



CITY OF TRENTON, NJ HOME-ARP Allocation Plan

Submitted to the U. S. Department of Housing and Urban Development
as a Substantial Amendment to the
2021 Annual Action Plan

RESOLUTION

No. **23-091**

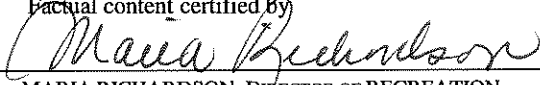
MAR 09 2023

Date of Adoption _____

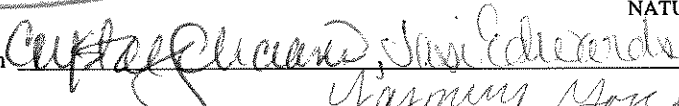
Approved as to Form and Legality

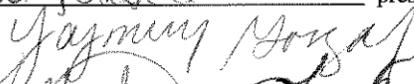

WESLEY BRIDGES, CITY ATTORNEY

Factual content certified by


MARIA RICHARDSON, DIRECTOR OF RECREATION,
NATURAL RESOURCES, AND CULTURE

Councilman/woman


presents the following Resolution:

**RESOLUTION AUTHORIZING THE CITY OF TRENTON HOME INVESTMENT PARTNERSHIP
AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN TO BE SUMMITTED TO HUD AS
A SUBSTANTIAL AMENDMENT TO THE 2021 ANNUAL ACTION PLAN, IN ACCORDANCE
WITH THE COMMUNITY PLANNING AND DEVELOPMENT NOTICE CPD-21-10**

WHEREAS, The American Rescue Plan Act of 2021 appropriated \$5 billion to provide housing, services, and shelter to individuals experiencing homelessness and other vulnerable populations, to be allocated by formula to jurisdictions that qualified for HOME Investment Partnerships Program allocations in Fiscal Year 2021; and

WHEREAS, the City of Trenton has been allocated \$3,228,324 of federal funds appropriated under section 3205 of the American Rescue Plan Act of 2021 for the HOME Investment Partnership Program (HOME-ARP); and

WHEREAS, these special Home-ARP funds can be used for acquisitions of newly constructed permanent supportive housing to primarily benefit individuals and families who are homeless, at risk of homelessness, or other vulnerable populations (Qualifying Populations) as defined by HOME-ARP; and

WHEREAS, it is a condition for receipt of such funding that the City submit to the United States Department of Housing and Urban Development (HUD) a HOME-ARP Allocation Plan in accordance with the Community Planning and Development Notice CPD-21-10; and

WHEREAS, on March 6, 2023, the City held a public hearing, notifying citizens of the HOME-ARP award amount, the activities that the City may undertake, and encouraged citizen participation in the development of the allocation plan; and

WHEREAS, the City also consulted with requisite agencies, including, but not limited to, M & L Associates; homeless service providers; domestic violence service providers; veterans' groups; public housing agencies; 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; and

WHEREAS, on February 19, 2023, the City published and made available online with a 15-day public comment period its Draft HOME-ARP Allocation Plan to discuss and receive comments on the plan; and

WHEREAS, on February 19, 2023, the City notified citizens of the FY2021 Substantial Amendment through the Trenton Times; and

RESOLUTION

WHEREAS, the City is amending its FY2021 One Year Action Plan by Substantial Amendment to use its HOME-ARP funds pursuant to HUD requirements.

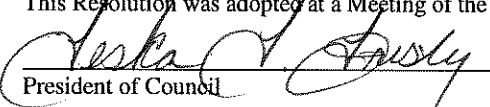
NOW, THEREFORE, BE IT RESOLVED

- 1) That the HOME-ARP Allocation Plan is hereby approved and a copy of said Allocation Plan directed to be filled with minutes of this meeting.
- 2) That the Mayor is hereby authorized to provide such assurances and/or certifications as required by the American Rescue Plan and the National Affordable Housing Act of 1990, as amended, and also any supplemental or revised data which HUD may request in connection with this Allocation Plan.
- 3) That the Mayor is hereby authorized to execute on behalf of the City of Trenton the formal agreement contracts, amendments, and other documents relating to the City's HOME-ARP Allocation Plan.

