

# **HOME-ARP ALLOCATION PLAN 2022**

**PARTICIPATING JURISDICTION: ONONDAGA COUNTY, NY**

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## Introduction

The U.S. Department of Housing and Urban Development announced the allocation of \$2,389,171.00 to Onondaga County for a grant called the Home Investment Partnerships Grant American Relief Plan (HOMEARP). The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include Production or Preservation of Affordable Housing, Tenant-Based Rental Assistance (TBRA), Supportive Services, Homeless Prevention Services, and Housing Counseling, and Purchase and Development of Non-Congregate Shelter.

HOME-ARP funds must assist people in HOME-ARP "qualifying populations", which include:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

To receive funding, the County must develop and submit to HUD a HOME-ARP Allocation Plan, which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and community engagement. The following is the HOME-ARP Allocation Plan.

## Consultation

The County partners with public and private entities, which several were consulted with during the development of the HOME-ARP Allocation Plan. These consulted stakeholders have relevant knowledge that can speak to the needs, service gaps, and potential activities that would best benefit qualified populations. Stakeholders consulted included those who work with families or individuals experiencing or at-risk of homelessness, fleeing domestic violence, and other vulnerable qualifying populations.

In the development of the allocation plan, the County consulted with stakeholders and asked for their input concerning the HOME-ARP grant, eligible activities, and the proposed budget. Stakeholders articulated their gap in services and/housing needs by providing written and verbal input. The County will continue to meet with stakeholders throughout the implementation of the HOME-ARP activities in an effort to assess the ongoing needs of stakeholders' clients. The County will also strive to collaborate with stakeholders to develop and effectuate strategies that will help end chronic homelessness.

The City of Syracuse and Onondaga County consolidated outreach for this program. An initial email was sent to a targeted list of providers in Onondaga County who were identified by Onondaga County Community Development and the City of Syracuse Department of Neighborhood and Business Development as organizations in Onondaga County that directly serve the targeted population for these funds. This survey was sent out on March 18<sup>th</sup> with a response due date of April 1. City and County teams met on April 6<sup>th</sup> and reviewed feedback data from the survey.

The survey was sent out a second time to the entire CoC email list with a response date of May 1. The City and County teams met again on May 3 to review the collected data.

A Public meeting was held on May 24<sup>th</sup> at 10AM in the City Hall Atrium. There were approximately 20 people in attendance. The second public meeting was a virtual conference that was held on 6/21 at 5:30pm. There were 5 people in attendance.

- Requests to complete the survey were sent to the Continuum of Care and approximately 40 individuals and agencies
- 27 responses to the survey were received (68%)
- 89% of respondents serve those that have housing instability
- 82% of respondents also serve those at risk of homelessness
- 78% of respondents also serve homeless individuals/families.

The City of Syracuse and Onondaga County have synthesized feedback from participants and the following table will provide summaries of the feedback received

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>ARISE</b>	Homeless, At Risk of Homelessness, Veterans, Those that have housing instability, disabled and seniors	Survey	For the city of Syracuse a robust wheelchair ramp program must be created where lowest income tenants and homeowners will be able to get help with ramp construction or metal ramps installation. Currently such program does not exist and there is a huge demand for such assistance. Lack of this help leads to unnecessary institutionalization of seniors.
<b>YWCA</b>	Homeless, At Risk of Homelessness, Persons fleeing domestic violence, Those that have housing instability	Survey	landlords need to take care of their properties and need to be educate about the people they are serving
<b>Home Headquarters</b>	At Risk of Homelessness, Those that have housing instability	Survey	Affordable rental rehabilitation.
<b>Salvation Army</b>	Homeless, At Risk of Homelessness, Veterans, Persons fleeing domestic violence, Those that have housing instability	Survey	Rehabbing of older units, incentivizing landlords to rent to homeless and housing vulnerable that may not have the best credit, increasing access to transportation to jobs outside the city
<b>Chadwick Residence</b>	Homeless, At Risk of Homelessness, Persons fleeing domestic violence, Those that have housing instability	Survey	To have more affordable housing that is well maintained, safe and secured. Improve housing conditions as well as expanding affordable options which could include new construction or restored apartment communities.
<b>Allyn Foundation</b>	At Risk of Homelessness, Those that have housing instability	Survey	Reduce barriers to use of/access to home improvement subsidies to bring as many existing units online and affordable. Support for tenants with poor rental histories and lack of ability to pay market rate and/or affordable rents. Increase access to programs like Section 8 or TBRA to help bridge the gap. Create incentives for landlords to take advantage of existing and/or new funding programs.

