

Questions/Comments from April 20th Public Input Meeting

Question Report

Topic Webinar ID

Actual Start Time

Public Input Meeting 18927012-6867 HOME ARP Plan

4/20/2022 18:13

Question Details

#	Question	Asker Name
1	How many people are homeless in Rochester	Thomas Pastecki
2	The copy I have reviewed does not have p. 13 Refinancing information completed. Is there a subsequent document that is complete at this stage?	I reagan
3	SUBSTANTIAL AMENDMENT TO THE CITY OF ROCHESTER'S CONSOLIDATED COMMUNITY DEVELOPMENT PLAN/2021-22 ANNUAL ACTION PLAN ADDITION OF HOME-ARP FUNDING, NEW PROJECTS	I reagan
4	Was Tenant Purchase Assistant Program?	Liz McGriff
5	from the link on the page registrants were directed to.	I reagan
6	In the plan?	Liz McGriff
7	What about sanctions, this is one of the root causes to the problem.	Liz McGriff
8	That is a system cause.	Liz McGriff
9	When speaking about eligible activities John refers to families. Can the target population also be singles?	Sarah Peters
10	What is the AMI dollar amount that is being used?	Thomas Pastecki
11	Can tell us how the HOME-ARPA can fund the city's successful Tenant Emergency Repair Program which is a revolving loan that repairs for tenants who have negligent landlords who cause immediate health hazards which if not fixed could lead to displacement. The landlord is billed for the renovations and the city is paid back for the repairs.	Ryan Acuff
12	what is the amount of 80% of the AMI	Thomas Pastecki
13	WHO decides the home ARP funding allocaton Plan. need to see who is making that decision.	Karl Weekes

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14	Can there be grants and programming to help local private property owners provide affordable housing instead of strictly developers? The Rochester Housing Coalition has some proposals that we believe would effectively engage the private property owners. https://www.rochesterhousingcoalition.com/advocacy/solutions	Jacob Thorp
15	Who are the administration and planning people and who are the non-profit groups they appear to take 1/3 of the budget	Mary Coffey
16	Can you elaborate on the 3 million plus for "development and support of affordable housing" and how it will be allocated. Is this new construction?	Thomas Pastecki
17	What is the 30% AMI number?	Marcia Reaver
18	There is no reference that I found in the plan that includes seniors, and particularly seniors with age related disabilities, as a target population at risk of homelessness, I'd like to have an opportunity to raise a consideration of the evaluating the risks to seniors of homelessness and the regular undercounting of this subpopulation. This would be difficult to write into this box. Can I raise my hand and explain instead?	I reagan
19	what is the role of faith based entities if any with this funding?	Easter see Tucker
20	Will the public be given a break down of how this money is being used . Why in the last two years do we no longer have affordable housing in Rochester.	Mary Coffey
21	the city issues RFPs to determine projects or the RFPs related to already determined projects?	Ryan Acuff
22	there were percentages already established for ARP funding allocation - who or what group of people decided this ? Q was not answered last time.	Karl Weekes
23	what is 30% of the AMI of persons who are residing within the city of Rochester versus the area wide?	Thomas Pastecki
24	How would someone recommend a grant program to use the funds for?	Jacob Thorp
25	thank you	Karl Weekes

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26	The definition of homeless and at risk of homelessness excludes seniors, and specifically seniors with disabilities, because they generally will not say that they have no one with whom they can stay. But they cannot safely couch-surf or go to shelters. Common Ground Health determined that seniors of color in Rochester generally live in multi-generational housing, often without sufficient supports. No bedrooms or bathrooms on the ground floor, often home alone because of family away at work. This is a specific need for a certain type of housing. I have other details.	I reagan
27	I am happy to provide more info about this.	I reagan
28	FYI: Lifespan published a document titled "Poverty in Later Life" that may give you some solid information.	Marcia Reaver
29	The senior population should be in their home neighborhoods, to avoid disruptions later in life that cause dementia, with moves away from family and familiar .	I reagan
30	Have you picked locations yet????	Mary Coffey
31	many of Rochester's largest developers are telling churches and residents that the development of 30ami is not possible in Rochester. Can you speak to this misinformation?	Ryan Acuff
32	thank you for clarifying that	Ryan Acuff
33	yes what is the time line for this process	Karl Weekes
34	Good	I reagan
35	Thank you, this was a very clear presentation.	Sarah Peters

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Question

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Answer
At present there are 815 persons identified as Homeless, according to the Partners Ending Homelessness website.
Please identify the document that you have, by name?
At this point there have been no changes to the draft funding allocation plan included in the document.
The City will undertake Requests for Proposals for specific activities, programs or projects to be implemented with HOME-ARP funding.
See response to the second question you asked.
Please clarify your question.
Please provide a bit more context for your question.
Yes, it is common to use references to families, households and or single persons when discussing vulnerable populations, as any size household (including single persons) or family may be at risk of homelessness.
These funds can be used to assist households with income of up to 80% AMI, however the focus for the use of these funds will be directed to assist those Households that are extremely low income.
Requests for Proposals will be issued to determine programs and projects to be funded with HOME-ARP
For 1 person Household, 80% AMI is \$44,950 For 4 person Household, 80% AMI is \$64,150
live answered

Questions/Comments from April 20th Public Input Meeting

live answered
live answered
1 person household 30% AMI \$16,850 4 person household 30% AMI is \$24,050
Deputy Commissioner Erik Frisch to facilitate contact between John Oster and Ms. Reagan.
live answered
live answered
live answered
HUD regulations provided a cap whereby no more than 15% of the HOME-ARP funds can be spent on Admin and Planning. Likewise, there is a 5% cap on non-profit operating and capacity building
live answered
live answered
live answered

Questions/Comments from April 20th Public Input Meeting

live answered
live answered
live answered
live answered

From: [City of Rochester Communications](#)
Subject: City of Rochester News Release – City Seeks Community Input on HUD Funding for Pandemic Relief
Date: Monday, April 4, 2022 5:37:04 PM

City of Rochester

News Release

City Seeks Community Input on HUD Funding for Pandemic Relief

(Monday April, 4, 2022) – The City of Rochester is seeking community input regarding the use of federal funding from the U.S. Department of Housing and Urban Development (HUD) in response to the coronavirus pandemic.

As a provision of the American Rescue Plan Act (ARPA) adopted in early 2021, the City is slated to receive \$8,982,027 in additional Home Investment Partnership (HOME-ARP) funding to address issues of increased housing instability and homelessness that resulted from the coronavirus pandemic. The additional funding will be added in the form of a substantial amendment to the 2021-22 Annual Action Plan, Consolidated Community Development Plan, which represents the budget for the City's annual HUD allocation.

The draft plan amendment allocates 85% of the above-referenced new HOME-ARP funding amongst four new projects to be added to the 2021-22 Annual Action Plan. These include: (1) Development and Support of Affordable Housing HOME-ARP; (2) Tenant-Based Rental Assistance (TBRA) HOME-ARP; (3) Provision of Supportive Services- HOME-ARP; and (4) Acquisition and Development of Non-Congregate Shelter Units HOME-ARP. The remaining 15% of funds will be added to the existing project Program Administration to reimburse City staff costs in overseeing implementation of the grant. Projects will primarily serve the needs of persons who are homeless or at-risk of homelessness, persons fleeing or attempting to flee domestic violence, veterans and other vulnerable populations, including those identified to have the greatest risk of housing instability.

The draft plan amendment is available for public download here:

<https://www.cityofrochester.gov/ConsolidatedPlan2020/>.

Printed copies of the draft plan will be made available for review at the following locations:

- City Hall room 224B, 30 Church St.;
- Northeast Neighborhood Service Center, 500 Norton St.;
- Northwest Neighborhood Service Center, 71 Parkway, first floor;
- Southwest Neighborhood Service Center, 923 Genesee St.;
- Southeast Neighborhood Service Center, 320 N. Goodman St.

