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Introduction

Northampton County is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Shelter Grant (ESG) Program.

During the FY 2021 program year, Northampton requalified for entitlement status as an urban county for FYs 2022-2024. The County is comprised of thirty-eight (38) municipalities, which includes two (2) cities, nineteen (19) boroughs, and seventeen (17) townships. All jurisdictions are members of the urban county entitlement program except for the City of Bethlehem, which is a federal CDBG and HOME entitlement community. The City of Easton, a previous federal CDBG entitlement community, and Northampton County entered into a cooperation agreement on 8/16/2018, and recertified during FY 2021, that recognized the City's decision to opt in as an urban county participant. By opting in, the City and County qualify for additional HUD funding as a HOME and ESG entitlement community.

Northampton County is currently in year four of its FY 2019-2023 Five-Year Consolidated Plan. The Five-Year Consolidated Plan identified the following priority needs and goals for the low- and moderate-income population of the County:

Housing Strategy –

Priority Need: There is a need for decent, safe and sanitary housing that is affordable and accessible to homebuyers, homeowners and renters.

Goals:

- HS-1 Housing Support – Assist low- and moderate-income households to access decent, safe and sanitary housing that is affordable and accessible for rent or for sale through housing counseling, down payment and closing cost assistance.
- HS-2 Housing Construction – Encourage the construction of new affordable housing units throughout the County for both owners and renters.
- HS-3 Housing Rehabilitation – Conserve and rehabilitate existing affordable housing units occupied by owners and renters in the County by addressing code violations, emergency repairs and handicap accessibility.

Homeless Strategy –

Priority Need: There is a need for housing for homeless persons and persons at-risk of becoming homeless.

Goals:

- HO-1 Housing – Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities.
- HO-2 Operation/Support – Assist housing providers who operate or provide housing support services for the homeless and persons or families at-risk of becoming homeless.

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Other Special Needs Strategy –

Priority Need: There is a need for housing, services, and facilities for persons with special needs.

Goals:

- SN-1 Housing – Support an increase in the supply of decent, safe and sanitary housing that is affordable and accessible for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs, through rehabilitation of existing buildings and new construction of housing.
- SN-2 Social Services – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.

Community Development Strategy –

Priority Need: There is a need to improve the community facilities, infrastructure, public services, and quality of life in the County.

Goals:

- CD-1 Community Facilities and Infrastructure – Improve the County’s public facilities and infrastructure through rehabilitation, reconstruction, and new construction.
- CD-2 Public Safety and Services – Improve and enhance public safety, public services, and public programs.
- CD-3 Connectivity – Improve connectivity throughout the County and surrounding municipalities through physical, visual, transportation, and accessibility improvements.
- CD-4 Clearance/Demolition – Remove and eliminate slum and blighting conditions throughout the County.

Economic Development Strategy –

Priority Need: There is a need to encourage employment and to promote economic opportunities in the County.

Goals:

- ED-1 Employment – Support and encourage job creation, job retention, and job training opportunities.
- ED-2 Development – Support business and commercial growth through expansion and new development.
- ED-3 Redevelopment – Plan and promote the development, redevelopment, and revitalization of vacant commercial and industrial sites and buildings.
- ED-4 Financial Assistance – Support and encourage new economic development through local, state, and federal tax incentives and programs such as: Tax Incremental Financing (TIF); Tax Abatement (LERTA); Payment in Lieu of Taxes (Pilot); Enterprise Zones/Entitlement Communities; Section 108 Loan Guarantees; Economic Development Initiative (EDI) funds; etc.
- ED-5 Access to Transportation – Support the expansion of public transportation and access to bus and automobile service to assist the transportation needs for employment and job training opportunities.

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Administration, Planning, and Management Strategy –

Priority Need: There is a need for planning, administration, management, and oversight of federal, state, and local funded programs.

Goals:

- AM-1 Overall Coordination – Provide program management and oversight for the successful administration of federal, state, and local funded programs, including planning services for special studies, environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.

“On March 11, 2021, President Biden signed the American Rescue Plan into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses.

To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units. The program described in this notice for the use of the \$5 billion in ARP funds is the HOME-American Rescue Plan or “HOME-ARP.”

ARP defines qualifying individuals or families as those that are (1) homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) (“McKinney-Vento”); (2) at risk of homelessness, as defined in section 401 of McKinney-Vento; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; (4) part of other populations where providing supportive services or assistance would prevent a family’s homelessness or would serve those with the greatest risk of housing instability; or (5) veterans and families that include a veteran family member that meet the criteria in one of (1)-(4) above.” (Source: Notice CPD-21-10: Requirements for the Use of Funds in the HOME-ARP Program)

On September 22, 2021, Northampton County received a letter from the U.S. Department of Housing and Urban Development notifying the County that its HOME Investment Partnerships - American Rescue Plan (HOME-ARP) allocation was \$2,338,781.00. To receive HOME-ARP funds, the County is required to create a HOME-ARP Allocation Plan. The purpose of the plan is to identify how the County can assist qualifying populations, which include individuals and families experiencing and at-risk of homelessness, by providing rental housing, supportive services, non-congregate shelter, tenant based rental assistance (TBRA), and non-profit operating and capacity building. The County started the planning process by consulting with stakeholders and organizations that serve homeless and at risk of homelessness populations to gather information and priorities for the preparation of the County’s HOME-ARP Allocation Plan.

