

City of Niagara Falls HOME-ARP Allocation Plan

Background

The American Rescue Plan Act of 2021 appropriated \$5 billion to provide housing, services, and shelter to individuals experiencing homelessness and other vulnerable populations. These funds were allocated by formula to jurisdictions that qualified for funding through the HOME Investment Partnership Program (HOME Program) from the U.S. Department of Housing and Urban Development (HUD). This special round of funding is called the "HOME-ARP" program. In September, 2021, HUD awarded the City of Niagara Falls \$1,624,703 in HOME-ARP funds.

Eligible activities that may be funded with HOME-ARP include: (1) development and support of affordable housing; (2) tenant-based rental assistance; (3) provision of supportive services (such as housing counseling, homelessness prevention, child care, job training, legal services, case management, moving costs, rental applications, and rent assistance; and (4) acquisition and development of non-congregate shelter units.

Funds must primarily benefit individuals and households in the following qualifying populations:

- Experiencing homelessness (as defined in 24 CFR 91.5 "Homeless" (1), (2), or (3))
- At risk of homelessness (as defined in 24 CFR 91.5 "At risk of homelessness")
- Fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking, (as defined in 24 CFR 5.2003)
- Other populations with high risk of housing instability (including highly cost-burdened low-income households, households who have moved two or more times in the last 60 days, and households living in a hotel/motel)

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

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

Consultation

Before developing its HOME-ARP allocation plan, the City of Niagara Falls was required to consult with the local Continuum of Care (CoC), homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the

needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

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

The City of Niagara Falls has prepared our HOME-ARP Allocation Plan to strategically implement the federal program that provides funding for housing activities that will benefit those individuals and families experiencing homelessness, at risk of homelessness, Domestic Violence, Stalking, Human Trafficking, or those with the greatest risk of housing instability within the City of Niagara Falls.

The consultation process entailed one (1) public meeting, as well as discussions with local service providers, the Niagara Falls Housing Authority (NFHA), and the Niagara County Continuum of Care (CoC). The City developed this HOME-ARP Allocation Plan and application document for the use of obtaining Federal Entitlement funding being made available through the HOME-ARP Allocation.

The City of Niagara Falls identified and consulted with all appropriate social service agencies that provide services directly to the identified Qualified Populations, requesting recommendations/feedback for proposed projects as related to the amendment of the 2021 Annual Action Plan to include the HOME-ARP allocation.

The agencies that the City of Niagara Falls requested input from and participated in the consultation process for the HOME-ARP allocation were:

- the Homeless Alliance of Western New York - HAWNY
- the Niagara Falls Housing Authority
- the Young Woman's Christian Association of the Niagara Frontier - YWCA
- Pinnacle Community Services
- Community Missions of Niagara Frontier
- Niagara County Continuum of Care
- Heart, Love & Soul
- Niagara County Department of Social Services
- Western New York Independent Living, Inc.
- Housing Opportunities Made Equal, Inc. (HOME)
- Belmont Housing Resources for WNY
- Veterans One Stop Center of WNY

The City of Niagara Falls Office of Community Development staff also spoke at the January 9, 2023 and March 13, 2023, Niagara County Coalition for Homeless Services virtual board meeting regarding the requirements for the HOME-ARP allocation and any proposed activities.

The City of Niagara Falls will submit to the U.S. Department of Housing & Urban Development (HUD) a HOME-ARP Allocation Plan through an amendment to the 2021 Annual Action Plan.

The City consistently confers with the Niagara County CoC to address the needs of persons living with disabilities through participation in monthly CoC meetings.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Homeless Alliance of Western New York	Continuum of Care	Public Hearing and Virtual meetings	Need more supportive services and develop of affordable housing to target the chronically homeless
Community Missions of Niagara Frontier	Homeless Services	Public Hearing and Virtual meetings	Need more supportive services and need more tenant Based services (TBRA).
YWCA	Domestic Violence and Child Care Services	Public Hearing and Virtual meetings	Need more housing, child care, and transportation
Pinnacle Community Services	Homeless Services	Public Hearing and Virtual meetings	Need more permanent supportive housing. Need for more rental supportive services.
Heart, Love & Soul	Homeless Services	Public Hearing and Virtual meetings	Need more rental assistance. Use funding to create a “community services navigator”. Put the majority to create more affordable housing through permanent supportive or transitional housing.
Niagara County Coalition for Homeless Services	Homeless Services	Public Hearing and Virtual Meeting	The group as a whole supports the Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing including permanent supportive housing for qualifying populations and a broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare and educational services.
Niagara Falls Housing Authority	Public Housing	Public Hearing and Virtual meetings	Believes using HOME ARP to increase capacity for non profit organizations. We believe creating social and economic self

			sufficiency initiatives will greatly benefit the City of Niagara Falls and the NFHA's residents
Department of Social Services	Public Agency	Email Response	We continue to see the need for more shelter space as Community Missions is frequently at capacity. The lack of affordable housing in the City is a barrier for those who are ready to move out of shelter.
Western New York Independent Living, Inc.	Disability Service Provider	Virtual Meeting	Need more Affordable housing and need more tenant Based services (TBRA).
Veterans One Stop Center of WNY	Veterans Service Provider	Email Response	As to needs of the community: more affordable housing please. Also, access to support and services are often hindered by the inability to connect to agencies. Often problems with phone access and transportation are the reason why clients are not engaged. The inability to connect thru a phone call or walk-in for services would mean another day with no services.
Belmont Housing Resources of WNY	Public Housing Agency	Email Response	Need more affordable housing and more funding for supportive services and non profit staff capacity.
Housing Opportunities Made Equal, Inc. (HOME)	Civil Rights/Fair Housing	Email Response	We support the City of Niagara Falls' proposal to create more affordable housing opportunities, especially for large families with very low incomes and persons with disabilities. We support tenant based rental assistance and other means of fostering housing stability; and we advocate for fair housing education and outreach so housing providers and home seekers will know their rights and responsibilities and act accordingly.

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

The comments received ahead of time and during the public information meeting were generally supportive of the information included within the plan, but most recommendations requested that the City try to address as many needs as possible with the funding and try to spread across as many of the eligible populations including the most chronically homeless. Recommendations included; remodeling vacant city owned structures to house those facing chronic homelessness. Several comments encouraged the City to use the funds to build supportive housing for extremely/very low income households, and to partner with non-profits to both develop the housing and provide services to the eventual tenants.

Public Participation

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

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

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

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

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

- ***Date(s) of public notice: 1/6/2023***
- ***Public comment period: start date – 1/6/2023 end date - 2/6/2023***
- ***Date(s) of public hearing: 2/16/2023***

Describe the public participation process:

The public had an opportunity to attend either in person or by teleconference to discuss the HOME-ARP requirements and comment accordingly, including a thirty (30) day comment period.

Describe efforts to broaden public participation:

During the consultation session, participants were asked to describe what people experiencing or at greatest risk of homelessness say they need, in addition to what professionals understand to be the primary needs and opportunities in the City of Niagara Falls. Participants were encouraged to provide follow-up information or ideas as they arise and to identify any additional stakeholders that would help enhance the process. Additionally, the City of Niagara Falls utilizes its website to inform residents of current news, public meetings as well as all current & new programming.

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

- Robyn Krueger - Community Missions (General Homeless) - More funding for Supportive Services, More Tenant Based Services (TBRA), In favor of renovation over new construction projects
- Kathy Granchelli - YWCA - Carolyn's House (DV, sexual assault victims, child care) - Affordable Housing, Child Care, Transportation, NF is a "Child Care Desert", Non-Housing - Sexual Assault counselor (Partner with NF Memorial)
- Ryan Trubits HAWNY - CoC - Strongly supports permanent supportive housing, Target most "chronically homeless" population, In favor of renovation over new construction projects
- Laura Pennington - Pinnacle (General Homeless, DV, abused youth) - More Affordable Housing, Permanent Supportive Housing, Use funding to leverage more funding (gap financing for a larger project), Rental supportive services
- Mark Baetzhold - Heart, Love & Soul - Via Email - Suggest at least 10% goes to Rental assistance. 10% goes toward a case manager or community services navigator. 80% goes to creating more affordable housing like permanent supportive or transitional housing.
- Kexin Ma - HAWNY - would like to see a smaller portion of HOME-ARP used towards Supportive Services and a larger portion of it used towards developing affordable housing.
- Niagara County Coalition for Homeless Services - The group as a whole supports the Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing including permanent supportive housing for qualifying populations and a broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare and educational services.
- Erin Hooks - Niagara County Department of Social Services - Niagara County agrees with the following priorities that you have identified:

1. Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations;
2. Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments;
3. A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services;
4. Acquisition and development of non-congregate shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations;

We continue to see the need for more shelter space as Community Missions is frequently at capacity. The lack of affordable housing in the City is a barrier for those who are ready to move out of shelter.