	Aye	Nay	Abstain	Absent		Aye	Nay	Abstain	Absent		Aye	Nay	Abstain	Absent
EDWARDS	✓				GONZALEZ	✓				FRISBY	✓			
FELICIANO	✓				HARRISON	✓								
FIGUEROA KETTENBURG	✓				WILLIAMS	✓								

This Resolution was adopted at a Meeting of the City Council of the City of Trenton on

MAR 09 2023


President of Council


City Clerk

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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


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

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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE W. Reed Gusciora, Mayor
APPLICANT ORGANIZATION City of Trenton	DATE SUBMITTED 2-27-23

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:

03/21/2023

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M-21-MP-34-0210

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Trenton

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

21-60001242

* c. UEI:

ELLUYGS3VHB5

d. Address:

* Street1:

Trenton City Hall

Street2:

* City:

319 N. State St

County/Parish:

Trenton

* State:

NJ: New Jersey

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

086080000

e. Organizational Unit:

Department Name:

Dept. Recreation/Nat. Resource

Division Name:

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

Prefix:

Ms.

* First Name:

Maria

Middle Name:

* Last Name:

Richardson

Suffix:

Title:

Director

Organizational Affiliation:

* Telephone Number:

609-989-3361

Fax Number:

* Email:

MRichardson@TrentonNJ.org

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:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

*** 12. Funding Opportunity Number:**

14.239

*** Title:**

HOME Investment Partnerships Program

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:**

HOME Investment Partnerships Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

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

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

* a. Federal	<input type="text" value="3,228,324.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="3,228,324.00"/>

*** 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

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

☒ ** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

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

* Signature of Authorized Representative:

* Date Signed:

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

2.27.23
Date

W. Reed Gusciora, Mayor
Title

ASSURANCES - CONSTRUCTION PROGRAMS

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

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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.
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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.
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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
	W. Reed Gusciora, Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Trenton	2-27-23

THE CITY OF TRENTON, NJ

HOME-ARP Allocation Plan

Submitted to HUD as a Substantial Amendment to the
Approved 2021 Annual Action Plan

Consultation

Section 1: Describe the consultation process including methods used and dates of consultation

See Appendix A for all Stakeholder Consultation materials.

Stakeholder comments received throughout the various sessions and individual meetings are summarized below and referenced throughout the Needs Assessment & Gaps Analysis section.

The City of Trenton collaborated with Mercer County in the stakeholder consultations conducted for the HOME-ARP program. The two entities comprise the Trenton/Mercer County Continuum of Care (CoC). In most cases the same stakeholders cover both the entire county without regard for the jurisdictional boundaries that separate them.

Together, Trenton and Mercer County conducted virtual stakeholder consultations via GoToMeeting in January 2023. For each consultation, a brief PowerPoint presentation on the HOME-ARP program was presented followed by a series of questions meant to engage participants in identifying the unmet needs among the qualifying populations they served.

Section 2: List the organizations consulted and summarize feedback received and results of upfront consultation with these entities.

Date	Attendees and Summary of Needs Identified
Continuum of Care January 10, 2023 10:00 am	Attendees: Anchor House (QP3) Homefront (QP3) Mercer County Board of Social Services (QP1, QP2, QP3) Needs Identified: <ul style="list-style-type: none"> • Safe affordable rental housing for: 0-30% AMI households, accessible for persons with disabilities; persons with substance abuse conditions; youth aging out of foster care • Housing for persons with medical issues not yet eligible for assisted living • Almost all hotels/motels in Trenton are filled with people who cannot afford to rent units • Supportive services: case management, mental health, life skills, homeless prevention • Shelters at full capacity especially for families with children due to lack of affordable rental units to move into • Funding for landlords of rental units to make repairs • Landlords requiring excessive standards from lower income tenant applicants • Eviction due to nonpayment of rent

