

NEW JERSEY
DEPARTMENT OF
COMMUNITY AFFAIRS

SUBSTANTIAL AMENDMENT

NATIONAL HOUSING TRUST FUND
PROGRAM YEAR 2021 & 2022

NJDCA
Division of Housing & Community Resources
101 S. Broad Street, 5th Floor
PO Box 806
Trenton, NJ 08625-0806

PY
2021
-2022

INTRODUCTION	2
CITIZEN PARTICIPATION PLAN	2
PY 2021 & 2022 AMENDMENTS.....	6
CONCLUSION	17
APPENDIX A:	NHTF Guidelines (updated as of January 23, 2023)
APPENDIX B:	Public Comments (received as of February 23, 2023)



INTRODUCTION

The following serves as a Substantial Amendment to the Program Year (PY) 2021 and PY 2022 National Housing Trust Fund (NHTF) allocations, as it relates to the specific program requirements for method of distribution of funds as administered by the New Jersey Department of Community Affairs (NJDCA).

Substantial Amendments for the PY 2021 and PY 2022 NHTF Allocations are in response to increased funding provided by the U.S. Department of Housing & Urban Development (HUD) and the ongoing impacts of COVID-19. These impacts and its residual effects have devastated environments suitable to bring quality, affordable housing into service. Inflation, rising interest rates, supply chain delays, labor shortages and the like have turned development budgets upside down, creating gaps in financing and further delaying the production of affordable housing – which is already at a shortage in New Jersey.

The proposed amendments to the program requirements for the NHTF, which will assist in committing the remaining \$24 million in the Department’s PY 2021 allocation, which requires a commitment by September of 2023, as well as the \$26 million in the Department’s PY 2022 allocation, which requires a commitment by September of 2024.

For ease of review and for reference, the proposed amendments in this document will be noted in **RED BOLD TEXT** with **BOLD ITALICIZED ANNOTATIONS** noting the specific changes, which will not appear in IDIS once submitted. This is organized by Section in HUD’s Annual Action Plan template provided in IDIS. If there is no change to that Section, as it relates to these proposed Amendment, it will be noted in the document.

CITIZEN PARTICIPATION PLAN

Only those amendments which meet the definition of a substantial amendment are subject to public notification procedures. The State defines a substantial amendment as any significant change in the priority goals and/or in the distribution of funds (25% change in funding). In the case of a substantial amendment the State will publish these changes on the Department of Community Affairs’ Division of Housing and Community Resources’ website: <https://www.nj.gov/dca/divisions/dhcr/>.

The public will be provided with an opportunity to comment on all proposed substantial amendments. A summary of each proposed substantial amendment will be included in a public notice published on the Department of Community Affairs’ Division of Housing and Community Resources’ website. The State will provide citizens with a 30-day comment period. Written comments may be submitted to the New Jersey Department of Community Affairs, 101 S. Broad Street, 5th Floor, PO Box 806, Trenton, New Jersey 08625-0806. A summary of all comments received and the reasons why any comments were not incorporated will be included in the Consolidated Plan or Annual Action Plan. The State will submit a copy of each amendment to the Department of Housing and Urban Development at the time of the amendment’s implementation.

On January 23, 2023, NJDCA placed the Substantial Amendment on its website, which commences the required 30-day public comment period from January 24, 2023 to February 23, 2023 and provided the Substantial Amendment on the NJDCA website.

SUBSTANTIAL AMENDMENT COMMENTS

The following provides a summary of comments received regarding the Substantial Amendment with responses noted in *BLUE ITALICS*:

COMMENT #1: These amendments are great. By increasing the per unit grant it will make it much more financially feasible to construct affordable housing.

RESPONSE #1: The Department received a number of positive comments from various organizations including HQM Properties, Nouvelle, Inc., Salt & Light, Triple C Housing, Inc., the Housing & Community Development Network of New Jersey (HCDNNJ) and the Supportive Housing Association – New Jersey (SHA-NJ) Chapter. The Department takes note of these comments and thanks those organizations for their participation.

COMMENT #2: Property taxes can be an issue and will not allow the project to pencil out. Some townships will give PILOTS some will not. For the cases of the will nots would it be possible to not have private financing on the proforma. This will allow for cash flow to work better. Example is a project I am looking at in Denville. They will not allow a PILOT. If I increase the number of units and have no debt service that would help in making the numbers work and pay off NHTF annually. The other option is to allow no private financing all together and allow the NHTF fund be paid down annually. I think this would allow more projects to be submitted.

RESPONSE #2: The Department has recognized that without certain municipal or local concessions – like a PILOT – it may be difficult for developers to design a cost-feasible project, especially if private financing is necessary to fill a gap. The NHTF is a 0% interest, \$0 payment mortgage that is otherwise forgivable at the end of its 30-year term so long as the project has been compliant and should require no annual payment. By increasing the unit cap and by amending the maximum project subsidy, the Department is confident that it will elevate those barriers and allow developers to create viable projects with the NHTF funding.

COMMENT #3: The guidelines should clearly indicate this is a FMR project. The field office does not know this, and they do not go by that guideline. They are implementing 5% rent increases annually when it should be FMR from the time it is leased to the renewal period. There seems to be a disconnect.

RESPONSE #3: The Department will provide additional detail on how the State's Section 8 Office handles increases to the PBVs on an annual basis, which are initially set at the Fair Market Rent (FMR) in year 1.

COMMENT #4: Believes that this program is the most comprehensive program NJ Department of Community Affairs (NJDCA) administers to meet the needs of extremely low income, special needs consumers and families in need of permanent supportive housing.

RESPONSE #4: *The Department received a number of positive comments from various organizations including HQM Properties, Nouvelle, Inc., Salt & Light, Triple C Housing, Inc., the Housing & Community Development Network of New Jersey (HCDNNJ) and the Supportive Housing Association – New Jersey (SHA-NJ) Chapter. The Department takes note of these comments and thanks those organizations for their participation.*

COMMENT #5: Enthusiastically supports the proposed substantial amendment to NJDCA's Plan with HUD, specifically:

Allowing units that are part of a Condominium/Homeowner Association to be eligible. As the vast majority of households (85%) identified as homeless in the 2022 Point-In-Time Count survey were single individuals, this change allows agencies to access a large number of existing properties that were previously excluded.

Increasing the maximum number of units from four (4) to eight (8) allows land costs to be allocated over more units, which will assist in making new development more financially feasible. Increasing the maximum developer fee from five percent (5%) to eight (8%) recognizes the efforts that are needed to acquire small multi-family properties and upgrade them to meet NJDCA standards.

Removing the maximum grant amount of \$1,000,000 and increasing the total project capital subsidy to the maximum per unit subsidy amount times the number of units. This recognizes the current real estate market in New Jersey.

RESPONSE #5: *The Department received a number of positive comments from various organizations including HQM Properties, Nouvelle, Inc., Salt & Light, Triple C Housing, Inc., the Housing & Community Development Network of New Jersey (HCDNNJ) and the Supportive Housing Association – New Jersey (SHA-NJ) Chapter. The Department takes note of these comments and thanks those organizations for their participation.*

COMMENT #6: Appreciates that NJDCA has listened to the suggestions of the development community in order to make the NHTF a program that will serve even more individuals and families in very vulnerable populations. I would also like to commend the staff of the NJDCA Housing Production Team for their responsiveness to questions and their ability to move projects through the process efficiently and effectively.

RESPONSE #6: *The Department received a number of positive comments from various organizations including HQM Properties, Nouvelle, Inc., Salt & Light, Triple C Housing, Inc., the Housing & Community Development Network of New Jersey (HCDNNJ) and the Supportive Housing Association – New Jersey (SHA-NJ) Chapter. The Department takes note of these comments and thanks those organizations for their participation.*

COMMENT #7: Has heard consistently from constituent members that the current limit of four homes per project is too restrictive. The amendment to provide capital financing and State Project Based

Vouchers (PBVs) for projects up to eight units will allow for more developers to propose homes for the targeted very low income and special needs population that the program is designed to serve.

RESPONSE #7: *The Department received a number of positive comments from various organizations including HQM Properties, Nouvelle, Inc., Salt & Light, Triple C Housing, Inc., the Housing & Community Development Network of New Jersey (HCDNNJ) and the Supportive Housing Association – New Jersey (SHA-NJ) Chapter. The Department takes note of these comments and thanks those organizations for their participation.*

COMMENT #8: Hopes the flexibility to consider capital-only financing for projects ranging from nine to twenty-five units where the applicant has a commitment for Project Based Vouchers from a Public Housing Authority (PHA) will incentivize more developers who are serving a very low income and special needs population to apply for this funding. Further, commenter supports the proposal to increase the developer fee from 5% to a fee that must not exceed 8% of the project total development cost. This amendment will also encourage more robust and thoughtful proposals for NHTF's use.

RESPONSE #8: *The Department received a number of positive comments from various organizations including HQM Properties, Nouvelle, Inc., Salt & Light, Triple C Housing, Inc., the Housing & Community Development Network of New Jersey (HCDNNJ) and the Supportive Housing Association – New Jersey (SHA-NJ) Chapter. The Department takes note of these comments and thanks those organizations for their participation.*

COMMENT #9: The proposed amendments would allow a project to allocate up to one-third of their NHTF as operating cost assistance if paired with HOME-ARP and Medicaid. We think this is a positive change that will help to make those projects feasible. We agree with the proposal that applicants should be allowed to calculate total subsidy based on the bedroom size of the homes they will provide, instead of capping the total subsidy limit to \$1,000,000 as is currently the case.

RESPONSE #9: *The Department received a number of positive comments from various organizations including HQM Properties, Nouvelle, Inc., Salt & Light, Triple C Housing, Inc., the Housing & Community Development Network of New Jersey (HCDNNJ) and the Supportive Housing Association – New Jersey (SHA-NJ) Chapter. The Department takes note of these comments and thanks those organizations for their participation.*

COMMENT #10: The proposal allows DCA to consider cross-subsidization with the State Affordable Housing Trust Fund (AHTF) or other Housing Production Unit programs on a case-by-case basis. We strongly support this change for projects that require a very low income population be served. In summary, commenter supports the above referenced substantial amendments to NJDCA's NHTF plan. With the increased allocation that New Jersey received in 2021 and 2022, it is important to provide more flexibility to developers of very low income and special needs housing so New Jersey is able to fully use its federal allocation to provide the desperately needed homes needed by this population.

RESPONSE #10: *The Department received a number of positive comments from various organizations including HQM Properties, Nouvelle, Inc., Salt & Light, Triple C Housing, Inc., the Housing & Community Development Network of New Jersey (HCDNNJ) and the Supportive Housing Association – New Jersey (SHA-*

NJ) Chapter. The Department takes note of these comments and thanks those organizations for their participation.

COMMENT #11: Below are specific changes that will enhance our developer's ability to utilize the program and increase the number of homes available to people of low-income and special needs.

Allowing units that are part of a Condominium/Homeowner Association to be eligible. As housing prices have escalated, many properties have become out of reach for developers of supportive housing. Of special concern is that high opportunity neighborhoods, in particular, are completely closed to prospects. The addition of this new category of eligible properties will allow the funding to be used in a wider geographic area and give people more options throughout the entire state.

Increasing the maximum number of units from four (4) to eight (8) and the maximum grant amount increase allows for projects to be more financially feasible. In addition, considering capital only financing for up to 25 units leaves the door open for additional projects to be able to utilize this funding.

Increasing the maximum developer fee from five percent (5%) to eight (8%) recognizes the rise in cost associated with renovating and developing properties.

***RESPONSE #11:** The Department received a number of positive comments from various organizations including HQM Properties, Nouvelle, Inc., Salt & Light, Triple C Housing, Inc., the Housing & Community Development Network of New Jersey (HCDNNJ) and the Supportive Housing Association – New Jersey (SHA-NJ) Chapter. The Department takes note of these comments and thanks those organizations for their participation.*

PY 2021 & 2022 AMENDMENTS

The proposed amendments to the PY 2021 and PY 2022 Annual Action Plans are noted below by the applicable section.

AP-05 EXECUTIVE SUMMARY: No changes.

PR-05 LEAD & RESPONSIBLE AGENCIES: No changes.

AP-10 CONSULTATION: No changes.

AP-12 PARTICIPATION: No changes.

AP-15 EXPECTED RESOURCES: No changes.

AP-20 ANNUAL GOALS AND OBJECTIVES: No changes.

AP-25 ALLOCATION PRIORITIES: No changes.

AP-30 METHODS OF DISTRIBUTION: Note the following changes to the Section below:

5	State Program Name:	Housing Trust Fund
	Funding Sources:	HTF

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Develop affordable rental housing units for families at or below 30% AMI and for people who are most vulnerable, including those with disabilities or other special needs. DCA will award only those projects that will provide housing to extremely low-income individuals and families with special needs.</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>1. Applicant's ability to obligate HTF funds and applicant's ability to undertake eligible activities in a timely fashion:</p> <p>The best applications must substantiate the applicant's experience in developing affordable housing, demonstrated financial ability to develop the project, experience with DCA and HUD programs, no outstanding issues with DCA/HUD, a feasible project budget and timeline which evidences that the project will be completed within two years of award.</p> <p>2. Priority based upon geographic diversity:</p> <p>This program seeks to encourage geographic diversity through "High Opportunity" neighborhoods, which are characterized by the following criteria - low municipal poverty level, the municipality is not on State Urban Aid list, accessible public transportation within one mile, and low municipal labor force unemployment rate.</p> <p>3. The merits of the application in meeting the State's priority housing needs:</p> <p>Applicants should have experience in serving special needs populations, preferably be a nonprofit, include a service plan detailing how services will be provided on a voluntary basis to targeted special needs population (by applicant or by partner in formal Memorandum of Understanding) and 100% of units within the project will serve Special Needs population.</p> <p>4. The extent to which application makes use of non-federal funding sources:</p> <p>Applications that substantiate leveraging of non-public funds will receive preferential points.</p>

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>NA</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>NA</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>NA</p>

<p>Describe how resources will be allocated among funding categories.</p>	<p>\$21,919,204 has been allocated for housing production (2021)</p> <p>\$24,186,213 has been allocated for housing production (2022)</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Eligible project size shall be determined as follows:</p> <p>NJDCA shall provide capital financing and State Project Based Vouchers (PBVs) for projects up to 8 units (maximum) and shall consider capital-only financing for projects ranging from nine (9) to twenty-five units, where applicants must have a commitment of non-State-issued PBVs. In order to qualify for the 9 to 25 unit projects, applicants must demonstrate PBV commitments by the issuing Public Housing Authority (PHA) or other equivalent entity throughout the affordability period (minimum 30 years) and shall comply with Davis-Bacon requirements. <i>The current guidelines don't permit projects greater than four (4) units and cap the maximum subsidy at \$1,000,000.</i></p> <p>However, if warranted, at the sole discretion of DCA, additional units may be funded.</p> <p>The HTF funds will be provided as gap financing, using current HOME subsidy limits slightly adjusted upwards based on actual project costs in the State's CDBG-DR Neighborhood Enhancement Program and Special Needs Housing Partnership Loan Program. The amount of funds reserved for a project will be based on the information provided in the HTF application via SAGE and will fund only the gap between project cost and other revenue. The Department, at its discretion, may award less than the maximum subsidy.</p>

	What are the outcome measures expected as a result of the method of distribution?	<p>The goal of the program is to develop 59 units of affordable housing in 2021.</p> <p>The goal of the program is to develop 56 units of affordable housing in 2022.</p>
--	--	---

AP-35 PROJECTS: No changes.

AP-40 SECTION 108 LOAN GUARANTEE: No changes.

AP-45 COMMUNITY REVITALIZATION STRATEGIES: No changes.

AP-50 GEOGRAPHIC DISTRIBUTION: No changes.

AP-55 AFFORDABLE HOUSING: No changes.

AP-60 PUBLIC HOUSING: No changes.

AP-65 HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES: No changes.

AP-70 HOPWA GOALS: No changes.

AP-75 BARRIERS TO AFFORDABLE HOUSING: No changes.

AP-85 OTHER ACTIONS: No changes.

AP-90 PROGRAM SPECIFIC REQUIREMENTS:

- **COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM:** No changes.
- **HOME INVESTMENT PARTNERSHIP (HOME) PROGRAM:** No changes.
- **EMERGENCY SOLUTIONS GRANT (ESG) PROGRAM:** No changes.
- **HOUSING TRUST FUND (HTF) PROGRAM:** Note the following changes to this Section below:

**Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:

☒ Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

The State will distribute HTF funds by selecting applications submitted by eligible recipients. Eligible recipients will be for-profit or nonprofit developers who demonstrate the experience and capacity to successfully undertake the proposed activities. Eligible recipients must demonstrate, through their own experience or through a formal partnership with other entities participating in the proposed project the following:

- Experience in developing affordable housing
- Experience in managing affordable housing
- Experience in working with the target population
- Organization must be financially sound
- Organization must be in good standing with the State of New Jersey Department of Community Affairs (DCA) and the U.S. Department of Housing and Urban Development (HUD)

- b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

- Project must not require any municipal, county, regional, or state approval beyond a construction permit.
- All financial sources must have written commitments.
- Project must provide housing to extremely low-income individuals, those earning 30% or less of the AMI as defined by the U.S. Department of Housing & Urban Development (HUD), and families with special needs.
- Project must be able to be completed within 2 years.
- **Eligible project size shall be determined as follows:**

NJDCA shall provide capital financing and State Project Based Vouchers (PBVs) for projects up to 8 units (maximum) and shall consider capital-only financing for projects ranging from nine (9) to twenty-five units, where applicants must show a commitment of non-State-issued PBVs. In order to qualify for the 9 to 25 unit projects, applicants must demonstrate PBV commitments by the issuing Public Housing Authority (PHA) or other equivalent entity throughout the affordability period (minimum 30 years) and shall comply with Davis-Bacon requirements. The current guidelines don’t permit projects greater than four (4) units.

- Projects must not be in a floodplain or environmentally sensitive area.
- Project units must be considered permanent housing, and no aspect of the lease can be contingent upon receiving social services.
- **Developer fee must not exceed 8% of the project total development cost. This amendment increases the Developer Fee from 5% to 8% - consistent with NJDCA’s Balanced Housing Program (aka the Affordable Housing Trust Fund) and Federal HOME programs.**
- Debt Coverage Ratio must be at least 1.2.

- Project must be financially feasible.

In addition to eligibility for capital funds, NJDCA may allocate up to 1/3 of the funds to pair with potentially with HOME ARP and future Medicaid 1115 Waiver funds (New Jersey Healthy Homes Initiative) as operating cost assistance, when a gap in the Medicaid Repair & Replacement Reserve or other programs exists. Operationalizing these funds is permitted under the Interim Rule and those Operational Cost Assistance Guidelines will be prepared in compliance with the Interim Rule and will continue to serve populations making less than 30% of AMI. *Currently, NJDCA has not operationalized any of the NHTF funds for operating cost assistance. This provides increased subsidy for very low-income units facing operating short falls, when it exists.*

Qualified applicants must submit the following documents in support of their organizational eligibility:

- Articles of Incorporation.
 - Certificate of Good Standing.
 - Proof of site control (Deed, Contract of Sale, Option Agreement, etc.).
 - Original Sealed Resolution of support from the Board.
- c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Applicant’s ability to obligate HTF funds and applicant’s ability to undertake eligible activities in a timely fashion: Applications must substantiate their experience in developing affordable housing, demonstrate their financial ability to develop the project, have experience with DCA and HUD programs, have no loan findings or other outstanding issues with DCA/HUD, have a feasible project budget, and timeline which evidences that the project will be completed within two (2) years of award.

Priority based upon geographic diversity: This program seeks to encourage geographic diversity through High Opportunity neighborhoods, which are characterized by the following criteria: low municipal poverty level, the municipality is not on a State Urban Aid list, accessible public transportation within 1 mile, and low municipal labor force unemployment rate.

The merits of the application in meeting the State’s priority housing needs: Applicants should have experience in serving the special needs population, preferably be a nonprofit, include a service plan detailing how services will be provided on a voluntary basis to targeted special needs population (by applicant or by partner in formal Memorandum of Understanding) and 100% of units within the project will serve the special needs population.

The extent to which application makes use of non-federal funding sources: Applications that substantiate leveraging of non-public funds will receive preference.

- d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Although the entire State is eligible, DCA reserves the right to distribute projects equitably throughout the state regardless of score.

In addition, to further the State's commitment to the development of affordable housing in areas of high opportunity, applications will receive points for projects located in places with access to public transportation and other amenities.

- e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The applicant's capacity and successful experience in developing and managing affordable housing projects will be crucial in ensuring that HTF funds are obligated quickly and that projects are successfully completed in a timely fashion. Applications will receive points for demonstrating the ability to meet the following criteria:

- Applicant has experience in developing affordable housing
- Applicant has demonstrated financial ability to develop the project
- Applicant has experience with DCA and HUD programs
- Applicant has no loan findings or other outstanding issues with DCA or HUD
- Project timeline is feasible and project will be completed within 2 years of award
- Project budget is feasible and reasonable.

- f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

NJDCA shall provide capital financing and State Project Based Vouchers (PBVs) for projects up to 8 units (maximum) and shall consider capital-only financing for projects ranging from nine (9) to twenty-five (25) units, where applicants must show a commitment of non-State-issued PBVs. In order to qualify for the 9 to 25 unit projects, applicants must demonstrate PBV commitments by the issuing Public Housing Authority (PHA) or other equivalent entity throughout the affordability period (minimum 30 years) and shall comply with Davis-Bacon requirements. This will ensure that all rents are affordable to extremely low-income families. The current guidelines don't permit projects greater than four (4) units and only allow use of the State's PBVs.

- g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Projects must be financially feasible to receive funding. Applications will receive preference points for extending the affordability controls beyond the initial 30 years.

- h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A

- i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

While projects may apply for up to 100% of financing from the HTF funds, DCA will award points to projects that include evidence of leverage from other non-federal sources.

- 4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

- 5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

- 6. **Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

- 7. **Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.** Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds. The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area. If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how

the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above. The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area. If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

Subsidy amounts were tailored after the current HOME subsidy limits with some upward adjustment based on actual production costs in the State's CDBG-DR Neighborhood Enhancement Program (NEP) and the State's Special Needs Housing Partnership Loan Program (SNHPLP.) DCA also conducted comparative research of construction costs throughout the state and found the costs to be consistent with no large variations.