The City is providing a 30-day public comment period on the proposed amendment which begins today, Monday, April 4, and will conclude with a public hearing of the Rochester City Council to be held at 5 p.m. May 5, 2022.

Comments on the amendment can be delivered by email to Henry Fitts at

HUDFunding@cityofrochester.gov or by U.S. mail to Henry Fitts, c/o HOME-ARP Plan Amendment, City Hall Room 224B, 30 Church Street, Rochester, NY 14614.

The City will hold a virtual public input meeting on April 20 from 6:30-8:30 p.m. to present the draft plan and solicit feedback from attendees. Information on how to participate in the public meetings can be found here: <https://www.cityofrochester.gov/ConsolidatedPlan2020/>.

City Council will also hold a public hearing in advance of final approval of the plan. In order for a comment to be presented at the City Council public hearing, it must be received no later than 5 p.m. on Wednesday, May 4, 2022 and be prefaced by the name and address of the commenting individual or organization.

Each comment submitted in this manner will be read into the record for up to three (3) minutes of time on the live cast of the public hearing that begins at 5 p.m. on Thursday, May 5. The full text of the comment will be shared with each member of the Council prior to the hearing.

In addition, comments may also be submitted during the City Council public hearing as described below:

The hearing format may be changed from on-line video conference to in-person format at City Hall. The present plan is to conduct the public hearing remotely due to the coronavirus pandemic and pursuant to Chapter 1 of the 2022 Laws of New York State and the Governor's disaster declaration issued and renewed by Executive Orders 11 and 11.3.

However, if, prior to the hearing, the Governor terminates the disaster declaration or if Council decides that an improvement in health conditions justifies it, the public hearing will be conducted in-person at the Council Chambers in City Hall. Please check the Council's public meeting access website at <https://www.cityofrochester.gov/publicmeetings/> on or after April 13 to find out which format will be used.

Hearing participation via video conference will be streamed live for public viewing on City Council's YouTube Channel (<https://www.youtube.com/user/RochesterCityCouncil/videos>) and shared on the Council's Facebook Page (<https://www.facebook.com/RochesterCityCouncil>).

Those who wish to have their comments read into the record at the hearing can do so by sending them for receipt no later than 1 p.m. on the hearing day. To email, send to Council@Cityofrochester.gov. By U.S. Postal Service, mail to: City Council Public Hearing, City Hall Room 301A, 30 Church St., Rochester, NY 14614.

In order to be shared at the hearing, comments must include the individual's name, address and the name of the legislation on which they wish to comment.

If Council chooses the in-person format, the public may attend, observe and present oral comments in-person at the Council Chambers, room 301A, in City Hall, 30 Church St.

Assisted listening devices and/or alternative formats, including American Sign Language (ASL) interpreters, are available upon request. To arrange for these services, please telephone the City Clerk at (585) 428-7421 (voice) or (585) 428-7600 (TTY) during regular business hours by 4 p.m. on the day before the meeting. Later requests will be accommodated to the extent feasible.

The City provides bilingual services to the Hispanic community. To make arrangements for these services, please telephone (585) 428-8662 during regular business hours, at least three (3) business days prior to the City Council meeting.

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News Media: For more information, contact Communications Director Barbara Pierce at Barbara.Pierce@cityofrochester.gov.

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Rochester | New York | 14614
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Patrick.Flanigan@CityofRochester.gov

Public Comments Received via Online Survey

Completion time	First Name	Last Name	Zip Code	Please provide any input on the proposed amendment
4/18/2022	Ryan	Acuff	14609	The proposed amendment are general enough that's unclear what it is for. I strongly recommend that the City create and fund a Tenant Purchase Assistance Program and fund its Emergency Repair Program that is currently out of funds.
4/18/2022	Peter W.	Peters	14610	Given the paucity of very low income safe affordable and supportive housing, I would suggest that the City explore ways to create such housing units by collaborating with not for profit organizations that are in a position to offer support services. Why not use the money to remodel a hotel to house men and women who experience chronic homelessness for transitional housing?
4/20/2022	Laura	Felts	14609	The emergency repair program in the City of Rochester has no funding and must be fully funded using funds from this to get it started again and then sustainable funding needs to be allocated going forward. A tenant purchase assistance program also needs to be created in the City of Rochester and funded with these funds as a start-up and then permanent sustainable funds must go to it after the start-up funds run out.
4/20/2022	Ritti	Singh	14620	Allocate at least 1 million to the Emergency Repair Program so that tenants leaving in dangerous slum conditions can get repairs. All of our people deserve safe and stable housing. Allocate \$3 million dollars to the Tenant Purchase Assistance Program so that tenants can purchase their own buildings, instead of out-of-town slumlords. We deserve basic control over our living situations -- we should be able to purchase our homes instead of paying a slumlord's mortgage and increasing his profit.

Public Comments Received via Online Survey

ment described above

Fitts, Henry

From: Kenny kannan <bonniecannan@hotmail.com>
Sent: Monday, April 25, 2022 6:16 PM
To: HUD Funding
Subject: Fw: City Proposal for HUD funding Bonnie Cannan 66 Malling Dr 14621

To Henry Fitts Consolidated community Development Plan

Sent from [Outlook](#)

From: Kenny kannan
Sent: Wednesday, December 9, 2020 4:15 PM
To: amy.ventura@cityofrochester.gov <amy.ventura@cityofrochester.gov>
Subject: City Proposal for HUD funding Bonnie Cannan 66 Malling Dr 14621

The North East Neighborhood Community participated in developing a development plan to meet the needs of our neighbors in the north east area of the City. The plan consisted of many of the both desires and needs of our area. We urged the City to use this document which we had spent both energy, commitment and time to ensure our voice was not just heard but was included in all decision making When the City Master Plan began we pushed hard to advocate that our plan stand as the specific goals of the Master Plan rather than developing a separate one as we felt the one we did could serve to meet the needs as we saw them. The proposal to follow re HUD funds is consistent and imaginative in meeting the intent of that effort.

Proposal :

We recognize that a house or housing is not the real target but supporting homes is. our neighborhood has houses that are one hundred years old as are many in Rochester. While they were built to be very sturdy, nothing lasts a 100 years without wear and tear. We have been told that 40% of the housing primarily in this low income area has defined repairs but little wealth. So what do you do.

There is a former paint decorative store in the area. This store is on a major corner and has a lot of space. It is only being used partially at the present.

Any older manufacturing buildings in the area could serve to be the location to meet the needs for repairing the single homes .

Our plan would be to use such spaces to develop cooperatives to do a range of repairs that are desperately needed. The repairs could included the many small and middle range of repair tasks that require workers who could do this. There is a range of needs from helping elder neighbors with not only with repairs but moving heavy items which they often cannot do. Some of the furnishing no longer needed could also be recycled rather than being thrown away. The current businesses that sometimes do these activities function on a national level and recently have been questioned as to some of their practices. A coop with workers who have the skills and other who could learn the skills would operate the coop as a self directed collective. There could also be legal services related to housing and repairs to avoid the dishonest person who can take advantage of neighbors. In addition we recently learned that the Landmark Society has begun a learning opportunity being done at Geneseo to begin to teach those interested in doing construction and repair skills, One of the most appealing factors is that the coop model would be part of the neighborhood and be located in it. The neighbors needing these skills for repairs etc and those working at the coop would also feel part of the community rather than distant from it.

In keeping with the importance of having a home and not just a house the service this could provide would go along way in maintaining more residents in their homes and part of a community. During the corona virus much was made of the health threats that can take over when the place someone lives is overcrowded and susceptible for illness. One reviewer commented that there could be more options to stay in a single home if issues like repairs and help with heavy items etc were the norm.