CITY OF TRENTON, NJ

Domestic Violence & Human Trafficking January 10, 2023 2:00 pm	Attendees: Central NJ Legal Services (all QPs) Oaks Integrated Care, Inc. (all QPs) Needs Identified: <ul style="list-style-type: none"> • Safe affordable rental housing, including first floor units for persons with disabilities; for persons fleeing domestic violence or human trafficking • Supportive services: case management, mental health, therapy for trauma survivors, substance abuse, counseling for children and adults, job readiness, financial planning, legal, affordable childcare, transportation, homeless prevention • Rental assistance
Veterans January 11, 2023 11:00 am	Attendees: Soldier On (QP1, QP2, QP4) Needs Identified: <ul style="list-style-type: none"> • VASH voucher only provides shallow subsidy that pays rent for two years • High recidivism rate among veterans due to need for wrap-around services • High eviction rates due to high rents and nonpayment of rent • Affordable studio/1-bedroom rental units • Supportive services: intensive case management, financial literacy, for chronic mental illness, transportation
Public Housing Authorities January 11, 2023 2:00 pm	Attendees: Trenton Housing Authority (all QPs) Needs Identified: <ul style="list-style-type: none"> • Based on waiting list, 1-bedroom units • Job loss contributing to homelessness • Potential evictions among THA tenants due to unpaid backlog of over \$1M in rent • Supportive services: transportation, vo-tech skills training, education, mental health services, affordable childcare
Homeless Service Providers & Organizations serving Those at Risk of Homelessness January 12, 2023 10:00 am	Attendees: Central NJ Legal Services (all QPs) Oaks Integrated Care, Inc. (all QPs) Needs Identified: <ul style="list-style-type: none"> • Emergency shelter for person 18-24 who have aged out of foster care • Rapid rehousing with necessary services and more landlords to participate • Permanent supportive housing for individuals and families to move out of shelters • Affordable housing for very low income, homeless persons, and those at risk of homelessness • Affordable rental housing, including accessible housing for persons with disabilities and for elderly who are evicted due to nonpayment of rent • Housing for persons with criminal backgrounds • Supportive services: case management, mental health, addiction management, more resources for homeless, tenant education, early intervention to prevent eviction
Fair Housing & Civil Rights Advocacy Organizations January 12, 2023 2:00 pm	Attendees: Central NJ Legal Services (all QPs) Anchor House (QP3) Needs Identified: <ul style="list-style-type: none"> • Affordable rental housing

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	<ul style="list-style-type: none">• Landlords claimed they received ERAP payments then deny receiving them, placing the tenant at risk of eviction; landlords try to evict tenants so they rent units at higher rents• Difficult finding landlords who will accept vouchers due to several reasons but also includes length of time and bureaucratic red tape required by NJDCA (state HCV provider)• Getting landlords to make reasonable accommodation for persons with disabilities• Rents are unacceptably high and HUD FMRs cannot compete with them• Supportive services: homeless prevention programs, fair housing training for landlords re: reasonable accommodation
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Public Participation

Appendix B contains proof of publication of the City's public notice and a copy of the PowerPoint presentation made during the public hearing.

Section 1: Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan.

- *Date(s) of public notice: 2/19/2023*
- *Public comment period: start date - 2/20/2023 end date - 3/6/2023*
- *Date(s) of public hearing: 3/6/2023*

Describe the public participation process:

The City of Trenton advertised the 15-day public comment period and required public hearing in *The Times* on February 19, 2023. The public comment occurred beginning on February 20 and ended on March 6, 2023. The public hearing was conducted virtually on March 6, 2023. See Appendix B for a copy of the notice.

Describe efforts to broaden public participation:

To broaden public participation, the City:

- Placed a draft Allocation Plan at the following locations for residents to review either in-person or online: City Hall and at <https://www.trentonnj.org>
- Provided an online link for the virtual public hearing at <https://meet.goto.com/941119517>
Instructions on how to join the public hearing were posted at <https://www.trentonnj.org/>
- Encouraged written comments to be submitted via mail, hand delivery or email to mrichardson@trentonnj.org and at the March 6th public hearing

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

No comments were received during the 15-day comment period or during the public hearing.

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

Not applicable.