The total subsidy shall be calculated as follows: the maximum per unit subsidy limits by bedroom MULTIPLIED the by the number of units. Therefore, instead of capping the total subsidy limit to \$1,000,000 (currently in place), applicants would be allowed to calculate total subsidy as follows (used for illustrative purposes):

Bedroom Size	STUDIO	1-BDR	2-BDR	3-BDR	4-BDR
Maximum Per Unit Subsidy	\$250,000	\$350,000	\$430,000	\$500,000	\$570,000
Maximum Project Subsidy (4-unit with State PBV)	\$1,000,000	\$1,400,000	\$1,720,000	\$2,000,000	\$2,280,000
Maximum Project Subsidy (8-unit with State PBV)	\$2,000,000	\$2,800,000	\$3,440,000	\$4,000,000	\$4,560,000
Maximum Project Subsidy (9-25-unit with non-State PBV)	\$2,250,000 - \$6,250,000	\$3,150,000 - \$8,750,000	\$3,870,000 - \$10,750,000	\$4,500,000 - \$12,500,000	\$5,130,000 - \$14,250,000

All maximum subsidies and awards shall be reviewed consistent with NJDCA's underwriting standards and other criteria in addition to the calculations above. It should be noted that the Maximum Per Unit Subsidy Limits By Bedrooms are currently approved by HUD.

The current guidelines provide for the same maximum per unit subsidy by bedroom; however, cap the maximum award per project \$1,000,000.

- Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine

the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below. In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

The attached New Jersey HTF Minimum Housing Rehabilitation Standards shall apply to NJHTF assisted projects. The standards provide details on what work is required, how that work should be performed (methods), and what materials should be used. The standards refer to applicable codes and, in some circumstances, establish requirements that exceed the minimum requirements of codes. Methods and materials are specified in some of the incorporated applicable codes referenced on page 6. In addition, NJHTF Minimum Housing Rehabilitation Standards include language that provides detail on methods and materials. The rehabilitation standards address the following categories: health and safety; major systems; lead-based paint; accessibility; disaster mitigation; State and local codes, ordinances, and zoning requirements; and inspectional areas and observable deficiencies from HUD's Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing.

http://www.state.nj.us/dca/divisions/dhcr/offices/docs/HTF-rehabilitation_standards.pdf

9. **Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. **HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A". Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

N/A

11. **Refinancing of Existing Debt.** Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

N/A

Discussion:

N/A

CONCLUSION

NJDCA recognizes how different this approach deviates, as it compares to the current guidelines for program delivery (as it is a function of increasing the number of units per project); however, the State recognizes that in order to provide capital-only funding for units that are priced at 30% or less, PBVs are necessary. And while NHTF funds don't trigger Davis Bacon, PBV-developments over 9 units does trigger Davis Bacon requirements, which increase the cost of the project. Based on our existing assets, it is less common to see 2 or more-bedroom developments for special needs populations. We anticipate that awards will generally range from \$1,000,000 to \$8,750,000 (studios and 1-bedrooms) depending on their size – which will be further limited by the availability of funds and only for the two (2) program years noted herein, where our allocation is significantly larger. The Department will reassess the 2023 guidelines once HUD releases those allocations.

It is the Department's position that these amendments will allow for the timely commitment of funds, which would otherwise not be possible if the State continues to administrate the program as approved. It also allows NJDCA to look at all funding programs holistically in order to cross-subsidize and braid those resources. This is particularly true for the anticipated HOME ARP allocation and forthcoming New Jersey Healthy Homes Initiative.

In discussions with developers there are a number of projects that are finding it difficult to secure capital funding for their affordable housing developments. Many of these projects are shovel ready and would be under construction if it weren't for the short falls in funding or lack of funding in general. Also, many of them have PBVs dedicated to these projects by other Public Housing Authorities.

In the past six (6) years, the NHTF has funded approximately 120 units of housing. Modifying the guidelines for the 2021 and 2022 allocations will produce approximately the same number of units, if not more. Given the need for affordable housing and the mismatch between vouchers and units, the State believes this is a viable way to produce the units but also limit staff resources to administering approximately a dozen projects, as opposed to the 50 projects the Department would have to award using the current guidelines.

These proposed amendments will help ensure that NJDCA meets the timely commitment and expenditure requirements for those Program Years, which is difficult to comply with under current guidelines due to the significant increases in the annual allocations. NJDCA believes that this strategy will continue to serve HUD's mission and the State's priorities – via a variety of project sizes, in greater coordination with the State's communities and public housing authorities.

Once approved, the NHTF guidelines will be updated to reflect and include the 2023 allocation, as well.

Appendix A

NHTF GUIDELINES (*updated as of January 23, 2023*)

To be updated once Substantial Amendment is approved by HUD

Appendix B

PUBLIC COMMENTS *(received as of February 23, 2023)*

From: [Lou Riccio](#)
To: [Luciani, Lorissa \[DCA\]](#)
Subject: [EXTERNAL] RE: NHTF Substantial Amendment Notice - PY 2021 & PY 2022
Date: Thursday, January 26, 2023 9:56:42 AM
Attachments: [image001.jpg](#)

Lorissa,

These amendments are great. By increasing the per unit grant it will make it much more financially feasible to construct affordable housing.

I am looking at demolishing a 110 year old house that we own and building 8 two bedroom apartments on the site. We would make all available for the homeless and or homeless veterans. The building will have an elevator and be totally sprinklered. Would this meet the priority criteria? We have used these funds in the past and have the expertise to perform again.

What do you think?

How soon will the RFP will be published?

Thanks,

Lou

*Louis A. Riccio
Chief Executive Officer
HQM Properties, Inc.
455 Diamond Spring Road
Denville, New Jersey 07834
973-664-1080
973-664-1083 Fax*

Lriccio@HQMProp.com

<https://www.hqmprop.com>

From: Luciani, Lorissa [DCA] <Lorissa.Luciani@dca.nj.gov>
Sent: Wednesday, January 25, 2023 4:02 PM
To: Luciani, Lorissa [DCA] <Lorissa.Luciani@dca.nj.gov>
Cc: Malnak-Renn, Sheri [DCA] <Sheri.Malnak@dca.nj.gov>; Fowler, Julian [DCA] <Julian.Fowler@dca.nj.gov>; Goode, Angela [DCA] <Angela.Goode@dca.nj.gov>; Mirbach, Louis [DCA] <Louis.Mirbach@dca.nj.gov>; Popko, William [DCA] <William.Popko@dca.nj.gov>; Stewart, Karen [DCA] <Karen.Stewart@dca.nj.gov>
Subject: NHTF Substantial Amendment Notice - PY 2021 & PY 2022
Importance: High

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

NOTICE: Draft NHTF Substantial Amendment (PY 2021 & PY 2022)

The following serves as a Substantial Amendment to the Program Year (PY) 2021 and PY 2022 National Housing Trust Fund (NHTF) allocations, as it relates to the specific program requirements for method of distribution of funds as administered by the New Jersey Department of Community Affairs (NJDCA). The proposed amendments to the program requirements for the NHTF, which will assist in committing the remaining \$24 million in the Department's PY 2021 allocation, as well as the \$26 million in the Department's PY 2022 allocation, are outlined in the document provided below. On January 24, 2023, NJDCA placed the Substantial Amendment on its website, which commences the required 30-day public comment period from January 24, 2023 to February 23, 2023 and provided the Substantial Amendment on the NJDCA website. Comments can be emailed to Lorissa Luciani, Administrator of the Housing Production unit at Lorissa.Luciani@dca.nj.gov by Thursday, February 23, 2023.

[NHTF Substantial Amendment PDF](#)

Lorissa Luciani, PP, AICP, Administrator

New Jersey Department of Community Affairs (NJDCA)
Division of Housing & Community Resources – Housing Production
101 S. Broad Street, 5th Floor
PO Box 806
Trenton, NJ 08625-0806
Phone: (609) 815-3930 | Fax: (609) 984-8454 | Email: Lorissa.Luciani@dca.nj.gov



Confidentiality Note: This electronic message contains information from the NJDCA which may be confidential, privileged, consultative, or otherwise protected from disclosure. This information is intended only for the use of the individual to whom it was originally addressed. Any disclosure, copying, distribution or use of the contents of this information without prior authorization from the original author is prohibited. If you received this electronic transmission in error, please notify me by return electronic mail, and destroy the original message and all copies.

From: [Luciano Bruni](#)
To: [Luciani, Lorissa \[DCA\]](#)
Subject: [EXTERNAL] Re: NHTF Substantial Amendment Notice - PY 2021 & PY 2022
Date: Thursday, January 26, 2023 9:08:47 AM
Attachments: [image001.jpg](#)

Lorissa.....Thanks for sending this. If these potential changes are implemented, this will allow me to increase some of the projects sizes I am currently negotiating or going under contract. A few comments I have to the amended guidelines are as follows:

- Property taxes can be an issue and will not allow the project to pencil out. Some townships will give PILOTS some will not. For the cases of the will nots would it be possible to not have private financing on the proforma. This will allow for cash flow to work better. Example is a project I am looking at in Denville. They will not allow a PILOT. If I increase the number of units and have no debt service that would help in making the numbers work and pay off NHTF annually. The other option is to allow no private financing all together and allow the NHTF fund be paid down annually. I think this would allow more projects to be submitted.
- The guidelines should clearly indicate this is a FMR project. The field office does not know this and they do not go by that guideline. They are implementing 5% rent increases annually when it should be FMR from the time it is leased to the renewal period. There seems to be a disconnect.

Those are my comments. I hope they are helpful. I do want to say this is a great amendment and it is obvious you have a vision to increase the ability to get more projects through. I hope you are successful in getting it passed. Thanks again.

Luciano Bruni
Managing Principal
610 Anderson Ave
Cliffside Park, NJ 07010
Tel: 973.726.0488
Cell: 973.903.0268
Website: www.nouvellellc.com



On Wed, Jan 25, 2023 at 4:02 PM Luciani, Lorissa [DCA] <Lorissa.Luciani@dca.nj.gov> wrote:

NOTICE: Draft NHTF Substantial Amendment (PY 2021 & PY 2022)

The following serves as a Substantial Amendment to the Program Year (PY) 2021 and PY 2022 National Housing Trust Fund (NHTF) allocations, as it relates to the specific program requirements for method of distribution of funds as administered by the New Jersey Department of Community Affairs (NJDCA). The proposed amendments to the program requirements for the NHTF, which will assist in committing the remaining \$24 million in the Department's PY 2021 allocation, as well as the \$26 million in the Department's PY 2022 allocation, are outlined in the document provided below. On January 24, 2023, NJDCA placed the Substantial Amendment on its website, which commences the required 30-day public comment period from January 24, 2023 to February 23, 2023 and provided the Substantial

Amendment on the NJDCA website. Comments can be emailed to Lorissa Luciani, Administrator of the Housing Production unit at Lorissa.Luciani@dca.nj.gov by Thursday, February 23, 2023.

[NHTF Substantial Amendment PDF](#)

Lorissa Luciani, PP, AICP, Administrator

New Jersey Department of Community Affairs (NJDCA)

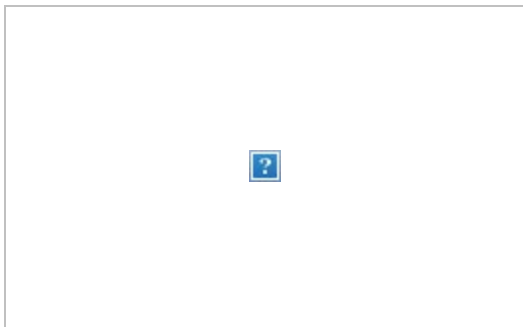
Division of Housing & Community Resources – Housing Production

101 S. Broad Street, 5th Floor

PO Box 806

Trenton, NJ 08625-0806

Phone: (609) 815-3930 | Fax: (609) 984-8454 | Email: Lorissa.Luciani@dca.nj.gov



Confidentiality Note: This electronic message contains information from the NJDCA which may be confidential, privileged, consultative, or otherwise protected from disclosure. This information is intended only for the use of the individual to whom it was originally addressed. Any disclosure, copying, distribution or use of the contents of this information without prior authorization from the original author is prohibited. If you received this electronic transmission in error, please notify me by return electronic mail, and destroy the original message and all copies.

From: [Kent Pipes](#)
To: [Luciani, Lorissa \[DCA\]](#)
Cc: [Malnak-Renn, Sheri \[DCA\]](#); [Fowler, Julian \[DCA\]](#); [Goode, Angela \[DCA\]](#); [Mirbach, Louis \[DCA\]](#); [Popko, William \[DCA\]](#); [Stewart, Karen \[DCA\]](#)
Subject: [EXTERNAL] Re: NHTF Substantial Amendment Notice - PY 2021 & PY 2022
Date: Wednesday, January 25, 2023 5:43:47 PM

These changes are very good. We will be able to use them!

Kent R. Pipes, President
The Affordable Homes Group
1841 Burlington-Mt. Holly Road
Westampton, NJ 08060
(609) 261-4571
Cell: (609) 284-8893

Twitter: @kentpipes
Sent from my iPad

On Jan 25, 2023, at 4:02 PM, Luciani, Lorissa [DCA]
<Lorissa.Luciani@dca.nj.gov> wrote:

NOTICE: Draft NHTF Substantial Amendment (PY 2021 & PY 2022)

The following serves as a Substantial Amendment to the Program Year (PY) 2021 and PY 2022 National Housing Trust Fund (NHTF) allocations, as it relates to the specific program requirements for method of distribution of funds as administered by the New Jersey Department of Community Affairs (NJDCA). The proposed amendments to the program requirements for the NHTF, which will assist in committing the remaining \$24 million in the Department's PY 2021 allocation, as well as the \$26 million in the Department's PY 2022 allocation, are outlined in the document provided below. On January 24, 2023, NJDCA placed the Substantial Amendment on its website, which commences the required 30-day public comment period from January 24, 2023 to February 23, 2023 and provided the Substantial Amendment on the NJDCA website. Comments can be emailed to Lorissa Luciani, Administrator of the Housing Production unit at Lorissa.Luciani@dca.nj.gov by Thursday, February 23, 2023.

[NHTF Substantial Amendment PDF](#)

Lorissa Luciani, PP, AICP, Administrator

New Jersey Department of Community Affairs (NJDCA)
Division of Housing & Community Resources – Housing Production
101 S. Broad Street, 5th Floor
PO Box 806
Trenton, NJ 08625-0806
Phone: (609) 815-3930 | Fax: (609) 984-8454 | Email: Lorissa.Luciani@dca.nj.gov

[<image001.jpg>](#)

Confidentiality Note: This electronic message contains information from the NJDCA which may be confidential, privileged, consultative, or otherwise protected from disclosure. This information is intended only for the use of the individual to whom it was originally addressed. Any disclosure, copying, distribution or use of the contents of this information without prior authorization from the original author is prohibited. If you received this electronic transmission in error, please notify me by return electronic mail, and destroy the original message and all copies.



1520 Route 130 N, Suite 201
North Brunswick, NJ 08902

Phone: (732) 658-6636

Fax: (732) 658-6642

E-mail: info@triplechousing.org

Website: www.triplechousing.org

Board of Trustees

Matthew Mayo, MSW
Chair

Kristen Gilmore Powell
Ph.D., MSW, LSW
Vice Chair

Robin Stephenson
Secretary

Eileen Joseph, MS, CPRP
Treasurer

William Waldman, MSW
Emeritus

Alison Recca-Ryan, MSW, LCSW
Emmy Tiderington, Ph.D., MSW, LMSW
Bashir Jordan
Jorge Cruz
Trustees/CHDO

Leslie Stivale, MA, CPRP
President/CEO

February 13, 2023

Ms. Sheri Malnak-Renn
New Jersey Department of Community Affairs
Division of Housing and Community Resources
PO Box 806
Trenton, NJ 08625-0806

Re: National Housing Trust Fund Substantial Amendment Program Years 2021 & 2022

Dear Ms. Malnak-Renn,

Triple C Housing, Inc. (Triple C) has been the recipient of five (5) awards under the National Housing Trust Fund (NHTF) and we believe that this program is the most comprehensive program NJ Department of Community Affairs (NJDCA) administers to meet the needs of extremely low income, special needs consumers and families in need of permanent supportive housing.

We enthusiastically support the proposed substantial amendment to NJDCA's Plan with HUD, specifically:

- Allowing units that are part of a Condominium/Homeowner Association to be eligible. As the vast majority of households (85%) identified as homeless in the 2022 Point-In-Time Count survey were single individuals, this change allows agencies such as Triple C access to a large number of existing properties that were previously excluded.
- Increasing the maximum number of units from four (4) to eight (8) allows land costs to be allocated over more units, which will assist in making new development more financially feasible.
- Increasing the maximum developer fee from five percent (5%) to eight (8%) recognizes the efforts that are needed to acquire small multi-family properties and upgrade them to meet NJDCA standards.
- Removing the maximum grant amount of \$1,000,000 and increasing the total project capital subsidy to the maximum per unit subsidy amount times the number of units. This recognizes the current real estate market in New Jersey.

We appreciate that NJDCA has listened to the suggestions of the development community in order to make the NHTF a program that will serve even more individuals and families in very vulnerable populations. I would also like to commend the staff of the NJDCA Housing Production Team for their responsiveness to questions and their ability to move projects through the process efficiently and effectively.

Sincerely,

Leslie C. Stivale
President/CEO



February 23, 2023

Lorissa Luciani, PP, AICP, Administrator
New Jersey Department of Community Affairs
Division of Housing & Community Resources – Housing Production
101 S. Broad Street, 5th Floor
PO Box 806
Trenton, NJ 08625-0806

RE: Comments on Substantial Amendment to the Program Year (PY) 2021 and PY 2022
National Housing Trust Fund (NHTF) allocations

Submitted electronically

Dear Lorissa,

Thank you for the opportunity for the Housing and Community Development Network of NJ (HCDNNJ) to comment on NJDCA's Substantial Amendments to the Program Year (PY) 2021 and PY 2022 National Housing Trust Fund (NHTF) allocations. We are pleased to see that NJDCA is significantly increasing the flexibility for developers to be able to apply for the increased NHTF allocations that are coming to New Jersey. We hope these amendments will enable NJDCA to fully allocate the substantial funding it has received for 2021 and 2022.

We have consistently heard from our members that the current limit of four homes per project is too restrictive. The amendment to provide capital financing and State Project Based Vouchers (PBVs) for projects up to eight units will allow for more developers to propose homes for the targeted very low income and special needs population that the program is designed to serve.

Additionally, we hope the flexibility to consider capital-only financing for projects ranging from nine to twenty-five units where the applicant has a commitment for Project Based Vouchers from a Public Housing Authority (PHA) will incentivize more developers who are serving a very low income and special needs population to apply for this funding. Further, we support the proposal to increase the developer fee from 5% to a fee that must not exceed 8% of the project total development cost. This amendment will also encourage more robust and thoughtful proposals for NHTF's use.

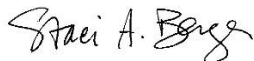
The proposed amendments would allow a project to allocate up to one-third of their NHTF as operating cost assistance if paired with HOME-ARP and Medicaid. We think this is a positive change that will help to make those projects feasible. We agree with the proposal that applicants should be allowed to calculate total subsidy based on the bedroom size of the homes they will provide, instead of capping the total subsidy limit to \$1,000,000 as is currently the case.

The proposal allows DCA to consider cross-subsidization with the State Affordable Housing Trust Fund (AHTF) or other Housing Production Unit programs on a case-by-case basis. We strongly support this change for projects that require a very low income population be served.

In summary, HCDNNJ supports the above referenced substantial amendments to NJDCA's NHTF plan. With the increased allocation that New Jersey received in 2021 and 2022, it is important to provide more flexibility to developers of very low income and special needs housing so New Jersey is able to fully use its federal allocation to provide the desperately needed homes needed by this population.

Thank you very much for the opportunity to provide these comments in support of these proposed changes. As always, please let us know if we can provide additional information or answer any questions you may have.

Very truly yours,

A handwritten signature in black ink, reading "Staci A. Berger". The signature is written in a cursive, flowing style.

Staci Berger,
President and CEO



The Supportive Housing Association of New Jersey

February 23, 2023

Ms. Lorissa Luciani
Administrator of the Housing Production unit
Department of Community Affairs
P.O. Box 806
Trenton, NJ 08625

Dear Ms. Luciani,

The Supportive Housing Association of NJ (SHA), on behalf of our members who develop supportive housing and therefore utilize the National Housing Trust Fund (NHTF), commend The Department of Community Affairs for the proposed amendment changes to the program.

Below are specific changes that will enhance our developer's ability to utilize the program and increase the number of homes available to people of low-income and special needs.

- Allowing units that are part of a Condominium/Homeowner Association to be eligible. As housing prices have escalated, many properties have become out of reach for developers of supportive housing. Of special concern is that high opportunity neighborhoods in particular, are completely closed to prospects. The addition of this new category of eligible properties will allow the funding to be used in a wider geographic area and give people more options throughout the entire state.
- Increasing the maximum number of units from four (4) to eight (8) and the maximum grant amount increase allows for projects to be more financial feasible. In addition, considering capital only financing for up to 25 units leaves the door open for additional projects to be able to utilize this funding.
- Increasing the maximum developer fee from five percent (5%) to eight (8%) recognizes the rise in cost associated with renovating and developing properties.

185 Valley Street, South Orange NJ 07079 Diane Riley 908.931.1131
diane.riley@shanj.org



The Supportive Housing Association of New Jersey

- Adding the category of Head of households who are senior citizens to the list eligible special needs populations for project points recognizes the growing aging population, the financial burden and service needs associated with this group.

SHA appreciates the time the housing team at DCA has taken to listen to the needs and comments of developers for improvements to the NHTF program. The proposed changes will make a positive impact and result in a greater number of affordable housing units available in the future.

Sincerely,

A handwritten signature in blue ink that reads "Diane Riley". The signature is written in a cursive, flowing style.