- Maria Domingo – Veterans One Stop Center of WNY - As to needs of the community: more affordable housing please. Also, access to support and services are often hindered by the inability to connect to agencies. Often problems with phone access and transportation are the reason why clients are not engaged. The inability to connect thru a phone call or walk-in for services would mean another day with no services.
- Michelle Scheib – WNY Independent Living –
 1. Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations. Half of the staff said this was #1 and the other half #2.
 2. Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments. Most of the staff said if they could have two 1's this would be the other one.
 3. A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services. Staff voted all over for this one. Either in 4th or 5th spot. They also suggested taking out some of the job training, since that is offered already.
 4. Acquisition and development of non-congregated shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations. Staff voted for this to be number 3
 5. Capacity Building & Nonprofit Operating to build capacity and financial stability in local nonprofit organizations serving your community with HOME-ARP activities; Staff mostly said leave it at 5.
 6. Administration and planning to hire, train, and support new staff to select, manage, monitor, and evaluate HOME-ARP projects and activities. Everyone said leave it last.
- Joyelle Tedeschi – Belmont Housing of WNY - The need for affordable housing for low-income families and individuals is at an all-time high. We have always been unable to meet the need but with the housing market as it is now the low stock of quality of affordable housing needs to be at the forefront of where we put our resources. Programs like TBRA could allow families/individuals to stay in place -assuming the units pass HQS inspection, and the landlord works with us- a more expedient way to secure housing

and stabilize families. Support Services that are partnered with housing subsidized are shown to be the most effective. Obtaining housing is task one but to maintain and then move forward for families the supports are needed to help support. For some families providing a low-barrier application for the one-time financial crisis that could cause housing instability has proven to be a way to prevent families from entering the “homeless” system. Non-profits are especially feeling the strain of the recent turnover the job market has experienced. We can’t maintain employees when we are not able to provide them with the ability to provide fully for their families. In the past non-profits have leaned on the ability of two-income households being able to “afford” one income earner to earn less. Two-income households are not the norm. Non- Profits have had to figure out how to balance the quality of service and the ability to serve with fewer staff as budgets get tighter. Affordable Housing entities have always had to balance the ability to build and maintain affordable housing with an operation budget that does not necessarily support the operation needs of the building. As mentioned above staffing for all has been a challenge. Companies have had to take steps back as new employees have come on and need to train them to get up to speed while still trying to main the work needed to be done. But proper recruitment and training are essential for the long-term success of these programs.

- DeAnna Eason – Housing Opprtunities Made Equal (HOME) - Housing Opportunities Made Equal, Inc. (HOME) is a civil rights organization founded in 1963 whose mission is to promote the value of diversity and to ensure all people an equal opportunity to live in the housing and communities of their choice—through education, advocacy, enforcement of fair housing laws, and the creation of housing opportunities. We hold contract with several local municipalities, Erie County, New York State, and the Department of Housing and Urban Development in an effort to enforce fair housing in Western New York. Although HOME does not possess a contract of this sort with the City of Niagara Falls, we regularly advise it’s residents of their rights and responsibilities under fair housing laws, mediate landlord and tenant issues, provide technical assistance when requested, assist families in finding safe and affordable housing, hold fair housing presentations and trainings, and investigate allegations of discrimination. Our work in the City has confirmed that the Buffalo/Niagara metropolitan statistical area is the 6th most segregated region in the United States and this is the result of systemic discrimination. Affirmatively furthering fair housing, enforcement of fair housing laws and providing education on rights and responsibilities is necessary to reverse the decades old prejudices that have led to high numbers of housing instability in BIPOC and disabled populations. We support the City of Niagara Falls’ proposal to create more affordable housing opportunities, especially for large families with very low incomes and persons with disabilities. We support tenant based rental assistance and other means of fostering housing stability; and we advocate for fair housing education and outreach so housing providers and home seekers will know their rights and responsibilities and act accordingly.

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

None.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	46	13	63	62	0								
Transitional Housing	51	16	84	84	0								
Permanent Supportive Housing	0	0	14	14	0								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						97	161	1	56				
Unsheltered Homeless						0	7	1	6				
Current Gap										0	3	0	0

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

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	9,565		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,210		
Rental Units Affordable to HH at 50% AMI (Other Populations)	2,205		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,265	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,315	
Current Gaps			4,580

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

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

Homeless as defined in 24 CFR 91.5

The most recent one-day homeless count that we have data for was conducted in January 2022. That information is included in the table above. The City used PIT, HIC, CHAS, ACS, and local data to determine where the needs in the community were, and also used interviews and the consulting meeting to gather input.

Based on the PIT and HIC data for Niagara County there are 29 households with children and 97 total people in emergency or transitional housing. Of the 97 people, 67 were children. There were 147 Adult Only households in emergency or transitional housing. There are 7 people Unsheltered. There are 7 households, with children only, living in emergency or transitional housing. 8 persons are chronically homeless.

Demographics from the data provided by the CoC identifies on the night of the PIT count 141 individuals were living in emergency or transitional housing in the City of Niagara Falls. Of the 141 individuals, 47 were female, 88 were male, and 6 did not provide data. 66 were White, 50 were Black/African Americans, 1 was Pacific Islander, 1 was American Indian, 1 was Asian American, 18 were multiple races, and 4 did not provide data are living in emergency or transitional housing. Of the 141 individuals, 33 are under the age of 18. There are 120 Non-Hispanics, 9 Hispanics and 12 did not provide data living in emergency or transitional housing. The CoC identifies 1 Male veteran living in an emergency shelter.

Based on the PIT, 56 survivors of domestic violence were in emergency or transitional housing. Of the 56 survivors sheltered, 32 were adults and 18 were under the age of 18, 31 were female and 16 were males. Of the 56 sheltered 24 were White, 19 were African American, 1 was American Indian, and 12 were multiple races. 6 victims were unsheltered which were all females over the age of 24. Of the 6 unsheltered 3 were White, 2 were Black/African American, and 1 was Asian American.

At Risk of Homelessness as defined in 24 CFR 91.5

The CHAS and ACS data showed the City of Niagara Falls as having 4,265 renter households with incomes at or below 30% AMI. Renters with Extremely Low Income represent 44% of all renter households.

Prevention data provided by the CoC tells us that in the City of Niagara Falls, on the night of the PIT count, 26 individuals were receiving prevention assistance. Of the 26 individuals, 17 were female, 7 were male, and 2 did not provide data. 7 were White, 14 were Black/African Americans, 1 was American Indian, and 4 did not provide data. Of the 26 individuals, 13 were under the age of 18. There were 21 Non-Hispanics, 1 was Hispanic, and 4 did not provide data

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

Based on the 2022 PIT data, there were 56 survivors of domestic violence in emergency or transitional housing. Of the 56 survivors sheltered, 32 were adults and 18 were under the age of 18, 31 were female and 16 were males. Of the 56 sheltered, 24 were White, 19 were African American, 1 was American Indian, and 12 were multiple races. 6 victims were unsheltered which are all females over the age of 24. Of the 6 unsheltered, 3 were White, 2 were Black/African American, and 1 was Asian 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 Notice

The current housing situation in the City of Niagara Falls is dire for extremely-low income renters due to the ongoing housing and employment issues related to the COVID-19 pandemic. While several state, federal, and local resources have been allocated to help address the effects of the COVID-19 pandemic, these funds will be available for a limited period of time and it is unclear what the situation will look like once the funding expires.