Needs Assessment & Gaps Analysis

This section presents the results of the homeless needs and gaps analysis, drawing on Continuum of Care HMIS data, Point-In-Time (PIT) count information, and several other data sources that are identified.

Where appropriate, this information is contextualized with feedback from stakeholders consulted during the HOME-ARP planning process.

Section 1: Housing Inventory

The City of Trenton has a shortage of affordable rental housing that impacts the ability of housing and service providers to rapidly re-house or place homeless and at-risk homeless persons and families in stable living situations within 30 days. The shortage of units for households at 0-30% area median income (AMI) and 31-50% AMI increases housing insecurity and rent pressure on lower-income households.

Within the rental housing inventory, there is a severe housing gap for households at 0-30% and 31-50% AMI (see Table 1). Analyzing the household occupancy of rental units by income tier provides additional information. According to CHAS data, there are 9,430 renter households at 0-30% AMI. However, there are only 5,900 rental units affordable to this group of households. Further exacerbating the situation is that only 3,750 of these 5,900 affordable units are occupied by 0-30% AMI households. The remaining 2,150 units are occupied by households with incomes above 30% AMI. ***This results in a housing gap of 5,680 rental units affordable and available to 0-30% AMI renter households.***

Moving up the income spectrum, there are 3,405 renter households at 31-50% AMI. For this income group, there is a supply of 9,060 units affordable to them. However, only 1,705 of the 9,060 units are occupied by 31-50% AMI households. The remaining supply of 7,355 units is occupied by households of other income tiers. ***This results in a housing gap of 1,700 rental units affordable and available to 31-50% AMI renter households.***

Table 1. Housing Gap Analysis, City of Trenton

Renter Households	0-30% AMI	31-50% AMI
Total Households	9,430	3,405
Affordable Housing Units	5,900	9,060
Units Occupied by Appropriate Income Tier	3,750	1,705
Units Occupied by Other Income Households	2,150	7,355
Gap	5,680	1,700

Data Source: 2015-2019 Comprehensive Housing Affordability Strategy

¹ Number of housing units occupied by a household of the same income tier (i.e., a 0-30% AMI household occupies a unit that is affordable to a 0-30% AMI household)

² Number of housing units occupied by a household that is not of the same income tier (i.e., a 0-30% AMI unit is occupied by a household above 30% AMI)

³ Total Number of Households minus Units Occupied by Appropriate Income Tier equals the number of units needed to house the balance of the households within that income tier that are occupying units affordable to households above their income tier (i.e., the housing gap).

Section 2: Size and Demographic Composition of Qualifying Populations

1. Homeless as defined in 24 CFR 91.5

Under the HOME-ARP program, the homeless QP is defined to include:

- An individual or family who lacks a fixed, regular, and adequate nighttime residence
- An individual or family who will imminently lose their primary nighttime residence within 14 days
- Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition

At the time of the January 2022 PIT Count, there were 439 sheltered and 94 unsheltered homeless individuals in Mercer County (including Trenton) that met the definition of homeless under 24 CFR 91.5. Of these 533 individuals, 60% were male, 39.4% were female, 66.8% were Black/African American, 29.1% were White, and 14.1% were Hispanic/Latino.

Table 2 includes the current homeless housing inventory in Trenton and Mercer County. On the night of the 2022 PIT count, the Housing Inventory Count included:

- 200 emergency shelter beds plus 190 overflow beds with a utilization rate of 90%
- 260 rapid rehousing beds with a utilization rate of 100%
- 76 transitional housing beds with a utilization rate of 73.7%
- 430 permanent supportive housing beds with a utilization rate of 89%. Of these, 43 were designated for chronically homeless veterans with a 100% utilization rate.
- 350 beds categorized as Other Permanent Housing with a 99% utilization rate

In addition, the Housing Inventory Count included the following for domestic violence survivors:

- 25 emergency shelter beds with a utilization rate of 64%
- 20 transitional housing beds with a utilization rate of 86%
- 6 rapid rehousing beds with a utilization rate of 100%