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Consultation

To develop the Allocation Plan, Northampton County consulted with public and private agencies and organizations that provide assisted homeless and at risk of homelessness services and housing. The County also consulted with local units of government in and around the County, as well as County residents. Input from the meetings and consultations were used establish the priority needs and strategies to be addressed with HOME-ARP funds. A complete list of organizations that were contacted, the qualifying population that they serve, and type of organization is attached in the Appendix. The County consulted with the following entities:

- Continuums of Care (CoCs)
- Homeless Service Providers
- Domestic Violence Service Providers
- Veterans' Groups
- Public Housing Agencies (PHAs)
- Public agencies that address the needs of the qualifying populations
- Public or private organizations that address fair housing, civil rights, and the needs of person with disabilities

The County's Department of Community and Economic Development acts as the single point of contact to coordinate efforts between public and assisted housing providers, as well as private and governmental health, mental health, and social service agencies. The County works with the following agencies to enhance funding and service allocations to address the housing and community development needs of the area:

- Northampton County Department of Community and Economic Development - oversees the CDBG program and administers competitive HOME grants.
- Northampton County Department of Human Services - provides care and protection to County residents from infancy to old age, through consumer-focused programs designed to maintain and improve the quality of life for consumers and their families.
- Lehigh Valley RHAB CoC - oversees the Continuum of Care Network for Lehigh County and Northampton County.
- Northampton County Housing Authority and Easton Housing Authority - manage the Public Housing and Section 8 Housing Choice Voucher Program, create improvements to public housing communities, and develop affordable housing.
- Social Services Agencies - provides services to address the needs of low- and moderate-income persons.
- Housing Providers - rehabilitates and develops affordable housing for low- and moderate-income families and individuals.

Coordination with these entities is an ongoing process in order to capitalize on potential future funding opportunities, as well as potential project partnerships. As part of the ARP planning process, stakeholders were notified of the availability of HOME-ARP funds, invited to complete

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an online survey (<https://www.surveymonkey.com/r/CNP78PK>) and participate in a meeting or phone call, and individually contacted to receive input on the Plan. The following organizations participated in the consultation:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Northampton County Dept. of Human Services	Local government and provider of emergency, veteran, children and youth, mental health, drug and alcohol, early intervention, developmental, and aging services.	Meeting 2/14/2023 Survey	Need for affordable housing options, especially for seniors and large households; need for accessibility at shelters; need for shelters that can serve serious mental illness; need for longer term temporary housing units/beds; and need for affordable personal care/assisted living housing.
Lehigh Valley RHAB CoC	CoC member; Homeless services and housing provider; Public organization that addresses the needs of the homeless, those at risk of homelessness	Meeting 2/15/2023	Lack of available shelter beds in rural and suburban areas; need for affordable rental housing; need for legal services to assist with evictions; need for translation services; need for landlords willing to accept vouchers and housing subsidies; access to transportation that serves affordable housing; need for lead free housing; and need for housing to be code complaint.
Northampton County Housing Authority	Public Housing Authority	Survey	Need for affordable housing.
City of Easton Housing Authority	Public Housing Authority	Survey	Need for affordable housing.
Greater Easton Development Partnership	Community and Economic Development Non-profit organization.	Survey	Need for affordable housing, down payment assistance, lease to own housing option; and financial literacy programs.
Lehigh Valley Center for Independent Living	Non-profit organization that addresses the needs of persons with disabilities.	Survey	Need for affordable rental housing; need for more shelter beds; need for more housing subsidies and vouchers; need for rental maintenance enforcement; and need for housing for young people with disabilities.
Third Street Alliance	CoC member; Homeless services and housing provider; Public organization that addresses the needs of the homeless, those at risk of homelessness, and early childhood education provider.	Survey	Lack of available shelter beds in rural and suburban areas; need for affordable rental housing; need for legal services to assist with evictions; need for translation services; need for landlords willing to accept vouchers and housing subsidies; access to transportation that serves affordable housing; need for lead free housing; and need for housing to be code complaint.
Greater Shiloh Church	CoC member; Homeless services and housing provider; Public organization that	Survey	Need for affordable permanent housing options for homeless households; need for educational services and resources for