Diane Riley
Executive Director

NEW JERSEY
DEPARTMENT OF
COMMUNITY AFFAIRS

SUBSTANTIAL AMENDMENT

NATIONAL HOUSING TRUST FUND
PROGRAM YEAR 2021 & 2022

PY
2021
-2022

NJDCA
Division of Housing & Community Resources
101 S. Broad Street, 5th Floor
PO Box 806
Trenton, NJ 08625-0806

State of New Jersey HOME-ARP Allocation Plan



**State of New Jersey
Phil Murphy, Governor
Department of Community Affairs
Lt. Governor Sheila Y. Oliver, Commissioner**

Contents

Executive Summary.....	3
Consultation.....	5
Organizations Consulted	7
Summary of Feedback Received	11
Public Participation	11
Date of Public Notice:	12
Public Comment Period:	12
Date of Public Hearing:	12
Efforts to Broaden Public Participation.....	12
Comments and Recommendations Received	12
Comments or Recommendations Not Accepted	12
Needs Assessment and Gaps Analysis	13
Size and Demographic Composition of Qualifying Populations.....	13
Homeless Individuals, as defined in 24 CFR 91.5.....	13
At Risk of Homelessness, as defined in 24 CFR 91.5.....	21
Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the HOME-ARP Notice	25
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 HOME-ARP Notice ..	26
Current Resources Available to Assist Qualifying Populations	30
Congregate and Non-Congregate Shelter Units	30
Supportive Services	31
Tenant Based Rental Assistance	31
Affordable and Permanent Supportive Rental Housing	31
Unmet Housing and Service Needs of Qualifying Populations	31
Homeless Populations, as defined in 24 CFR 91.5	32
At Risk of Homelessness, as defined in 24 CFR 91.5.....	32
Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice.....	34

New Jersey HOME ARP Allocation Plan

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 HOME-ARP Notice ..	34
Gaps within Current Shelter and Housing Inventory and Service Delivery Systems	35
Additional Characteristics Associated with Instability and Increased Risk of Homelessness	36
Identify Priority Needs for Qualifying Populations	36
Determination of Level of Need and Gaps in Shelter and Housing Inventory and Service Delivery Systems.....	37
HOME-ARP Activities	37
Method(s) of Selection.....	37
Direct Administration by PJ.....	38
No Use of Subrecipient Prior to HUD Approval	38
Use of HOME-ARP Funding	38
Distribution of HOME-ARP funds In Accordance with Priority Needs.....	39
Rationale Funding Based on Characteristic Needs Identified in the Gap Analysis.....	39
HOME-ARP Production Housing Goals	41
Estimated Number of Affordable Rental Housing Units for Qualifying Populations	41
Rental Housing Production Goals and Correspondence with Need	41
Preferences.....	41
Identification of Preference	41
Using Preference to Address Unmet Need	42
Referral Methods.....	42
Limitations in a HOME-ARP Rental Housing or NCS Project	42
HOME-ARP Refinancing Guidelines	42
APPENDIX A – SUMMARY OF SURVEY RESULTS	43
APPENDIX B – PUBLIC NOTICES	44
APPENDIX C – SF-424s and Certifications	45

Executive Summary

The American Rescue Plan of 2021 (ARP), also called the COVID-19 Stimulus Package, Pub.L. 117–2 (March 11, 2021) provides \$5 billion 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 across the country. These grant funds will be administered through HUD’s HOME Investment Partnerships Program (HOME) and are known as HOME-ARP funds. Eligible HOME-ARP activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing, administration and planning, and nonprofit operating and capacity building assistance. A certain portion of HOME-ARP funds must assist people in HOME-ARP "qualifying populations," which include:

- Sheltered and unsheltered homeless populations, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)); Those currently housed populations at risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42U.S.C. 113060(1)).
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- Other families requiring services or housing assistance or to prevent homelessness.

In September 2021, HUD announced that the State of New Jersey will receive \$19,495,890 in HOME-ARP funds. This supplemental funding was allocated by formula under the HOME entitlement program. To receive the HOME-ARP allocation, the Department of Community Affairs (DCA) must develop a HOME-ARP Allocation Plan that will become part of the State’s FY 2021 HUD Annual Action Plan by substantial amendment. The Allocation Plan includes 1) an outline of the consultation and public participation processes undertaken, 2) an assessment of the needs of qualifying populations and gaps in local housing and services systems, and 3) planned uses of HOME-ARP funds for prioritized populations and eligible activities.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, the DCA engaged in consultation with stakeholders and the public, including an online survey, virtual consultation sessions, direct contact with HUD-required organizations that did not participate in a virtual session, a 15-day public comment period, and a public hearing.

The needs assessment and gap analysis identified the following needs and gaps that may be addressed using HOME-ARP funds:

- A 2022 Point in Time (PIT) count found a total of 8,754 persons, were experiencing homelessness in the State of New Jersey. Of those, a total of 978 persons (11%) were unsheltered, and 1,750 persons (20%) were identified as chronically homeless.
- According to data submitted by school districts to the U.S. Department of Education, in the 2018-2019 school year, an estimated 13,929 public school students in New Jersey experienced homelessness over the course of the year.¹ The vast majority of these students (76%) were doubled-up, or living with another family, and 24% were living in temporary shelter (11% in hotel/motel, 13% in shelter or traditional housing).
- Households earning between 0-30% of AMI are more likely to be cost-burdened; pay more than 30% of their income towards housing expenses making them at risk for homelessness. Among all renters in New Jersey who are cost burdened, 62% earn below 50% of AMI (a total of 425,740 households).
- According to the Emergency Rental Assistance Program reporting required by the U.S. Department of the Treasury, between January 2021 and January 2022, 87,246 households in New Jersey received rental assistance.
- The Household Pulse Survey measures the percentage of adults in households not current on rent or mortgage payments and eviction or foreclosure in the next two months is either very likely or somewhat likely. The July 2022 report indicates that evictions and foreclosures are on the rise with 5,395,412 individuals reporting that they were facing eviction or foreclosure in the next two months.
- The State has historically low vacancy rates and increasingly high rents. The result is fewer available units generally but especially units that are affordable. Further,

¹ National Center for Homeless Education using the U.S. Department of Education's EDFacts Initiative.

stakeholders have noted that individuals with housing vouchers are having increasing difficulty in finding landlords willing to accept vouchers.

To address these needs and gaps, the DCA will utilize HOME-ARP funds for the development of new affordable housing, tenant based rental assistance, the acquisition or development of non-congregate shelter, and capacity building.

Consultation

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

In developing this Allocation Plan, DCA conducted a diverse outreach strategy to engage the community and stakeholders through three methods. An online survey was published in English and Spanish, a series of four virtual community meetings were held, and direct one-on-one outreach to stakeholders was conducted to collect specific information around needs of qualifying populations. This section summarizes the consultation efforts made by DCA.

DCA's HOME-ARP Community Needs Survey was open from May to August 2022. The survey was made available in English and Spanish and received a total of 144 responses. A summary of the results is attached as **Appendix A**. The survey explored issues of fair housing, housing affordability, and the needs of those experiencing homelessness, at risk of homelessness, and other vulnerable populations. When asked about the greatest housing needs That can be addressed with HOME-ARP funds, 91% of respondents said production of new housing units was very important, 85.4% said supportive services, homelessness prevention services, and housing counseling was very important, 84.7% said preservation of existing housing was very important, 74.3% said tenant based rental assistance was very important, and 62.5% said expanding non-congregate shelter opportunities was very important. When asked about priorities for services for those experiencing homelessness, those at risk of homelessness, and other vulnerable populations, respondents selected mental health services (88.9%), employment and job training (82.6%), outreach services (82.6%), case management services (77.1%), and outpatient health services (77.1%) as very important. Written responses to an open-ended question asking about community needs for qualifying populations contained themes related to the need for more affordable units, housing assistance for working families, childcare and assistance for single mothers, transportation, and assistance for seniors and people with disabilities.

DCA also held a series of four community meetings to solicit input and consult with key stakeholders that serve and support the qualifying populations identified in the HOME-ARP guidance issued by HUD in September 2021. At these meetings, DCA provided an overview of HOME-ARP, reviewed the eligible qualifying populations, discussed the eligible uses of funds identified within the guidance provided by HUD, and described the required components of the HOME-ARP allocation plan including the process and anticipated timeline for submitting the plan. During the sessions, DCA solicited questions, comments, and feedback about the eligible uses of funds through an interactive dialogue. Notice of the meetings was posted to DCA’s website on May 4, 2022, and Invitations were sent to 500 stakeholders throughout the State. Registration was requested for attendance and the total number of registrants is listed below along with the total number of individuals in actual attendance. Overall themes in the meetings included a need for more affordable units, the need for low barrier entry housing, and the need for housing with wrap around supportive services.

Meeting Date	Meeting Topic	Registrants
May 17, 2022 1 pm ET	Homelessness and Special Needs	34
May 17, 2022 3 pm ET	Housing	33
May 18, 2022 6 pm ET	General Resident Perspectives	6
May 26, 2022 2 pm ET	Community Services	32

Finally, DCA had one-on-one meetings with stakeholders to further explore the needs of those experiencing homelessness, those at risk of homelessness, and other vulnerable populations. Invitations for interviews were sent to 22 stakeholders and the overall themes from these conversations included the need for more affordable units, low barrier entry housing options, funding for mental health services, and support for case management and service navigator roles. Stakeholders discussed the increases in rents and the difficult in finding landlords willing to participate in voucher programs as the main obstacle to finding affordable housing. Given these challenges some stakeholder said that tenant based rental assistance may not be the best use of HOME-ARP funds at this time. Further, stakeholders expressed that without safe, decent units available to house individuals and families, the services that already exist in communities fall short of being able to close the needs gaps for these vulnerable populations.

Organizations Consulted

List the organizations consulted.

Agency/Organization	Type of Organization	If a Service Provider, Qualifying Population Served	Method of Consultation
Ascenda	Healthcare	Homeless, At Risk of Homeless, Vulnerable Populations, Fleeing Domestic Violence	Online Survey Invitation, Stakeholder Interview
Advance Housing, Inc.	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations, Fleeing Domestic Violence	Community Meeting; Online Survey Invitation
Affordable Housing Alliance	Housing Provider	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation; Stakeholder Interview
Anchor House	Housing Provider	Homeless Youth, At Risk of Homeless Youth, Youth Fleeing Domestic Violence	Community Meeting; Online Survey Invitation
Belmont Homes	Housing Provider	Homeless, At Risk of Homeless, Veterans	Community Meeting; Online Survey Invitation
Blauer Associates	Consultant	N/A	Community Meeting; Online Survey Invitation
Blue Diamond Equities	Real Estate Investment	N/A	Community Meeting; Online Survey Invitation
Burlington County	Local Government	N/A	Community Meeting; Online Survey Invitation
Camden County Habitat for Humanity	Housing Provider	Vulnerable Populations	Community Meeting; Online Survey Invitation
Cape Hope	Homeless Advocacy	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
CARING, Inc.	Nonprofit	Vulnerable Populations - Seniors	Community Meeting; Online Survey Invitation
Catholic Charities of the Archdiocese of Newark	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation; Public Hearing
Center for Family Services	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations, Fleeing Domestic Violence and Sex Trafficking	Online Survey Invitation; Stakeholder Interview
Coming Home of Middlesex County	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations, Fleeing Domestic Violence	Community Meeting; Online Survey Invitation; Public Hearing

New Jersey HOME ARP Allocation Plan

Community Health Law Project	Legal Services	Vulnerable Populations - Disabilities; Fair Housing	Community Meeting; Online Survey Invitation
Community Planning and Advocacy Council	Nonprofit	Vulnerable Populations	Community Meeting; Online Survey Invitation; Stakeholder Interview
Compass Group/ Leading Age NJ and DE	Nonprofit	Vulnerable Populations - Seniors	Community Meeting; Online Survey Invitation
Collaborative Support Programs of New Jersey (CSPNJ)	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
DASI - Domestic Abuse Services, Inc.	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations, Fleeing Domestic Violence and Sex Trafficking	Community Meeting; Online Survey Invitation
Disability Rights, NJ	Nonprofit	Vulnerable Population - Disabilities; Fair Housing	Community Meeting; Online Survey Invitation
Domestic Abuse and Sexual Assault Crisis Center of Warren County	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations, Fleeing Domestic Violence and Sex Trafficking	Online Survey Invitation; Stakeholder Interview
Essex County	Local Government	N/A	Community Meeting; Online Survey Invitation
Eva's Village	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Family Promise of Essex County	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation; Stakeholder Interview
Gloucester County Habitat for Humanity	Housing Provider	Vulnerable Populations	Community Meeting; Online Survey Invitation; Public Hearing
Habitat for Humanity of Salem County, NJ	Housing Provider	Vulnerable Populations	Data Collection; Online Survey Invitation
Holly City Development Corporation	Nonprofit	Vulnerable Populations	Community Meeting; Online Survey Invitation
HomeFront	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations, Fleeing Domestic Violence, Veterans	Community Meeting; Online Survey Invitation; Stakeholder Interview; Public Hearing
Housing and Community Development Network of New Jersey	Housing Advocacy	Vulnerable Populations, Fair Housing	Community Meeting; Online Survey Invitation
Hunterdon County	Local Government	N/A	Community Meeting; Online Survey Invitation; Public Hearing
Isaiah House	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation

New Jersey HOME ARP Allocation Plan

Jewish Family Services of Atlantic and Cape May Counties	Nonprofit	Vulnerable Populations; Fair Housing	Community Meeting; Online Survey Invitation; Public Hearing
Madison Housing Authority	Public Housing Authority	Vulnerable Populations	Community Meeting; Online Survey Invitation; Public Hearing
Mental Health Association of Essex and Morris, Inc.	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations; Fair Housing	Online Survey Invitation; Stakeholder Interview
Monmouth County Continuum of Care	COC	Homeless, At Risk of Homeless, Vulnerable Populations	Online Survey Invitation; Stakeholder Interview
Monarch Housing Associates	Housing Advocacy	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation; Public Hearing
My Brother's Keeper	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
New Jersey Community Development Corporation	Nonprofit	Vulnerable Populations	Stakeholder Interview; Online Survey Invitation
Nouvelle, LLC	Housing Developer	N/A	Community Meeting; Online Survey Invitation
Parkside Business & Community in Partnership, Inc.	Advocacy	Vulnerable Populations	Community Meeting; Online Survey Invitation
Paterson Task Force for Community Action, Inc.	Nonprofit	Homeless, At Risk of Homeless	Community Meeting, Online Survey Invitation
Pemberton Township	Local Government	N/A	Community Meeting; Online Survey Invitation
Pennrose, LLC	Housing Developer	N/A	Stakeholder Interview; Online Survey Invitation
Quest Autism	Nonprofit	Vulnerable Populations	Stakeholder Interview; Online Survey Invitation
Raritan Bay Area YMCA	Nonprofit	Vulnerable Populations	Community Meeting; Online Survey Invitation
Region Nine Housing Corporation	Nonprofit	Vulnerable Populations - Seniors, Disabilities	Community Meeting; Online Survey Invitation
Sussex, Hunterdon, Warren Counties Continuum of Care	COC	Homeless, At Risk of Homeless, Vulnerable Populations	Online Survey Invitation; Stakeholder Interview
RPM Development	Housing Developer	N/A	Community Meeting; Online Survey Invitation; Public Hearing
Taylor Care - Adult Behavioral Health	Nonprofit	Vulnerable Populations	Community Meeting; Online Survey Invitation

New Jersey HOME ARP Allocation Plan

The Affordable Homes Group	Housing Developer	N/A	Community Meeting; Online Survey Invitation
The Apostle House	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
The Community Builders	Housing Developer	N/A	Community Meeting; Stakeholder Interview
The Gateway Family YMCA	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
The Supportive Housing Association of NJ	Housing Advocacy	Vulnerable Populations	Community Meeting; Online Survey Invitation
Township of Middletown	Local Government	N/A	Community Meeting; Stakeholder Interview
Union County	Local Government	N/A	Community Meeting; Online Survey Invitation
United Community Corporation	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation; Public Hearing
Wellspring Center of Prevention	Nonprofit	Vulnerable Populations	Community Meeting; Online Survey Invitation
Newark Habitat for Humanity	Nonprofit	Vulnerable Populations	Online Survey Invitation; Public Hearing
Samaritan Inn	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Online Survey Invitation; Public Hearing
Ingerman	Housing Developer	N/A	Public Hearing
New Jersey Community Capital	Nonprofit	N/A	Public Hearing
AtlantiCare Foundation	Healthcare	N/A	Public Hearing
Bergen County, Housing, Health, and Human Services	Housing Advocacy	Vulnerable Populations, Fair Housing	Public Hearing, Online Survey Invitation
Women Aware-Middlesex County	Nonprofit	Vulnerable Populations, Fleeing Domestic Violence	Public Hearing
Saint Joseph's Carpenter Society	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Public Hearing, Online Survey Invitation
Camden County	Local Government	N/A	Public Hearing, Online Survey Invitation
Cumberland County, Human Services	Housing Advocacy	Vulnerable Populations, Fair Housing	Public Hearing, Online Survey Invitation
Herman Bruns Realty Inc.	Housing Developer	N/A	Public Hearing
Atlantic County, Department of Family and Community Development	COC	Homeless, At Risk of Homeless, Vulnerable Populations	Public Hearing, Online Survey Invitation
Safe + Sound - Somerset	Nonprofit	Vulnerable Populations, Fleeing Domestic Violence	Public Hearing
Raritan Valley Habitat for Humanity	Housing Provider	Vulnerable Populations	Public Hearing, Online Survey Invitation
Cara Squared LLC	Housing Developer	N/A	Public Hearing

New Jersey HOME ARP Allocation Plan

Just Believe Inc-Toms River	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Public Hearing
City of Perth Amboy, Economic and Community Development	Local Government	N/A	Public Hearing, Online Survey Invitation
Greater Bergen Community Action	Nonprofit	Homeless, At Risk of Homeless, Homeless Youth	Public Hearing, Online Survey Invitation
La Casa de Don Pedro	Nonprofit	Homeless, At Risk of Homeless, Homeless Youth	Public Hearing
The Brooke Group LLC	Housing Developer	N/A	Public Hearing
180 Turning Lives Around	Nonprofit	Vulnerable Populations, Fleeing Domestic Violence	Public Hearing

Summary of Feedback Received

Largely the public and stakeholders agreed that the needs lie primarily in accessing more affordable housing units, addressing increases in rent prices, and addressing mental health and case management challenges. Stakeholders also noted increasing domestic violence and homelessness among senior and youth. See more detailed discussion of consultation on page 5.

Public Participation

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.

DCA began its public participation process with a Community Needs Survey distributed throughout the State and during community engagement public hearings. This survey was utilized to gather information from respondents on their views on the specific needs and priorities within their communities. After the completion of the Community Needs Survey process, survey data was evaluated, and this information was utilized as a starting point for discussion with various individuals, groups, and organizations during focus group sessions held online. This wide variety of contacts included: local officials, substance abuse and mental health organizations, COCs, housing advocates and developers, homeless services advocates, and other members of the public. DCA conducted four meetings on May 17 (two meetings), 18, and 26, 2022. The public sessions included presentations to explain the HOME-ARP Allocation Plan and an opportunity for citizen comments. The meetings were held virtually via Zoom.

Public meeting notices were posted on the DCA website and distributed directly to local officials; developers; non-profit organizations; Planning and Development Districts; and the Continuum of Cares throughout the State.

Once drafted, the plan was released for a 15-day comment period beginning November 29, 2022. A copy of the draft was posted on the DCA website.

Date of Public Notice:

The notice announcing the public comment period and public hearing was published on November 29, 2022. See **Appendix B**.

Public Comment Period:

A 15-day public comment period during which the draft was available on DCAs website began on November 29, 2022 and ended at 5 pm on December 15, 2022.

Date of Public Hearing:

A public hearing was held virtually on December 7, 2022. Forty-seven people attended the public hearing.

Efforts to Broaden Public Participation

Efforts to broaden community participation included holding public hearing meetings, early in the planning process via Zoom to make them accessible to a wider range of people. Accommodations are made for people with disabilities upon request. The Community Needs Survey was available in English and Spanish.

Comments and Recommendations Received

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

Comments received during public participation stressed the need for more affordable rental units. Comments also noted that the need for units is urgent because many areas of the state have no options for low- to moderate-income households. Recommendations included investing more funds in affordable housing development to address the unit crisis.

Comments or Recommendations Not Accepted

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

Some commenters to the publication draft felt more HOME-ARP funds should be allocated to development of new affordable units. While DCA recognizes the need for more affordable housing units, the State has several sources of funds that can be used to address affordable housing development. This HOME-ARP Allocation Plan allocates funds for both the development

of affordable rental units and for tenant based rental assistance (TBRA) to allow for more immediate action in addressing the lack of options for low- and moderate-income renters. Development of new units takes time. The use of HOME-ARP funds for both development and TBRA will allow for short and long term assistance.

Needs Assessment and Gaps Analysis

Size and Demographic Composition of Qualifying Populations

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

The needs assessment and gap analysis must evaluate the “demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations.”²

The qualifying populations are as followed:

- Homeless
- At-risk of Homelessness
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking
- Veterans and Families that include a Veteran Family Member
- Other Populations (Other Families Requiring Services or Housing Assistance to Prevent Homelessness and Households at Greatest Risk of Instability)

There are several demographic overlaps of these discreet qualifying population categories as defined in the HOME ARP Guidance. For this needs assessment section, two primary categories will be used, Homeless and At-Risk of Homeless. Within these large categories, needs and gaps of other qualifying populations will be described.

Homeless Individuals, as defined in 24 CFR 91.5

The NJ Counts 2022 point in time count report notes that during the pandemic, homeless service systems and planning bodies have had to substantially alter the way they have traditionally operated for the health and safety of their clients and staff. Across New Jersey, communities had to alter their methodology for interviewing persons experiencing homelessness during the PIT count. It notes that the differences in data collection between 2021 and 2022 do not allow for

² HOME ARP Guidance.

comparison. This Allocation Plan provides both the 2021 and 2022 data as a point of reference for circumstances during the pandemic, not as a direct comparison to establish trends.

Data for 2021: According to the HUD Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations data for the State of New Jersey from 2021, 8,262 persons were identified as homeless, with 7,443 (90%) of those persons sheltered, and 1,028 (12.4%) identified as chronically homeless.³

As shown in the summaries below for New Jersey, households without children represented about 73% of the homeless households, and about 58% of people experiencing homelessness were in households without children. Nearly 6% of homeless individuals were under 18. Nearly 52% of individuals were male, about 38% were female, just about .1% were transgender or non-confirming/nonbinary.

³ **In 2021, HUD gave communities the option to cancel or modify the unsheltered survey portion of their counts based on the potential risk of COVID-19 transmission associated with conducting an in-person survey. As a result, HUD has excluded the unsheltered population sub-totals and all unsheltered sub-population data for this reporting period. The user is cautioned that the total homeless counts reported here for 2021 are missing data. Users may refer to the CoC-level reports to review the unsheltered PIT count numbers for CoCs that conducted an unsheltered PIT count. For reference, the total homeless count in 2020 was 9,662 with 7,881 sheltered and 1,781 unsheltered.

New Jersey HOME ARP Allocation Plan

State Name: New Jersey

Summary by household type reported:

	Sheltered		Unsheltered**	Total**
	Emergency Shelter	Transitional Housing*		
Households without children ¹	3,875	820	—	—
Households with at least one adult and one child ²	686	207	—	—
Households with only children ³	26	11	—	—
Total Homeless Households	4,587	1,038	—	6,411

Summary of persons in each household type:

Persons in households without children¹	3,952	824	—	—
Persons Age 18 to 24	205	115	—	—
Persons Over Age 24	3,747	709	—	—
Persons in households with at least one adult and one child²	2,016	606	—	—
Children Under Age 18	1,237	378	—	—
Persons Age 18 to 24	146	42	—	—
Persons Over Age 24	633	186	—	—
Persons in households with only children³	34	11	—	—
Total Homeless Persons	6,002	1,441	—	8,262

Demographic summary by ethnicity:

	Sheltered		Unsheltered**	Total**
	Emergency Shelter	Transitional Housing*		
Hispanic / Latino	1,184	286	—	—
Non-Hispanic / Non-Latino	4,818	1,155	—	—
Total	6,002	1,441	—	—

Demographic summary by gender:

Female	2,575	567	—	—
Male	3,415	872	—	—
Transgender	12	2	—	—
Gender Non-Conforming (i.e. not exclusively male or female)	0	0	—	—
Total	6,002	1,441	—	—

Source: 2021 HUD Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations

With respect to race and ethnicity, Black/African American individuals represented about 52% of the homeless population, about 33% were white, about .6% were Asian, about .8% were American Indian or Alaskan Native, about .4% were Native Hawaiian or Other Pacific Islander, and 2.8% were multiple races. About 17.7% were Hispanic.