Table 2. Homeless Needs Inventory and Gap Analysis, Trenton and Mercer County

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	
	# Beds	# Units	# Beds	# Units	# Beds					# Beds	# Units	# Beds	# Units
Emergency Shelter (non-DV)	200	46	102	-	-								
Rapid Rehousing (non-DV)	195	68	65	-	-								
Transitional Housing (non-DV)	-	-	76	-	-								
Permanent Supportive Housing	73	58	314	-	43								
Other Permanent Housing	250	98	100	-	-								
Emergency Shelter (DV)	25	8	-	-	-								
Rapid Rehousing (DV)	6	2	-	-	-								
Transitional Housing (DV)	20	8	-	-	-								
Sheltered Homeless						65	200	5	39				
Unsheltered Homeless						-	94	-	-				
Current Gap										-	-	94	-

Sources: January 2022 CoC Point in Time Count; 2021 CoC Housing Inventory Count; Calculations by Mullin & Loneragan Associates

The annual PIT Count provides a one-night snapshot of the number of individuals and families who are homeless. For a more complete profile of the homeless population, the City of Trenton HUD ESG SAGE Report from July 1, 2021, through June 30, 2022, was reviewed.

According to the SAGE Report, a total of 1,302 homeless persons were served by programs in Trenton. There were 1,024 adults, 68.3% of whom comprised adult-only households. Children accounted for 21.3% of the total. In addition, 19 children (1.5%) were in children-only households. Adult males were the majority at 60.3% and 39.3% were female. Of the 277 children, 47.7% were male and 52.3% were female.

By race and ethnicity, Black/African Americans comprised the majority (65.9%) of the homeless population but only 48.4% of the overall population, indicating a disproportionate representation among the homeless population in Trenton. Whites accounted for 28% and Hispanic/Latino 19.2%.

Of the 1,302 individuals that accessed the various homeless programs, 80.9% exited the homeless system and of those, only 19.8% exited to positive destinations. This suggests a need for more permanent housing options.

The Coordinated Entry and Assessment System (CEAS) report for Mercer County, including Trenton, from January 1, 2022, through December 31, 2022, lists 824 assessments. Of those, 56% were single adults, 25.5% were families, 11.5% were unaccompanied youth, and 6.9% were parenting youth (i.e., youth between the ages of 18-24 with children).

According to the Mercer County FY2021 Performance Measurement Module, the average length of stay in shelter in 2020 was 52 days. By 2021, that number increased 23.1% to 64 days.

2. At Risk of Homelessness as defined in 24 CFR 91.5

Under the HOME-ARP program, the definition of persons at risk of homelessness includes an individual or family who:

- Has an annual income below 30% of median family income for the area
- Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place, and meets other qualifying conditions

The definition also includes a homeless child or youth and the parents or guardians of that child or youth if living with them.

CHAS data identified in Trenton housing gaps of 5,680 rental units affordable and available to households at 0-30% AMI and 1,700 rental units affordable and available to households at 31-50% AMI. This significant housing gap for the two lowest income groups among renters means that most of the households in need of these units are currently residing in units where they are paying more than 30% of their income on housing costs, making them cost burdened. These households are at risk of becoming homeless should they experience a job loss or a decrease in their hours, a medical emergency or any of a myriad of unexpected events that could cause them to miss one or more rent payments.

Exiting the homeless system to temporary destinations can increase the risk of someone returning to homelessness. Among homeless persons who exited programs in 2021, 18% did so to temporary destinations, with 40.5% of those to places not meant for human habitation. Individuals who exit to temporary destinations, locations not meant for human habitation, and/or without income face a greater risk of housing instability than those exiting to permanent destinations.

Attempts were made to obtain data from the Trenton Housing Authority for the waiting lists for public housing and Housing Choice Voucher applicants. No data was received. According to the [Center on Budget and Policy Priorities](#), the average wait time for households in the Trenton-Princeton Metro Area to receive housing vouchers is 18 months during which time persons who are homeless struggle to find other living arrangements, regardless of the cost, housing condition, location, and lack of safety.