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	addresses the needs of the homeless, those at risk of homelessness, civil rights and fair housing; and persons with disabilities.		those at risk of homelessness; and need for housing choices and options.
Easton Area Community Center	Non-profit Community Youth and Senior Center.	Survey	Need for affordable rental housing, childcare, transportation, food security, after school program, and mental health support programs.
Easton Area Neighborhood Center	CoC member; and Homeless services and housing provider.	Survey	Need for affordable rental housing; need transitional housing; need financial support and supportive services for those at risk of homelessness; and need for housing and supportive services for domestic violence victims.
Lehigh Valley Habitat for Humanity	Non-profit housing and supportive services organization.	Meeting 2/14/2023	Need for affordable housing.
NAACP	Public organization that addresses civil rights and fair housing.	Survey	Need for affordable rental housing; need transitional housing; need financial support and supportive services for those at risk of homelessness; and need for housing and supportive services for domestic violence victims.
ProJeCt of Easton	Homeless service provider.	Survey	Need for affordable housing options; need for shelter beds, especially women and children beds; need for living wage jobs; and need for supportive services that support domestic violence victims, substance abuse, and mental health.
Turning Point of Lehigh Valley	Domestic violence services provider.	Survey	Need for affordable housing units; need for landlords willing to accept vouchers and housing subsidies; need for more permanent supportive housing; and need for enforcement of housing health and quality standards.
Northampton County Network of Care	Local government and provider of veteran supportive services.	Survey	Need for additional shelter beds for homeless households; lack of stable income increases risk of homelessness; and mental health problems lead to housing instability.
City of Bethlehem	Local government and administrator of CDBG, HOME, and ESG programs.	Survey	Need for additional shelter beds for homeless households; lack of affordable housing; lack of living wage jobs; and need for landlords willing to accept vouchers and housing subsidies.

In summary of the consultations, the following unmet needs; gaps in the shelter, housing, and service delivery system for qualifying populations; and priorities for HOME-ARP eligible activities were received:

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- The largest housing problem in the County and the surrounding region is housing affordability.
- Supportive services are necessary to reduce recidivism and sustain stable housing.
- There is a need for additional shelter beds and non-congregate beds due to slow turnover.
- Lack of transportation; access to affordable childcare; lack of education; a lack of job skills; eviction history; unemployed or employed at nonliving wage job; and lack of support system.
- There is a need for first time homebuyer assistance, housing counseling, handicap accessible housing, availability of senior housing, availability of group home or communal living arrangements, rehabilitation assistance, abatement of lead based paint in housing units, and code compliance for housing. The CoC has recognized the increased demand to assist families at risk of homelessness or recently homeless through short term rental assistance, utility assistance and corresponding supportive services.

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Public Participation

Northampton County prepared the HOME-ARP Allocation Plan in compliance with the County's Citizen Participation Plan. The County held two (2) Public Hearings; one in person and one virtually. The hearings were held on: March 2, 2023 at 1 PM via Zoom; and March 2, 2023 at 3:30 PM at the regularly scheduled Economic Development Meeting in County Council Chambers. These Hearings provided residents, agencies, and organizations with the opportunity to discuss the County's Plan and to provide suggestions for funding priorities. The Public Hearing advertisement was published in The Express Times on February 13, 2023 and announced the "draft" Plan display period, as well. A "draft" of the HOME-ARP Plan was placed on public display at the following locations for review:

- County of Northampton Department of Community & Economic Development - County of Northampton Human Services Building 2801 Emrick Blvd, Bethlehem, PA 18020
- Bangor Public Library 39 S. Main Street, Bangor, PA, 18013
- Memorial Library of Nazareth & Vicinity Library 295 E. Center Street, Nazareth, PA 18064
- Northampton Area Public Library 1615 Laubach Avenue, Northampton, PA 18067
- City of Easton, Department of Community & Economic Development, 123 South Third Street, Easton, PA 18042
- County of Northampton website (www.northamptoncounty.org) Government section of the website under "Community and Economic Development"

The newspaper notice announced that the "draft" plan was available for review and comment for a period of 30-days starting on February 14, 2023, and ended on March 15, 2023. The County additionally notified the public of its opportunity to comment on the Plan through its website and social media accounts. Upon completion of the 30-day comment period, the County submitted the plans to the County Council for approval to submit the application to HUD. The County passed a resolution on March 16, 2023, approving the submission of the HOME-ARP Plan to HUD. The plans were electronically submitted through HUD's online IDIS system prior to March 31, 2023.

The following comments were received:

- There is a need for affordable housing in Northampton County

All comments received were integrated into the Plan.

Needs Assessment and Gaps Analysis

The largest problem affecting low- and moderate-income households in the County is housing affordability. According to the 2015-2019 ACS data, 46.2% of all renter households were cost overburdened by 30% or more, and 22.5% of all owner households were cost overburdened by 30% or more. The housing stock in the County is older, in need of rehabilitation, and most residential structures are not accessible. The median year housing was built in the County is 1969, which is now over 50 years old. Slightly less than one-third (27.8%, 35,273 units) of the housing stock was built prior to 1939 and almost two-thirds (61.8%) of the current housing stock was built prior to 1979.