Demographic summary by race:

	Sheltered		Unsheltered**	Total**
	Emergency Shelter	Transitional Housing*		
Black or African-American	3,515	788	—	—
White	2,186	551	—	—
Asian	42	14	—	—
American Indian or Alaska Native	58	12	—	—
Native Hawaiian or Other Pacific Islander	27	13	—	—
Multiple Races	174	63	—	—
Total	6,002	1,441	—	—

Source: 2021 HUD Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations

When looking at the different self-identified categories of homeless persons throughout New Jersey in 2021, nearly a quarter had a severe mental illness and nearly 16% struggled with chronic

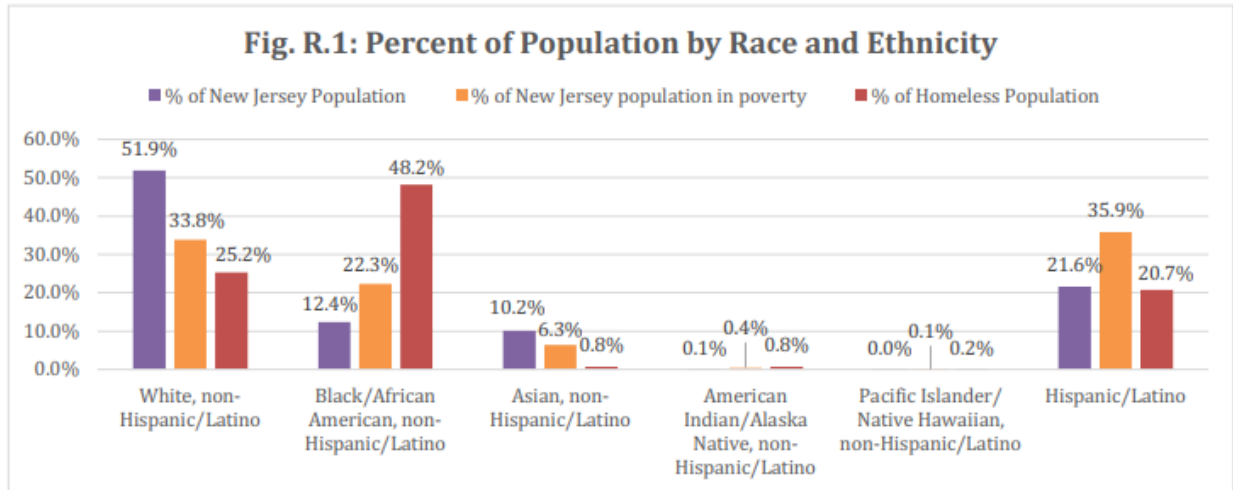
substance abuse. Victims of domestic violence and veterans each represented about 5% of the homeless population. About 4% were unaccompanied youth.

Date for 2022: NJ Counts 2022 is the 2022 annual Point in Time (PIT) count providing a statewide snapshot of households experiencing homelessness in communities, where they find shelter, what their needs are, and what factors contribute to making them homeless.

The report notes that on the night of January 25, 2022, a total of 6,631 households, including 8,754 persons, were experiencing homelessness in the State of New Jersey. Of those, a total of 978 persons (11%) were unsheltered, and 1,750 persons (20%) were identified as chronically homeless.

In the 2022 PIT count, 72% of those counted were adults over age 24, 7% were between 18 and 24 years old, and 21% were children under 18 years. The data also showed that 22% of those counted were over 55 years old, supporting reports from stakeholders that both youth and senior populations are experiencing homelessness at increasing rates.

The report's Figure R.1 illustrates the racial breakdown of the total population in New Jersey, those living below the poverty line, and those experiencing homelessness. From this data it can be seen that persons identifying as Black or African American non-Hispanic/Latino are overrepresented in the population experiencing homelessness. While just 12.4% of the general population in the State, persons identifying as Black or African American are 22.3% of the population in poverty and 48.2% of the population identified as experiencing homelessness in the PIT count. Persons identifying as Pacific Islander non-Hispanic/Latino have the lowest rates of homelessness, making up 0.2% of the counted population experiencing homelessness. The report further found that persons identifying as Black or African American non-Hispanic/Latino represent 52% of the sheltered population (staying in emergency shelter, or transitional housing) and 45% of the identified unsheltered population. Persons identifying as White non-Hispanic/Latino represent 26.5% of the sheltered population and 30% of the identified unsheltered population. Additionally, the report found 22% of homeless persons identifying as Black or African American and 29% of persons identifying as Hispanic/Latino were children under the age of 18, as compared to 11% of persons identifying as White non-Hispanic/Latino.



Source: NJ Counts 2022

With respect to geographic impact of homelessness across the State, the PIT report found a significant percentage of homeless persons in Essex County. Twenty-two percent of those counted were in Essex County as compared to the next highest percentage of 8% in Hudson and Union Counties. Essex and Hudson Counties also had the highest percentage of unsheltered people at 15%, and Essex and Camden Counties had the highest percentage of chronic homeless persons at 15% and 12% respectively. Figure i of the report provides a full list of counts by County.

Figure i. Number of Homeless Persons by County and Percentage of State Total						
County	Total Homeless Persons	% of Total Homeless Persons	Chronic Homeless Persons	% of Chronic Homeless Persons	Unsheltered Homeless Persons	% of Unsheltered Homeless Persons
Atlantic	343	4%	118	7%	107	11%
Bergen	306	3%	12	1%	15	2%
Burlington	585	7%	143	8%	15	2%
Camden	625	7%	211	12%	136	14%
Cape May	119	1%	18	1%	1	0%
Cumberland	123	1%	23	1%	8	1%
Essex	1,914	22%	254	15%	149	15%
Gloucester	127	1%	15	1%	11	1%
Hudson	665	8%	154	9%	143	15%
Hunterdon	184	2%	26	1%	8	1%
Mercer	533	6%	100	6%	94	10%
Middlesex	586	7%	156	9%	87	9%
Monmouth	453	5%	95	5%	23	2%
Morris	351	4%	62	4%	13	1%
Ocean	419	5%	96	5%	13	1%
Passaic	374	4%	107	6%	86	9%
Salem	20	0%	5	0%	4	0%
Somerset	220	3%	16	1%	3	0%
Sussex	67	1%	5	0%	1	0%
Union	677	8%	116	7%	59	6%
Warren	63	1%	18	1%	2	0%
Total	8,754		1,750		978	

Source: NJ Counts 2022

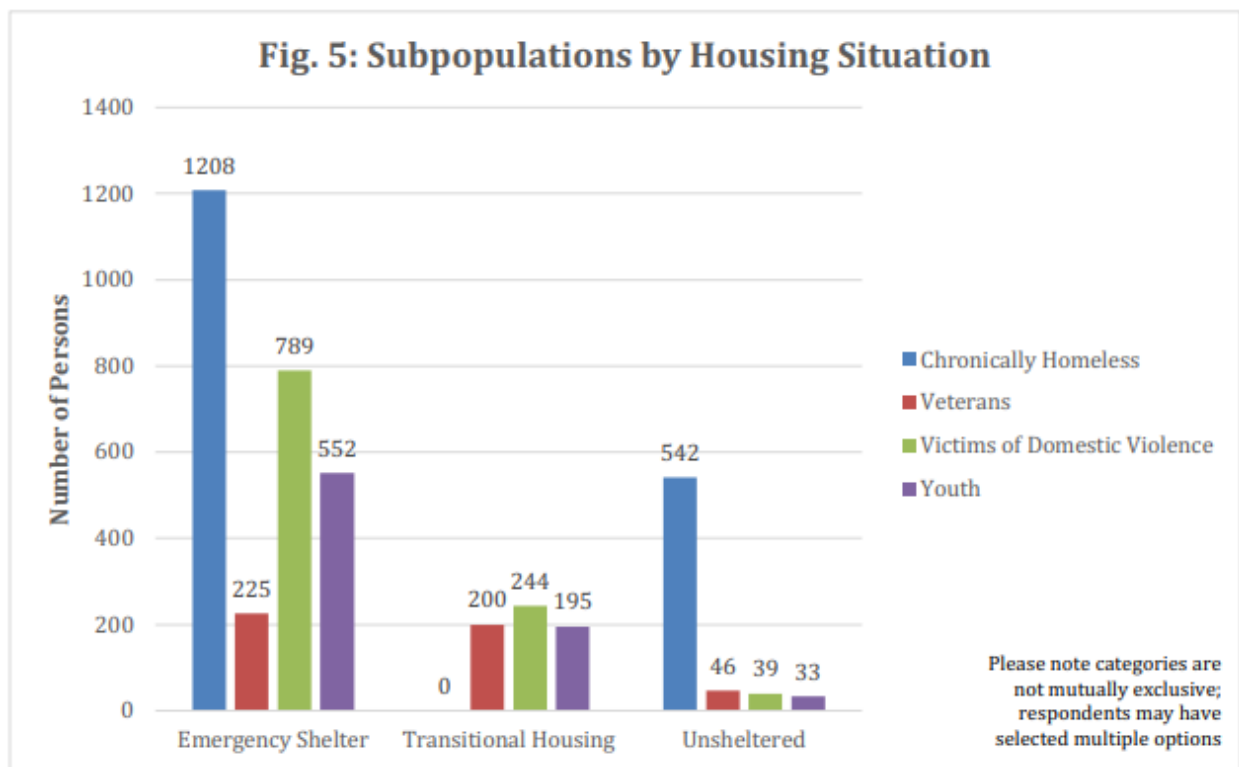
Veterans, Victims of Domestic Violence, and other Categorized Populations

HOME ARP Guidance specifically identifies individuals “Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking” and “Veterans and Families that include a Veteran Family Member” as two qualifying populations eligible to receive assistance.

According to the 2021 Point-in-Time Count, 5% (419) of New Jersey’s homeless population were Veterans, and 5% (426) of the State’s homeless were victims of domestic violence. NJ Counts 2022 report, however, describes that those experiencing domestic violence represent a higher percentage of those who are homeless than veterans. On the night of the count, 1,072 people (12.2%) identified as a victim of domestic violence while 471 (6.9%) were veterans. The report’s Fig. 5 provides a graphic representation of this data. Stakeholders interviewed for this plan noted

that victims of domestic violence are often undercounted in the homeless population, and so the true count of victims of domestic violence experiencing homelessness may be higher than reported in either year. Figure 5 of the report shows that victims of domestic violence were also more likely to be in emergency shelters than in transitional housing. Nearly 74% of victims of domestic violence experiencing homelessness on the night of the count were in emergency shelters as compared to nearly 48% of veterans.

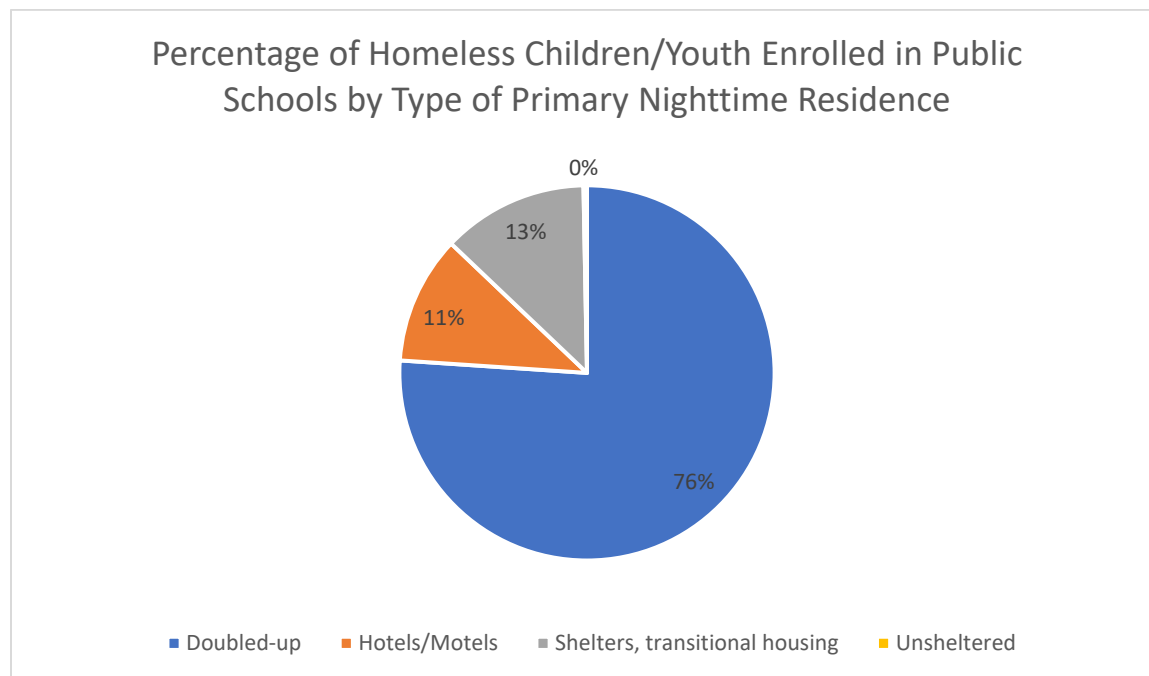
The United States Interagency Council on Homelessness (USICH) has prioritized ending homelessness among veterans, and many communities in New Jersey have also been working to end homelessness for veterans. Stakeholder feedback indicated that while there is work to be done, some success has been made in meeting these goals as services and shelter for veterans are easier to access than for other vulnerable populations.



Source: NJ Counts 2022

Homeless Families and Youth

According to data submitted by school districts to the U.S. Department of Education, in the 2018-2019 school year, an estimated 13,929 public school students in New Jersey experienced homelessness over the course of the year.⁴ The vast majority of these students (76%) were doubled-up, or living with another family, and 24% were living in temporary shelter (11% in hotel/motel, 13% in shelter or traditional housing). Further, stakeholders discussed youth homelessness as a growing concern as the number of homeless youth have risen in recent years. Anchor House reported that youth homelessness accounts for 25% of the homeless population in Trenton.



Source: National Center for Homeless Education using the U.S. Department of Education's EDFacts Initiative.

Note: Unsheltered includes cars, parks, campgrounds, temporary trailer, or abandoned building.

Additional information on Homeless Families is found in the NJ Counts 2022 report. According to the report of the 6,631 homeless households counted in New Jersey, 988 (15%) were families with at least one child under the age of 18 and one adult. These families included 2,945 persons, including 1,799 children under age 18 and 1,146 adults.

⁴ National Center for Homeless Education using the U.S. Department of Education's EDFacts Initiative.

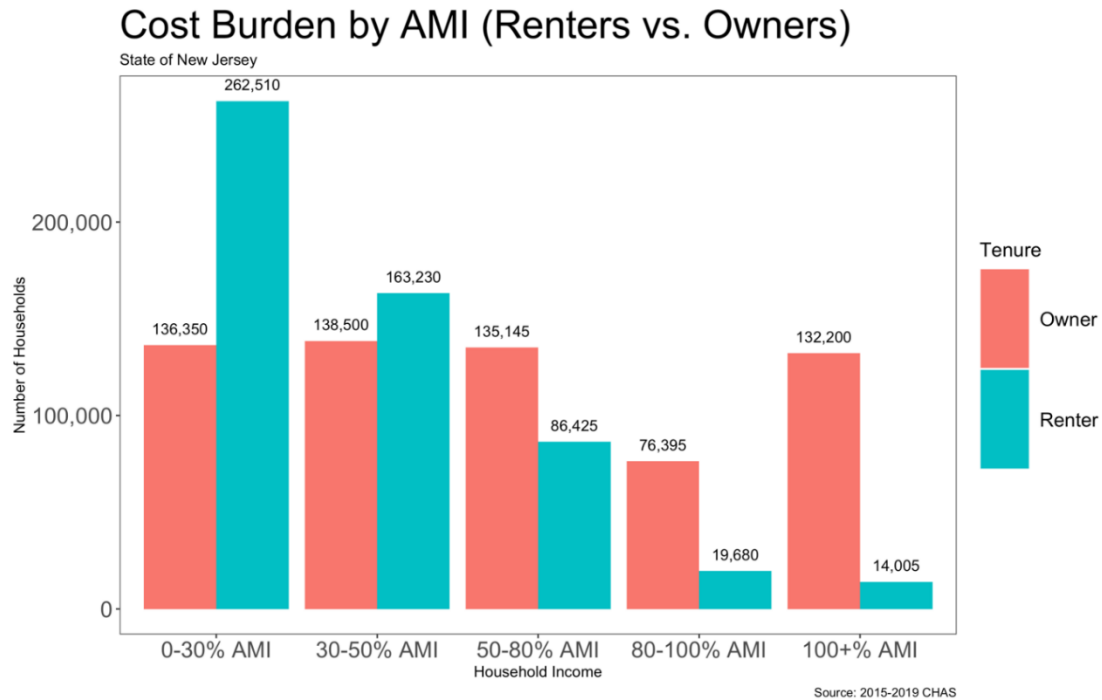
[At Risk of Homelessness, as defined in 24 CFR 91.5](#)

As defined in the HOME ARP Guidance, households at risk of homelessness are those with incomes below 30% of AMI that do not have resources or family, friend, or faith-based support networks to prevent homelessness, and:

1. Has moved because of economic reasons two or more times during the 60 days,
2. Lives in the home of another because of economic hardship,
3. Has received a 21-day eviction notice,
4. Lives in a hotel or motel, which is not paid for with assistance from a charitable organization or government,
5. Lives in overcrowded conditions as defined by HUD, OR
6. Is exiting a publicly funded institution or system of care.

Cost burden, which is the ratio of housing costs to household income, is an indication of housing need, and the need for reduced rental costs. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. Renter households who pay more than 30% of their income for rent and utilities are considered cost burdened. In New Jersey, households earning between 0-30% AMI are more likely to pay more than 30% of their income towards housing expenses.⁵ Among all renters in New Jersey who earn less than 30% AMI, 77% are cost burdened (a total of 262,510 households).

⁵ The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.² Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

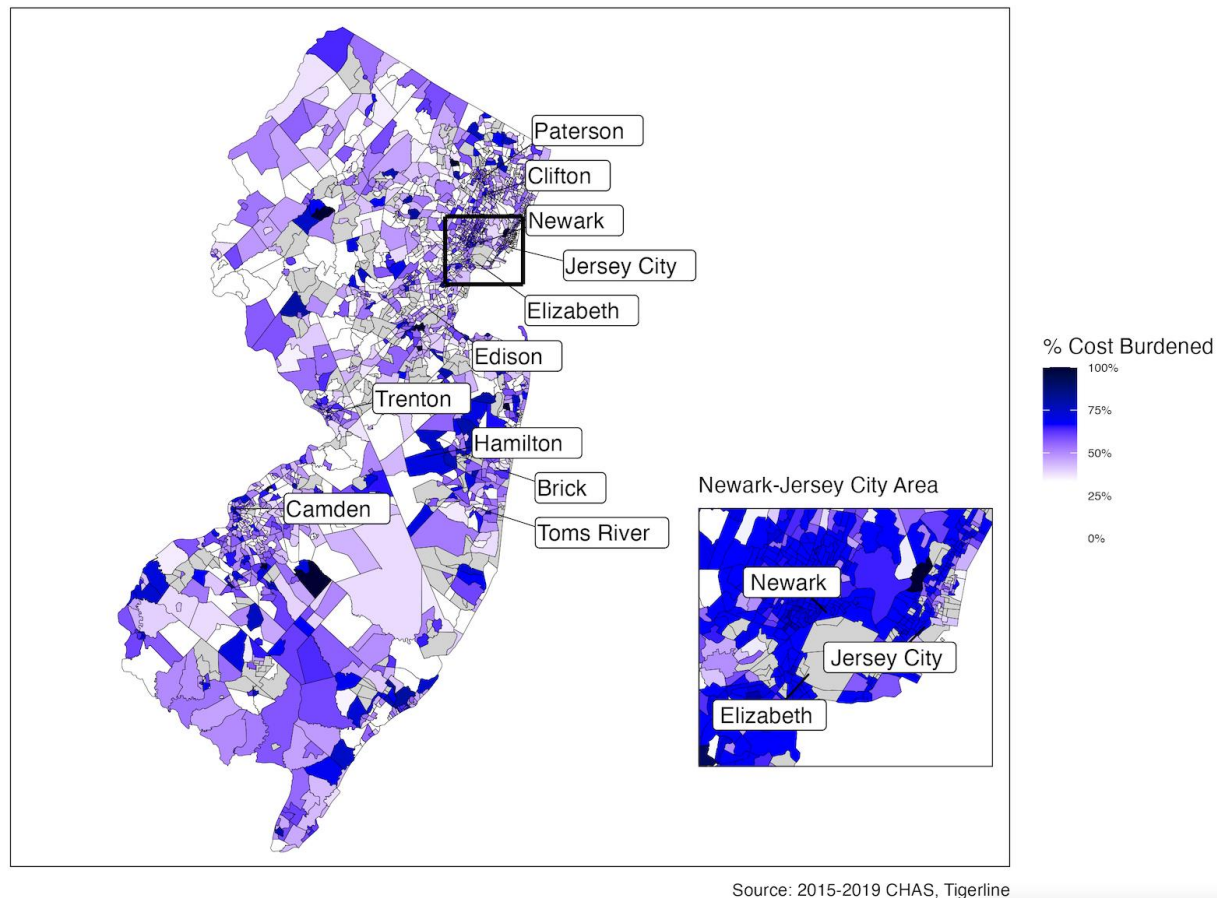


Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.

According to data from the 2015-2019 HUD Comprehensive Housing Affordability Strategy, there is not a single New Jersey county in which fewer than 25% of renter households were cost burdened. Furthermore, in the following counties, more than 50% of renter households were cost burdened: Cumberland (57%), Atlantic (55%), Ocean (54%), Salem (53%), Cape May (52%), Passaic (51%), Essex (50%).