According to the [Social Security Administration](#), there were 9,164 recipients of Supplemental Security Income (SSI) in Mercer County in 2021. The SSI program is a cash assistance program that provides monthly benefits to low-income aged, blind, or disabled persons. In many cases, the monthly payment (\$794 in 2021) may be the sole source of income for these recipients, putting them at risk of homelessness.

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

Under the HOME-ARP program, this qualifying population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

According to the SAGE Report, 16.7% of homeless persons assisted had a history of domestic violence and 72.4% of these persons were actively fleeing domestic violence. Children under the age of accounted for 40% while 3% were parenting youth between the ages of 18-24. Eighty-one percent were females. By age, 51% were between 25-61, 8% were between 18-24, and 40% were under 18. Black/African Americans accounted for 51% of the total, and Whites 40%. All other races, including persons of multiple races, comprised 9%. Hispanics represented 28% of the total. Two adults were veterans.

According to the New Jersey Department of Education, New Jersey is considered particularly vulnerable to the proliferation of human trafficking due to its dense population and location along the I-95 corridor. In 2020, there were 146 reported cases to the National Human Trafficking Hotline in New Jersey. These numbers only reflect cases identified through the hotline and do not reflect cases identified by hospitals, law enforcement, social service agencies, and others who help survivors directly without reporting. No additional data specific to Trenton or Mercer County is available.

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

Under the HOME-ARP program, this qualifying population includes families where providing supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability.

Severely Cost Burdened Households: Those at greatest risk of housing instability in Trenton include 5,260 renter households with an annual income less than or equal to 30% AMI and experiencing severe cost burden (paying more than 30% of income for housing costs). This represents 29.8% of all renter households in Trenton. In addition, 525 renter households earn 30%-50% AMI and pay more than 50% of their income on housing. These 5,785 households represent a population in need of rental subsidies to maintain their housing.

Elderly: According to the SAGE Report for July 1, 2021, through June 30, 2022, 8.1% of those accessing programs were aged 62 years or older. Stakeholders reported they are beginning to see more elderly being displaced due to rent increases, which is forcing some elderly to shelters for housing. Further complicating the problem is the concern of safety when housing elderly individuals in a temporary shelter. Many are in wheelchairs and/or have severe mobility challenges which cannot be easily accommodated in shelters.

Section 3: Current Resources Available to Assist Qualifying Populations

Homeless Qualifying Population

The following resources are available through the Trenton/Mercer County CoC:

- Emergency Shelters: Six year-round shelters with 225 beds; two facilities and four voucher/hotel bed programs for 190 overflow beds
- Other Permanent Housing: Two facilities with 350 year-round beds
- Permanent Supportive Housing: 430 year-round beds
- Rapid-Rehousing: 266 year-round beds
- Transitional Housing: 96 year-round beds

The Mercer County Office on Homeless Services funds programs at local agencies that include:

- Legal services for indigent clients in Mercer County
- Production of affordable housing units targeted at homeless individuals and households or those at risk of becoming homeless
- 24-hour response for individuals and families experiencing homelessness placed at hotels/motels and Code Blue alert plans to shelter at-risk individuals during severe weather
- Homeless support services to Mercer County residents to assist in obtaining housing
- Client-centered case management services to serve individual experiencing chronic homelessness with co-occurring disorders, severe and persistent mental illness, involvement with the criminal justice system, and/or other challenges that prevent them from obtaining and maintaining stable housing
- Liaison/case management services for homeless individuals
- Day drop-in center for single adults experiencing homelessness at the local emergency shelter
- Emergency shelter services for homeless single adults
- Identification services for Mercer County individuals experiencing homelessness
- Short-term rental assistance and supportive services including rental assistance, housing location, and intensive case management in the community for families who are experiencing homelessness or at risk of becoming homeless

At Risk of Homeless Qualifying Population

Trenton Housing Authority administers 1,496 public housing units across five residential developments. No other data was made available from the Trenton Housing Authority.