According to the 2015-2019 CHAS data, there are 9,570 housing units occupied by households earning less than fifty percent of the area median income (AMI) with at least one of four severe housing problems. It is expected that the true number is higher based on the

increased demand for affordable housing in the last couple of years. The lack of affordable housing is becoming an unmet need throughout the City. This includes shortages of emergency shelter and transitional housing beds, long term affordable housing, and housing for seniors and persons living with disabilities.

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):

The majority of the services enjoyed recently by the community were enhanced or funded by programs and funding sources related to COVID. CARES Act funding, including ESG-CV and CDBG-CV, Emergency Rental Assistance Program (ERAP) dollars were largely spent or will be fully spent in the near term, and the Rental Supplement Program through the Department of Social Services .

Current resources include annual HUD funding for the City, County, and CoC, State/federal funding for affordable and supportive housing, local foundation and private donor support, as well as ongoing support such as Housing Choice Vouchers.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The City currently has homeless shelters that operate year-round and the homeless community heavily relies on city shelters and the Niagara County Department of Social Services to provide temporary housing and financial assistance.

As of the last PIT count, there were 251 persons within the emergency shelter system. Of these, 29 households were families with children, and 146 were households without children. There were 7 unsheltered persons found during the PIT count in 2022. The need for beds within the shelter system can fluctuate based on season and type of unit needed, but much data shows that a non-congregate shelter of some type is needed within the community. These non-congregate type shelters were established during COVID and were often used for those at the highest risk of transmission or for those that had tested positive. However, the user can be much greater than that and would add to the continuum of services offered in the community.

Additionally, the lack of transportation greatly impacts access to service needs, especially for homeless and low-income based households as there is a shelter capacity issue in the city and an issue for community members access Code Blue shelters to make up for the gap in congregate shelter space.

At Risk of Homelessness as defined in 24 CFR 91.5

The data show that there is a shortage of rental housing units affordable to extremely low income (ELI) households. This forces many ELI households to rent more expensive units and pay more than 30% of their income towards housing (cost burdened) or 50% of their income towards housing (severe cost burden). Many of these households also experience other housing issues but have limited options available to remedy those issues. The greatest needs, as indicated by both the consultation meetings and the surveys, were: 1) development of affordable rental housing, 2) supportive services, 3), acquisition and development of non-congregate shelter 4), tenant based rental assistance, and 5) non-profit operating funding and capacity building.

While the lack of housing options was identified by many groups, the majority of participants in the consultation meetings highlighted support services and capacity building as some of the highest needs. Specifically, services such as housing search and placement, documentation gathering and assistance, and case management are in demand.

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

Victims of Domestic Violence pose an increased risk throughout the community. Through the consultations it was identified that there is a lack of access to affordable housing which can increase the chance of staying in an abusive and dangerous situation. Increasing the number of options for affordable housing and access to services would be a priority for this population.

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

The CHAS and ACS data showed the City of Niagara Falls as having 4,265 renter households with incomes at or below 30% AMI. Renters with Extremely Low Income represent 44% of all renter households.

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

Although there is an adequate amount of shelter beds for homeless individuals requesting assistance, there is a gap within the system related to homeless individuals who are employed on overnight shifts and in need of a place to sleep during daytime hours.

A current issue relating to housing inventories is the recent population growth in the area which has resulted in a decrease in available housing stock, especially affordable housing. Many available apartments are well above HUD's established FMR for our area, and thus unattainable for our CoC

Permanent Supportive Housing and Rapid Re-Housing programs. Programs have been negotiated with area landlords and although they have been somewhat successful, especially in maintaining existing leases, etc., quickly finding housing for homeless individuals and families has been difficult.

Emergency financial assistance for homelessness prevention is offered to households that request it for housing stability, but the influx of funding from the Treasury (ERAP, EPPI) and HUD (ESG-CV) is largely spent. The need for this type of assistance remains high, but funding is limited.

Access to services can be confusing, and gathering materials needed to be approved for services can also be overwhelming. Case management and other supports are often used to help people make their way through the services/housing application processes, and many partners called this out as a difficulty their clients face. These services were the higher priority in our survey and among our consultees. It was noted at our February 16th, 2023 consultation, that there is a great need for more supportive services to aid our service delivery systems and more must be done. Lastly, there is a gap in non-congregated shelters, and in the provision of quality, affordable housing for the qualifying populations. During the pandemic, it was identified that there is a lack of non-congregate shelters and low-barrier shelters. The need to have private space for individuals from the homeless population was difficult, and in many cases, hotel rooms were secured. These were temporary solutions, but the need was demonstrated.

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:

According to most measures, affordable housing means only spending 30% or less of a household's income on housing related expenses. Rent burden is defined as spending more than 30% of a household's income on housing expenses. When the share exceeds that threshold, it impacts a household's ability to buy food and support other essentials like healthcare and transportation. A higher rent burden is often associated with a greater risk of eviction, or risk of homelessness. Housing cost burden can therefore be viewed as a strong contributor to homelessness. While the City of Niagara Falls housing costs are not extraordinarily high, extremely low incomes have led to a high number of households facing a rent burden.

Since the end of the various moratoria, rents have increased, and/or landlords and management companies have become more restrictive with whom they are willing to rent. As previously mentioned, many households spend more than 30% of their income on housing costs, and this is seen with greater frequency as incomes decrease. However, finding new housing is harder than ever. Many households/individuals are unable to secure new housing because they do not have perfect credit profiles, and their incomes are not 3-4 times greater than the rent. Housing cost burden can therefore be viewed as a strong contributor to homelessness.

“Other Populations” included with eligible qualifying populations will include households earning no greater than 50% AMI and exhibiting characteristics associated with instability and an increased risk of homelessness, such as a previous history of homelessness, imminent risk of eviction,

- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- Is living in the home of another because of economic hardship;
- Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
- Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
- Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or another youth facility, or a correction program or institution)

Identify priority needs for qualifying populations:

Priority needs include appropriate, affordable housing units that are readily available to those that need them, and that have support services included for anyone that needs them. This was identified as the number one priority amongst survey respondents and through the consultation process, and it confirms data was reviewed concerning the HIC and population of persons at risk of homelessness due to severe housing cost burden.

The support services, such as ongoing case management, and housing search/counseling (may vary by population), were identified as crucial for successful long-term housing of the qualifying populations. A discontinuity of services exists in our community. Although there are many services available locally, accessing the services is not always straightforward. Services that help individuals leaving institutions and help individuals secure important documents are needed and wrap around services, provided to anyone living in the affordable housing to be developed, are crucial to long-term housing stability of the qualifying populations. Access to services can be confusing, and gathering materials needed to be approved for services can also be overwhelming. Case management and other supports are often used to help people make their way through the services/housing application processes, and many partners called this out as a difficulty their clients face.

Additionally, the provision of a non-congregate shelter within the community was identified as a high priority need. These types of shelters were created during the pandemic, but they have long

been identified as a need within our community. The current shelter system offers many useful and successful interventions and services and provides an emergency lifeline to many who need it. But the current model does not work for everyone, and the innovative approaches deployed during the COVID pandemic showed that alternative options can be successful with the right support. During the pandemic, several hotels were temporarily turned into NCS. These shelters provided both housing and structure to those with the highest risk of COVID transmission. Some of the individuals living in the hotels were moved there as part of a shelter “decompression”, while other chronically homeless individuals were moved there from homeless encampments and other locations not meant for human habitation. The hotel NCS model showed that many persons previously unwilling/unable to access the traditional shelter system were willing to try a new model. The temporary NCS model used during COVID showed it could be successful, but that it was not a right fit for everyone, and that it was crucial to have the right support staff and services in place.

Lastly, the lack of transportation greatly impacts access to service needs, especially for homeless and low-income based households. Access to services can be confusing, and gathering materials needed to be approved for services can also be overwhelming. Case management and other supports are often used to help people make their way through the services/housing application processes, and many partners called this out as a difficulty their clients face.