Cost Burdened Renter Households

State of New Jersey



COVID-19 Related Emergency Rental Assistance

Many of the eligibility requirements for the U.S. Department of Treasury's Emergency Rental Assistance Programs overlap with HOME APR eligibility requirements, including:

- At risk of homelessness or experiencing housing instability (e.g., past due notice, non-payment of rent, or eviction notice) and
- A household income less than 80% AMI.⁶

Data from the New Jersey Emergency Rental Assistance Program can help quantify those individuals and households in New Jersey that are housing insecure. According to the Emergency

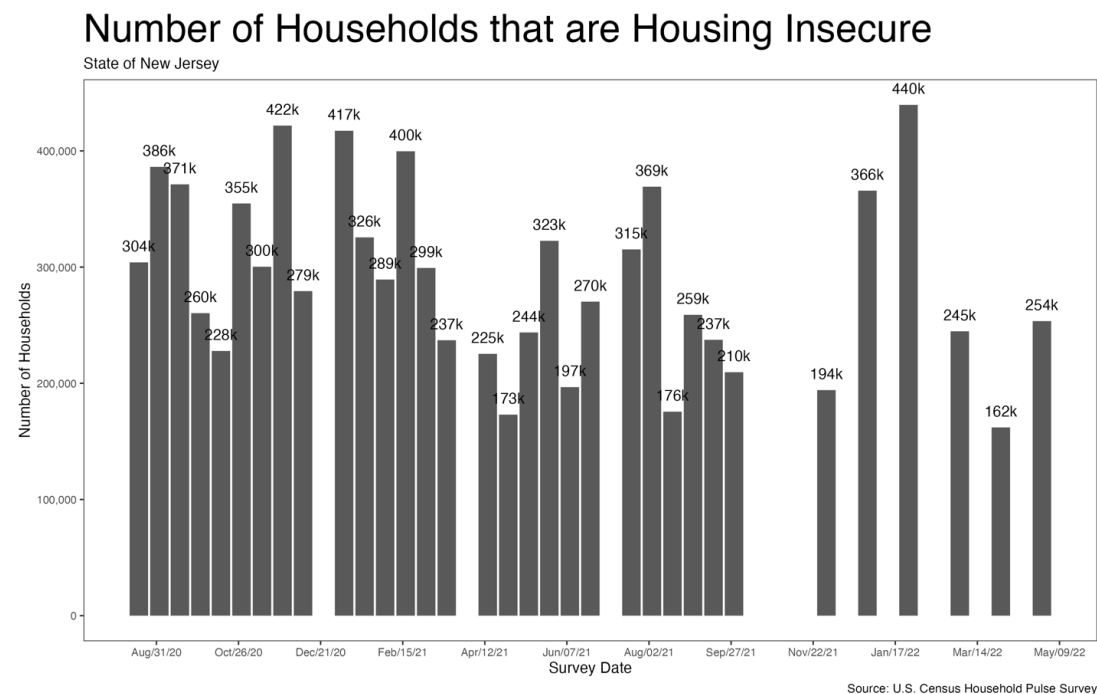
⁶ While 80% AMI is the upper limit of assistance, many state and local ERA programs have developed systems to prioritize assistance for households earning 30% AMI.

Rental Assistance Program reporting required by the U.S. Department of the Treasury, New Jersey has approved over \$589 million in payments.

- Between January 2021 and January 2022, 87,246 households in New Jersey received rental assistance.
- The average amount of assistance was just over \$6,750 per household.⁷

Housing Insecurity and Eviction

Additionally, data collected in the online Household Pulse Survey, which measured housing insecurity throughout the COVID-19 pandemic found that households experiencing housing insecurity⁸ in New Jersey was relatively stable between August 2020 to May 2022 (the latest data available).



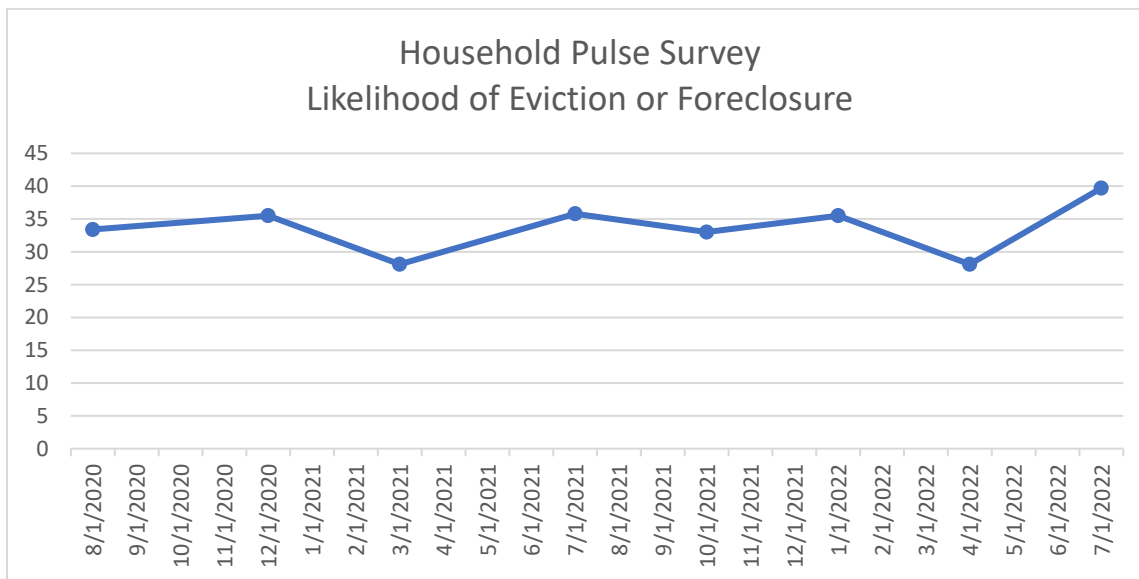
Source: Household Pulse Survey, Housing Insecurity (Missed Payment and Low Confidence).

⁷ Emergency Rental Assistance monthly compliance report data: <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/reporting>.

⁸Housing Insecurity as defined by the Household Pulse Survey includes households that have missed the last months' rent or mortgage payment, or who have slight or no confidence that their household can pay next month's rent on time.

While the number of households throughout New Jersey experiencing housing insecurity has decreased since August 2020, this data helps establish a baseline data point of an average 289,000 households in New Jersey experiencing housing insecurity between 2020 and 2022.

The Household Pulse Survey also measures the percentage of adults in households not current on rent or mortgage were eviction or foreclosure in the next two months is either very likely or somewhat likely. The graph below details the residents in New Jersey reporting that eviction or foreclosure was likely between August 2020 and July 2022. While the trend of likely evictions or foreclosures has remained stable over the period, reports from July 2022 indicate that evictions and foreclosures may be on the rise with the highest percentage of the period. During this period 5,395,412 individuals reported that they were facing eviction or foreclosure in the next two months.



Source: Household Pulse Survey, Likelihood of Eviction or Foreclosure.

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

HOME ARP Guidance specifically identifies individuals “Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking” as a specific qualifying population eligible to receive assistance. Domestic violence service providers consulted for this

Plan indicated that they have seen a rise in need for services for those fleeing domestic violence. The number of people seeking shelter, those making calls to hotlines, and those on waiting lists continue to grow. The New Jersey Coalition to End Domestic Violence has reported that programs run by their 34-member domestic violence providers had responded to 37% more hotline calls in 2021 compared to 2020 and provided shelter to 53% more victims.

With respect to sex trafficking, stakeholders consulted noted that many are not citizens, and most are transient as they are often moved around to be hidden from law enforcement. As a result, these individuals are often hard to reach and difficult to count.

As noted previously, the NJ Counts 2022 report found 1072 people (12.2% of the homeless population counted) identified as a victim of domestic violence. About 54% of these were without children, 29% noted a disability, and 42% were Black/African American.

[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 HOME-ARP Notice](#)

The HOME-ARP notice defines families *“Requiring Services or Housing Assistance to Prevent Homelessness”* 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. In the 2022 PIT count, 1,750 people (20% of the homeless persons counted) were found to be chronically homeless. Chronically homeless households, as defined by HUD, are persons with a long-term disabling condition who have been continually homeless for a year or more, or at least four times in the past three years where the length of time in those episodes add up to a year or more. These households are likely to need greater supportive services and case management to stay housed once housing is secured for them. Demographically, these chronically homeless persons were largely adults (96.4%). About 65% identified as male and about 34% identified as female. Racially, 47.5% were Black/African American. Of those counted, about a third were unsheltered and 67% identified multiple disabilities. About 54% were homeless despite receiving assistance such as SSI, SSDI, TANF, or general public assistance/welfare. Stakeholders interviewed for this Allocation Plan noted that assistance received by those receiving disability, for example, often falls far short of what is needed to secure housing, and these situations are becoming intensified

as rents increase. As a result, services and housing assistance to prevent homelessness are needed.

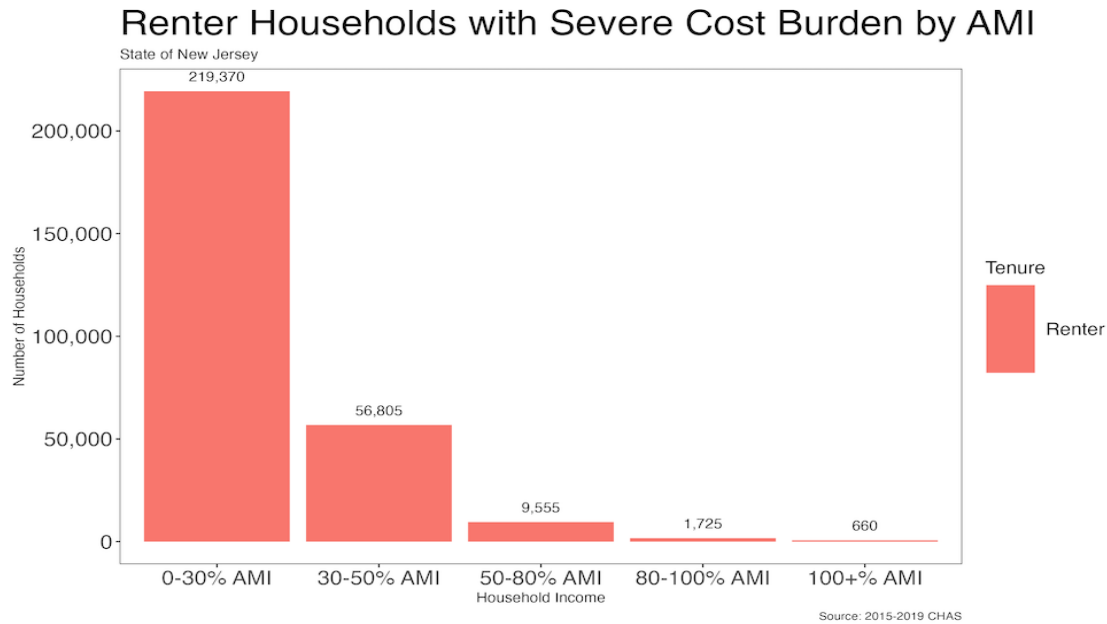
The HOME-ARP notice defines *“Other Populations at Greatest Risk of Housing Instability”* in two ways. The first definition includes those with annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly income on housing costs.) In New Jersey, there are 334,665 extremely low income and severely cost burdened households, which places them at imminent risk of becoming homeless.

The second definition is that the household has an annual income that is less than or equal to 50% of the area median income, as determined by HUD, and meets one of the conditions of “At risk of homelessness.”

In New Jersey, there are 466,960 households earning between 0-50% AMI that are severely cost burdened or paying more than 50% of their income towards housing expenses.⁹

Of these severely cost-burdened households, 276,175 or about 59%, are renters and the majority are earning below 30% AMI.

⁹ Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.



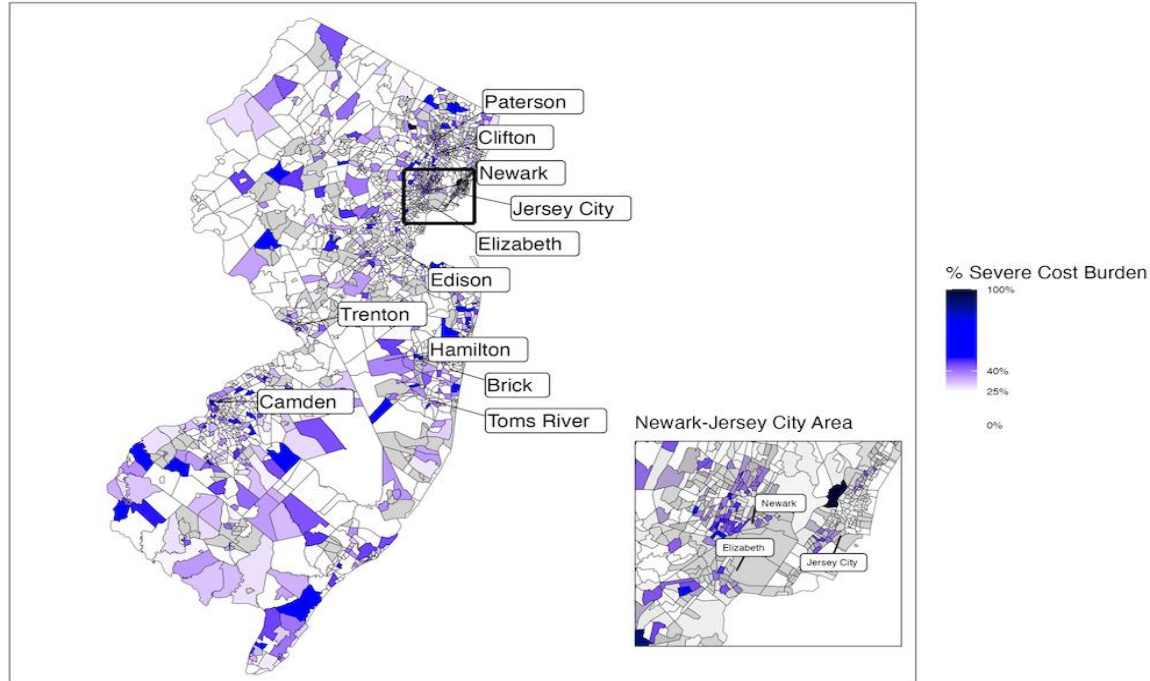
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.

The below map shows the geographic distribution of the estimated percent of all renters who are severely cost burdened.¹⁰ The following counties have over 25% of all renters experiencing a severe cost burden: Cumberland (33%), Ocean (30%), Passaic (29%), Salem (29%), Essex (28%), Cape May (27%), Camden (27%), Monmouth (27%), Atlantic (26%), Gloucester (26%), Mercer (25%), Hunterdon (25%).

¹⁰ Severe Cost Burden: renter households for whom gross rent is 50% or more of household income.

Renter Households with Severe Cost Burden

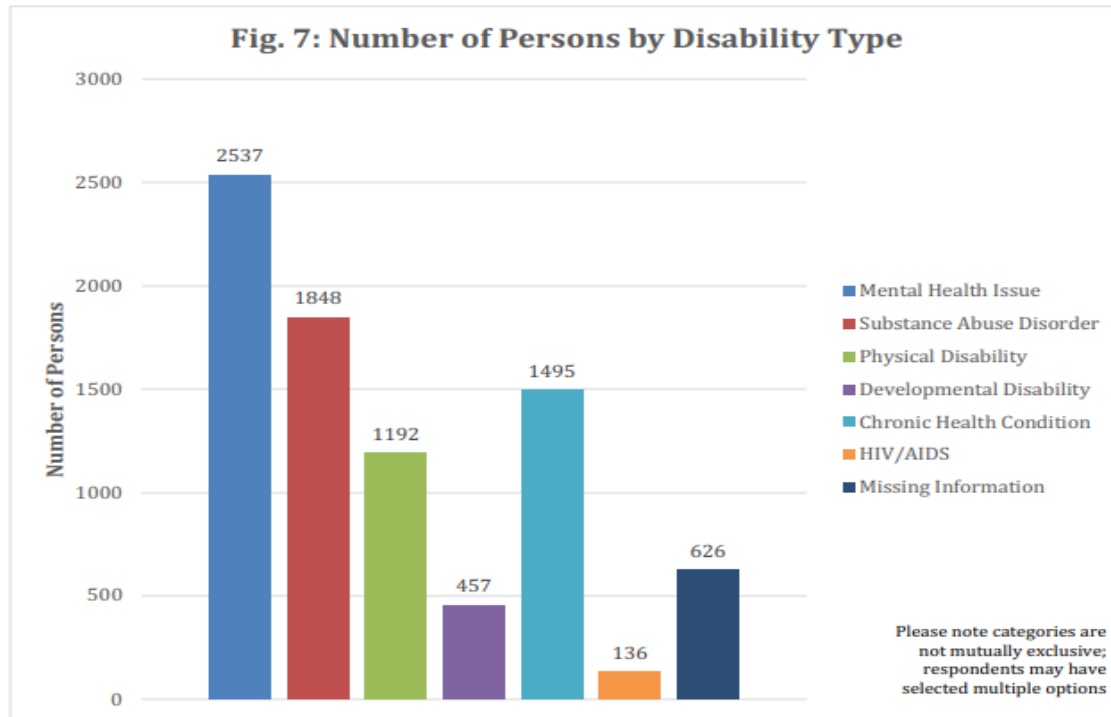
State of New Jersey



Source: 2015-2019 CHAS, Tigerline

HOME ARP Guidance specifically identifies “Veterans and Families that include a Veteran Family Member” as another eligible population under HOME-ARP. Veteran homelessness is discussed in the Homelessness section of this Plan.

Research shows that people with disabilities are likely to fall into this qualifying population. The NJ Counts 2022 report collected information on people who are homeless with disabilities and found that 58.9% of people had a disability. Among persons identifying a disability, 60.4% reported mental health issues; this accounts for 29% of the total identified population experiencing homelessness. This data is consistent with information received from stakeholders who described that people living with disabilities face extreme housing instability and are often close to finding themselves homeless due their extremely low incomes and housing cost burden, as well as a significant need for services to sustain their living situations. Figure 7 of the NJ Counts 2022 report illustrates the range of disabilities experienced by those who were homeless on the night of the count.



Source: NJ Counts 2022

Current Resources Available to Assist Qualifying Populations

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

Congregate and Non-Congregate Shelter Units

As indicated in the 2021 HIC (Housing Inventory Count), New Jersey’s homeless system had 16,258 total year-round shelter beds for people experiencing homelessness: 3,814 are described as family units, 8,073 are described as “family beds”, 8,158 are described as adult only beds, and 27 are described as child only beds. Of these total year-round shelter beds, 3,687 are reserved for chronically homeless, 2,048 are reserved for veterans, and 602 are for youth. Further the state has shelters including some dedicated to those fleeing domestic violence and sex trafficking, however, all the shelters consulted noted that they are always at maximum capacity and shelter services in rural areas are especially difficult to access.

Stakeholders interviewed for this Plan discussed the ways in which the pandemic highlighted the need for more non-congregate shelter. Many pre-pandemic shelters operated in a congregate style, which was not appropriate for containing the spread of COVID-19. While shelters transitioned to non-congregate models, many are temporary or not sustainable as currently operated. Because homeless individuals are more vulnerable to an outbreak of highly communicable diseases like COVID due to their lower vaccination rates and higher rates of chronic conditions, the acquisition and development of non-congregate shelters is needed. Further, stakeholders report that those experiencing homelessness are more likely to seek shelter when non-congregate options are available. Therefore, more non-congregate options will help protect this vulnerable population and reduce the chance of infectious transmission in group shelter settings.

Supportive Services

Under its goals to support rental housing and services for people experiencing homelessness, DCA provides homeless prevention and rapid re-housing funds to those in or at risk of becoming homeless and tenant-based rental assistance to individuals diagnosed with HIV/AIDs. Also, DCA provides funds to emergency shelters and transitional housing facilities to address life safety issues and improve the living conditions of the residents. DCA also provides assistance to support temporary housing for people recovering from substance abuse and supports local jurisdictions' planning process to reduce and end homelessness.

Tenant Based Rental Assistance

In New Jersey, there are over 81 agencies managing over 84,790 Tenant-Based vouchers and 1,686 Veterans Affairs Supportive Housing Vouchers.

Affordable and Permanent Supportive Rental Housing

According to the 2021 HIC, there are 185 permanent supportive housing beds and 107 rapid rehousing beds throughout the State. Further, DCA has financed 548 affordable housing units over the last five-years with an additional 517 units approved for funding. The New Jersey Housing and Mortgage Finance Agency through its Low-Income Housing Tax Credit (9%), also finance affordable housing development.

Unmet Housing and Service Needs of Qualifying Populations

Describe the unmet housing and service needs of qualifying populations.

[Homeless Populations, as defined in 24 CFR 91.5.](#)

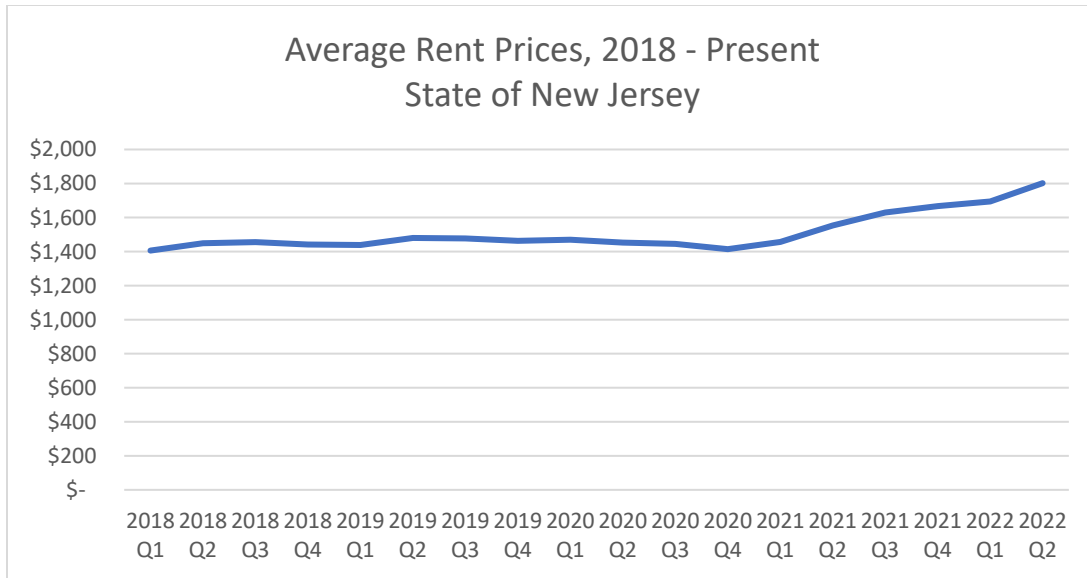
The 2021 Point in Time Count for New Jersey found a total of 8,262 homeless individuals throughout the State. During this same year, the Housing Inventory Count for New Jersey reported over 16,000 total year-round bed for emergency housing, transitional housing, and supportive housing. While it would appear that there may be enough beds for those needing shelter, these beds are spread through the State and may not be located in areas where demand at any given time is highest. Further some beds are reserved for specific populations such as veterans or victims of domestic violence. Additionally, in the 2018-2019 school year, an estimated 13,929 public school students in New Jersey experienced homelessness over the course of the year.¹¹ The vast majority of these students (76%) were doubled-up, or living with another family, and 24% were living in temporary shelter (11% in hotel/motel, 13% in shelter or traditional housing).