<b>Syracuse Housing Authority</b>	Housing	Survey	I would like to see more affordable housing, rehab of existing housing to make them safe and affordable. New construction of single family homes for all family sizes
<b>YMCA</b>	Seniors	Survey and public meeting	Rated all needs as equally necessary – Supportive services, Non-Congregate Shelter, TBRA, Rehabilitation and New Construction
<b>Vera House, Inc.</b>	Persons fleeing domestic violence	Survey	More safe, affordable apartments
<b>OCDCFS, MH</b>	Homeless, At Risk of Homelessness, Veterans, Persons fleeing domestic violence, Those that have housing instability, forensic, re-entry housing, SMI high need, frequent users of services	Survey	affordable housing for at risk individuals and families coming from transitional programs, housing for TAY and ELI
<b>OnCare TAY</b>	Homeless, At Risk of Homelessness, Persons fleeing domestic violence, Those that have housing instability, Transition Age Youth	Survey	Subsidized Housing
<b>CCSI - Syracuse</b>	Homeless, At Risk of Homelessness, Persons fleeing domestic violence, Those that have housing instability, Substance Use Issues compounded by lack of housing in areas that are not surrounded by dealers and other community that is not seeking recovery	Survey	More. Housing Appropriate for issues. Affordable with real services and safety. Not a room in a boarding house with no supports.
<b>United Way of Central NY</b>	Homeless, At Risk of Homelessness, Veterans, Persons fleeing domestic violence, Those that have housing instability	Survey	More affordable housing outside of the city of Syracuse. More housing for wheelchair access or those with mobility impairments. Abilities to build affordable housing with ESSHI funding.
<b>Greater Syracuse</b>	At Risk of	Survey	Deveolpment of more affordable rental

<b>Tenants Network</b>	Homelessness, Those that have housing instability		housing
<b>Onondaga County DSS-ES</b>	Homeless, At Risk of Homelessness, Persons fleeing domestic violence, Those that have housing instability	Survey	affordable housing
<b>Onondaga County CFS, Adult MH Services</b>	Homeless, At Risk of Homelessness, Persons fleeing domestic violence, Those that have housing instability, Homeless Transition Age Youth with BH issues, Re-entry, SMI/ID/SUD co-occurring,	Survey	really need more housing stock for all low income, those disabled, entry level staff, the working poor; also incentives for landlords to take a chance on high risk tenants
<b>NEHDA</b>	Homeless, At Risk of Homelessness, Veterans, Persons fleeing domestic violence, Those that have housing instability	Survey	more affordable housing, more emergency shelters for families in crisis, financial assistance for relocation and homelessness prevention
<b>Frank H. Hiscock Legal Aid Society</b>	Homeless, At Risk of Homelessness, Veterans, Persons fleeing domestic violence, Those that have housing instability	Survey	The current rental market is increasingly more challenging to find affordable units, especially of any quality. I would not recommend putting too much money into TBRA as there has been strategic investment in rapid rehousing but identification of units is the biggest challenge. Expanding affordable housing options is necessary now as homelessness increases in our community.

***Summary of feedback received and results of survey responses received from these entities:***

Respondents were asked to rate each of the identified gaps in services on a scale of 1 to 5 with 1 being not very challenging and 5 being extremely challenging.