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Bonnie Cannan NENCC 585-784- 0862 bonniecannan@hotmail.com

Fitts, Henry

From: Lisa Reagan <lisareagan@frontiernet.net>
Sent: Friday, April 22, 2022 5:46 PM
To: HUD Funding
Cc: Frisch, Erik L.; Loren Ranaletta; gvalenti@swpc.org
Subject: amplification of comments at the public meeting 4/20/22 regarding seniors as a GAP in the draft HOME-ARP plan

To John Oster, Senior Community Housing Planner for City of Rochester

During the HUD HOME-ARP presentation this week, I put a comment in the Q&A Wednesday that had to do with a GAP (#4) in the proposed HOME-ARP Plan for the City of Rochester. I'd like to have an opportunity to amplify the comment, which was difficult to explain in the limited space of the Zoom meeting Q&A.

I believe the Plan's identification of characteristics of housing associated with instability and an increased risk of homelessness had a GAP when it came to seniors, and specifically seniors with age related disabilities.

First, I'm concerned that the definitions of homelessness and at risk of homelessness continues to structurally undercount seniors. The definition as applied continues to evaluate populations like seniors and seniors with age related disabilities in the same way as an able adult. A person is not considered homeless if they will not admit that they have no one with whom they can stay. Seniors tend to be too embarrassed to acknowledge that they don't have family to help them. Also, seniors and seniors with disabilities cannot couch-surf and be safe, or safely be housed in shelters even if they did acknowledge homelessness. So this definition criteria undercounts this population and discounts the impact on this community of homelessness risk for seniors, while we also have one of the oldest populations in the State. This is particularly true now, during the Covid pandemic, and after, when many will avoid at all costs going to nursing homes, even if they could afford it.

Common Ground Health accounted for the disconnect between the known census population of seniors in Rochester and the reports of housing providers of known senior housing units by deducing that seniors of color in the Rochester area live primarily within multi-generational homes with family. These homes may be culturally supportive, but are not always safe for seniors because the 19th C. housing stock of Rochester does not have bedrooms or bathrooms on the ground floor and family may not be able to provide consistent support because of overlapping and changing work schedules. This population needs a special assessment. If investigated, it would be clear that this Rochester population of seniors and seniors with age related disabilities needs additional resources to not become homeless and special solutions in housing provision. The seniors of colors have even less income and higher housing cost burden than their white peers, who are also significantly at risk in Rochester. Seniors of color suffer the effects of discrimination and lack of legally required accommodation in their housing searches. And all seniors have difficulty advocating effectively for themselves, for cultural and historical reasons. This is particularly true in the internet based, and alienating, housing rental system and resource provision environment.

Seniors can benefit from case management, both to prevent homelessness and to find housing if homeless. But that is insufficient because both of these tasks are more difficult for seniors due to cell phone and internet communication deficits. And different housing solutions are needed -- avoiding high rises with which they are unfamiliar and which are dangerous to them when there is a fire that requires tenants to walk down multiple stories. They need housing in their own neighborhoods. They need trusted support at a very vulnerable and humiliating time for the seniors. Seniors are particularly sensitive to disconnection from family and familiar neighborhood reference points, like environment, stores and pharmacies. Loss of these familiar supports often increase risks of dementia and worsen dementia that is already in progress. That loss also worsens their physical health.

Please consider supplementing your plan with housing and housing support that allows seniors to age in place safely in their life-long neighborhoods, where they have raised families and supported the City for decades. For additional resources, please see Melissa Wendland at Common Ground Health, Lifespan and Loren Ranaletta at Episcopal Senior Living Communities. Loren has worked on many local partnerships with other not-for-profits to provide supportive housing for seniors in our community. Resources to acquire property for building and adaptive reuse of local buildings that can be converted would fill a significant Rochester neighborhood need for our seniors.

respectfully,

Lise Reagan,
Rochester resident and retired senior housing attorney

Fitts, Henry

From: Rochester Housing Coalition <advocacy@rochesterhousingcoalition.com>
Sent: Wednesday, April 20, 2022 7:51 PM
To: Fitts, Henry; HUD Funding
Subject: Housing Incentive Grants

HOME ARP team,

I'd like to submit our housing incentive grant outline for consideration for some of this funding. This is just a draft and requires further discussion, but we firmly believe that by partnering with private owners we can help activate housing units that would be otherwise difficult to bring online. Please let me know if you would like to discuss further. Thank you!

<https://drive.google.com/drive/folders/1JrLYpRdiNaaaslt9Pq6pCgJMXT2xP7Cz>

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Rochester Housing Coalition
(585) 340-7607
www.rochesterhousingcoalition.com

To increase affordable quality housing and promote accountability for Housing Providers and Residents.

Affordable Housing Incentive Grants



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Affordable Housing Incentive Grant

Purpose	<i>Incentivize Owners to rent to very low income tenants (60% Median Family Income (MFI)) at a rent discount, by offering a financial risk offset.</i>
Eligibility	<ol style="list-style-type: none"> 1. Max Rent: 75% of FMR (see chart) (rent's can increase year over year to match 75% FMR) 2. 1-3yr lease (Tenant option to sign lease for 1-3yrs) 3. Landlord agrees to maintain compliance for 3yrs 4. Must rent to someone who meets 60% MFI (see chart) 5. Rent must not exceed 30% of tenant's gross monthly income 6. Tenant must NOT have a Housing Choice Voucher 7. IF unit is already rented, Landlord can get this grant if they meet other criteria 8. <i>Enrolled in Housing Council's Tenant training program if available</i>
Grant Amount	\$5,000 one time payment at lease start per unit
Required Docs	Lease agreement. Income docs, Current C of O. No code violations. Pre-move in photos.
Other Details	<ol style="list-style-type: none"> 1. Pre-approval prior to renting apartment: Owner submits unit information and gets 90 days pre-approved for guaranteed funding. 2. Rent must not exceed 30% of household GROSS income (last 12-14 weeks of pay stubs divided by # of weeks, multiplied by 52, divided by 12 months, times 0.3). (Utilities not included in this calculation, just rent. If utilities are included owner must show utility cost per unit and can add it from their rent amount) <p>Compliance</p> <ol style="list-style-type: none"> 1. If the resident makes more money and exceeds 60% AMI, but does NOT change, the grant stays. (doesn't punish tenants for making more money) 2. City will conduct random validations of the program (mechanisms to protect landlords with non-compliant tenants) 3. City will keep database of all units in the program <p>Turnovers</p> <ol style="list-style-type: none"> 1. Owner retains the funding position but must re-submit docs for new tenant to prove compliance. Has 180 days to find new tenant.

Eviction Risk Mitigation Grant

Purpose	<i>Offset financial risk of an eviction / damages for participants in the Affordable Housing Incentive Grant Program.</i>
Eligibility	<ol style="list-style-type: none"> 1. Landlord must be a participant in the <i>Affordable Housing Incentive Grant Program</i> 2. Tenant is evicted for any reason (other than non-renewal if covered under the Affordable Housing Incentive Grant) 3. Tenant leaves at lease end & damages were done to the property 4. Covers: Unpaid rents, repairs, legal fees.
Grant Amount	Up to \$10,000
Required Docs	Docs for application: Before & after photos. Receipts for labor/material. Unpaid rent ledger. No rules on contractors, just receipts.
Other Details	<ol style="list-style-type: none"> 1. After eviction payout; owner retains the funding position for 180 days to replace tenant & receive another <i>Affordable Housing Incentive Grant</i>. 2. Idea is suggested by the United States Interagency Council on Homelessness. Link here.