[At Risk of Homelessness, as defined in 24 CFR 91.5.](#)

Cost burden and extreme cost burden are the most common housing problems for New Jersey households earning less than 30% of AMI. Among all renters in New Jersey who are cost burden, nearly 78% earn below 50% of AMI: 262,510 households under 30% AMI and 163,230 households between 30 and 50% AMI.

As incomes for many renters stay stagnant, costs of rents have been steadily increasing. Rental prices have been increasing since 2018 with sharper increases over the last two years. According to Apartment List, an online data source for rent and vacancy information nationally, the current median cost of a 1-bedroom unit in New Jersey is \$1,556, a \$309 increase since first quarter 2020, and the current median cost of a 2-bedroom unit is \$1,937, a \$385 increase since first quarter 2020. See graphic illustration below. These rents are statewide averages and urban markets will experience higher rents than rural areas. As rents increase, renters will spend increasingly higher percentages of their income on housing costs, which will further deepen concerns of housing instability.

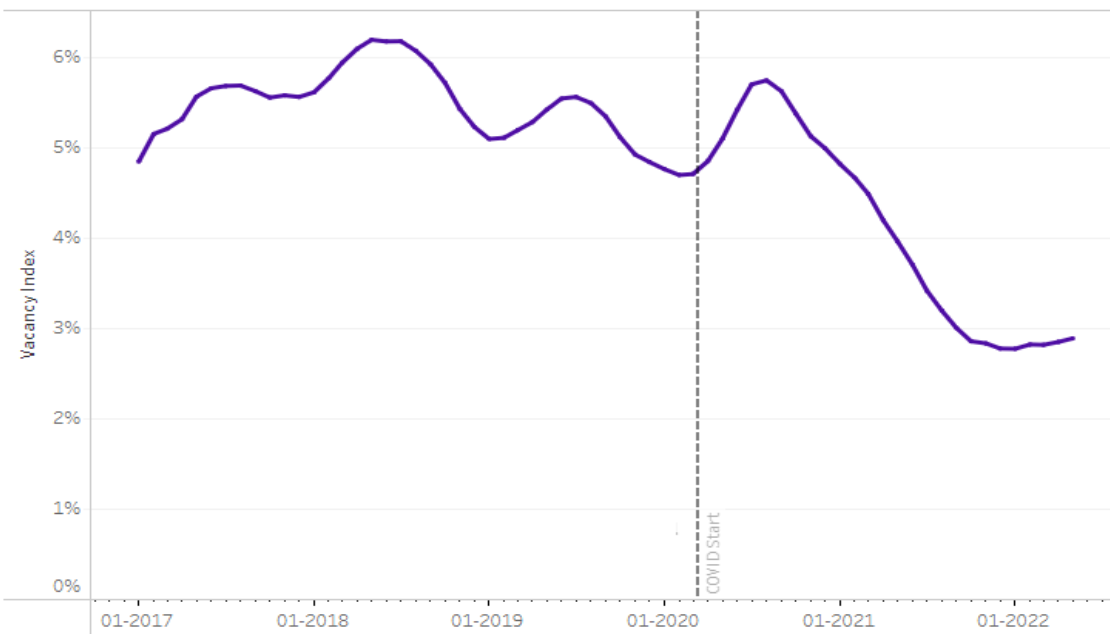
¹¹ National Center for Homeless Education using the U.S. Department of Education's EDFacts Initiative.



Source: Apartment List Rent Estimate Data, September 2022

Rising rents are, in part, the result of decreases in available vacant units. The stock of available rental units has dropped significantly in the New Jersey since early in 2020 to under 3% vacancy in the latest quarter. Limited housing availability has contributed to the increasing rent costs over this same time period.

State Level Vacancy Index: New Jersey



Source: Apartment List Vacancy Estimate Data, September 2022

According to data submitted by school districts to the U.S. Department of Education, in the 2018-2019 school year, an estimated 13,929 public school students in New Jersey experienced homelessness over the course of the year.¹² The vast majority of these students (76%) were doubled-up.¹³ Additionally, the Household Pulse Survey recent data indicated that 5,395,412 individuals were facing eviction or foreclosure in the next two months.

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

The 2022 NJ Counts report identified 1072 homeless victims of domestic violence. Domestic violence or human trafficking survivors often lack easy access to short-term shelter and quick access to medical and mental health and other services.

Those fleeing domestic violence who use intervention services (e.g., counseling, information services, human resources, or employment assistance programs), and other workplace support services have a much better positive outcome, including a more positive outlook, greater drive to achieve their goals, better mental health, stronger workplace performance, and lower rates of absenteeism. All stakeholders consulted indicated a greater need for service funding for those fleeing domestic violence and, importantly, a need for the services to be more easily accessible to those in need. Services that are scattered and require transportation or multiple stops can mean that those services are more difficult or even impossible for those fleeing to use them.

Further, the programs and needs of children experiencing domestic violence have increased with the rising incidents of violence in families making their needs a heightened priority. Children need an environment with programs to address the trauma they have experienced.

With respect to those fleeing sex trafficking, stakeholders reported that these populations tend to be immigrants and are often in need of legal services.

[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 HOME-ARP Notice](#)

Severely cost burdened households are those with housing expenses greater than 50% of their income and earning less than 50% of AMI. In New Jersey, there are 276,175 renter households

¹² National Center for Homeless Education using the U.S. Department of Education's EDFacts Initiative.

¹³ American Community Survey 2019.

earning between 0-50% of AMI that are severely cost burdened or paying more than 50% of their income towards housing expenses.¹⁴

The issues already discussed in the previous sections for those at risk of homelessness, including cost burden, apply equally to those facing housing instability.

Gaps within Current Shelter and Housing Inventory and Service Delivery Systems

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

As described throughout this Plan, the consultation with residents and stakeholders reveals a gap in affordable units due to rising rents and decreasing vacancy. DCA has a pipeline of affordable housing units that will assist in addressing the need for more affordable housing, but service providers indicate that the need surpasses currently planned units. Service providers have seen a significant strain on both temporary and permanent shelter for those who request it daily. As discussed previously, New Jersey's statewide vacancy rate is historically low at less than 3%. As individuals become housing insecure or homeless, it becomes more difficult for them to find housing in a market where prices are increasing, and housing stock is limited.

Further, the lack of affordable units causes a greater demand for rental assistance for those who are housing instable or homeless. The number of households applying for open rental assistance waiting lists continues to grow each year. Additional Tenant Based Rental Assistance vouchers are needed to bridge this gap. Similarly, for those who find themselves homeless, access to temporary shelter is needed to avoid the consequences that often accompany homelessness, including decreased well-being, substance abuse, incarceration, violence, and fatality. Stakeholders report that many people experiencing homelessness are more likely to seek shelter in a non-congregate environment. While additional non-congregate shelter options were added during the pandemic, many of these are temporary and still not enough to address the need.

¹⁴ Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

Additional Characteristics Associated with Instability and Increased Risk of Homelessness

Optional: 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.

DCA does not plan to formally adopt additional definitions of “other populations,” however, a look at additional characteristics that can help clarify the stressors on those facing housing instability in New Jersey is useful. The high-cost burden is a housing characteristic strongly linked with instability and an increased risk of homelessness. In ability to earn a living wage directly affects the cost burden that households face. The federal minimum wage is \$7.25/hour. The current state minimum wage is \$13.00/hour. Massachusetts Institute of Technology, Department of Urban Studies and Planning Living Wage Calculator reported the State of New Jersey living wage for an individual is \$20.57. A single parent with three children would need to earn at least \$70.57 per hour to make a livable wage. Two working parents with three children would need to earn at least \$35.66 each per hour to sustain a livable wage.

Identify Priority Needs for Qualifying Populations

Identify priority needs for qualifying populations.

The following priority needs have been identified for qualifying populations:

- Affordable housing units
- Low barrier entry housing options
- Diversion programs, case management, and housing navigation to prevent homelessness
- Shelter space that can accommodate individuals and families experiencing homelessness in healthy environments
- Supportive housing that provides services for vulnerable populations to prevent housing instability

Determination of Level of Need and Gaps in Shelter and Housing Inventory and Service Delivery Systems

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.

The level of need and gaps in shelter and housing inventory and service delivery was determined through an analysis of data and series of community outreach efforts, including an online survey and stakeholder interviews. The data presented in this Allocation Plan is a compilation of data collected from Census, ACS, CHAS, PIT count, data from organizations on the populations served through their programs, and the current Consolidated Plan. Stakeholders consulted to assess need and gaps included the public, the COC, homeless service providers, veterans' groups, domestic violence agencies, the public housing agency and other public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

HOME-ARP Activities

Method(s) of Selection

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

HOME-ARP is a new one-time funding program authorized by the American Recovery Plan Act of 2021. HOME-ARP program requirements do not mirror the requirements of the HOME Investment Partnership Program (HOME program) and potential applicants should not rely on knowledge of the HOME program when contemplating or applying for HOME-ARP funding. Applicants are advised to review HOME-ARP Notice [CPD 21-10](#) on the HUD Exchange for more information.

DCA proposes to focus its HOME-ARP funding on tenant based rental assistance, development of affordable rental housing, acquisition and development of non-congregate shelter, and non-profit capacity building. DCA will allocate HOME-ARP funds through a competitive, open process via the Department of Community Affairs' System for Administering Grants Electronically (SAGE). The SAGE site (<https://dcasage.intelligrants.com/Portal.asp>) includes detailed information on the program requirements, identifies eligible agencies, and provides contact information. DCA utilizes SAGE to review, approve, and manage grants electronically.

Direct Administration by PJ

Describe whether the PJ will administer eligible activities directly.

DCA will contract with subgrantees for the implementation of activities and monitor all activity delivery.

No Use of Subrecipient Prior to HUD Approval

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.

DCA has not provided funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan and will not allocate funds to a subrecipient nor contractor to administer the entire HOME-ARP grant.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant
Supportive Services	\$0.00	0.00%
Acquisition and Development of Non-Congregate Shelters	\$2,000,000.00	10.26%
Tenant Based Rental Assistance (TBRA)	\$10,000,000.00	51.29%
Development of Affordable Rental Housing	\$3,596,712	18.45%
Non-Profit Operating	\$0.00	0.00%
Non-Profit Capacity Building	\$974,794.50	5.00%
Administration and Planning	\$2,924,383.50	15.00%
Total HOME ARP Allocation	\$19,495,890.00	100.00%

Distribution of HOME-ARP funds In Accordance with Priority Needs

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

DCA proposes to focus its HOME-ARP funding on development of affordable rental housing, tenant based rental assistance, acquisition and development of non-congregate shelter, and non-profit capacity building. This distribution is intended to provide diversified support for the number one priority identified by stakeholders and through the needs assessment - the severe lack of affordable housing options in the State. DCA will provide \$3,596,712 for affordable housing development, however, investing in the development of additional units alone is not enough to address this significant need in a timely manner. The timeline for development can often be years, and units cannot always be placed in areas where they are most needed. To fill the gaps until units come online and in areas where development is not a viable option, DCA will allocate \$10,000,000 in HOME-ARP funds for TBRA, which can be deployed more quickly. Further, temporary shelter for those who find themselves homeless is critical to getting them on a path to secure, permanent housing situations. DCA will provide \$2,000,000 for the development of non-congregate shelter options to provide a landing place where additional assistance can be accessed. Finally, the need for new affordable units is so great that for-profit developers cannot meet the need alone. Therefore, DCA is allocating \$974,794.50 to provide training and education to develop the capacity of non-profit agencies so that they can efficiently and successfully develop affordable housing projects.

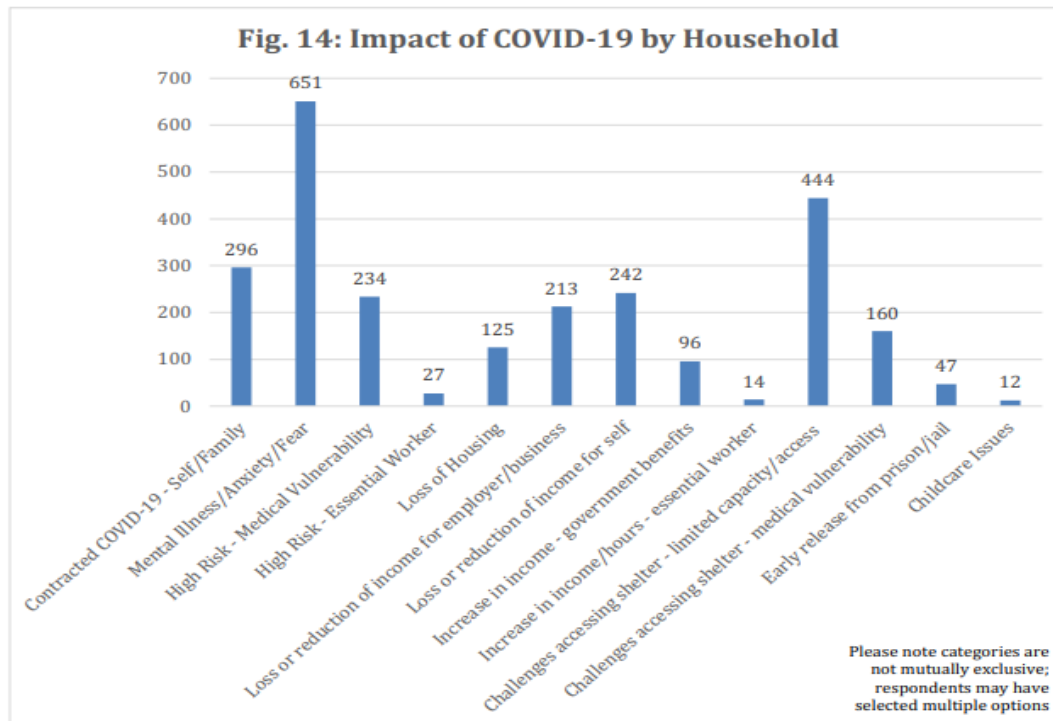
Rationale Funding Based on Characteristic Needs Identified in the Gap Analysis

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.

Stakeholders and the needs assessment overwhelmingly identified more affordable housing units as the most significant gap and need with respect to HOME-ARP eligible uses. Data shows this need has been intensifying over the last few years as cost-burden among renters becomes more severe in a market with continually increasing rent prices and decreasing vacancies. Funding additional units is necessary, but it cannot address the housing affordability crisis alone or in a timely manner. DCA will also fund \$10,000,000 for tenant based rental assistance to create more expeditious pathways to accessing affordable housing and will fund \$2,000,000 for the development of additional non-congregate shelter. Investment in non-congregate shelter will help to stabilize those facing homelessness so that permanent housing is a closer reach and the

consequences of homelessness, including decreased well-being, increased incarceration, violence, and even fatality, may be avoided. Before the pandemic, many shelters operated in a congregate format. The public health emergency of COVID-19 necessitated the transition to non-congregate models, however, many of the current non-congregate options are temporary or not sustainable. Stakeholders have also indicated that those facing homelessness are more likely to seek shelter in a non-congregate environment and so increasing this option will help with longer term housing stability.

Further, stakeholders also described that mental health challenges have intensified universally during the COVID-19 pandemic, and for already vulnerable populations the lack of mental health services can result in behaviors that increase the likelihood of housing instability and homelessness. The NJ Counts 2022 report asked how the pandemic impacted respondent's current living situation (regardless of whether they identified COVID-19 as a direct cause of their current homeless situation). Of the 1,656 households that responded, Mental Illness/Anxiety/Fear was the most common impact identified by 39.3% of COVID-19 impacted households. The second most common response was challenges accessing shelter due to limited capacity/access, which was identified by 26.8% of households identifying a COVID-19 impact. Figure 14 of their report provides a summary of the impact of COVID-19 by Household. This data demonstrates the need for safe and healthy shelter options for those who become homeless.



Source: NJ Counts 2022

HOME-ARP Production Housing Goals

Estimated Number of Affordable Rental Housing Units for Qualifying Populations

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

To address the most urgent need for more affordable housing units, DCA has allocated \$3,596,712 in HOME-ARP funding for the development and creation of affordable housing. DCA estimates it can subsidize the development of 15 affordable units with this allocation. In addition, \$974,794.50 has been allocated for nonprofit capacity building to increase nonprofit developer's skills and capacity to develop housing units for low- and moderate-income households.

Further, based on rental assistance averages, it is estimated that at least 400 households will receive two years of assistance with DCA's \$10,000,000 allocation for TBRA.

Rental Housing Production Goals and Correspondence with Need

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.

As noted above, at least 415 households will access housing opportunities. In particular, at least 15 units of new rental affordable housing will be constructed with \$3,596,712 in HOME ARP funds. Additionally, \$10,000,000 will be allocated to tenant-based rental assistance to provide up to 2 years of assistance to at least 400 households to address the increasing rent costs and provide more immediate pathways to securing permanent housing. Further, those who are experiencing homelessness need a safe place to land while waiting to secure more permanent assistance. Therefore, it is also a gap and priority to ensure additional safe shelter is created. The funds for non-congregate shelter will assist with that goal.

Preferences

Identification of Preference

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.

DCA has not adopted any preferences among the qualified populations in soliciting proposals for development of affordable units and non-congregate shelter and administration of TBRA. For any selected housing project, DCA will ensure that the tenant selection policy complies with the Fair Housing Act.

Using Preference to Address Unmet Need

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 were identified.

Referral Methods

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

Not applicable. DCA does not intend to use a coordinated entry process.

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.

Not applicable. No limitations are being implemented.

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\(b\)](#).

Not applicable to chosen HOME-ARP activities.

APPENDIX A – SUMMARY OF SURVEY RESULTS

State of New Jersey 2022 Annual Action Plan and HOME-ARP Community Needs Survey

144

Responses

28:23

Average time to complete

Active

Status

1. What City do you live in?

144

Responses

Latest Responses

*"Camden"**"Bridgeton "**"Camden"*

8 respondents (6%) answered **Township** for this question.

Lower Township Cape May Courthouse
 Newark NJ Haddon Township West Orange
 NJ City
 Washington nj Lumberton **Township** cape Twp
 Jersey
 Burlington Township Paterson Nj court house
 Ocean Township Hopewell Township Gallo

2. What County do you live in?

144
Responses

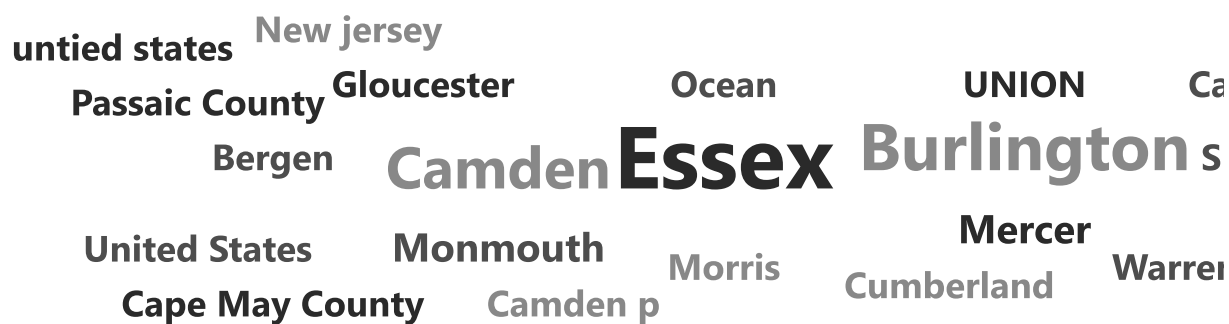
Latest Responses

"County"

"Cumberland "

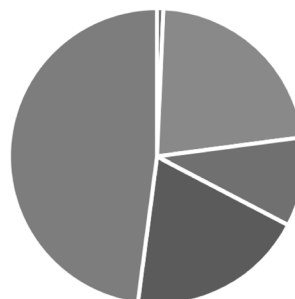
"Camden"

17 respondents (**12%**) answered **Essex** for this question.



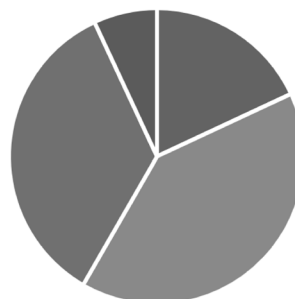
3. How long have you lived in your City?

- | | |
|---|----|
| I am not a State of New Jersey resident | 1 |
| 5 years or less | 32 |
| 6 to 10 | 14 |
| 11 to 20 | 28 |
| More than 21 | 69 |



4. How many people are in your household, including yourself?

- | | |
|-----------|----|
| 1 | 26 |
| 2 | 58 |
| 3 - 5 | 50 |
| 6 or more | 10 |



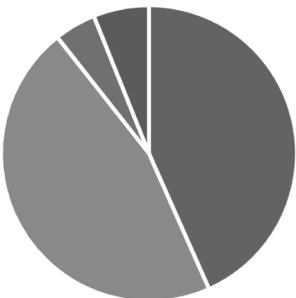
5. Do you have a home internet connection?

● Yes	133
● No	11



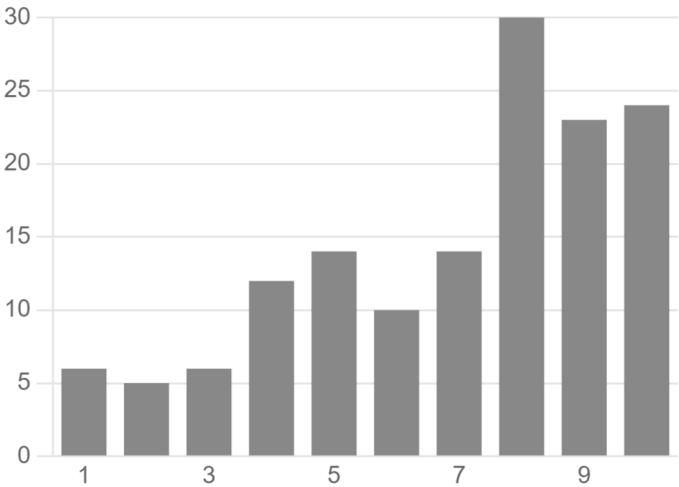
6. Where do you or your family access the internet? If you choose "other," please tell us where in the space provided.

● Computer	114
● Cell Phone	121
● Library	12
● Other	16



7. In general, how would you rate the housing, safety, and environment of the area in which you live or spend most of your time?