Northampton County is a member of the Lehigh Valley Regional Homeless Advisory Board (LV-RHAB) under the Continuum of Care Network for Eastern Pennsylvania (Eastern PA CoC). The Eastern PA CoC is administered by the Pennsylvania Department of Community and Economic Development (PA DCED). The County's Department of Community and Economic Development staff attends the local CoC meetings and acts as the County's representative. The County coordinates its activities with the Continuum of Care and supports its applications for funds. The County helps the Eastern Pennsylvania CoC to address homelessness by working together to develop a framework to deliver housing and supportive services to the homeless and those at risk of homelessness.

The Lehigh Valley RHAB identifies regional and local homeless issues; coordinates regional planning; identifies regional housing gaps and needs, strategies, and priorities; provides input for Supportive Services for Veteran Families (SVF) and Emergency Solutions Grants (ESG) applications; participates in completion of the CoC application; monitors Homeless Management Information Systems (HMIS) participation and implementation; and coordinates and follows-up on the Point in Time (PIT) count and Annual Homeless Assessment Report (AHAR).

The RHAB Co-Chairs are currently representatives of the Community Action Committee of the Lehigh Valley in Bethlehem, PA, (which is located partly in Lehigh County and partly in Northampton County), and the Third Street Alliance in Easton, PA, which is located in Northampton County. The LV- RHAB has representation from multiple interest groups including: CDBG/HOME/ESG Jurisdictions, Public Housing Authorities, domestic violence service providers, Veterans groups, youth service providers, Community Action Partnerships, homeless service providers, and faith-based organizations.

The Lehigh Valley RHAB \$3,989,823 in FY 2022 to provide emergency shelter, rapid rehousing, transitional housing, permanent supportive housing, street outreach, and related supportive services. Northampton County received \$189,113 in FY 2022 ESG funds to address homeless needs. The County utilized approximately \$30 million in rent/utility assistance for 3,850 beneficiaries through the Emergency Rental Assistance Program (ERAP) during the pandemic. Additionally, the County received \$2,170,520 in CDBG and \$682,646 in HOME funds for FY

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2022 to address the housing and community needs of the low- and moderate-income population in the County.

The Eastern PA CoC 2022 Gaps Analysis, prepared by Diana T. Myers and Associates, noted the following characteristics:

- The Continuum of Care Housing Inventory Count (HIC) for Lehigh Valley included 640 emergency shelter beds, 43 rapid rehousing beds, 134 transitional beds, 257 permanent supportive beds, and 35 other permanent housing.
- The Coordinated Entry system for Lehigh Valley received 1,086 enrollments in 2021 and of those enrollments, 397, or 36.6%, were attributed to Northampton County. For Northampton County 76% of enrollments were completed through “211” and 24% were completed at an Access Site.
- Of the 397 enrollments in Northampton County, 148 were Fleeing Domestic Violence, 54 were Youth 24 and Under, 39 were Chronically Homeless, 16 were Veteran, and 160 were No Subpopulation.
- Enrollments for Northampton County by Race were: 47.1% White; 27.5% Black, African American, or African; 20.2% were Unknown; 4.06% were Multi-Racial; 1.0% were American Indian, Alaska Native, or Indigenous; and 0.3% were Native Hawaiian or Pacific Islander.
- Enrollments for Northampton County by Ethnicity were: 62.0% Non-Hispanic/Non-Latin(a)(o)(x); 22.9% were Latin(a)(o)(x); and 15.1% were Unknown.
- Coordinated Entry Referrals for Northampton County were: 389 Emergency Shelter; 353 Prevention Assistance; 69 Transitional Housing; and 49 Street Outreach.
- For Northampton County, the average length of time on BNL was 145 days for leavers and 61 days for stayers.
- For Northampton County, the outcomes from BNL were: 25% Active; 15% Permanent Housing; 8% Temporary Housing; 0.1% Institutional Settings; 1% Homeless Situations; 1% Other; and 50% Missing.
- For Northampton County, the exits from BNL were: 20% Permanent Housing; 11% Temporary Housing; 0.1% Institutional Settings; 1% Homeless Situations; 2% Other; and 66% Missing.

Northampton County is served by two (2) housing authorities: Northampton County Housing Authority and Easton Housing Authority. The Northampton County Housing Authority owns and manages 106 public housing units and administers 530 vouchers (56 project-based, 465 tenant-based, and 8 mainstream). The Easton Housing Authority owns and manages 372 public housing units and administers 514 vouchers (39 project-based and 475 tenant-based).