<u>Rehabilitation Grant I (Sale)</u>	
Purpose	<i>Financial incentive for house flippers to renovate vacant single family properties to sell to income eligible families.</i>
Eligibility	<ol style="list-style-type: none"> 1. Property must be on a city targeted area (exact regions TBD) 2. Property must be a single family home 3. Entity that wins the grant must be the same entity that sells the property (no wholesalers) 4. Buyer must be in the EAHI (Employer Assisted Housing Initiative) or HPAP (Home Purchase Assistance Program) program
Grant Amount	30k per property (<i>exact value tbd. But same for all properties</i>)
Required Docs	Buyer's income documents
Other Details	<ol style="list-style-type: none"> 1. Flipper identifies property and submits to city for approval 2. Flippers have a set amount of time to complete the project (12mo?) 3. Flipper sells property to an EAHI/HPAP participant (flipper can ID buyer then have them apply for EAHI to become eligible) 4. City releases 30k grant to flipper upon closing the sale. <p>If renovating the unit to bring online</p> <ol style="list-style-type: none"> 1. Can get pre-approved for up to 12 months to allow time to renovate unit, get C of O, & rent out <p>Example</p>

Rehabilitation Grant II (Rental)

Purpose	<i>Financial incentive for Landlords to renovate vacant properties to rent to income eligible families.</i>
Eligibility	<ol style="list-style-type: none"> 1. Property must be on a city targeted area (exact regions TBD) 2. Entity that wins the grant must be the same entity that rents the property (no wholesalers) 3. Tenant must qualify for the <i>Affordable Housing Incentive Grant Program</i> and maintain compliance for 3yrs.
Grant Amount	25k per unit
Required Docs	Submit property information to city. Tenant packet covered in the <i>Affordable Housing Incentive Grant Program</i> (landlord does NOT receive a duplicate payment)
Other Details	<ol style="list-style-type: none"> 1. Landlord identifies property and submits to city for approval 2. Landlord has a set amount of time to complete the project (12mo?) 3. Landlord rents the unit to renter that qualifies for the <i>Affordable Housing Incentive Grant Program</i>. 4. City releases 25k per unit after each unit is rented out. <p>If renovating the unit to bring online</p> <ol style="list-style-type: none"> 1. Can get pre-approved for up to 12 months to allow time to renovate unit, get C of O, & rent out <p>What happens if property is sold during the grant period?</p> <ol style="list-style-type: none"> 1. City holds a lien on the property and it must be resolved. <p>What happens if the property is foreclosed during the grant period?</p> <ol style="list-style-type: none"> 1. Owner gets sued for the prorated loan amount (\$1,666.66/yr)

MAX RENTS BY BED COUNT					
APT sizes	<u>Studio</u>	<u>1bd</u>	<u>2bd</u>	<u>3bd</u>	<u>4bd</u>
FMR	\$ 698.00	\$ 805.00	\$ 1,006.00	\$ 1,251.00	\$ 1,364.00
Adjusted rents (75% FMR)	\$ 523.50	\$ 603.75	\$ 754.50	\$ 938.25	\$ 1,023.00
Gov cost/mo	\$ 138.89	\$ 138.89	\$ 138.89	\$ 138.89	\$ 138.89
Rent Savings /mo	\$ (174.50)	\$ (201.25)	\$ (251.50)	\$ (312.75)	\$ (341.00)
Rent savings 3yrs	\$ (6,282.00)	\$ (7,245.00)	\$ (9,054.00)	\$ (11,259.00)	\$ (12,276.00)
Minimum Gross Income/mo	\$ 1,745.00	\$ 2,012.50	\$ 2,515.00	\$ 3,127.50	\$ 3,410.00
5k Grant	\$ 5,000.00	\$ 5,000.00	\$ 5,000.00	\$ 5,000.00	\$ 5,000.00

AFFORDABILITY BASED ON 60% MFI					
Family Size	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
60% MFI	\$ 31,450.00	\$ 35,950.00	\$ 40,450.00	\$ 44,950.00	\$ 48,500.00
Monthly Income	\$ 2,620.83	\$ 2,995.83	\$ 3,370.83	\$ 3,745.83	\$ 4,041.67
Affordability	\$ 786.25	\$ 898.75	\$ 1,011.25	\$ 1,123.75	\$ 1,212.50
Adj. Rent / Monthly Gross Income	19.97%	20.15%	22.38%	25.05%	25.31%

<u>Terms</u>	
FMR	Fair Market Rent (per HUD)
MFI	Median Family Income (per HUD)
VL	Very Low Income (50% of MFI) (per HUD)

SUBSTANTIAL AMENDMENT TO THE CITY OF ROCHESTER'S CONSOLIDATED
COMMUNITY DEVELOPMENT PLAN/2021-22 ANNUAL ACTION PLAN
ADDITION OF HOME-ARP FUNDING, NEW PROJECTS

May 9, 2022

HOME-ARP Allocation Plan Template

Guidance

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

Participating Jurisdiction: City of Rochester, New York

Date: 4/4/2022

Consultation

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

Summarize the consultation process:

The City began by meeting with the planning group, including Monroe County (County) and Partners Ending Homelessness (PEH), formerly Rochester/Monroe County Continuum of Care. The City and its partners used regularly scheduled meetings to introduce the funding and announce the outreach and engagement process. The first announcement was made to the Homeless Services Network (HSN), an advocacy group that focuses on homelessness and those

at-risk of homelessness. Subsequent to the announcement of funding, the City scheduled meetings to consult with organizations specializing in provision of services for homeless and at risk populations, those fleeing and survivors of domestic violence (DV), and veterans. Virtual consulting meetings were also scheduled with public housing agencies (PHA), agencies that address fair housing, civil rights, and the needs of persons with disabilities. The City and its partners used the meetings to provide more information to potential partner agencies, and to collect information and data from the attendees. The virtual consultation meetings were held in January, February, and March 2022; more information is included in the table below.

The City and its partners also used surveys to collect qualitative and quantitative data from the community. Two surveys were released; the first survey was sent to housing and service providers that specialize in providing services to the qualifying populations. The second survey released was for consumers, or persons that access emergency shelter services. However, an insufficient number of responses were received, and the survey results were not included for analysis. The service provider survey was released on December 22, 2021, and was open for 45 days. The information and data collected from this survey has been reviewed and included in this plan. In total, 84 responses were collected from a variety of different organizations, including: homeless/housing service providers (27 responses), housing authorities (14), housing developers (10), local government (6), healthcare (6), and education (4). A number of other groups participated, including community members/residents (4) and landlords (4).

The engagement with these organizations focused on answering (1) what are the needs and (2) where are the funding gaps in our community with respect to the HOME-ARP qualifying populations.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Rochester Housing Authority (RHA)	PHA	Virtual Consultation Meeting – 1/24/22	Case management needed, difficult for qualifying populations to find and secure housing, landlords more cautious now.
Empire Justice	Fair Housing/Civil Rights/Legal Services	Virtual Consultation Meeting – 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities.
Legal Aid of Western New York (LAWNY)	Fair Housing/Civil Rights/Legal Services	Virtual Consultation Meeting – 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities.