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 City obtained data from the PIT, HIC, CHAS, ACS, and local data to determine where the needs in the community were, and also used interviews and the consulting meeting to gather input. The data came from information obtained in the annual Point In Time Count and the Housing Inventory Counts conducted in 2022.

Income and housing statistics were taken from various sources, including 2015-2019 ACS and decennial Census Data (2020) from the US Bureau of the Census. Some housing and household data was taken from the 2015-2019 Community Housing Affordability Strategy (CHAS) data.

HOME-ARP Activities

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

The City of Niagara Falls will pursue applications for funding from the agencies through a Request for Proposal process for HOME-ARP eligible activities to benefit the qualified populations within the City of Niagara Falls that follow Federal and local procurement policies. The City anticipates a 60 day period for proposals to be submitted and reviewed. Proposals will be competitively scored and reviewed by a committee made up of Community Development staff.

The City will also leverage HOME-ARP funds to create suitable rental housing units to serve the City's HOME-ARP qualifying populations

Describe whether the PJ will administer eligible activities directly:

At this time, the City does not intend to administer eligible activities directly. The City will provide HOME-ARP funds to sub-recipients and non-profit developers to administer eligible activities directly.

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

The City of Niagara Falls did not provide any HOME-ARP administrative funds to a sub-recipient or contractor before HUD accepted the City's HOME-ARP allocation plan for the development of this plan

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

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 276,199.62		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 1,104,798.00		
Non-Profit Operating	\$ #	0 %	5%
Non-Profit Capacity Building	\$ #	0 %	5%
Administration and Planning	\$ 243,705.45	15 %	15%
Total HOME ARP Allocation	\$ 1,624,703.00		

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

The rationale for allocating funding this way is due to the data, consultation meetings, and community needs. After much discussion with each consultation group, the City determined that the above distribution is currently the best fit for the needs of the community. The majority of resources will be dedicated to the Development of Affordable Housing and the creation of Non Congregate shelters, but funding will be available for the other eligible activities. If additional resources become available, or if new research or information proves otherwise, the distribution may be amended in response to that.

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:

A review of the gap analysis for shelter, affordable and supportive housing, as well as feedback and experiences from those working to end homelessness within the City, provide the rationale for funding the acquisition and development of non-congregate shelters and additional affordable rental housing units, as well as supportive services to help end homelessness and those who experience possible homelessness.

There are significant needs in the City of Niagara Falls for HOME-ARP eligible activities. The need for capital improvements or acquisition/development of non-congregate shelters, specifically for homeless men was identified by nearly every respondent.

While safe, decent, and affordable supportive housing can help reduce long-term shelter stays, unsheltered homelessness it also provides a safe space for community members to recover from substance abuse, mental illness, and other disabling conditions. Niagara Falls is aware that existing shelter and housing programs are not adequately funded in operations or services to meet the needs of the population they were created to serve.

HOME-ARP Production Housing Goals

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

The City estimates that it will produce or support 4 affordable rental and permanent supportive housing units for qualifying populations.

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

The City hopes to fund the support affordable rental housing with the goal in mind of assisting future housing projects. This will address the need of low-income housing within the community and with hopes the community can create and sustain more affordable housing projects. The City plans to work with local organizations to identify potential projects and provide affordable housing to qualifying populations within the community.

Preferences

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

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

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of

vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

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

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

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

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.** For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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:

The City of Niagara Falls does not intend to give preference to one or more qualifying populations but rather intends to provide services to every individual that meets the definition of a "qualifying population".

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:

N/A

Referral Methods

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

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

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

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

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

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

N/A

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

N/A

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

N/A

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

N/A

Limitations in a HOME-ARP rental housing or NCS project

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the

qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.

- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

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:

The City does not intend to limit eligibility to one or more of the qualifying populations but rather with the intention to provide services to every individual that meets the definition of "qualifying population".

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

N/A

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

N/A

HOME-ARP Refinancing Guidelines

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

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

The City does not plan on refinancing any existing debt at this time.

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

N/A

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

N/A

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

N/A

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

N/A

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

N/A

**CITY OF NIAGARA FALLS, NEW YORK
DEPARTMENT OF COMMUNITY DEVELOPMENT**

**Notice of Public Comment Period, Public Hearings, and Proposed Substantial Amendment to 2021
Annual Action Plan
January 6, 2023**

Background

The City of Niagara Falls (City) is proposing amendments to its 2021 Annual Action Plan. The amendments address the use of HOME American Rescue Plan (HOME ARP) funds awarded to the City. This notice also addresses the public comment period and public hearing for the amendments.

2021 Action Plan Substantial Amendment

Notice is hereby given that the City proposes a Substantial Amendment of its 2021 Action Plan. The 2021 Action Plan will address the award of \$1.6 Million from HUD to provide housing, shelter, and supportive services for persons experiencing or at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other vulnerable populations at greatest risk of housing instability. After the receipt and evaluation of proposed activities, this substantial amendment is subject to a public comment period and public hearing as detailed below.

Requests for additional information regarding the Substantial Amendment should be submitted by email to Clifford Scott at Clifford.Scott@niagarafalls.ny.gov. This proposed Substantial Amendment is subject to a public comment period and public hearing as detailed below.

HOME ARP Funding

Notice is hereby given that the City of Niagara Falls proposes a Substantial Amendment of its Annual Action Plan for 2021 to include the use of HOME ARP funding awarded to the City. The City is proposing to use this funding to implement activities in the following categories:

- Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations;
- Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments;
- A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services;
- Acquisition and development of non-congregate shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations;
- Capacity Building & Nonprofit Operating to build capacity and financial stability in local nonprofit organizations serving your community with HOME-ARP activities;
- Administration and planning to hire, train, and support new staff to select, manage, monitor, and evaluate HOME-ARP projects and activities.

Requests for additional information regarding the CARES Act funding should be submitted by email to Clifford Scott at Clifford.Scott@niagarafalls.ny.gov. This proposed Substantial Amendment is subject to a public comment period and public hearing as detailed below.

Public Comment Periods

A public comment period on Substantial Amendments to the 2021 Action Plan opens January 6, 2022. Public comments must be received in writing on or before February 6, 2023. Written comments may be submitted in person at, or by mail addressed to: City of Niagara Falls, Department of Community Development, 745 Main Street, Niagara Falls, NY 14302. Written comments may be submitted by e-mail addressed to Clifford Scott at Clifford.Scott@niagarafalls.ny.gov. All comments will be presented to the City Council prior to its consideration of resolutions to submit the amendments to HUD. The City also will meet with organizations from the Continuum of Care and other service providers.

Public Hearing

The Niagara Falls City Council will hold a public hearing on February 16, 2023 commencing at 6:00 p.m. The hearing will provide information and allow citizen comment regarding the proposed Substantial Amendment to the 2021 Annual Action Plan to include activities funded with HOME ARP funding. Public comments to be read during the public hearing may be submitted in advance of the hearing to Clifford.Scott@niagarafalls.ny.gov. Every effort will be made to respond to public concerns, suggestions, and questions during the hearing. All subsequent responses will be posted at the following website: <https://nf-cd.org/news>. All public comments will be presented to the City Council before a vote on 2021 Annual Action Plan-HOME ARP Funding moves forward. The 2021 Substantial Amendments to the Annual Action Plan must be approved by City Council.

Robert Restaino, Mayor
City Hall - 745 Main Street
Niagara Falls, New York 14302

NFCD Proposes Substantial Amendment to 2021 Annual Action Plan

January 06, 2023

The City of Niagara Falls (City) is proposing amendments to its 2021 Annual Action Plan. The amendments address the use of HOME American Rescue Plan (HOME ARP) funds awarded to the City. This notice also addresses the public comment period and public hearing for the amendments.

Notice is hereby given that the City proposes a Substantial Amendment of its 2021 Action Plan. The 2021 Action Plan will address the award of \$1.6 Million from HUD to provide housing, shelter, and supportive services for persons experiencing or at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other vulnerable populations at greatest risk of housing instability. After the receipt and evaluation of proposed activities, this substantial amendment is subject to a public comment period and public hearing. Requests for additional information regarding the Substantial Amendment should be submitted by email to Clifford Scott at Clifford.Scott@niagarafallsny.gov.