6.92
Average Rating



8. Why did you rate the area in which you live or spend most of your time that way?

144

Responses

Latest Responses

"I believe there should be stricter regulations for property owne..."

"Crime rate is moderate "

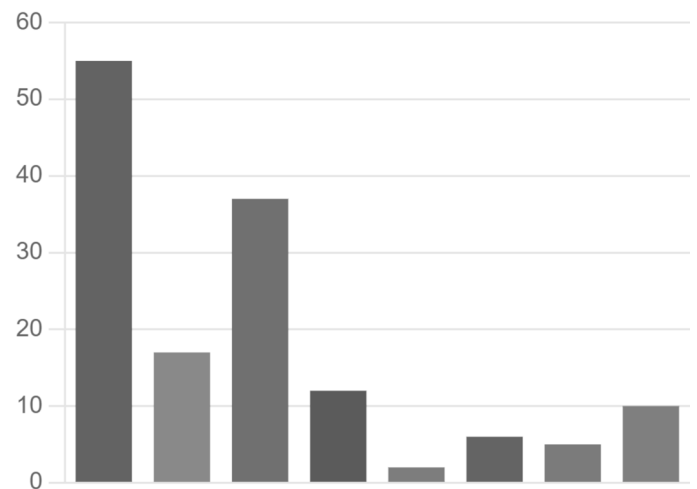
"Some abandoned homes, vacant lots with trash, trash on stree..."

36 respondents (25%) answered **safe** for this question.



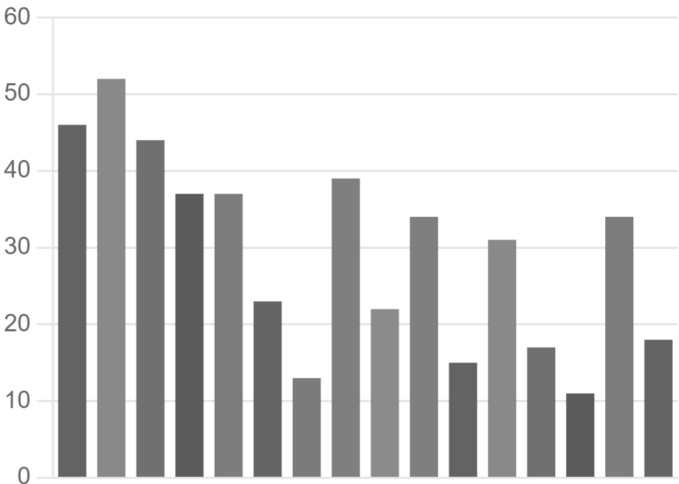
9. Do you rent or own the place where you live? Which best describes your living situation?

Own with mortgage	55
Own, no mortgage	17
Rent from a private landlord wit...	37
Rent from a private landlord wit...	12
Rent in a public housing complex	2
Rent an income-qualified housi...	6
Live with others	5
Live in a shelter or homeless	10



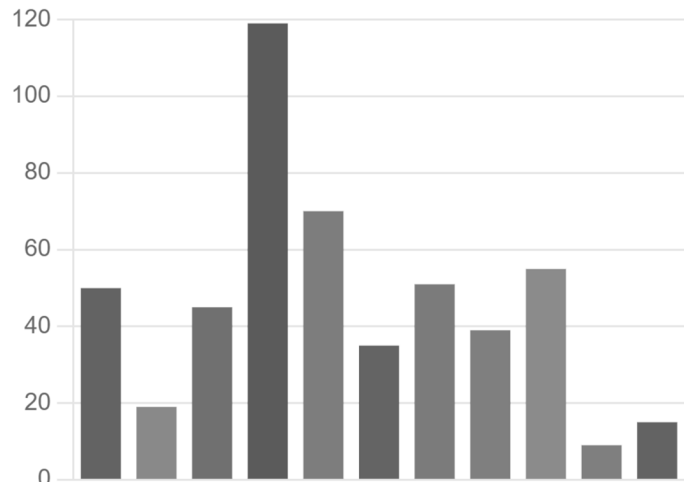
10. Have you experienced any of the following in the past 2 years? (Select all that apply.)

- Difficulty paying rent and/or mo... 46
- Difficulty paying utility bills 52
- Dissatisfaction with local service... 44
- Plumbing, electric, appliances, o... 37
- Inability to make needed repairs... 37
- Unwillingness of landlord to ma... 23
- Overcrowding (too many peopl... 13
- Crime in your neighborhood 39
- Abandoned buildings in your ne... 22
- Houses in poor condition in you... 34
- Vandalism 15
- Homelessness 31
- Application for housing being d... 17
- Application for mortgage loan b... 11
- None of the above 34
- Other 18



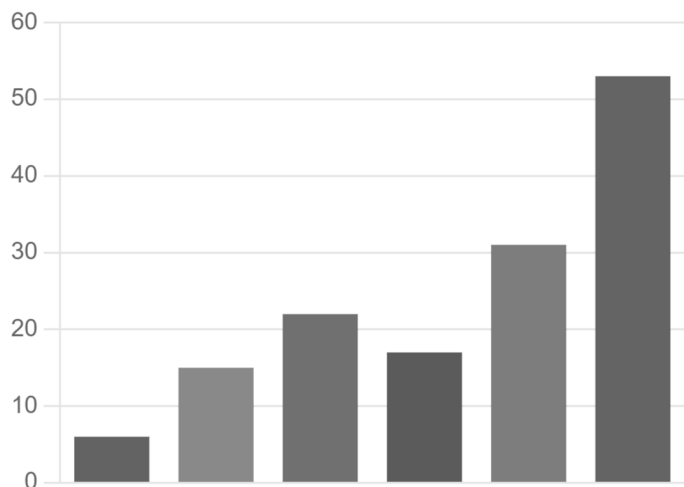
11. What are the barriers to finding good housing in your city that you have experienced or observed?

● Accessibility for people with dis...	50
● Housing restricted based on age	19
● Condition of housing units	45
● Cost of housing	119
● Affordable housing options avai...	70
● Distance to employment, shopp...	35
● Lack of diversity of housing opti...	51
● Transportation or access to publ...	39
● Cost of utilities	55
● None of the above	9
● Other	15

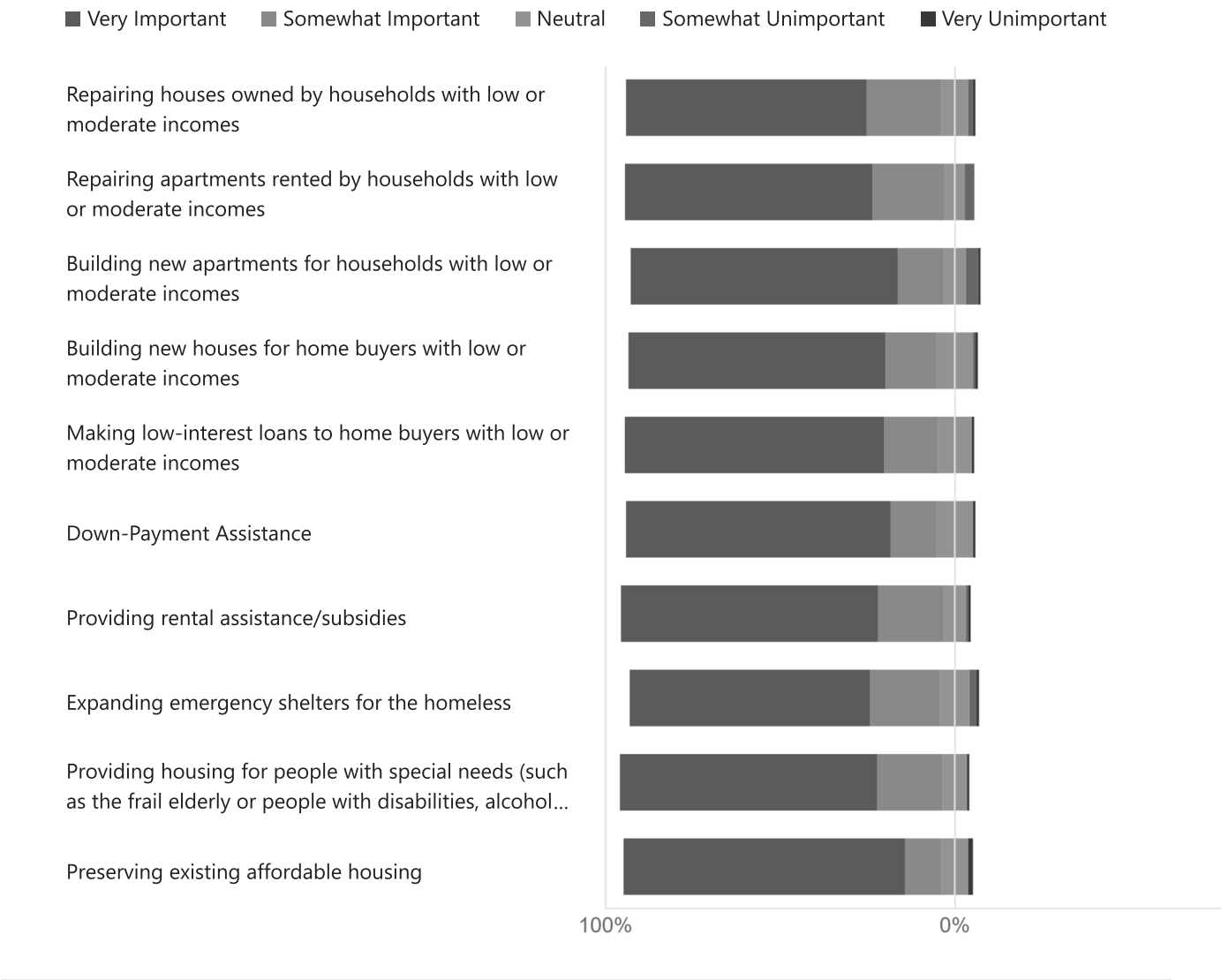


12. About how much of your total household income is spent on housing (includes mortgage, rent, insurance, and utilities)?

● Less than 10%	6
● 10% to 19%	15
● 20% to 24%	22
● 25% to 29%	17
● 30% to 49%	31
● 50% or more	53

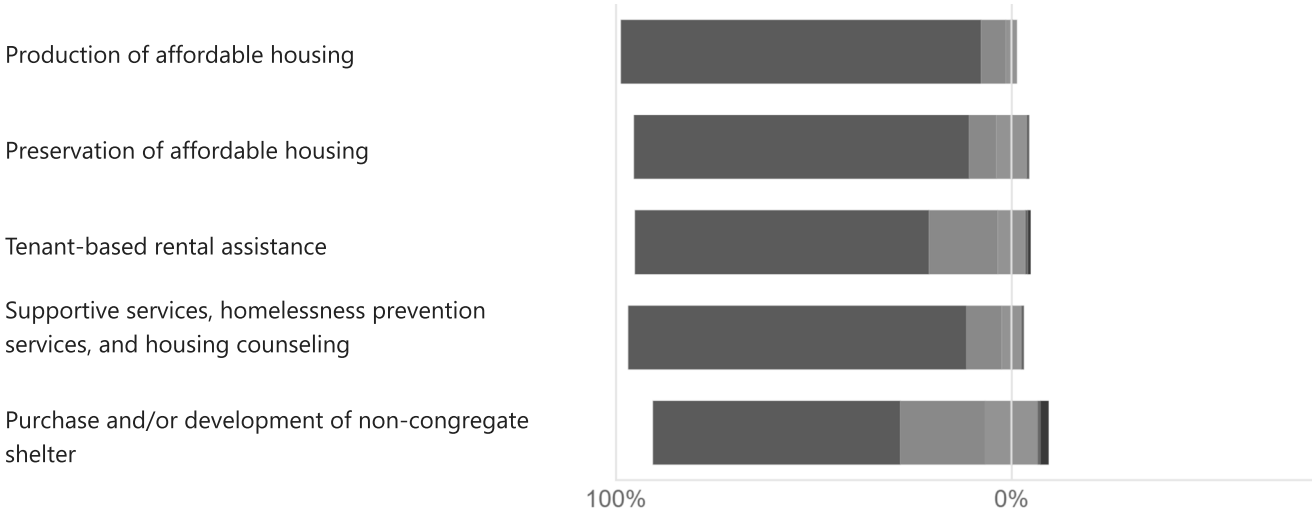


13. Please identify your priorities related to decent, safe, and affordable housing in your community generally.

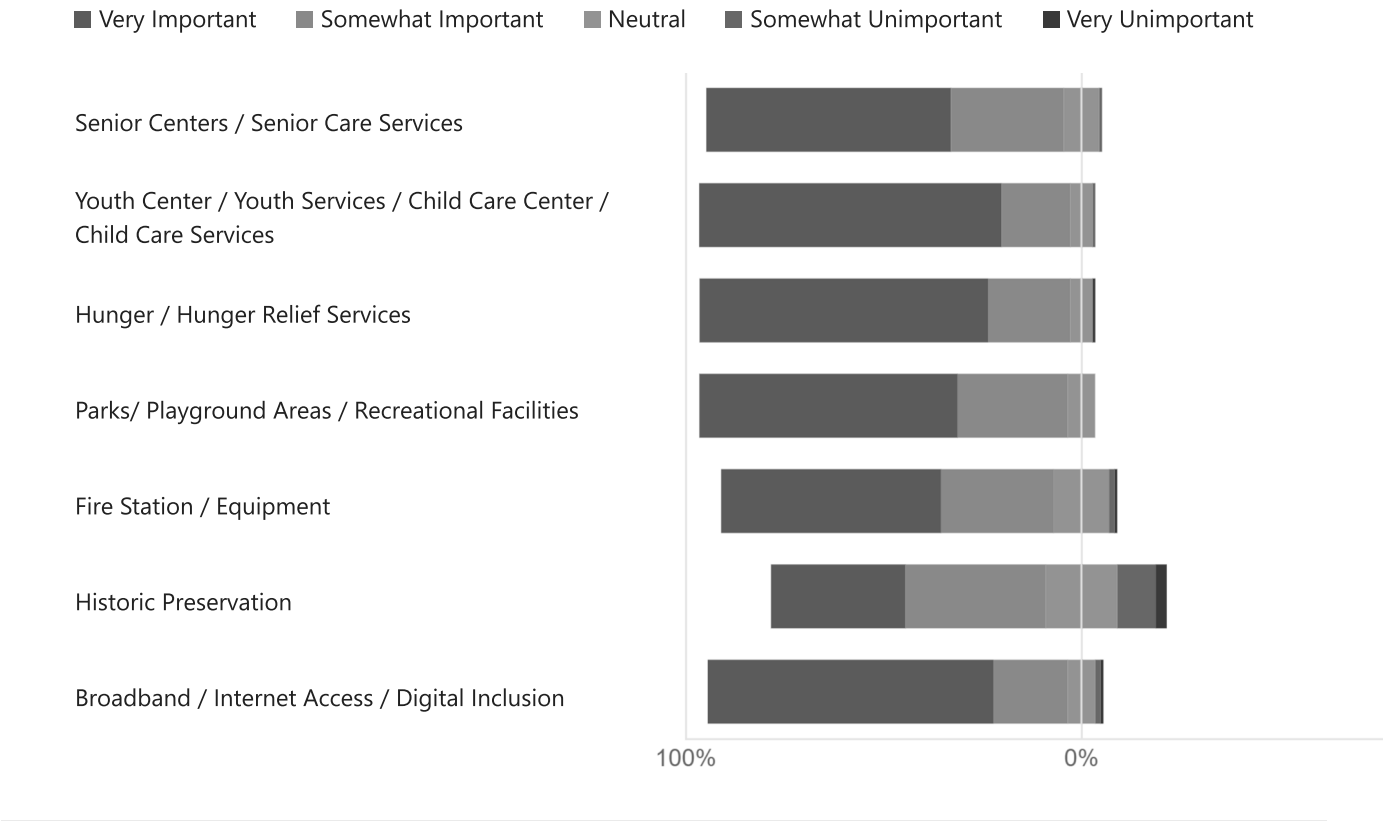


14. HOME-ARP funds can be used for the specific housing needs listed below. Please rank the following HOME-ARP categories based on the needs of people experiencing homelessness, those at risk of homelessness, and other vulnerable populations in your community.

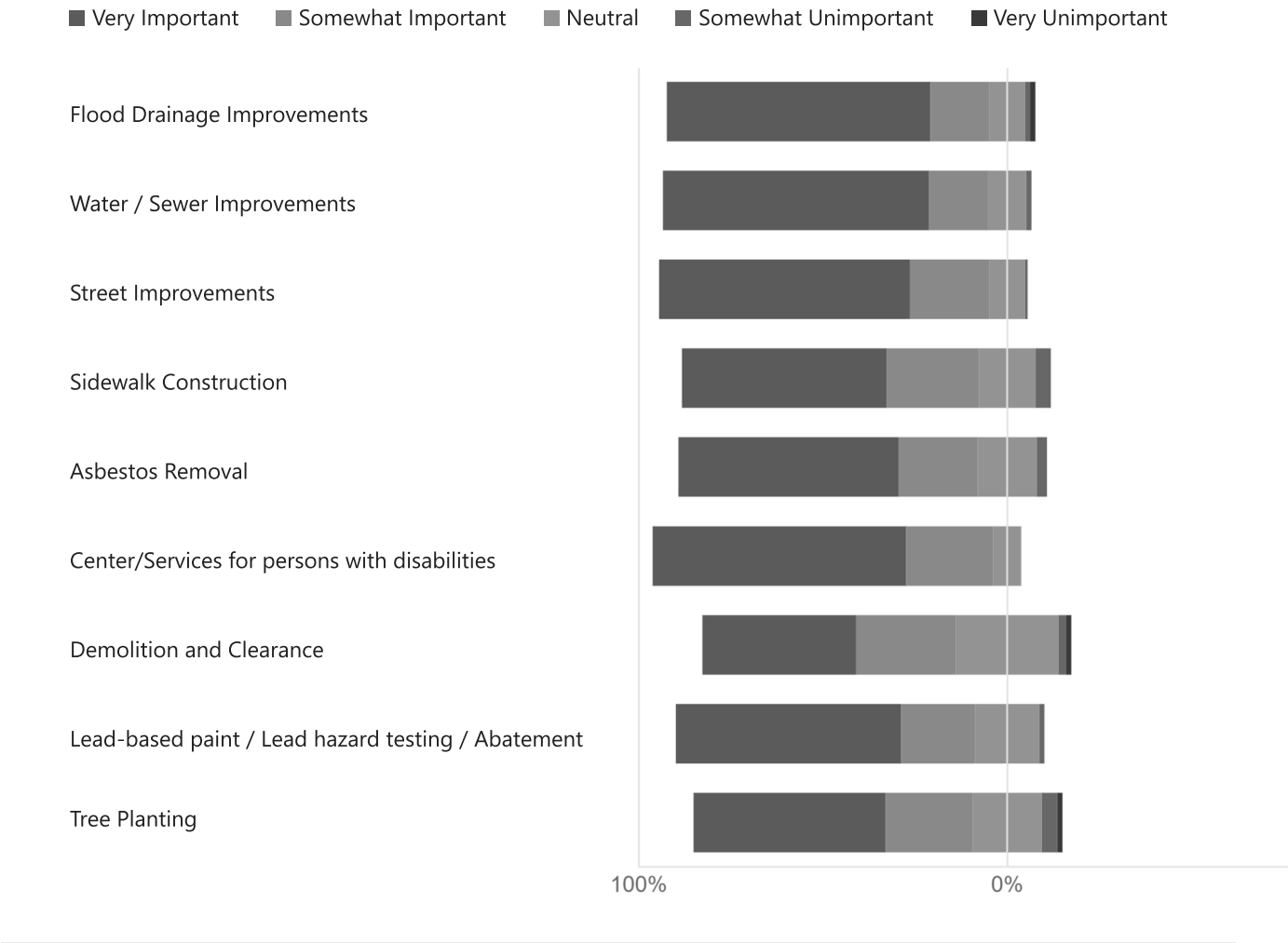
Very Important Somewhat Important Neutral Somewhat Unimportant Very Unimportant



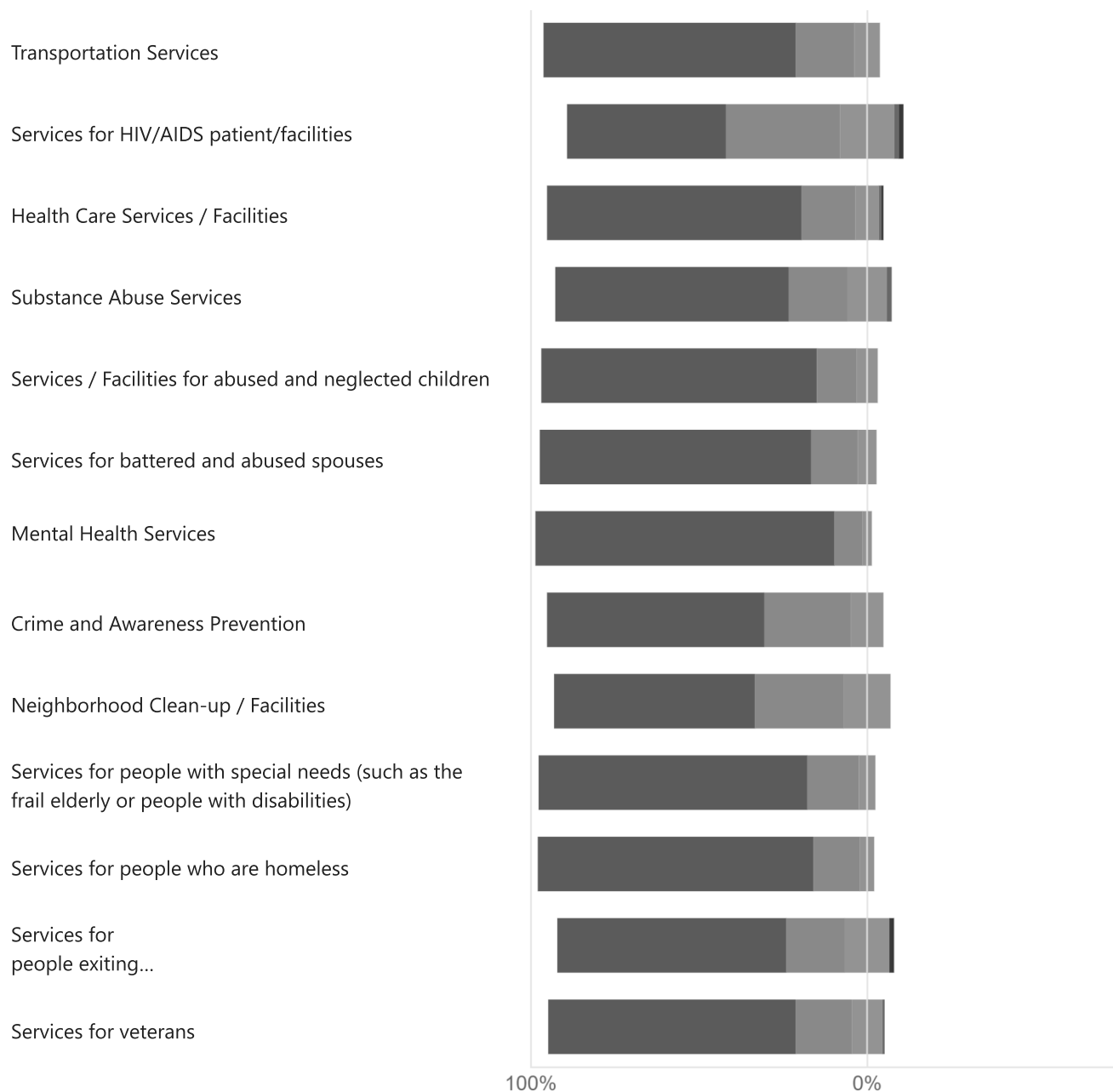
15. Please identify your priorities related to quality of life.