As of 2021, there were 520 individuals on the Easton Housing Authority's Public Housing Waiting List. Of those individuals, 80% were extremely low-income, 4% were very low-income, and 16% were low-income. Units requested are: 52% 1 BR, 38%, 2 BR, 7% 3 BR, and 3% 4+ BR. The

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largest demand for affordable housing on the waiting list is for affordable housing for extremely low-income households. The waiting list is currently open.

As of 2021, there were 733 individuals on the Easton Housing Authority's Housing Choice Voucher Waiting List. Of those individuals, 75% were extremely low-income, 20% were very low-income, and 5% were low-income. Units requested are: 43% 1 BR, 31%, 2 BR, 18% 3 BR, and 8% 4+ BR. The largest demand for affordable housing on the waiting list is for affordable housing for extremely low-income households. The waiting list is currently open.

As of 2021, there were 594 individuals on the Northampton County Housing Authority's Public Housing Waiting List. Of those individuals, 70% were extremely low-income, 28% were very low-income, and 2% were low-income. Units requested are: 100% 1 BR. The largest demand for affordable housing on the waiting list is for affordable housing for extremely low-income households. The waiting list is currently open.

As of 2021, there were 616 individuals on the Northampton County Housing Authority's Housing Choice Voucher Waiting List. Of those individuals, 92% were extremely low-income, 8% were very low-income, and 0% were low-income. The largest demand for affordable housing on the waiting list is for affordable housing for extremely low-income households. The waiting list is currently open.

The following tables summarize housing needs in the County:

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	51	17	70	-	0								
Transitional Housing	102	33	38	-	0								
Permanent Supportive Housing	18	5	75	-	16								
Other Permanent Housing	0	0	15	-	0								
Sheltered Homeless						74	216	33	16				
Unsheltered Homeless						0	28	4	11				
Current Gap										0	0	46	-

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

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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	32,682		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,895		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,425		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		7,385	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		5,885	
Current Gaps			9,950

Data Sources: 1. 2015-2019 5-Year American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS) 2015-2019 ACS

The following qualifying populations will be assisted with HOME-ARP funds to address their housing and service needs:

Homeless

The following data was collected during the January 2022 Point-In-Time Survey conducted by the CoC specific to Northampton County. The Point-In-Time Survey was performed at the following locations throughout the Eastern PA CoC service area: hospitals, soup kitchens, day programs, street outreach, shelters, transitional housing of various types, and permanent housing which addresses the needs of the homeless.

Unsheltered:

- Total Households – 28
- Total Persons – 36
- Children under 18 years old – 0
- Young Adults 18 to 24 years old – 3
- Adults over 24 years old – 33

Transitional Housing:

- Total Households – 59
- Total Persons – 102
- Children under 18 years old – 38
- Young Adults 18 to 24 years old – 15
- Adults over 24 years old – 49

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Emergency Shelter:

- Total Households – 237
- Total Persons – 399
- Children under 18 years old – 114
- Young Adults 18 to 24 years old – 34
- Adults over 24 years old – 251

Northampton County is comprised of rural, suburban, and urban areas. In general, the homeless populations in the rural and suburban areas are white while the urban areas are black or hispanic. The majority of homeless persons are over the age of 25. During the 2022 PIT count there were 66 out of 921 (7%) chronically homeless persons; 36 out of 921 (4%) unaccompanied youth under the age of 25; 86 out of 921 (9%) severely mentally ill persons; 26 out of 921 (3%) chronic substance abuse persons; 2 out of 921 (~0%) persons with HIV/AIDS; 185 out of 921 (20%) persons with a disability; 64 out of 921 (7%) veterans; and 66 out of 921 (7%) victims of domestic violence.

The following unmet housing and service needs of the homeless are:

- Increase the number of emergency shelter beds, temporary housing options, permanent supportive housing options to address the waiting lists for all type of housing units.
- Increase the supply of non-congregate housing options.
- Improvements to the County's Coordinated Entry system to include more service providers, additional locations for intake assessments, and alternative intake and referral systems.
- Increase the availability of supportive services such as intensive case management, housing navigators, employment services, food access, and home goods.
- Provide affordable access to physical and mental health services.

At Risk of Homelessness

According to the 2015-2019 ACS data, 10.1% (11,560 households out of 114,185 total households) of the households in the County had incomes less than or equal to 30% of the area's HAMFI. There were 22.6% (7,385 households out of 32,680 total households) of renter households with incomes less than or equal to 30% of the area's HAMFI and 75.1% (5,545 households out of 7,385 total households) of those households had one or more housing problems. There were 5.1% (4,175 households out of 81,505 total households) of owner households with incomes less than or equal to 30% of the area's HAMFI and 72.1% (3,400 households out of 4,175 total households) of those households had one or more housing problems. The lack of access to affordable housing that meets the minimum standards for housing conditions places these households at a higher risk of becoming homeless.