To view the Proposed Amendments click [HERE](#)

Paul Martell

0 Likes

Share

2023 CDBG and ESG Funding Applications

January 04, 2023

The City of Niagara Falls, through its Citizen Participation process, develops an annual Action Plan that lists and prioritizes local housing and non-housing community development needs. Projects that address these priorities will be considered for funding.

Funding sources for the Action Plan are received through the U.S. Department of Housing and Urban Development (HUD) and are administered by the City of Niagara Falls Community Development Department. Three main funding sources are made available for program and project grants: Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Services Grant (ESG). These grants allow for better service and programming to low/moderate income areas, residents of low/moderate income, emergency shelter, rapid re-housing, homelessness prevention, and other urgent needs.

The City of Niagara Falls Community Development Department is currently accepting applications for the 2023 CDBG and ESG funding sources.

To view and download the applications click the respective links below.

2023 CDBG Funding Application

2023 ESG Funding Application

Please submit applications to:

Department of Community Development
745 Main Street - PO Box 69, Niagara Falls, NY 14302

OR Clifford.scott@niagarafallsny.gov

APPLICATIONS MUST BE RECEIVED or POSTMARKED BY:

February 6, 2023 @ 4:00pm

LATE APPLICATIONS WILL NOT BE ACCEPTED

Paul Martell

0 Likes

Share

Section 8 Leased Housing Wait List Set to Open

December 12, 2022

Meeting Sign-In Sheet

Project: Proposed Substantial Amendment to 2021 Annual Action Plan
--

Meeting Date:	February 16, 2023
---------------	-------------------

Facilitator: Clifford Scott

Place/Room: City Hall Council Chambers

[illegible]

Re: American Rescue Plan funding-\$1.6 Million

Mark Baetzhöld <m.baetzhöld@heartloveandsoul.org>

Tue 2/28/2023 11:12 AM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>

Cc: Clifford M. Scott <cmscott@nfha.org>; Robyn Krueger <rkrueger@communitymissions.org>; Tracy Schmidt <t.schmidt@heartloveandsoul.org>; Kathy Granchelli (granchelli@ywcanf.org) <granchelli@ywcanf.org>; trubits@wnyhomeless.org <trubits@wnyhomeless.org>; Laura Pennington, M.A. <lpennington@pinnaclecs.org>; Kelley Swann <kswann@ncpny.org>

Hi Paul,

I'm sorry I wasn't able to attend the 2/16 public hearing but appreciate the City's outreach to solicit input on the ARP funding.

Last year, HLS received more than \$100,000 from EFSP to provide rental assistance to struggling households. This funding was in addition to rental assistance support we helped the community access through ERAP. Both ERAP and EFSP money went quickly, an indication of the extent people in our community are struggling to keep up with housing costs. Given the need, it seems reasonable to allocate a % of the ARP money for rental assistance. I would suggest at least 10% (\$160K), which is much less than what is needed but still provides some resources in the absence of funding that is no longer available.

I would also suggest allocating another 10% to funding a "community services navigator" (i.e. case manager) to assist with service coordination for housing-insecure populations that fall outside of services funded for specific populations. One challenge we are finding at Daybreak is that our case manager positions are funded by sources that support specific populations (i.e. homeless services supported by ESG and CoC funding; elderly/disabled population supported by HUD's ROSS program). HLS does not have any sustainable revenue source for providing crisis intervention / case management / service coordination support to people who fall outside of the before-mentioned populations. The community needs such resources (whether stationed at Daybreak or not); a \$160,000 allocation would provide about 3 years of funding for such a position.

Given the lack of affordable housing options, PSH, transitional housing, etc. in Niagara Falls, it seems reasonable to me to allocate the remaining 80% of funding to those needs.

Happy to discuss this further with the Coalition on March 13, but I wanted to at least identify these 2 needs.

Thanks,
Mark

From: Clifford M. Scott <cmscott@nfha.org>

Sent: Tuesday, February 28, 2023 10:07 AM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>; Robyn Krueger <rkrueger@communitymissions.org>; aangora@cazenoviarecovery.org <aangora@cazenoviarecovery.org>; Allison Geddes (ageddes@msntwny.org) <ageddes@msntwny.org>; Bonnie Shaffer <ntfoodpantry@verizon.net>; Bridget Janese <Bridget.Janese@dfa.state.ny.us>; Brittany DePietro <bdepietro@ywcanf.org>; Casey, Jill M <jill.m.casey@hud.gov>; Charles Levesque <charles.levesque@depaulusa.org>; Chris Smith <grigglewis@grigglewis.org>; Dani Kelkenberg <adminassist@lockportcares.org>; David B. Taylor <dtaylor@niagara.edu>; Dean Bailor Jr <dean.bailorjr@niagarafallsny.gov>; Diana Proske <DProske@nls.org>; dvanderkooi@211wny.org <dvanderkooi@211wny.org>; Elizabeth McClam (Elizabeth.A.McClam@hud.gov) <Elizabeth.A.McClam@hud.gov>; Erika Veltri (eveltri@vocwny.org) <eveltri@vocwny.org>; Gail Bimont <gail.bimont@niagarafallsny.gov>; Grant Babcock <gbabcock@communitymissions.org>; immaculatahome@gmail.com <immaculatahome@gmail.com>; Jarrett Steffen

Recommendations for HOME ARP Funds

Robyn Krueger <rkrueger@communitymissions.org>

Tu, 6/14/2023 4:36 PM

To: Clifford M. Scott <cmscott@nfha.org>

Cc: Paul Martell <Paul.Martell@niagarafallsny.gov>; Casey, Jill M <jill.m.casey@hud.gov>

Good Afternoon, Cliff,

Yesterday afternoon the NC Coalition for Services to the Homeless met to discuss the categories put forward by the Notice of Public Comment dated January 6, 2023 for the HOME ARP funds. There were 21 Coalition Members on the call from 20 different organizations.

Paul did a great job fielding questions from the group and explaining how the comments are being considered to inform the City on how best to use the funds available. He further indicated that once the application is in, and approved, the City will release an RFP for the various categories for which they have been approved. Paul also indicated that agencies needed to think about the sustainability of a program as these are one time funds and longevity is desired in the process of the project.

Jill Casey was on the zoom meeting and encouraged individual organizations to get their comments into the City, if they had not done so already. I indicated I was familiar that some organizations had already done so, and that I would send this email to you to report what the Coalition would determine their priorities to be for the funds available.

The group as a whole supports the 1st and 3rd activities listed in the public notice.

Activity #1: Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing including permanent supportive housing for qualifying populations.

Activity #3: A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare and educational services.

Thank you for the opportunity to provide the City with input. Please let me know if there are any additional questions you might have.

Robyn

Robyn L. Krueger (she/her)

President & CEO

Community Missions of Niagara Frontier, Inc.


1570 Buffalo Avenue

Niagara Falls, NY 14303

Office: 716-285-3403, ext. 2238

fax: 716-285-0616

email: RKrueger@communitymissions.org

 please do not print this e-mail unless necessary

IMPORTANT NOTICE: This e-mail and electronic transmission is meant only for the use of the intended recipient or individual entity to which it was addressed. It may contain confidential information which is legally privileged or otherwise protected by law. If you are not the intended recipient, or if you believe you are not the intended recipient, or received this in error or from someone who was not authorized to send it to you, you are hereby notified that any review, use, disclosure, copying, distribution, dissemination or the taking of any action in reliance on the contents of this information, is strictly prohibited. Community Missions, Inc. is not responsible for the content of any external hyperlink referenced in this email or any email. PLEASE NOTIFY THE SENDER IMMEDIATELY OF THE ERROR BY RETURN E-MAIL, AND DELETE THE ORIGINAL MESSAGE FROM YOUR SYSTEM, ALONG WITH ANY PAPER OR ELECTRONIC COPIES. Thank you for your cooperation.