Legal Aid Society of Rochester	Fair Housing/Civil Rights/Legal Services	Virtual Consultation Meeting – 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities.
JustCause	Fair Housing/Civil Rights/Legal Services	Virtual Consultation Meeting – 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities.
PathStone	Fair Housing/Civil Rights/Serves needs of qualifying populations	Virtual Consultation Meeting – 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities.
Rochester Monroe Anti Poverty Initiative (RMAPI)	Serves needs of qualifying populations	Virtual Consultation Meeting – 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities.
Rochester Area Community Foundation (RACF)	Serves needs of qualifying populations	Virtual Consultation Meeting – 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Regional Center for Independent Living	Service Agency - persons with disabilities, homelessness, focus on civil rights	Virtual Consultation Meeting - 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities.
Partners Ending Homelessness (PEH) - CoC	Service Agency - homelessness (local CoC)	Multiple - co-host of virtual meetings and planning partner	Case management services are key to success for qualifying populations w/ shelter or permanent housing placements. Difficult to find appropriate, affordable housing, and difficult to maintain without supports.
Spiritus Christi Prison Outreach	Service Agency - persons exiting prison, homelessness	Virtual Consultation Meeting - 3/4/22	Qualifying population has greater barriers to finding, securing housing than typical household. Limited supply of adequate, affordable housing. Landlords less likely to rent to those with credit/rent history issues.
Eagle Star	Service Agency - veterans, homelessness	Virtual Consultation Meeting - 3/4/22	Qualifying population has greater barriers to finding, securing housing than typical household. Needs assistance w/ documentation and search, and continued case management in most cases. Limited supply of adequate, affordable housing.
Veterans Outreach Center (VOC)	Service Agency - veterans, homelessness	Virtual Consultation Meeting - 3/4/22	Qualifying population has greater barriers to finding, securing housing than typical household. Needs assistance w/ documentation and search, and continued case management in most cases. Limited supply of adequate, affordable housing.
Coordinated Care Services, Inc. (CCSI)	Service Agency - homelessness, serves needs of qualifying populations, manages coordinated entry	Virtual Consultation Meeting - 3/4/22	Needs assistance w/ documentation and search, and continued case management in most cases. Limited supply of adequate, affordable housing. Landlords less likely to rent to those with credit/rent history issues.
Huther Doyle	Service Agency - serves needs of qualifying populations, homelessness, addiction and mental health	Virtual Consultation Meeting - 3/4/22	Qualifying population has greater barriers to finding, securing housing than typical household. Needs assistance w/ documentation and search, and continued case management in most cases. Limited supply of adequate, affordable housing.
Willow Center	Service Agency - those fleeing or survivors of domestic violence, homelessness	Virtual Consultation Meeting - 3/4/22	Qualifying population has greater barriers to finding, securing housing than typical household. Needs assistance w/ documentation and search, and continued case management in most cases. Limited supply of adequate, affordable housing.
Reentry Association of WNY	Service Agency - persons exiting prison, homelessness	Virtual Consultation Meeting - 3/4/22	Qualifying population has greater barriers to finding, securing housing than typical household. Needs assistance w/ documentation and search, and continued case management in most cases. Limited supply of adequate, affordable housing.

Public Participation

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

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

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

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

- ***Public comment period:*** start date – 4/4/2022 end date – 5/5/2022
- ***Public hearing:*** 5/5/2022

Community input has been central to the development of the plan, and the information received during the public comment period and public hearing will be important to establishing priorities and identifying needs and gaps. The public comment period started the day the draft plan was released, and will last for 30 days thereafter. The City chose to forego the HOME-ARP optional 15-day public comment period to allow the community greater time to review and comment.

The Draft HOME-ARP Allocation Plan was made available for public comment on April 4, 2022, for a 30-day public comment period. It was published on the City’s website.

The City notified the public of the publication date of the HOME-ARP Allocation Plan with a press release on April 4, 2022, and by emailing local stakeholders a link to the City’s website where the Allocation Plan will be published.

The City Council held a public input meeting on the HOME-ARP Allocation Plan on April 20, 2022 at 6:30 PM.

The public input meeting included a presentation to the attendees, and a question and answer period where the public was also able to submit comments. Comments were also submitted beforehand.

Describe any efforts to broaden public participation:

The City is broadening public participation by holding a public meeting on April 20, 2022, which is in addition to the public hearing and public comment period. Additionally, the outreach and engagement efforts to date have focused on gathering the greatest amount of input from the greatest variety of resources. This has resulted in several Virtual Consulting Meetings with organizations that represent the qualifying population and two surveys.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

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

The comments received ahead of time and during the public information meeting were generally supportive of the information included within the plan, but most recommendations requested that the City look at a certain (sub)population or consider a specific intervention/program type. Recommendations included; remodeling a hotel to house those facing chronic homelessness, consideration of landlord incentive programs aimed at increasing the number of affordable, quality units available to low income households; inclusion of the City's elderly households that may not meet the traditional definitions of homelessness/at risk of homelessness; and encouragement to use HOME-ARP to fund a Tenant Option to Purchase Assistance Program and the City's Emergency Repair Program.

Lastly, several comments encouraged the City to use the funds to build supportive housing for extremely/very low income households, and to partner with non-profits to both develop the housing and provide services to the eventual tenants. The City needed to reject parts of one or two comments, but the majority of comments were accepted.

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

The City was unable to fully accept comments that recommended funding a Tenant Option to Purchase program, as the regulations state that HOME-ARP funds are not to be used for homeownership activities of any kind. Those comments were received and reviewed, but the recommendations for that activity cannot be fully considered.

Needs Assessment and Gaps Analysis

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

The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	208	71	255	255	0								
Transitional Housing	30	17	156	156	55								
Permanent Supportive Housing	557	201	786	786	198								
Other Permanent Housing						0	0	0	0				
Sheltered Homeless						48	319	49	90				
Unsheltered Homeless						0	33	0	2				
Current Gap										394	197	48	48

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	55,220		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	6,270		
Rental Units Affordable to HH at 50% AMI (Other Populations)	15,131		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		16,750	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		8,825	
Current Gaps			10,480

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

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

The most recent one-day homeless count that we have data for was conducted in January 2021. That information is included in the table above. The City used PIT, HIC, CHAS, ACS, and local data to determine where the needs in the community were, and also used interviews and the consulting meeting to gather input.

Based on recent PIT and HIC data; there are 117 Non-Hispanics with children living in emergency or transitional housing. There are 37 Hispanics living in emergency or transitional housing. The CoC tell us that 53 Whites with children, 90 Blacks/African Americans, 4 Pacific Islanders, and 7 multiple races, all with children are living in emergency or transitional housing. There are 15 households, with children only, living in emergency or transitional housing of whom 14 are females, 10 being Non-Hispanic. Demographics from the 2021 Point-in-Time Count (PITC) identifies 352 households without children. Of the 352 households, 82 are female, 265 are male, 4 are transgender, and 1 is Non-Conforming. 301 of the 352 households are Non-Hispanic, 51 are Hispanic, 146 are White, 185 are African American, 1 Asian, 3 Native American, 1 Hawaiian, and 16 Multiple Races. 68 persons are chronically homeless.

Current PITC identifies 1 White Male veteran with 4 children living in emergency shelter. Our PITC also identifies 49 persons living without children living in emergency or transitional housing. Of the 49 persons, 48 are male; 27 being white, 21 being African American and 1 being Native Hawaiian. The CoC states 90 adult survivors of domestic violence are in emergency or transitional housing. 2 victims are unsheltered.

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

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

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

While lack of options in housing was identified by many groups, the majority of participants in the surveys and in the consultation meetings highlighted support services and capacity building

as some of the highest need. Specifically, services such as housing search and placement, documentation gathering and assistance, and case management are in demand.

SHELTERED AND UNSHELTERED HOMELESS

As of the last PIT count, there were 358 persons within the emergency shelter system, out of a total 463 beds. Of these, 66 households were families with children, and 255 were households without children. There were 33 unsheltered persons found during the PIT count in 2021, down from 44 in 2020. This continued a downward trend from prior years (2017: 65, 2018: 56). Need for beds within the shelter system can fluctuate based on season and type of unit needed, but many respondents to the survey stated that a non-congregate shelter of some type is needed within the community. These non-congregate type shelters were established during COVID, and were often used for those at the highest risk of transmission or for those that had tested positive. However, the use can be much greater than that, and would add to the continuum of services offered in the community.

CURRENTLY HOUSED AND AT RISK OF HOMELESSNESS

The CHAS and ACS data showed the City of Rochester as having 20,265 renter households with incomes at or below 30% AMI. Renters with ELI represent 39% of all renter households.

OTHER FAMILIES REQUIRING SERVICES OR HOUSING ASSISTANCE TO PREVENT HOMELESSNESS

While there are technically more units than households at 30-50% AMI, the large deficit of units affordable to those households at 0-30% AMI creates a knock-on effect. Many of the 0-30% AMI households rent units affordable to those with AMIs between 0-30% or the next bracket up, which reduces the number of affordable units for those at 30-50% AMI, and so on.