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The Northampton County Emergency Rental Assistance Program (ERAP) processed 3,850 grants for rent and utility assistance during the pandemic. Approximately 15% of those receiving assistance were households that had incomes less than or equal to 30% of the area's HAMFI.

The CoC has a discharge policy in place for those exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution). This population is especially at risk of becoming homeless and requires skilled case managers to place these individuals in affordable housing.

The following unmet housing and service needs of those at risk of homelessness are:

- Increase the supply of affordable housing units.
- Increase the availability of rent, mortgage, and utility assistance.
- Increase access to eviction mitigation and foreclosure prevention.
- Increase the supply of housing vouchers.
- Increase the availability of supportive services such as intensive case management, housing navigators, employment services, food access, and home goods.
- Provide affordable access to physical and mental health services.

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

Turning Point of Lehigh Valley is the area's provider for housing and supportive services to those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. Turning Point helped a total of 3,548 survivors and their families in 2022. Turning Point received 2,583 helpline calls, delivered 1,280 hours of legal assistance, supplied 16,239 nights of shelter, provided 13,732 hours of counseling, and served 48,717 meals in 2022. Turning Point's housing was at 96-100% occupancy rate throughout 2022.

The following unmet housing and service needs of those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking are:

- Increase the supply of non-congregate emergency shelter beds, temporary housing options, and permanent supportive housing options to address the waiting lists for all type of housing units.
- Increase the supply of affordable housing options.
- Improvements to the County's Coordinated Entry and Street Outreach systems to include more service providers, more education and communication, additional locations for intake assessments, and alternative intake and referral systems.
- Increase the availability of supportive services such as intensive case management, housing navigators, employment services, food access, home goods, and childcare.
- Provide affordable access to physical and mental health services.

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Other Populations

According to the 2015-2019 ACS data, 10.1% (11,560 households out of 114,185 total households) of the households in the County had incomes less than or equal to 30% of the area's HAMFI. There were 22.6% (7,385 households out of 32,680 total households) of renter households with incomes less than or equal to 30% of the area's HAMFI and 58.6% (4,330 households out of 7,385 total households) of those households were cost burdened over 50%. There were 5.1% (4,175 households out of 81,505 total households) of owner households with incomes less than or equal to 30% of the area's HAMFI and 68.5% (2,860 households out of 4,175 total households) of those households were cost burdened over 50%. The lack of access to affordable housing places these households at a higher risk of becoming homeless.

According to the 2015-2019 ACS data, 20.8% (23,705 households out of 114,185 total households) of the households in the County had incomes less than or equal to 50% of the area's HAMFI. There were 40.6% (13,270 households out of 32,680 total households) of renter households with incomes less than or equal to 50% of the area's HAMFI and 76.2% (10,110 households out of 13,270 total households) of those households had one or more housing problems. There were 12.8% (10,435 households out of 81,505 total households) of owner households with incomes less than or equal to 50% of the area's HAMFI and 73.3% (7,650 households out of 10,435 total households) of those households had one or more housing problems. The lack of access to affordable housing that meets the minimum standards for housing conditions places these households at a higher risk of becoming homeless.

The Northampton County Emergency Rental Assistance Program (ERAP) processed 3,850 grants for rent and utility assistance during the pandemic. Approximately 25% of those receiving assistance were households that had incomes less than or equal to 50% of the area's HAMFI.

The CoC has a discharge policy in place for those exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution). This population is especially at risk of becoming homeless and requires skilled case managers to place these individuals.

There were 33 sheltered and 4 unsheltered veterans counted in the most recent PIT count. All of the veterans were male and single households.

The following unmet housing and service needs of other populations are:

- Increase the supply of decent safe sanitary accessible affordable housing units.
- Increase the availability of rent, mortgage, and utility assistance.
- Provide reasonable accommodation mediation and landlord education.
- Increase the supply of housing vouchers.

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- Increase the availability of supportive services such as intensive case management, housing navigators, employment services, food access, and home goods.
- Provide affordable access to physical and mental health services.

Based on consultations, public participation, and data analysis, the County identified the need for affordable housing as the greatest need for all qualifying populations in Northampton County. The County lacks decent safe sanitary accessible housing that is affordable. This supply issue places pressure on all types of housing in the County, as demand exceeds supply. There is not a sufficient supply of shelter housing, units for rapid rehousing, transitional housing, permanent supportive housing, rental housing (all income levels), and owner-occupied housing (all income levels). Additionally, there is a need for individualized supportive services for all qualifying populations to successfully reside in the new affordable housing units. Documented outcomes demonstrate lower rates of recidivism and higher rates of goal accomplishment by providing comprehensive household supportive services to beneficiaries.