Clifford Scott
Executive Director
City of Niagara Falls
Department of Community Development
745 Main Street
Niagara Falls, NY 14302

Dear Cliff,

I am submitting a public comment on the City's allocation of HOME-ARP funding on behalf of the Homeless Alliance of Western New York (HAWNY). We would like to see a smaller portion of HOME-ARP used towards Supportive Services and a larger portion of it used towards developing affordable housing.

Annually, there are 1050 people experiencing homelessness within the City of Niagara Falls. Through Coordinated Entry efforts, we know that conservatively, there were 37 people in 2022 with higher needs that require permanent housing with supportive services. Currently, there are very few programs that could serve this population and so, we would like to advocate for this funding to prioritize assisting Niagara Falls residents who experience homelessness the longest and have the most serious needs by providing affordable housing and supportive services to them. By prioritizing this population, it addresses the needs of all eligible populations, such as Veterans, individuals and families fleeing domestic violence, the LGBTQ community, and marginalized communities.


This could be achieved by building new/rehabbing units or through Tenant Based Rental Assistance (TBRA). No matter which models are being adopted, supportive services will be needed to address the needs of these most vulnerable community members and ensure they are stabilized in housing. A contingent plan should be created by selected non-profit partners to seek state/local funding to continue supportive services after HOME-ARP ends.

With the City of Niagara Falls allocating funding toward the development of affordable housing and providing supportive services, in the form of ongoing case management to the most vulnerable in the community, individuals and families will remain stably housed and reduce their use of community resources which will reduce overall cost over time.

Supportive Services could also be used to replace the current gaps of Rapid Rehousing needs. Since 2020, there has been additional funding--ESG CV, available to support Rapid Rehousing. This funding will end this September and most Rapid Rehousing agencies have already exhausted their funding. Ongoing funding is needed to provide short to medium term rental assistance along with case management.

Supportive Services under the HOME-ARP promote local participating jurisdictions (PJs) to develop innovative programs to address their community needs. This funding can be used to create an affordable housing centralized database. Allow community partners to hire staff who could assist in housing search, improve housing retention with a Landlord-Tenant Liaison, provide financial assistance toward rent/utilities/move-in costs, and offer a landlord incentive to incentivize and reduce risk.

Thank you so much for your consideration.



Kexin Ma, MUP
Executive Director
kexinma@wnyhomeless.org

FW: HOME ARP funding for Niagara Falls

DeAnna Eason <DEason@homeny.org>

Fri 4/28/2023 3:01 PM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>

Hi Paul,

I had a matter to deal with, so thanks for your patience! Please see HOME's comment below.

Housing Opportunities Made Equal, Inc. (HOME) is a civil rights organization founded in 1963 whose mission is to promote the value of diversity and to ensure all people an equal opportunity to live in the housing and communities of their choice—through education, advocacy, enforcement of fair housing laws, and the creation of housing opportunities.

We hold contract with several local municipalities, Erie County, New York State, and the Department of Housing and Urban Development in an effort to enforce fair housing in Western New York. Although HOME does not possess a contract of this sort with the City of Niagara Falls, we regularly advise it's residents of their rights and responsibilities under fair housing laws, mediate landlord and tenant issues, provide technical assistance when requested, assist families in finding safe and affordable housing, hold fair housing presentations and trainings, and investigate allegations of discrimination. Our work in the City has confirmed that the Buffalo/Niagara metropolitan statistical area is the 6th most segregated region in the United States and this is the result of systemic discrimination. Affirmatively furthering fair housing, enforcement of fair housing laws and providing education on rights and responsibilities is necessary to reverse the decades old prejudices that have led to high numbers of housing instability in BIPOC and disabled populations. We support the City of Niagara Falls' proposal to create more affordable housing opportunities, especially for large families with very low incomes and persons with disabilities. We support tenant based rental assistance and other means of fostering housing stability; and we advocate for fair housing education and outreach so housing providers and home seekers will know their rights and responsibilities and act accordingly.

Best,

DeAnna

From: Paul Martell <Paul.Martell@niagarafallsny.gov>

Sent: Monday, April 17, 2023 10:37 AM

To: Steven Haagsma <shaagsma@homeny.org>

Subject: HOME ARP funding for Niagara Falls

Good Morning!

Hi there! My name is Paul Martell, I am the Compliance Officer for the Department of Community Development with the City of Niagara Falls, and I am reaching out in regards to the HOME-ARP funding the City of NF is applying for.

The City is in the process of producing an application to receive HOME-ARP federal funds provided by HUD to provide housing, shelter, and supportive services for persons experiencing or at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other vulnerable populations at greatest risk of housing instability.

The City is proposing to use this funding to implement activities in the following categories:

- Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations;
- Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments;
- A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services;
- Acquisition and development of non-congregate shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations;
- Capacity Building & Nonprofit Operating to build capacity and financial stability in local nonprofit organizations serving your community with HOME-ARP activities;
- Administration and planning to hire, train, and support new staff to select, manage, monitor, and evaluate HOME-ARP projects and activities.

We are reaching out for any feedback or a possible public comment as to what the needs of the community are and which of the following activities above would be recommended to be funded.

I am not too sure if your organization does any or much work in Niagara Falls but if so we would appreciate any feedback, comments or questions you may have.

If you would like to discuss more we can also do that and I can be reached at 716-286-8836 and generally in the office Mon-Fri 8am-4pm.

Thank you!

Paul Martell

Compliance Officer

Community Development

716-286-8836

paul.martell@niagarafallsny.gov

CONFIDENTIALITY NOTICE: This message and any attached material is confidential and privileged. The information contained herein is intended only for the review and use of the recipient(s) named above. Any unauthorized disclosure, distribution, or other use of the transmitted information is strictly prohibited. If you have received this transmission in error, please notify the sender by reply e-mail, delete the email and then destroy all copies of the transmission. Any unauthorized interception of this transmission is prohibited by law.

RE: HOME ARP Funding for Niagara Falls

Joy Tedeschi <jtedeschi@belmonthousingwny.org>

Wed 4/25/2024 10:41 AM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>

Paul,

Please see my comments below.

- **Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations;**
The need for affordable housing for low-income families and individuals is at an all-time high. We have always been unable to meet the need but with the housing market as it is now the low stock of quality of affordable housing needs to be at the forefront of where we put our resources.
- **Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments;**
Programs like TBRA could allow families/individuals to stay in place -assuming the units pass HQS inspection, and the landlord works with us- a more expedient way to secure housing and stabilize families.
- **A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services;**
Support Services that are partnered with housing subsidized are shown to be the most effective. Obtaining housing is task one but to maintain and then move forward for families the supports are needed to help support. For some families providing a low-barrier application for the one-time financial crisis that could cause housing instability has proven to be a way to prevent families from entering the "homeless" system.
- **Acquisition and development of non-congregate shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations;**
- **Capacity Building & Nonprofit Operating to build capacity and financial stability in local nonprofit organizations serving your community with HOME-ARP activities;**
Non-profits are especially feeling the strain of the recent turnover the job market has experienced. We can't maintain employees when we are not able to provide them with the ability to provide fully for their families. In the past non-profits have leaned on the ability of two-income households being able to "afford" one income earner to earn less. Two-income households are not the norm. Non-Profits have had to figure out how to balance the quality of service and the ability to serve with fewer staff as budgets get tighter. Affordable Housing entities have always had to balance the ability to build and maintain affordable housing with an operation budget that does not necessarily support the operation needs of the building.
- **Administration and planning to hire, train, and support new staff to select, manage, monitor, and evaluate HOME-ARP projects and activities.**
As mentioned above staffing for all has been a challenge. Companies have had to take steps back as new employees have come on and need to train them to get up to speed while still trying to maintain the work needed to be done. But proper recruitment and training are essential for the long-term success of these programs.

Joyelle Tedeschi, Vice President of Housing Programs

Belmont Housing Resources for WNY, Inc.