Over the past two years, the City and its partners have worked on several programs aimed at preventing homelessness amongst the community. One offered rental arrears assistance, and the second offered legal assistance to persons facing eviction. It is difficult to determine the exact size of these populations, as the numbers in recent years have risen due to the pandemic, but utilization rates with these services were very high. More data on the individual qualifying populations will be included in the final Allocation Plan prior to submittal to HUD.

THOSE AT GREATEST RISK OF HOUSING INSTABILITY

The CHAS and ACS data shows the City of Rochester with 20,265 renter households with incomes at or below 30% AMI. Of those, 14,300 households are considered to have a severe housing cost burden. Households earning less than 30% AMI make up 81% of all severely cost burdened households in Rochester.

Lastly, through the plan development process, it was determined that further investigation was warranted into potential undercounts in seniors facing homelessness/at risk of homelessness, and the same for seniors with age related disabilities. Rochester is an “older” City, and established definitions of homelessness and at risk of homelessness may undercount seniors for various

reasons. Given this realization, more effort is being made to review the characteristics of housing associated with instability and an increased risk of homelessness – specific to seniors in Rochester. The City will look to its partners to help inform this work, and to determine if HOME-ARP can be used to provide interventions for this population, where warranted.

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

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

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

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

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

Access to services can be confusing, and gathering materials needed to be approved for services can also be overwhelming. Case management and other supports are often used to help people make their way through the services/housing application processes, and many partners called this out as a difficulty their clients face. These services were the higher priority in our survey and among our consultees. Housing rights and assistance in courthouses within the County of Monroe and the City of Rochester have been highly utilized and identified equally as a must needed continued service. It was noted at our February 15th, 2022 consultation, that there is a discontinuity in our service delivery systems and more must be done.

Lastly, there is a gap in non-congregated shelters, and in the provision of quality, affordable housing for the qualifying populations. During the pandemic, it was identified that there is a lack of non-congregate shelters, and low-barrier shelters. The need to have private space for individuals from the homeless population was difficult, and in many case, hotel rooms were secured. These were temporary solutions, but the need was demonstrated.

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

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

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

Identify priority needs for qualifying populations:

Priority needs include appropriate, affordable housing units that are readily available to those that need them, and that have the support services included for anyone that needs them. This was identified as the number one priority amongst survey respondents and through the consultation process, and it confirms data was reviewed with respect to the HIC and population of persons at risk of homelessness due to severe housing cost burden. The support services, such as ongoing case management, and housing search/counseling (may vary by population), were identified as crucial for successful long-term housing of the qualifying populations. A discontinuity of services exists in our community. Although there are many services available locally, accessing the services is not always straightforward. Services that help individuals leaving institutions and help individuals secure important documents are needed and wrap around services, provided to anyone living in the affordable housing to be developed, are crucial to long-term housing stability of the qualifying populations.

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

were willing to try a new model. The temporary NCS model used during COVID showed it could be successful, but that it was not a right fit for everyone, and that it was crucial to have the right support staff and services in place.

Lastly, non-profit capacity building and operating support, and help securing appropriate, affordable housing. While very much needed, the last point does not necessarily include specific development of affordable units, but in finding ways to help ELI households and other qualifying populations apply for existing housing that they are not currently able to secure. This can include outreach to landlords, shallow rent subsidies, and a number of other options under consideration.

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

The City and its partners obtained information on the homeless population and housing inventory serving the homeless through the Homelessness Data Exchange (through Partners Ending Homelessness) reports. The reports came from information obtained in the annual point in time counts and the housing inventory counts conducted in 2019 and 2021. The 2022 will be considered as soon as it is available.

Income and housing statistics were taken from various sources, including 2014-2018 ACS and decennial Census Data (2010 and 2020) from the US Bureau of the Census. Some housing and household data was taken from the 2014-2018 Community Housing Affordability Strategy (CHAS) data.

HOME-ARP Activities

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

During the consultation process, the City and its partners identified several priorities, but work will continue to further clarify the particulars and specifics of each. The City anticipates releasing Request for Proposals/Qualifications (RFP/RFQ), and/or Notice of Funding Availability/Opportunity (NOFA/NOFO) in partnership with the County and Continuum of Care to solicit proposals and gather more feedback from partner agencies.

Two priorities that will need to be discussed in greater detail include the Development of a NCS and the Development/Creation of Affordable Housing for the qualifying populations. For the development of an NCS, the City will partner with the County and local CoC to determine the best model and course of action, and to better identify other sources of construction financing and ongoing operating support. This part of the plan will require its own timeline and RFP, and it is likely that more outreach will occur to the experts in our community to help determine best practices and establish a viable path forward.

The Development of Affordable Housing Units with HOME-ARP funds will likely be folded in to the City's annual Affordable Housing RFP, with the expectation that HOME-ARP units will be a special set-aside or targeted development priority. Developers non-profit housing service providers will be able to propose how they plan to build and operate the HOME-ARP units long-term. Additionally, having mixed income and mixed population housing developments is preferable to concentrating poverty or housing issues in a certain location. Recently, there has been a push to include ELI and supportive housing units within developments serving a number of different household types, sizes, and incomes.

There are several ways to develop affordable housing, but the majority of units affordable to ELI, VLI, and LI households are created by developers with knowledge of how to access and secure local, State, and Federal sources of funding such as the Low Income Housing Tax Credit (LIHTC), State LIHTC, Historic Tax Credits, Tax Exempt Bonds, Shelter Rent PILOT agreements, as well as other sources of funding specific to the qualifying populations, such as the Empire State Supportive Housing Initiative (ESSHI) and the Homeless Housing Assistance Program (HHAP). Given the great cost of developing affordable housing, it will be important for the City and its partners to leverage existing sources of funding.

Eligible activities will likely each have an RFP/RFQ or NOFA/NOFA process, as provision of support services requires less pre-project or pre-development work than a project such as acquisition and development of a non-congregate shelter. Those individual processes for each eligible component are still in discussion, and will be more thoroughly explored after the plan is reviewed and submitted to HUD.

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

N/A

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,347,304		
Acquisition and Development of Non-Congregate Shelters	\$ 1,796,405		
Tenant Based Rental Assistance (TBRA)	\$ 898,203		

Development of Affordable Rental Housing	\$ 3,143,710		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 449,101	5 %	5%
Administration and Planning	\$ 1,347,304	15 %	15%
Total HOME ARP Allocation	\$ 8,982,027		

Additional narrative, if applicable:

Funding Allocation Plan distribution above.

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

HOME-ARP Production Housing Goals

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

The City is currently researching the cost of developing supportive housing, and is investigating which funding types we can leverage with the HOME-ARP funding. The City continues to incentivize developers to include supportive housing for the qualifying populations within any affordable or mixed income housing development in the City.

As noted in the need assessment and gaps analysis, there is a need for more affordable rental housing in the City of Rochester. To address this need, the City has allocated \$3.1 million in HOME-ARP funding to the development and rehabilitation of affordable rental housing. The City has not developed program guidelines and/or an application for these funds, but it is estimated that the funding will result in the production or 30-40 units of affordable rental housing units. Given the high cost of developing affordable housing and low incomes of the qualifying populations, it is likely that the units will have ongoing operating/rental subsidies, which will be secured later in the project development process. Lastly, the HOME-ARP funding allocated to supportive services and rental assistance will serve a to be determined number of households, as the sizing of the assistance and type of services have yet to be identified.

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

The City works with the local affordable housing developers to ensure that all developments include units that meet the needs of a variety of households, including that of ELI and VLI households and for all of the qualifying populations. The City will continue to work with partner organizations, the County, and the State to leverage funding opportunities and develop housing that is affordable and appropriate for all qualifying populations.