Below notes the percentage of respondents who selected “extremely challenging” to the listed gaps in service experienced:

89% - Lack of Quality Affordable Units

78% - Rent Affordability

11% - Housing Discrimination

33% - Lack of Supportive Resources such as staffing for case management programs

27% - Transportation

Respondents were asked to rate how frequently they encountered identified challenges that disrupt services. The rating was 1 to 5, with 1 being less frequently encountered and 5 being most frequently encountered

Below are the percentages of responses selecting “most frequently encountered” to the listed challenges:

- 12% - Operational Costs
- 46% - Capacity Limitations
- 39% - Adequate Staffing
- 82% - Lack of Housing Options

Respondents were asked to indicate the importance of issues Syracuse is facing for housing homeless, low income and disabled citizens on a scale of 1 to 5 with 1 being “less important” and 5 being “very important”

Below are the percentages of respondents who indicated this issue was “very important” to them:

- 93% Lack of Affordable Housing
- 48% Code Compliance Issue in Available Units
- 26% Limited Case Management Support Services

Using the same 1 to 5 scale from “less important” to “very important”, respondents were asked to rate qualified activities based on the current client need and the gaps in available programming

Below are the percentages of responses listing activities as “very important”.

- 44% Supportive Services
- 26% Non-Congregate Emergency Shelter
- 65% Tenant Based Rental Assistance
- 56% Rental Housing Rehabilitation
- 52% Rental Housing New Construction



## Public Participation

Summary of the Public Participation process, including information about and the dates of the public comment period and public hearing held during the development of the plan.

- ***Date(s) of public notice: 7/26/2022***
- ***Public comment period: start date – 8/3/2022 end date - 8/18/2022***
- ***Date(s) of public hearing: 8/12/2022***

### ***Describe the public participation process:***

In an attempt to increase public participation, the County actively maintains communication with local nonprofits and housing developers as well as the CoC and the City of Syracuse Department of Neighborhood and Business development. The notice was published in the local newspaper and on the Onondaga County Community Development website.

### ***Summary of comments and recommendations received through the public participation process either in writing, or orally at a public hearing:***

- Some of the needs highlighted during the Needs Assessment:
  - Lack of affordable housing
  - Limited stock of available housing
  - Need more funding for supportive services and case management
  - Limited Handicap Accessible low income units available
  - Need for better transportation access

### ***Summary of comments or recommendations not accepted and state the reasons why:***

All comments were accepted.

## Needs Assessment and Gaps Analysis

### 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	105	32	313	313	#								
Transitional Housing	22	11	96	96	24								
Permanent Supportive Housing	221	84	652	652	167								
Other Permanent Housing	76	37	218	218	0								
Sheltered Homeless						29	225	10	44				
Unsheltered Homeless						0	11	#	#				
<b><i>Current Gap</i></b>										#	#	#	#

### 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			
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	7.96		
Rental Units Affordable to HH at 50% AMI (Other Populations)	29.09		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		13.01	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		27.98	
<b><i>Current Gaps</i></b>			5.05

## Size and demographic composition of qualifying populations within Onondaga County

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

According to the 2020 PIT count for NY-505 the Syracuse, Onondaga, Oswego and Cayuga County CoC there are a total of 618 overall homeless people. 460 sheltered homeless in emergency shelter, 138 homeless in transitional housing and 20 unsheltered homeless.

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

Households at risk of homelessness are those with incomes at or below 30% AMI that lack sufficient resources or support networks to prevent homelessness, and

- Have moved more than two times due to economic reasons in the past 60 days, or
- Are doubled up with another household due to economic hardship, or
- Will be evicted within 21 days, or
- Live in a hotel or motel without financial assistance from a nonprofit or government entity, or
- Live in an efficiency apartment and are overcrowded, or
- Are exiting a publicly funded institution or system of care

The HUD Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 data provides information on households that have been identified as having Severe Housing Problems. This CHAS data indicates that there are approximately 27,240 households with at least 1 of 4 severe housing problems including incomes at or below 30% AMI that are at risk of homelessness in Onondaga County.

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

According to the PIT County data, there are 78 beds in Onondaga County for transitional housing for women and families fleeing domestic violence. In 2020 the Office of Criminal Justice for Onondaga County reported a total of 4640 calls for emergency service for domestic violence.

### ***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 HUD Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 data shows that there are 24,490 households in Onondaga County that have incomes  $\leq 30\%$  AMI, There are 51,455 households with at least 1 of 4 identified housing problems (The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.)