2393 Main Street, Buffalo, NY 14214

(716) 884-7797 x 191 (716) 884-8028 fax

https://link.edgexio.com/s/d322d639b6dQWVY956k_axYQ8XJ9nA?u=http://www.belmonthousingwny.org/

Pronouns: she/her/hers



Dedicated to expanding affordable housing opportunities

From: Paul Martell <Paul.Martell@niagarafallsny.gov>

Sent: Monday, April 22, 2024 5:07 PM

To: Joy Tedeschi <jtedeschi@belmonthousingwny.org>

Subject: HOME ARP Funding for Niagara Falls

Joyelle,

Hi there! My name is Paul Martell, I am the Compliance Officer for the Department of Community Development with the City of Niagara Falls, and I am reaching out in regards to the HOME-ARP funding the City of NF is applying for. If you are not the person I should be contacting could you please forward this message on to the correct person.

The City is in the process of producing an application to receive HOME-ARP federal funds provided by HUD to provide housing, shelter, and supportive services for persons experiencing or at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other vulnerable populations at greatest risk of housing instability.

The City is proposing to use this funding to implement activities in the following categories:

- **Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations;**
- **Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments;**
- **A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services;**
- **Acquisition and development of non-congregate shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations;**
- **Capacity Building & Nonprofit Operating to build capacity and financial stability in local nonprofit organizations serving your community with HOME-ARP activities;**
- **Administration and planning to hire, train, and support new staff to select, manage, monitor, and evaluate HOME-ARP projects and activities.**

We are reaching out for any feedback or a possible public comment as to what the needs of the community are and which of the following activities above would be recommended to be funded.

We would appreciate any feedback, comments or questions you may have.

If you would like to discuss more we can also do that and I can be reached at 716-286-8836 and generally in the office Mon-Fri 8am-4pm.

Thank you!

Paul Martell

Compliance Officer

Community Development

716-286-8836

paul.martell@niagarafallsny.gov

CONFIDENTIALITY NOTICE: The message and any attached material is confidential and privileged. The information contained herein is intended only for the review and use of the recipient(s) named above. Any unauthorized disclosure, distribution, or other use of the transmitted information is strictly prohibited. If you have received this transmission in error, please notify the sender by email, delete the email and then destroy all copies of the transmission. Any unauthorized interception of this transmission is prohibited by law.

Re: HOME ARP Funding for Niagara Falls

Michelle Scheib <mscheib@wnyl.org>

Monday, April 17, 2023 10:55 AM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>

I wanted to check in with you. Todd Vaarwerk should be getting in contact with you. He is WNYIL Chief Policy Officer. I was able to go over with my staff last week and here are the results.

Here are the results from the staff:

1. Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations. Half of the staff said this was #1 and the other half #2.
2. Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments. Most of the staff said if they could have two 1's this would be the other one.
3. A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services. Staff voted all over for this one. Either in 4th or 5th spot. They also suggested taking out some of the job training, since that is offered already.
4. Acquisition and development of non-congregated shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations. Staff voted for this to be number 3
5. Capacity Building & Nonprofit Operating to build capacity and financial stability in local nonprofit organizations serving your community with HOME-ARP activities; Staff mostly said leave it at 5.
6. Administration and planning to hire, train, and support new staff to select, manage, monitor, and evaluate HOME-ARP projects and activities. Everyone said leave it last.

From: Michelle Scheib <mscheib@wnyl.org>

Sent: Monday, April 17, 2023 11:32 AM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>

Subject: Re: HOME ARP Funding for Niagara Falls

Sounds good.

From: Paul Martell <Paul.Martell@niagarafallsny.gov>

Sent: Monday, April 17, 2023 11:31 AM

To: Michelle Scheib <mscheib@wnyl.org>

Subject: Re: HOME ARP Funding for Niagara Falls

Caution: External Email

Do not click on links or open any attachments unless you recognize the sender and know the contents are safe. Think before you click!

How about a virtual call tomorrow at 9 am?

This is just part of the consultation process for the City to apply for the funding.

We plan to issue an RFP (Request for Proposal) for agencies to apply for funding at a later date.

Paul Martell

Compliance Officer

Community Development

716-286-8836

paul.martell@niagarafallsny.gov

From: Michelle Scheib <mscheib@wnyl.org>

Sent: Monday, April 17, 2023 11:27 AM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>

Subject: Re: HOME ARP Funding for Niagara Falls

I'm pretty full this week. I have the 18th at 9am till about 950am and the 19th 4 till ?

From: Paul Martell <Paul.Martell@niagarafallsny.gov>

Sent: Monday, April 17, 2023 10:51 AM

To: Michelle Scheib <mscheib@wnyl.org>

Subject: Re: HOME ARP Funding for Niagara Falls

Caution: External Email

Do not click on links or open any attachments unless you recognize the sender and know the contents are safe. Think before you click!

Hi Michelle!

I apologize in advance because we are contacting you so late but I do have a deadline to complete the application by next week.

Are you available to meet this week?

Paul Martell

Compliance Officer

Community Development

716-286-8836

paul.martell@niagarafallsny.gov

From: Michelle Scheib <mscheib@wnyl.org>
Sent: Monday, April 17, 2023 10:36 AM
To: Paul Martell <Paul.Martell@niagarafallsny.gov>; Stephanie Orlando <sorlando@wnyl.org>
Subject: Re: HOME ARP Funding for Niagara Falls

Good Morning Paul,
Thank you for reaching out to Independent Living. We do work for all of Niagara County, but our main location is at 746 Portage Road in the falls. Is there a time we could meet in person to discuss this opportunity.

Michelle Scheib, BS, NYCPS, CRPA, FPA, Certified Work Incentive Practitioner
Director of Independent Living of Niagara County
740 Portage Road, Niagara Falls, NY 14301
716-284-4131 ext. 209 (Voice/TDD)
716-284-3230 (Fax) mscheib@wnyl.org

In the last year, we saved N.Y. State taxpayers over \$118 million by helping individuals leave or avoid institutionalization through practicing the principles of education, empowerment and equality for persons with disabilities.

Information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

From: Paul Martell <Paul.Martell@niagarafallsny.gov>
Sent: Monday, April 17, 2023 9:51 AM
To: Michelle Scheib <mscheib@wnyl.org>
Subject: HOME ARP Funding for Niagara Falls

Caution: External Email
Do not click on links or open any attachments unless you recognize the sender and know the contents are safe. Think before you click!

Michele,

Hi there! My name is Paul Martell, I am the Compliance Officer for the Department of Community Development with the City of Niagara Falls, and I am reaching out in regards to the HOME-ARP funding the City of NF is applying for.

The City is in the process of producing an application to receive HOME-ARP federal funds provided by HUD to provide housing, shelter, and supportive services for persons experiencing or at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other vulnerable populations at greatest risk of housing instability.

The City is proposing to use this funding to implement activities in the following categories:

- Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations;
- Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments;
- A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services;
- Acquisition and development of non-congregate shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations;
- Capacity Building & Nonprofit Operating to build capacity and financial stability in local nonprofit organizations serving your community with HOME-ARP activities;
- Administration and planning to hire, train, and support new staff to select, manage, monitor, and evaluate HOME-ARP projects and activities.

We are reaching out for any feedback or a possible public comment as to what the needs of the community are and which of the following activities above would be recommended to be funded.

I am not too sure if your organization does any or much work in Niagara Falls but if so we would appreciate any feedback, comments or questions you may have.

If you would like to discuss more we can also do that and I can be reached at 716-286-8836 and generally in the office Mon-Fri 8am-4pm.

Thank you!

Paul Martell
Compliance Officer
Community Development
716-286-8836
paul.martell@niagarafallsny.gov

CONFIDENTIALITY NOTICE: This message and any attached material is confidential and privileged. The information contained herein is intended only for the review and use of the recipient(s) named above. Any unauthorized disclosure, distribution, or other use of the transmitted information is strictly prohibited. If you have received this transmission in error, please notify the sender by reply e-mail, delete the email and then destroy all copies of the transmission. Any unauthorized interception of this transmission is prohibited by law.

CONFIDENTIALITY NOTICE: This message and any attached material is confidential and privileged. The information contained herein is intended only for the review and use of the recipient(s) named above. Any unauthorized disclosure, distribution, or other use of the transmitted information is strictly prohibited. If you have received this transmission in error, please notify the sender by reply e-mail, delete the email and then destroy all copies of the transmission. Any unauthorized interception of this transmission is prohibited by law.