The City's 2020-24 Five Year Con Plan noted that there was a shortage of affordable, safe housing units in our community. One of the overarching goals of the City's Consolidated Plan is "Providing decent housing by preserving affordable housing stock, increasing availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing." The City's HOME-ARP plan supports that goal, and will address the following needs as identified in the 2020-24 Con Plan; safe decent housing that is affordable to low income households, housing rehabilitation programs, and housing and services for persons for persons experiencing homelessness or who are at risk of becoming homeless.

Preferences

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

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

TBD – Preferences may be established within individual programs or projects to target the qualifying populations, or a higher need subpopulation, but the methodology has not been decided as of the writing the plan. Any proposals will comply with the points above.

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

N/A

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

N/A

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-

ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):***** Other (Specify):***** 3. Date Received:****4. Applicant Identifier:****5a. Federal Entity Identifier:****5b. Federal Award Identifier:**

M21-MP360504

State Use Only:**6. Date Received by State:****7. State Application Identifier:****8. APPLICANT INFORMATION:***** a. Legal Name:**

CITY OF ROCHESTER

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

CU87RABY53C9

d. Address:*** Street1:**

30 CHURCH STREET, ROOM 224B

Street2:*** City:**

ROCHESTER

County/Parish:

MONROE

*** State:**

NY: New York

Province:*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

14614

e. Organizational Unit:**Department Name:**

NEIGHBORHOOD AND BUSINESS DEVE

Division Name:

Office of the Commissioner

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

RITA

Middle Name:

MARIE

*** Last Name:**

RAJCA

Suffix:**Title:**

CDBG COORDINATOR

Organizational Affiliation:*** Telephone Number:**

585-428-7816

Fax Number:

585-428-7878

*** Email:**

RITA.RAJCA@CITYOFROCHESTER.GOV

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME ARP

* 12. Funding Opportunity Number:

M21-MP360504

* Title:

TITLE II OF THE CRANSTON-GONZALEZ NATIONAL AFFORDABLE HOUSING ACT - ASSISTANCE LISTINGS #14.239 - HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME ARP)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Various Projects: Supportive Services, Acquisition & Development of Non-Congregate Shelters, TBRA, Development of Affordable Rental Housing, Non-Profit Operating & Capacity Building, Admn/Planning

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

28

* b. Program/Project

28

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

09/20/2021

* b. End Date:

09/30/2030

18. Estimated Funding (\$):

* a. Federal

8,982,027.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL

8,982,027.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

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

Authorized Representative:

Prefix:

* First Name:

MALIK

Middle Name:

D.

* Last Name:

EVANS

Suffix:

* Title:

MAYOR

* Telephone Number:

585-428-7045

Fax Number:

585-428-6059

* Email:

MALIK.EVANS@CITYOFROCHESTER.GOV

* Signature of Authorized Representative:

* Date Signed:

09/20/2021

ASSURANCES - CONSTRUCTION PROGRAMS

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

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

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

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


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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE MAYOR
APPLICANT ORGANIZATION CITY OF ROCHESTER	DATE SUBMITTED 6/17/22

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.



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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	MAYOR
APPLICANT ORGANIZATION	DATE SUBMITTED
CITY OF ROCHESTER	

CERTIFICATIONS

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

Affirmatively Further Fair Housing- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan - It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

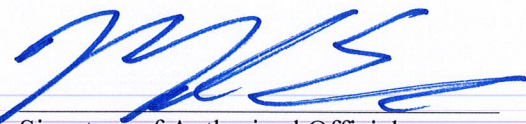
Anti-Lobbying - To the best of the jurisdiction's knowledge and belief:

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

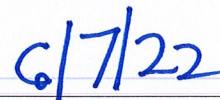
Authority of Jurisdiction - The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan - The housing activities to be undertaken with HOME-ARP funds are consistent with the strategic plan.

Section 3 - It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 75.



Signature of Authorized Official
Malik D. Evans, Mayor



Date

HOME ARP Grant Agreement

Title II of the Cranston-Gonzalez National Affordable Housing Act
Assistance Listings #14.239 – HOME Investment Partnerships Program

1. Grantee Name and Address Rochester 30 Church Street Room 106A Rochester, NY 14614-0000		2. Grant Number (Federal Award Identification Number (FAIN)) M21-MP360504																
		3a. Tax Identification Number 166002551	3b. Unique Entity Identifier (formerly DUNS) 002465805															
		4. Appropriation Number 861/50205	5. Budget Period Start and End Date FY 2021 – 09/30/2030															
6. Previous Obligation (Enter "0" for initial FY allocation)			\$0															
a. Formula Funds		\$																
7. Current Transaction (+ or -)			\$8,982,027.00															
a. Administrative and Planning Funds Available on Federal Award Date		\$449,101.35																
b. Balance of Administrative and Planning Funds		\$898,202.70																
c. Balance of Formula Funds		\$7,634,722.95																
8. Revised Obligation			\$															
a. Formula Funds		\$																
9. Special Conditions (check applicable box) <input type="checkbox"/> Not applicable <input type="checkbox"/> Attached		10. Federal Award Date (HUD Official's Signature Date) 09/20/2021																
11. Indirect Cost Rate* <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px solid black;">Administering Agency/Dept.</th> <th style="text-align: left; border-bottom: 1px solid black;">Indirect Cost Rate</th> <th style="text-align: left; border-bottom: 1px solid black;">Direct Cost Base</th> </tr> </thead> <tbody> <tr><td>—</td><td>—%</td><td></td></tr> <tr><td>—</td><td>—%</td><td></td></tr> <tr><td>—</td><td>—%</td><td></td></tr> <tr><td>—</td><td>—%</td><td></td></tr> </tbody> </table>		Administering Agency/Dept.	Indirect Cost Rate	Direct Cost Base	—	—%		—	—%		—	—%		—	—%		12. Period of Performance Date in Box #10 - 09/30/2030	
Administering Agency/Dept.	Indirect Cost Rate	Direct Cost Base																
—	—%																	
—	—%																	
—	—%																	
—	—%																	

* If funding assistance will be used for payment of indirect costs pursuant to 2 CFR 200, Subpart E-Cost Principles, provide the name of the department/agency, its indirect cost rate (including if the de minimis rate is charged per 2 § CFR 200.414), and the direct cost base to which the rate will be applied. Do not include cost rates for subrecipients.

The HOME-ARP Grant Agreement (the "Agreement") between the Department of Housing and Urban Development (HUD) and the Grantee is made pursuant to the authority of the HOME Investment Partnerships Act (42 U.S.C. 12701 et seq.) and Section 3205 of the American Rescue Plan (P.L. 117-2) (ARP). HUD regulations at 24 CFR part 92 (as may be amended from time to time), the CPD Notice entitled "Requirements for the Use of Funds in the HOME-American Rescue Plan Program" (HOME-ARP Implementation Notice), the Grantee's HOME-ARP allocation plan (as of the date of HUD's approval), and this HOME-ARP Grant Agreement, form HUD-40093a, including any special conditions (in accordance with 2 CFR 200.208), constitute part of this Agreement. HUD's payment of funds under this Agreement is subject to the Grantee's compliance with HUD's electronic funds transfer and information reporting procedures issued pursuant to 24 CFR 92.502 and the HOME-ARP Implementation Notice. To the extent authorized by HUD regulations at 24 CFR part 92, HUD may, by its execution of an amendment, deobligate funds previously awarded to the Grantee without the Grantee's execution of the amendment or other consent. The Grantee agrees that funds invested in HOME-ARP activities under the HOME-ARP Implementation Notice are repayable in accordance with the requirements of the HOME-ARP Implementation Notice. The Grantee agrees to assume all of the responsibility for environmental review, decision making, and actions, as specified and required in regulation at 24 CFR 92.352 and 24 CFR Part 58, as well as the HOME-ARP Implementation Notice.