The Mercer County Office on Homeless Services funds programs at local agencies that include:

- One-time emergency aid to prevent homelessness, access to food, up to 12 months of certain rent or utilities subsidies, and/or comprehensive case management services

- Homelessness prevention/emergency assistance for individuals and families in need due to a housing crisis and have been determined that one-time assistance will successfully prevent their homelessness
- Legal services for indigent clients in Mercer County
- Production of affordable housing units targeted at homeless individuals and households or those at risk of becoming homeless
- Short-term rental assistance and supportive services including rental assistance, housing location, and intensive case management in the community for families who are experiencing homelessness or at risk of becoming homeless

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

According to the 2022 HIC, the following resources are available through Womanspace, Inc. for this qualifying population:

- 25 emergency shelter beds
- 20 transitional housing beds
- 6 rapid rehousing beds

The Mercer County Office on Homeless Services funds programs at local agencies that include:

- One-time emergency aid to prevent homelessness, access to food, up to 12 months of certain rent or utilities subsidies, and/or comprehensive case management services
- Homelessness prevention/emergency assistance for individuals and families in need due to a housing crisis and have been determined that one-time assistance will successfully prevent their homelessness
- Legal services for indigent clients in Mercer County
- Production of affordable housing units targeted at homeless individuals and households or those at risk of becoming homeless
- 24-hour response for individuals and families experiencing homelessness placed at hotels/motels and Code Blue alert plans to shelter at-risk individuals during severe weather
- Homelessness support services to Mercer County residents to assist them in obtaining housing
- Short-term rental assistance and supportive services including rental assistance, housing location, and intensive case management in the community for families who are experiencing homelessness or at risk of becoming homeless
- Domestic violence shelter short-term residential program and specific services for women and children who are homeless survivors of domestic violence

Other Qualifying Populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

The Mercer County Office on Homeless Services funds programs at local agencies that include:

- One-time emergency aid to prevent homelessness, access to food, up to 12 months of certain rent or utilities subsidies, and/or comprehensive case management services
- Homelessness prevention/emergency assistance for individuals and families in need due to a housing crisis and have been determined that one-time assistance will successfully prevent their homelessness

- Legal services for indigent clients in Mercer County
- Production of affordable housing units targeted at homeless individuals and households or those at risk of becoming homeless
- Short-term rental assistance and supportive services including rental assistance, housing location, and intensive case management in the community for families who are experiencing homelessness or at risk of becoming homeless

Section 4: Describe the Unmet Housing and Service Needs of Qualifying Populations

According to the City of Trenton 211 calls for the 2022 calendar year, the service received 18,554 contacts. Utility assistance was the top request at 31.6% followed by housing and shelter at 27.6%. Of the 5,114 calls for housing and shelter, 93.3% were for three requests: 42.7% for rental assistance, 25.9% for low-cost housing, and 24.6% for shelters. Another 12.7% of the 18,554 calls were requests related to employment and income. The top three requests accounted for 72.1% of all calls.

According to stakeholders, the greatest need is for affordable rental housing, which has been exacerbated by increased competition due to a lack of inventory, increasing rental rates, and landlords who are no longer interested in participating in voucher programs. Subsidized rental units fill quickly because there is strong demand. There are landlords who are no longer willing to accept rental subsidies due to higher market rents that are obtainable from households without vouchers.

1. Homeless as defined in 24 CFR 91.5

The SAGE Report from July 1, 2021, through June 30, 2022, reported 1,302 individuals served by the homeless system in Trenton and Mercer County. According to the 2022 HIC, all 190 emergency shelter overflow beds using vouchers were occupied on the night of the 2022 PIT count. Two facilities exceeded 100% utilization rates. As a result, there were no available beds for the 94 unsheltered homeless persons counted during the PIT. This indicates a significant need for emergency shelter beds for adults. Among the 260 rapid rehousing beds, there was also a 100% utilization rate indicating an unmet need for housing unsheltered homeless persons and families. According to stakeholders, there is a waiting list of 141 persons for motel/hotel vouchers.