16. Please identify your priorities related to infrastructure and public facilities.

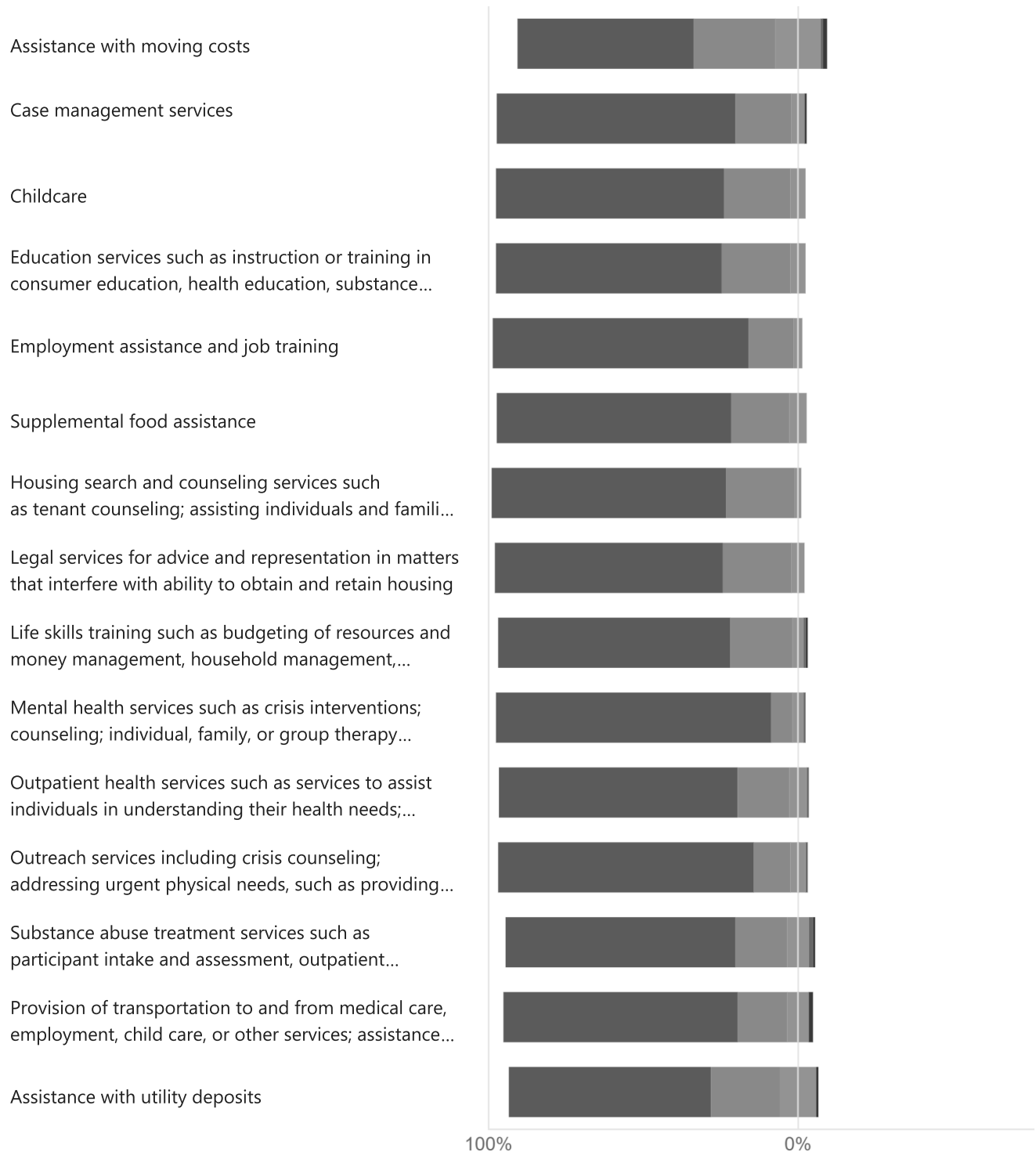


17. Please identify your priorities related to social and public services.



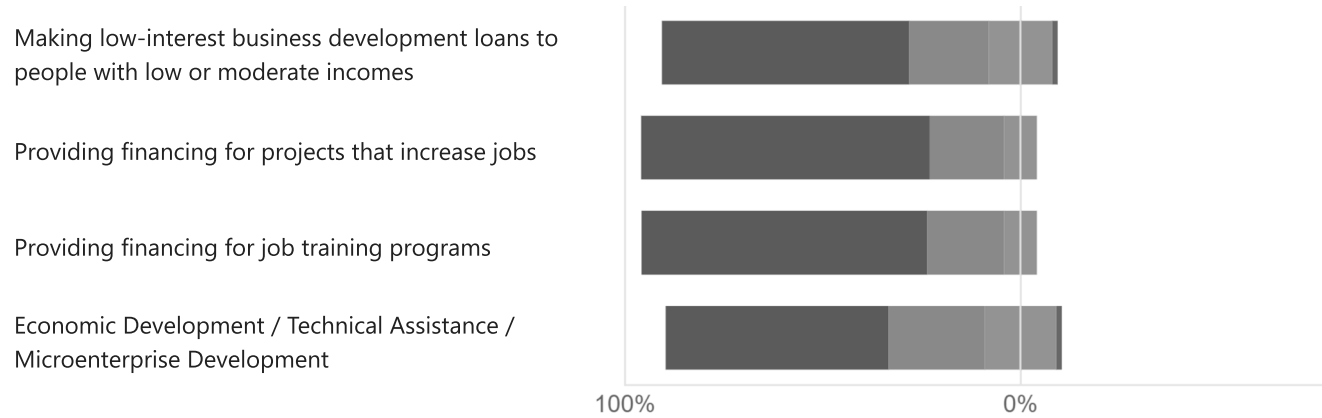
18. Please identify your priorities related to services for those experiencing homelessness, those at risk of homelessness, and other vulnerable populations at risk of housing instability.

■ Very Important ■ Somewhat Important ■ Neutral ■ Somewhat Unimportant ■ Very Unimportant



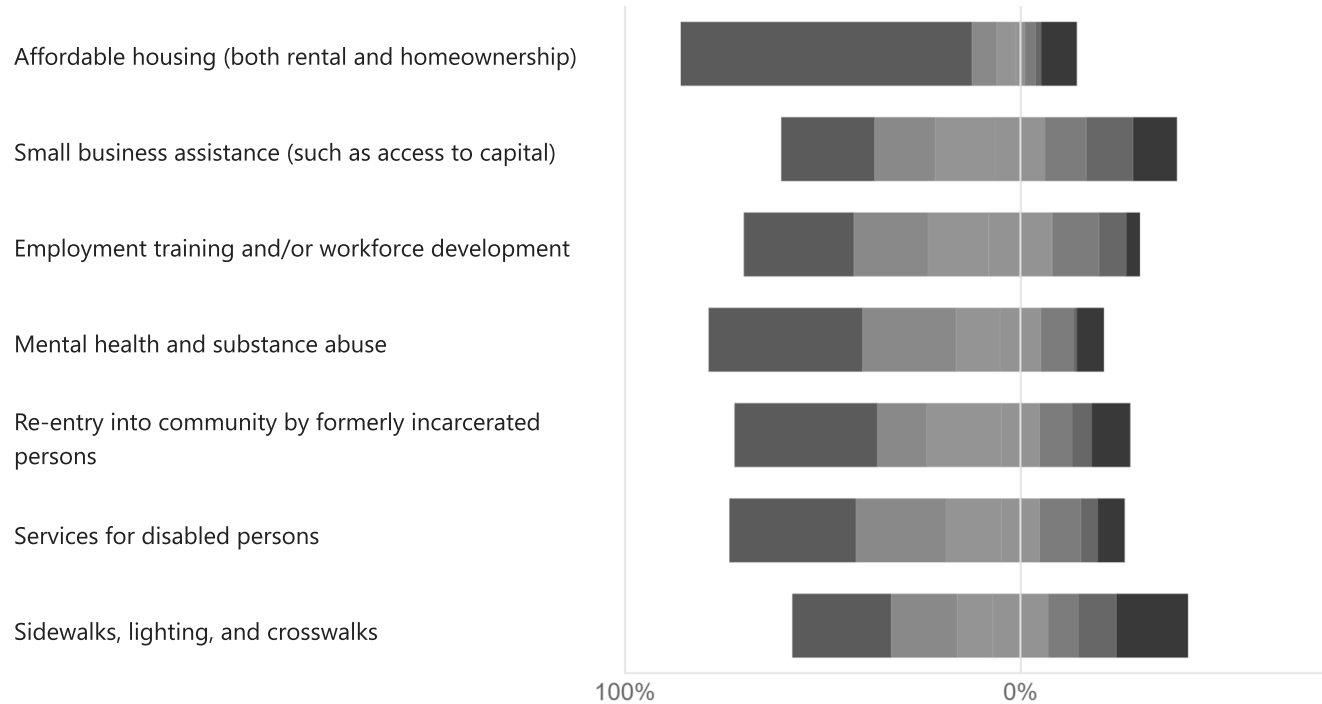
19. Please identify your priorities related to economic development.

■ Very Important ■ Somewhat Important ■ Neutral ■ Somewhat Unimportant ■ Very Unimportant



20. Rank the following categories starting with 1 being most underfunded and with the greatest need, and 7 being the least underfunded with the least need.

■ 1 ■ 2 ■ 3 ■ 4 ■ 5 ■ 6 ■ 7



21. Are there other categories you feel are very underfunded and with a great need?

71

Responses

Latest Responses

"Na"

↻ Update

11 respondents (15%) answered **people** for this question.



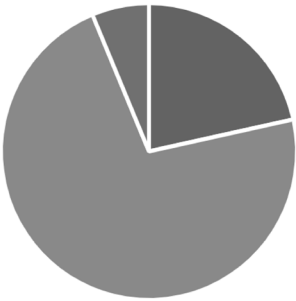
22. What is the primary language you speak?

English	141
Spanish	3
Other	0



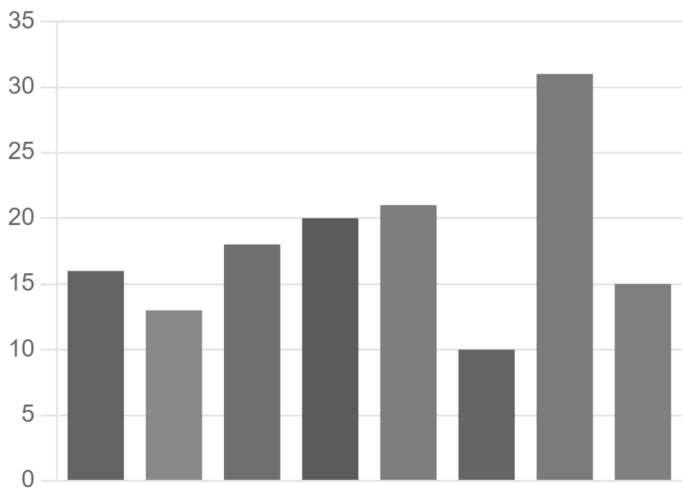
23. Do you have a disability or disabling condition?

Yes	31
No	104
Prefer not to answer	9



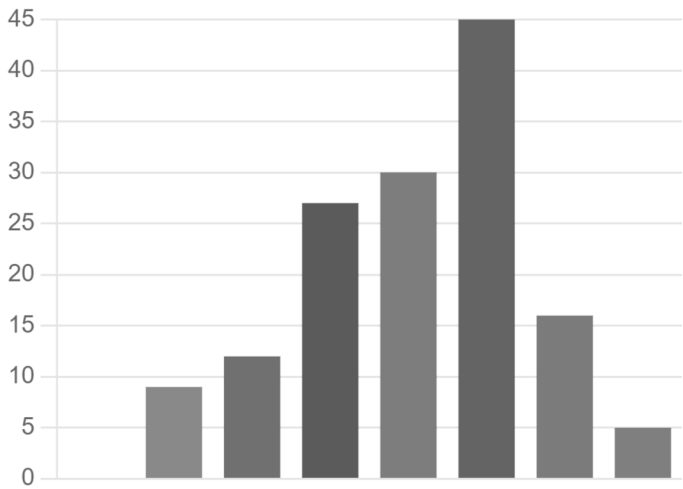
24. What is the total annual income of your household (before taxes)?

● \$0 - \$14,999	16
● \$15,000 to \$24,999	13
● \$25,000 to \$44,999	18
● \$45,000 to \$59,999	20
● \$60,000 to \$79,999	21
● \$80,000 to \$99,999	10
● \$100,000 to \$199,999	31
● \$200,000 - more	15



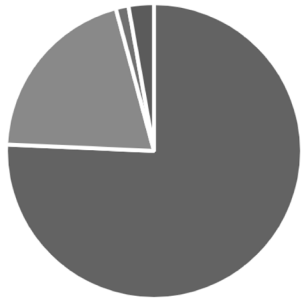
25. What is your age?

● Less than 18	0
● 18 to 24	9
● 25 to 34	12
● 35 to 44	27
● 45 to 54	30
● 55 to 64	45
● 65 to 74	16
● 75 or older	5



26. What is your gender

● Woman	109
● Man	29
● Non-binary	2
● Prefer not to say	4



27. Please share any additional comments regarding housing and community development.

56

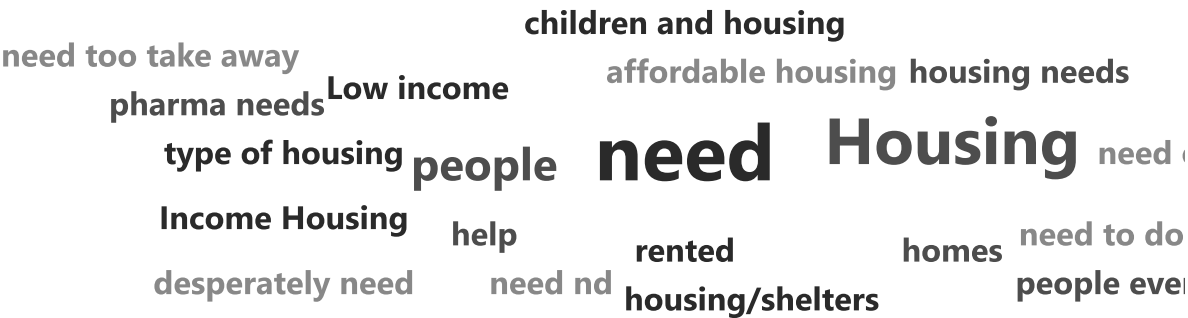
Latest Responses

"I believe we need access to less conventional financing to purc...

Responses

Update

25 respondents (45%) answered **need** for this question.



APPENDIX B – PUBLIC NOTICES

Home

[Home](#) > [Divisions & Offices](#) > [Housing & Community Resources](#) > [Announcements](#) > November 29, 2022 - NJ Home ARP Allocation Plan Draft

November 29, 2022 - NJ Home ARP Allocation Plan Draft

Divisions & Offices

Codes & Standards

Fire Safety

Housing & Community Resources

Offices & Programs

Office of Recreation

Forms & Applications

Rules

Publications

Newsroom

Announcements

Events

Q&A

Useful Links

Grant Opportunities

Contact Us

Local Government Services

Disaster Recovery and Mitigation

Office of Local Planning Services

Office of Legislative Affairs

Office of Communications

Affiliates

News Room

Announcements

Contact Us

Grants and Resources

Law, Rules & Decisions

Services

[NJ Home ARP Allocation Plan Draft \(PDF\)](#)

Please register to attend the 2022 HOME-ARP Allocation Plan public hearing on December 7, 2022 at 12 PM via Zoom.

The public hearing will include a presentation of the Draft HOME-ARP Allocation Plan and will include an opportunity for public comment.

Information to join the Zoom meeting will be forwarded to you after your registration is received.

<https://forms.office.com/r/dsJ0anNzeJ>

Comments can also be emailed to Sheri Malnak at sheri.malnak@dca.nj.gov until 5 PM on December 15, 2022.

Follow Us:



[Contact Us](#) | [Privacy Notice](#) | [Legal Statement & Disclaimers](#) | [Accessibility Statement](#) 



Statewide: [NJ Home](#) | [Services A to Z](#) | [Departments/Agencies](#) | [FAQs](#)
DCA: [Home](#) | [About DCA](#) | [Divisions](#) | [Affiliates](#) | [News Room](#) | [Announcements](#) | [Contact Us](#) | [Grants and Resources](#) | [Publications](#) | [Services](#) | [DCA Employees](#)
Copyright © State of New Jersey, 2023
Department of Community Affairs
PO Box 800
Trenton, NJ 08625-0800

- Home
- About DCA
- Divisions & Offices
- Codes & Standards
- Fire Safety
- Housing & Community Resources
- Offices & Programs
- Office of Recreation
- Forms & Applications
- Rules
- Publications
- Newsroom
- Announcements
- Events
- Q&A
- Useful Links
- Grant Opportunities
- Contact Us
- Local Government Services
- Disaster Recovery and Mitigation
- Office of Local Planning Services
- Office of Legislative Affairs
- Office of Communications
- Affiliates
- News Room
- Announcements
- Contact Us
- Grants and Resources
- Law, Rules & Decisions
- Services

[Home](#) > [Divisions & Offices](#) > [Housing & Community Resources](#) > [Announcements](#) > May 4, 2022- Public Meetings for the FY 2022 Action Plan and HOME ARP Funds

May 4, 2022- Public Meetings for the FY 2022 Action Plan and HOME ARP Funds

Public Meetings for the FY 2022 Action Plan and HOME ARP Funds

The State of New Jersey is in the process of drafting its FY 2022 Annual Action Plan for HOME, CDBG, ESG, HOPWA, and HTF funds as well as the allocation plan for HOME-ARP funds from the U.S. Department of Housing and Urban Development (HUD). The State is looking for your feedback on community needs to complete these plans. As a valued stakeholder, your feedback will provide us with perspectives on community needs across state. This feedback, along with collected data, will assist the State in making choices about how HUD funds will be used.

The State has scheduled four community meetings that are open to the public. The meetings will be facilitated discussions around community needs, existing resources, and ways we can address gaps for our most vulnerable residents. Seats are limited and registration is necessary. All meetings are virtual, and Zoom information will be forwarded after registration. To register for a session, please use this [link](#). We'd also appreciate your sharing the word about these meetings and encouraging others who may have valuable input to attend.

May 17 – 1 – 2 pm

May 17 – 3 – 4 pm

May 18 – 6 – 7 pm

May 26 – 2 – 3 pm

Follow Us:     

[Contact Us](#) | [Privacy Notice](#) | [Legal Statement & Disclaimers](#) | [Accessibility Statement](#) 



Statewide: [NJ Home](#) | [Services A to Z](#) | [Departments/Agencies](#) | [FAQs](#)
DCA: [Home](#) | [About DCA](#) | [Divisions](#) | [Affiliates](#) | [News Room](#) | [Announcements](#) | [Contact Us](#) | [Grants and Resources](#) | [Publications](#) | [Services](#) | [DCA Employees](#)
Copyright © State of New Jersey, 2023
Department of Community Affairs
PO Box 800
Trenton, NJ 08625-0800

APPENIDX C – Certifications and SF-424s

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:

HOME-ARP Program

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: NJ Department of Community Affairs

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

216-000-928

* c. UEI:

NFGKVV89Q55

d. Address:

* Street1:

101 S. Broad St.

Street2:

* City:

Trenton

County/Parish:

* State:

NJ: New Jersey

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code: 08608-2401

e. Organizational Unit:

Department Name:

Community Affairs

Division Name:

Housing and Community Resource

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

Prefix:

* First Name:

Sheri

Middle Name:

* Last Name:

Malnak

Suffix:

Title: Assistant Director

Organizational Affiliation:

* Telephone Number: 609-913-4466

Fax Number:

* Email: sheila.oliver@dca.nj.gov

Application for Federal Assistance SF-424

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

A: State Government



Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program: HOME-ARP

*** 12. Funding Opportunity Number:**

14.239

* Title:

FFY 2021 HOME-ARP Funds

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:**

FFY 2021 HOME-ARP Funds

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

4

* b. Program/Project

1-12

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

3/1/23

* b. End Date:

8/31/30

18. Estimated Funding (\$):

* a. Federal

19,495,890.00

* b. Applicant

0.00

* c. State

0.00

* d. Local

0.00

* e. Other

0.00

* f. Program Income

0.00

* g. TOTAL

19,495,890.00

*** 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 218, 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:

Sheila

Middle Name:

* Last Name:

Oliver

Suffix:

* Title:

Lt. Governor

* Telephone Number:

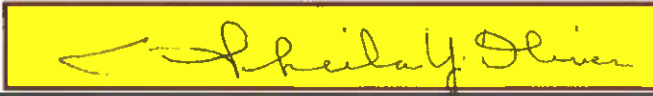
609-376-0802

Fax Number:

* Email:

sheila.oliver@dca.nj.gov

* Signature of Authorized Representative:



* Date Signed:

11/6/23

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

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

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. 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.
10. Will comply with all Federal statutes relating to non-discrimination. 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.

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.

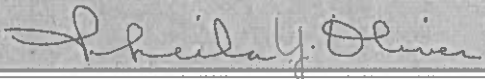
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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 Lt. Governor
APPLICANT ORGANIZATION NJ Department of Community Affairs	DATE SUBMITTED 02/21/2023

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the 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.
13. 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.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. 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.
17. 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).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Lt. Governor
APPLICANT ORGANIZATION State of New Jersey	DATE SUBMITTED 1/6/23

HOME-ARP CERTIFICATIONS

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

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

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

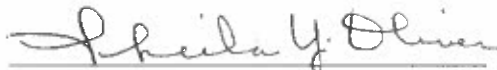
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

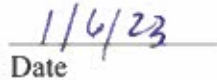
Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

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


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



Signature of Authorized Official



Date



Title