Re: HOME ARP funding for Niagara Falls

Maria Domingo <mdomingo@vocwny.org>

Thu 4/20/2023 11:07 AM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>; Heidi Phillips <hphillips@vocwny.org>

Hi Paul,

No apologies needed.

As to needs of the community: more affordable housing please. Also, access to support and services are often hindered by the inability to connect to agencies. Often problems with phone access and transportation are the reason why clients are not engaged. The inability to connect thru a phone call or walk-in for services would mean another day with no services.

Hope this helps.

Apple Domingo

SSVF Program Manager

<https://link.edgepilot.com/s/1f6fea10/qGDxZeT3tE2RZ5eJG-ShmQ?u=http://www.vocwny.org/>

From: Paul Martell <Paul.Martell@niagarafallsny.gov>

Sent: Tuesday, April 18, 2023 12:02 PM

To: Maria Domingo <mdomingo@vocwny.org>; Heidi Phillips <hphillips@vocwny.org>

Subject: Re: HOME ARP funding for Niagara Falls

Maria,

Thank you for your response, we greatly appreciate it.

Unfortunately (And I apologize in advance) but we are a little late in the consultation process and should have reached out earlier. Once the City has been approved for the funding the plan is to solicit and RFP for local stakeholders and agencies to submit proposal for funding late in the year (a few months).

If you would like to discuss the funding and eligible activities a little more I would be happy to do so.

But at this time we are hoping you would be willing to provide a comment as to what the needs of the community are and which of the eligible activities should be recommended to be funded.

Because we are facing a time crunch and the City has a deadline to complete the application by the end of next week this can be short and direct.

Also, any data related to veterans in our community that you would like to share would be appreciated.

We appreciate any information you are willing to provide. and again feel free to reach out if you would like to chat more in depth.

Thank you!

Paul Martell

Compliance Officer

Community Development

716-286-8836

paul.martell@niagarafallsny.gov

From: Maria Domingo <mdomingo@vocwny.org>

Sent: Tuesday, April 18, 2023 11:32 AM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>; Heidi Phillips <hphillips@vocwny.org>

Subject: Re: HOME ARP funding for Niagara Falls

Good Morning Paul,

Thank you for reaching out to us.

Your project proposal sounds comprehensive and will provide services in the Falls area that are much needed in the homeless community. These are great prospective projects; I know that new housing is needed everywhere so you are on the right track.

We welcome the opportunity to collaborate so please let us know how we can help or if you would like to discuss further.

Best,

Apple Domingo

SSVF Program Manager

https://link.edgepilot.com/s/40545be9/e6L9qTgNE0aG_PAgSDSsGQ?u=http://www.vocwny.org/

Re: HOME ARP Funding Feedback

Erin M Hooks <Erin.Hooks@niagaracounty.com>

Thu, 2/23/2023 9:19 AM

To: Paul Martell <Paul.Martell@niagarafallsny.gov>

Cc: Erin M Hooks <Erin.Hooks@niagaracounty.com>

Good afternoon,

I apologize for my delayed response but thank you so much for reaching out.

Niagara County agrees with the following priorities that you have identified:

- Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations;
- Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments;
- A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services;
- Acquisition and development of non-congregate shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations;

We continue to see the need for more shelter space as Community Missions is frequently at capacity. The lack of affordable housing in the City is a barrier for those who are ready to move out of shelter.

Our Rental Supplement Plan in Niagara County opened on 10/17/22 and was for individuals or families that were either homeless or facing imminent loss of housing. To date we received approximately 450 applications and of those 450 applications, 90 applications were approved and receiving a monthly ongoing supplement. As of 3/1/23, the funding for the program has been exhausted so no new households are being approved for this rental supplement. I will share as well that on 1/25/23 for the PIT, we had 85 homeless individuals placed in motels by DSS.

If there is anything additional I can assist with, please do not hesitate to reach out to me.

Thank you,

Erin Hooks
Senior Case Manager
Housing Unit
Niagara County Department of Social Services
716-278-6809 NF
716-439-7648 Lockport
Erin.Hooks@niagaracounty.com

From: Paul Martell <Paul.Martell@niagarafallsny.gov>

Sent: Wednesday, March 15, 2023 11:28 AM

To: Erin M Hooks <Erin.Hooks@niagaracounty.com>

Subject: HOME ARP Funding Feedback

[EXTERNAL MESSAGE]

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.

Report Abuse

Erin,

Hi there! My name is Paul Martell, I am the Compliance Officer for the Department of Community Development with the City of Niagara Falls, and I was referred to reach out to you by Ryan Trubits with HAWNY.

The City is in the process of producing an application to receive HOME-ARP federal funds provided by HUD to provide housing, shelter, and supportive services for persons experiencing or at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other vulnerable populations at greatest risk of housing instability.

The City is proposing to use this funding to implement activities in the following categories:

- Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for qualifying populations;
- Tenant-based rental assistance (TBRA) to help qualifying populations pay rent, security deposits, and utility deposits and payments;
- A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services;
- Acquisition and development of non-congregate shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations;
- Capacity Building & Nonprofit Operating to build capacity and financial stability in local nonprofit organizations serving your community with HOME-ARP activities;
- Administration and planning to hire, train, and support new staff to select, manage, monitor, and evaluate HOME-ARP projects and activities.

We are reaching out for any feedback or a possible public comment as to what the needs of the community are and which of the following activities above would be recommended to be funded.

Also, we would appreciate any type of data that may be provided. Ryan had mentioned possibly providing the number of people that were staying in hotels on the night of the PIT in 2022 (January 26). He also mentioned the Rental Supplement Program, so any information related to that (available funding, more need or assistance).

Unfortunately, and I do apologize for reaching out so late, but the City has a hard deadline of March 31 to submit the application and understand that you may not have enough time to provide any comments I completely understand.

If you would like to discuss more we can also do that and I can be reached at 716-286-8836 and generally in the office Mon-Fri 8am-4pm.

Thank you!

Paul Martell
Compliance Officer
Community Development
716-286-8836
paul.martell@niagarafallsny.gov

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.

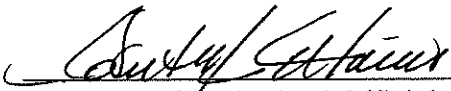
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

3/10/2023
Date

MAYOR

Title

Application for Federal Assistance SF-424*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):***** Other (Specify):***** 3. Date Received:****4. Applicant Identifier:****5a. Federal Entity Identifier:****5b. Federal Award Identifier:****State Use Only:****6. Date Received by State:****7. State Application Identifier:****8. APPLICANT INFORMATION:***** a. Legal Name:** *** b. Employer/Taxpayer Identification Number (EIN/TIN):***** c. UEI:****d. Address:***** Street1:** **Street2:** *** City:** **County/Parish:** *** State:** **Province:** *** Country:** *** Zip / Postal Code:** **e. Organizational Unit:****Department Name:****Division Name:****f. Name and contact information of person to be contacted on matters involving this application:****Prefix:***** First Name:****Middle Name:***** Last Name:****Suffix:****Title:****Organizational Affiliation:***** Telephone Number:** **Fax Number:***** Email:**

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

United States Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership (HOME) Program

* 12. Funding Opportunity Number:

FR-6100-N-01

* Title:

General Section

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:

Acquisition, Home buyer Assistance, Homeowner Rehab., Multi-family Rental New Construction, Multifamily Rental Rehab, New Construction for Ownership, TBRA.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

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

Add Attachment

Delete Attachment

View Attachment

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

* a. Federal	<input type="text" value="1,624,703.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="1,624,703.00"/>

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

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

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

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

☒ ** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

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

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

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

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


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.

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
	Mayor
APPLICANT NAME	DATE SUBMITTED
City of Niagara Falls	3/10/2023

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 Mayor
APPLICANT ORGANIZATION City of Niagara Falls	DATE SUBMITTED 3/10/2023