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HOME-ARP Activities

Northampton County identified the need for decent safe sanitary accessible affordable housing as the greatest need in the County. While there is a gap in shelter housing, this gap is directly related to the availability of all affordable housing units in the County. Housing providers noted that the lack of available long term housing delays the turnover in shelter housing. The County intends to use a top down housing first approach to house homeless or those at risk of homelessness. By increasing the supply of affordable housing, more housing choice will be created that will assist in moving households from shelters to permanent housing.

The County will conduct an open competition for HOME-ARP funds to create new affordable rental housing. The process will start with a request for proposals from housing and supportive service organizations that serve the homeless and those at risk of homelessness. Proposals will be ranked based on capacity, experience, scope, and investment return. The County will enter into subrecipient agreements with the housing and supportive services providers and monitor as agreed upon.

Northampton County developed its HOME-ARP Budget based on the identified needs from consultation with community stakeholders, agency surveys, the assessment of the data obtained from the Point In Time Count (PIT), Continuum of Care Housing Inventory Count (HIC), American Community Survey Data (ACS), HUD Comprehensive Housing Affordability Strategy (CHAS), and other statistical data provide from the CoC and Northampton County Department of Human Services. The County will use the following budget allocation for HOME-ARP funds:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 233,878		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing	\$ 1,754,086		
Non-Profit Operating	\$ 116,939	5 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 233,878	10 %	15%
Total HOME ARP Allocation	\$ 2,338,781		

The County allocated 10% of the funds for Supportive Services, 75% of the funds for the Development of Affordable Rental Housing, 5% of the funds for Non-Profit Operating, and 10% of the funds for Administration and Planning. Supportive services may include some of the following eligible services: childcare, education services, employment assistance and job training, food, housing search and counseling services, legal services, life skills training, mental health services, outpatient health services, outreach services, substance abuse treatment services,

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transportation, case management, mediation, credit repair, landlord/tenant liaison, services for special populations, and financial assistance costs. Development of affordable rental housing is for the acquisition, construction, rehabilitation, development costs, relocation, and operating cost assistance/reserves. Non-Profit operating will provide the affordable housing management organization with housing and supportive services staffing costs. Administration and planning will set aside 10% of the allocation to cover the cost to administer the HOME-ARP program by the County.

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HOME-ARP Production Housing Goals

Northampton County identified affordable rental housing as the largest need that will be addressed with HOME-ARP funding. Additionally, the County's Consolidated Plan identified the following two (2) priority needs for the low- and moderate-income households of Northampton County:

Housing Strategy –

Priority Need: There is a need for decent, safe and sanitary housing that is affordable and accessible to homebuyers, homeowners and renters.

Goals:

- HS-1 Housing Support – Assist low- and moderate-income households to access decent, safe and sanitary housing that is affordable and accessible for rent or for sale through housing counseling, down payment and closing cost assistance.
- HS-2 Housing Construction – Encourage the construction of new affordable housing units throughout the County for both owners and renters.
- HS-3 Housing Rehabilitation – Conserve and rehabilitate existing affordable housing units occupied by owners and renters in the County by addressing code violations, emergency repairs and handicap accessibility.

Homeless Strategy –

Priority Need: There is a need for housing for homeless persons and persons at-risk of becoming homeless.

Goals:

- HO-1 Housing – Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities.
- HO-2 Operation/Support – Assist housing providers who operate or provide housing support services for the homeless and persons or families at-risk of becoming homeless.

The County estimates that it will create eight (8) new decent safe sanitary accessible affordable housing units with HOME-ARP funding. The new rental units will provide affordable housing to eight (8) extremely low (0%-30% AMI) and very low income (30%-50% AMI) households. The HOME-ARP funds will also be used to provide supportive services through intensive case management and program referrals. The HOME-ARP funds will be distributed by the County to the housing management agency to administer, manage, and maintain the HOME-ARP housing.

Northampton County will leverage the HOME-ARP funds with other Federal, State, local, Foundation, private, etc. funding sources. The specific funding will be determined by the final activity scope.

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Preferences

Northampton County will not use preferences to provide a priority for the selection of applicants who fall into a specific qualifying population or category within a qualifying population to receive assistance. Prioritization, in the context of the coordinated entry process, refers 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.

Northampton County will comply with all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a) when applying preferences through its referral methods. Persons who are eligible for a preference have the opportunity to participate in all HOME-ARP activities of Northampton County in which they are eligible, including activities that are not separate or different, and cannot be excluded because of any protected characteristics or preferential status.

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Referral Methods

The County of Northampton is part of the Eastern PA CoC, serving a total of thirty-three (33) counties. The thirty-three counties are organized into five (5) geographically dispersed Regional Homeless Advisory Boards (RHABs). Northampton County is covered by the Lehigh Valley Regional Homeless Advisory Board. The RHAB is made up of two (2) counties which include: Lehigh County and Northampton County.