***Describe the unmet housing and service needs of qualifying populations:***

Based on consultation with service providers and survey responses, the greatest unmet service needs of qualifying populations, including sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, other families requiring services or assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations are:

- Lack of Quality Affordable Units
- Rent Affordability
- Lack of Supportive Resources such as staffing for case management programs
- Transportation

Additional unmet service needs of qualifying populations, including sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, other families requiring services or assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations include the following as described in HUD CPD Notice 2021-10, as may be amended:

- Case management services
- Legal services
- Mediation services
- Outpatient health services
- Outreach services
- Substance abuse treatment
- Services for special populations

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

There was expressed need for low income housing availability for families. There are shelter beds available for individuals, but a shortage of quality affordable units for families. The properties that are available are in poor condition and are not code compliant

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, Onondaga County 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:***

Other populations that are at greatest risk of homelessness may include adults leaving the foster care program or institutional facilities, individuals and families facing housing instability due to income limitations, or mental or physical disability,

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

Qualifying populations will be in need of affordable quality housing

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

The level of need and gaps were determined by data collected by the CoC

## HOME-ARP Activities

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

Onondaga County will issue an RFP to contractors who are able to construct and manage new construction of properties that will serve the targeted population through transitional housing case management programs or permanent supportive housing programs.

Onondaga County Department of Community Development will manage the RFP and construction process as well as maintaining the accountability of the property owner to the grant guidelines for usage.

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

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,269,712.45		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$0 #	# %	5%
Administration and Planning	\$ 119,458.55	5%	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 2,389,171.00</b>		

***HOME-ARP funds distribution in accordance with priority needs identified in the needs assessment and gap analysis:***

Funds will be used for new construction of low income housing in distressed areas of the City of Syracuse. Lack of quality affordable housing was identified in the outreach for this grant as a top priority by all contributors.

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

The current affordable housing stock in the City of Syracuse is very old and poor quality. Most available affordable units are extremely dilapidated and repair costs exceed the investment for demolition and reconstruction. Quality properties in this market are not affordable to low income households and the need was identified by all of the partners who contributed to the outreach.

## HOME-ARP Production Housing Goals

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

Using the Housing Production Goal Calculation Worksheet, It is estimated that we will be able to produce 4-5 two family units or up to 6 single family units

***Specific affordable rental housing production goal that Onondaga County hopes to achieve and how the production goal will address the priority needs identified in Onondaga County:***

The goal of this project is neighborhood revitalization and stabilization with a focus on developing a mixed income community that supports new housing options for the targeted population for this grant. This project is going to be working in partnership with several organizations that will be contributing to the re-development of the housing in an area that has been identified as high need. In addition to the HOME-ARP investment in this community, Onondaga County Housing Development Fund Company will be investing in the new construction of several single family homes that will be sold with incentives to first time homebuyers. The goal of this partnership is creating a balanced mixed income neighborhood with significant investment in new construction.

## 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 Onondaga County-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 Onondaga County 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 Onondaga County is using a CE that has a method of prioritization described in CPD-17-01, then Onondaga County 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 Onondaga County 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).
- Onondaga County 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 recipients are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, Onondaga County must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if Onondaga County 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 Onondaga County 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 Onondaga County 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 Onondaga County 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 Onondaga County 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:***

Onondaga County does not plan to give preference to one or more of the qualifying populations. Any individual or family who meets the criteria for the qualifying populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria.

## Referral Methods

If Onondaga County intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, Onondaga County must ensure compliance with Section IV.C.2 of the Notice (page10).

ONONDAGA COUNTY 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 Onondaga County in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to Onondaga County, sub recipient, 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.

Onondaga County 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 Onondaga County 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 Onondaga County 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, Onondaga County **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 Onondaga County HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

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

CoC Coordinated Entry from HMIS

***If Onondaga County 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):***

All qualifying populations will be eligible for this program.

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

This project will prioritize the chronically homeless and those that are in most need of supportive housing services.

### **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.

- Recipients 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.
- ONONDAGA COUNTY 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). ONONDAGA COUNTY 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 Onondaga County 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 Onondaga County HOME-ARP allocation plan.
- Recipients 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 Onondaga County 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:***

No limited eligibility. Any individual or family who meets the criteria for the qualifying populations is eligible to receive assistance or services funded through HOME-ARP without any additional limitations imposed.