The Grantee must comply with the applicable requirements at 2 CFR part 200, as amended, that are incorporated by the program regulations and the HOME-ARP Implementation Notice, as may be amended from time to time. Where any previous or future amendments to 2 CFR part 200 replace or renumber sections of part 200 that are cited specifically in the program regulations or HOME-ARP Implementation Notice, activities carried out under the grant after the effective date of the 2 CFR part 200 amendments will be governed by the 2 CFR part 200 requirements, as replaced or renumbered by the part 200 amendments.

The Grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Universal Numbering System and System for Award Management (SAM) requirements in Appendix I to 2 CFR part 200, and the Federal Funding Accountability and Transparency Act (FFATA) in Appendix A to 2 CFR part 170.

Funds remaining in the grantee's Treasury account after the end of the budget period will be cancelled and thereafter not available for obligation or expenditure for any purpose. Per 31 U.S.C. 1552, the Grantee shall not incur any obligations to be paid with such assistance after the end of the Budget Period.

13. For the U.S. Department of HUD (Name and Title of Authorized Official) William T. O'Connell, CPD Director	14. Signature 	15. Date 09/22/2021
16. For the Grantee (Name and Title of Authorized Official) Malik D. Evans, Mayor, City of Rochester	17. Signature 	18. Date 6/7/2022

19. Check one: ☒ Initial Agreement ☐ Amendment #

20. Funding Information:			
Source of Funds	Appropriation Code	PAS Code	Amount
2021	861/50205	HMX	\$8,982,027.00

21. Additional Requirements: These additional requirements are attached and incorporated into this Agreement. The Grantee agrees to these additional requirements on the use of the funds in 7., as may be amended from time to time by the Secretary.

- a) As of the Federal Award Date, the Grantee may use up to the amount identified in 7.a. of this Agreement for eligible administrative and planning costs in accordance with the HOME-ARP Implementation Notice.
- b) Until the date of HUD's acceptance of the Grantee's HOME-ARP allocation plan, the Grantee agrees that it will not obligate or expend any funds for non-administrative and planning costs, in accordance with the HOME-ARP Implementation Notice.
- c) In accordance with the HOME-ARP Implementation Notice, as of the date of acceptance by HUD of the Grantee's HOME-ARP allocation plan, HUD shall make the amount identified in line 7. of this Agreement available to the Grantee.
- d) If the Grantee does not submit a HOME-ARP allocation plan or if the Grantee's HOME-ARP allocation plan is not accepted within a reasonable period of time, as determined by HUD, the Grantee agrees that all costs incurred and HOME-ARP funds expended by the Grantee will be ineligible costs and will be repaid with non-Federal funds.

22. Special Conditions

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City of Rochester

City Clerk's Office

Certified Ordinance

Rochester, N.Y., _____
TO WHOM IT MAY CONCERN

I hereby certify that the following is a true copy of an ordinance which was duly passed by the Council of the City of Rochester on **May 10, 2022** and **Approved** by the Mayor of the City of Rochester, and was deemed duly adopted on **May 11, 2022** in accordance with the applicable provisions of law.

Ordinance No. 2022-129

Amending the 2021-22 Annual Action Plan to fund and authorize additional HOME Investment Partnership projects through the American Rescue Plan Act of 2021

WHEREAS, in Ordinance No. 2021-185, the City approved and adopted a 2021-22 Annual Action Plan (the Action Plan) to fund and implement community development activities under the federal Community Development Block Grant (CDBG) and other federal programs, including the Home Investment Partnership (HOME);

WHEREAS, a plan for amending the Action Plan to allocate an award to the City of \$8,982,027 to fund certain HOME projects for the homeless and those at risk of homelessness pursuant to the federal American Rescue Plan Act of 2021 (HOME-ARP Amendment) has been prepared, presented to the City Council, and circulated for public review and comment in accordance with the Citizen Participation Plan adopted in Ordinance No. 2020-153, which included:

- (1) Beginning April 4, 2022, posting information about the HOME-ARP Amendment citizen review process for the HOME-ARPA Amendment to the City's Consolidated Plan webpage at <https://www.cityofrochester.gov/ConsolidatedPlan2020/> ;
- (2) Scheduling, publishing on-line notice of, and conducting a Public Input Meeting virtually by means of an on-line video conference on April 20, 2021;
- (3) Scheduling a virtual Public Hearing on the HOME-ARPA Amendment before City Council for May 5, 2022;

- (4) Publishing in the Democrat & Chronicle advanced notice of the Public Hearing and of the availability of said Amendment and inviting the submittal of written comments for a period extending to through 4:00 PM on May 5, 2022;
- (5) Presenting the written comments received to the members of City Council before the Public Hearing; and
- (5) Streaming the Public Hearing live on the Council's Facebook <https://www.facebook.com/RochesterCityCouncil/> and YouTube https://www.youtube.com/channel/UC_U7nbtS5kEz4bjEM8AGXlQ?view_as=subscriber pages;

WHEREAS, the City Council has reviewed the public comments and recommendations on the HOME-ARPA Amendment; and

WHEREAS, the City Council has had the opportunity to review with City staff the needs, strategies and proposed actions to be addressed in the HOME-ARPA Amendment.

NOW, THEREFORE, BE IT ORDAINED, by the Council of the City of Rochester as follows:

Section 1. The Council hereby approves and adopts the HOME-ARPA Amendment, which consists of the following amendments to the 2021-22 Annual Action Plan:

- a. Adding \$8,982,027 in additional HOME Investment Partnerships Program funding from the American Rescue Plan Act of 2021 (HOME-ARP) to the 2021-22 Annual Action Plan for five programs to serve the needs of persons who are homeless or at-risk of homelessness, persons fleeing or attempting to flee domestic violence, veterans, and other vulnerable populations including those identified to have the greatest risk of housing instability.
- b. Allocating at least 85% of the above referenced HOME-ARP funding amongst the following five HOME-ARP projects to be added to the 2021-22 Annual Action Plan:
 - (a) Development and Support of Affordable Housing (35%);
 - (b) Tenant-Based Rental Assistance (TBRA) (10%);
 - (c) Provision of Supportive Services (15%);
 - (d) Acquisition and Development of Non-Congregate Shelter Units (20%); and
 - (e) Non-profit Capacity Building and Operating Assistance (5%),

with the parenthetical percentage figure for each project being a tentative approximate share of the funds, each of which may be adjusted upward or downward to account for public input and/or demonstrated need.

- c. Allocating the remainder, up to 15% of the HOME-ARP funds, for Administration and Planning, to reimburse City staff costs for overseeing implementation of the five HOME-ARP projects.

Section 2. The Mayor is hereby authorized to submit said HOME-ARPA Amendment to the United States Department of Housing and Urban Development (HUD).

Section 3. The Mayor is hereby further authorized to provide any such information that may be required by HUD and to execute any grant agreement, project sponsor agreement, or any other documentation as may be necessary to fund and carry out the activities provided for in said Amendment. The agreements and documents shall contain such additional terms and conditions as the Mayor deems appropriate.

Section 4. This ordinance shall take effect immediately.

Passed by the following vote:

Ayes - President Meléndez, Councilmembers Gruber, Harris, Lightfoot, Lupien, Martin, Patterson, Peo, Smith- 9.

Nays -None - 0.

Attest 
City Clerk

HOME-ARP CERTIFICATIONS

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

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

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

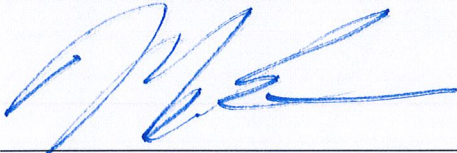
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

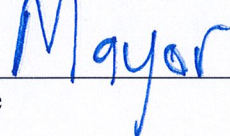
Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

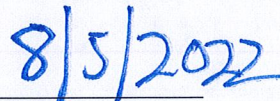
Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

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



Signature of Authorized Official


Title



Date