The Eastern PA CoC utilizes a comprehensive Coordinated Entry process that is fully implemented in the Lehigh Valley. The Lehigh Valley Coordinated Entry coordinates access, assessment and referral to housing and services for families and individuals in Lehigh and Northampton Counties experiencing or at imminent risk of homelessness. Entry includes outreach services through Valley Youth House and three walk-in sites. The walk-in sites are operated by the Lehigh Conference of Churches in Allentown and Bethlehem and the Third Street Alliance in Easton. The goals of CE are:

- To respond to a housing crisis by providing low barrier, person centered, county-wide entry process that is fair and allows equal access to housing assistance and homeless prevention resources.
- To utilize the same assessment approach and decision-making processes to help people resolve their housing crisis, to become stably housed as quickly as possible and to implement an easily accessible process that allocates resources as effectively as possible no matter how or where people present.
- To ensure that people with the most severe needs and levels of vulnerability are prioritized for housing and homeless assistance.
- To develop a Housing Stability Plan that identifies housing barriers, is inclusive of individual needs and includes client chosen referrals, linkages to services, housing assistance and financial stability resources.

Any family or individual experiencing a housing crisis in Lehigh or Northampton Counties can either call a toll-free hotline or visit a designated coordinated entry provider in Allentown, Bethlehem, or Easton. Veterans, those fleeing domestic violence, and transitional age, or runaway youth will be immediately connected to appropriate services. Families and single adults will be assessed using a national best practice vulnerability and service prioritization tool called the VI-SPDAT. Consumers will then be referred and connected to appropriate housing and services as they become available.

The CoC has adopted HUD CPD 16-11, HUD's Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing, as well as the accompanying updated HUD CPD-17-01 Notice. This notice established Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System. All qualifying populations that are eligible for a project or activity will be included in the CoC Coordinated Entry (CE) process. All households seeking service are provided fair and equal access regardless of their location or method by which they access the system.

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Northampton County will use the existing Coordinated Entry system, as a referral method only, not a method to prioritize clients, along with other approved referral methods from sources such as Lehigh Valley Continuum of Care and the approximately 50 non-profit organizations, faith-based initiatives and government agencies servicing the four (4) qualified populations to ensure that those qualified populations are considered for access to all units funded with HOME-ARP. Such referral members include: Bethlehem Emergency Sheltering: Catholic Charities; Cay Galgon Life House; City of Allentown; City of Bethlehem; Community Action Lehigh Valley; Early Learning Resource Center; Lehigh Conference of Churches; Lehigh County; Lehigh County Housing Authority; Lehigh County Office of Veterans Affairs; Lehigh Valley Center for Independent Living; Lehigh Valley Military Affairs Council; New Bethany; North Penn Legal Services; Northampton County; Northampton County Mental Health; Northampton County Office of Veterans Affairs; Northampton County Prison; One Big Smile, Everlasting Ministries; Project of Easton; Resources for Human Development; Ripple Community, Inc.; Salvation Army; Second Chance Training Center, Inc.; SELF Lehigh Valley; Third Street Alliance; Turning Point of Lehigh Valley; United Way of Lancaster County; Valley Youth House; and Vet Beds. Referrals may also come from project specific waiting lists. Clients will be admitted in chronological order based on when referred, with no prioritization or preference. Should the final projects developed for HOME-ARP funding require preferences, the County will submit a substantial amendment to the Allocation Plan.

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Limitations in a HOME-ARP Rental Housing

Northampton County will not limit eligibility for HOME-ARP rental housing.

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HOME-ARP Refinancing Guidelines

Northampton County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

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Definitions

The following definitions are applicable to the HOME-ARP Allocation Plan.

Homeless as defined in 24 CFR 91.5

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English

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proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

At Risk of Homelessness as defined in 24 CFR 91.5

(1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith based or other social networks, immediately available to prevent them from moving to an Emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

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

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

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

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

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

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

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(1) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

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

Domestic violence, which is defined in 24 CFR 5.2003 includes felony or misdemeanor crimes of violence committed by:

- 1) A current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- 2) A person with whom the victim shares a child in common;
- 3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- 4) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- 5) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating violence which is defined in 24 CFR 5.2003 means violence committed by a person:

- 1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- 2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship;
 - b. The type of relationship; and
 - c. The frequency of interaction between the persons involved in the relationship.

Sexual assault which is defined in 24 CFR 5.2003 means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking which is defined in 24 CFR 5.2003 means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- 1) Fear for the person’s individual safety or the safety of others; or
- 2) Suffer substantial emotional distress.

Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

- 1) Sex trafficking means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- 2) Labor trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

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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

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

(2) At Greatest Risk of Housing Instability is defined as household who meets either paragraph (i) or (ii) below:

(i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

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

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

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

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

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

or

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

Veterans and Families that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

Appendix

The following documentation is attached:

- SF 424 and Certifications
- Consultations
- Public Participation

SF 424 and Certifications

Consultations

Public Participation