Stakeholders expressed the same overwhelming need for more affordable rental housing. Almost every hotel/motel in Trenton is filled with persons who are unable to find affordable rental housing. These households are the most at-risk population for homelessness and are currently self-paying their hotel/motel expenses. Housing providers are finding it necessary to send people to other surrounding counties to be housed due to a lack of supply of affordable units. Shelters are full, especially family shelters with children, and stays are longer due to a lack of affordable housing to move people to once they become stabilized. Providers are also having trouble finding landlords who are willing to make necessary repairs to their units to allow for people to move into them. Funding for rehab could be used to increase the number of units in addition to new construction. There is a need to recruit new landlords for participating in affordable housing programs. There are other barriers with landlords including requiring potential applicants with no rental history to pass a rigorous assessment that many fail, which precludes them from being approved to sign leases. There is also a lack of units for youth aging out of foster care (youth between the ages of 18-24).

2. *At Risk of Homelessness as defined in 24 CFR 91.5*

According to the [Center on Budget and Policy Priorities](#), the average wait time for households in the Trenton-Princeton Metro Area to receive housing vouchers is 18 months during which time persons who are homeless must struggle to find other living arrangements, regardless of the cost, housing condition, location, and lack of safety.

Cost burden rates among 0-30% AMI and 31-50% AMI households are high in Trenton. Among the lowest income group, 70% of all renter households are cost burdened; 55.8% are severely cost burdened. In other words, more than 7 in 10 renters at 0-30% AMI are living in housing they cannot afford. Among 31-50% AMI renters with 67.8% being cost burdened; however, the degree of severe cost burden is significantly less among this income group. These households reside in units that are more costly than what would be considered affordable to them. Moreover, this does not consider additional living expenses such as food, health care, transportation, childcare, and such. Stakeholders confirmed that the supply of affordable options for housing persons and families exiting the homeless system is severely insufficient to meet growing needs among the qualifying populations.

Table 3. Cost Burdened Renter Households, City of Trenton

	Total		Cost burdened		Severely Cost Burdened	
	#	%	#	%	#	%
Total Renters	17,635	100.0%	9,425	53.4%	5,805	32.9%
30-50% AMI	3,405	19.3%	2,310	67.8%	525	15.4%
0-30% AMI	9,430	53.5%	6,600	70.0%	5,260	55.8%

Source: CHAS Data, 2015-2019

According to stakeholders, the need for rental assistance is very high. Increased rents, non-payment of rent, and inflation over the last year have exacerbated the risk to housing stability and increasing eviction rates. Assisting those who are already housed is crucial to stemming the number of homeless individuals. There is also a need for more landlords to participate in affordable housing programs.

The Rescue Mission of Trenton is an emergency shelter that also owns and manages 40 rental units in Trenton. About 50% of their clients are transient and stay on average for seven nights. They have a vocational development program, support service program, thrift store, food pantry, and new direction program. They see a need for affordable rental units with wrap-around services to keep people housed. They would like to expand the number of units they have and indicated a need to recruit more service providers in the CoC for Trenton and Mercer County.

According to stakeholders, many landlords have become stricter about their tenant selection process following the pandemic. Due to the expiration of eviction moratoria, which offered protection for many low-income renter households, coupled with escalating rents, lack of affordable housing inventory, and continued economic effects of the COVID-19 pandemic, the homeless system in Mercer County, including the City of Trenton, experienced significant strains. It lacks capacity across all systems to address the unmet needs of all qualifying populations. This includes staff capacity, inventory capacity and resource capacity to appropriately address growing needs among all of the QPs. Service providers and shelters alike experience ongoing staffing shortages that contribute to these capacity challenges, but also

the severely tight housing market and rising rents are impacting the ability to adequately the homeless in Trenton.

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

According to stakeholders, clients fleeing domestic violence are in immediate need of safe emergency shelter and shelters are not always the best for persons with children who are fleeing. Family units are needed. Additionally, housing units with two to three bedrooms are ideal for those fleeing with children. Stakeholders reported that long-term housing units that are private are needed to maintain the privacy and safety of those fleeing domestic violence.

According to stakeholders, rental assistance for persons fleeing domestic violence is needed when abusers stop paying family court-ordered rent, putting the fleeing members at risk for eviction. There is no emergency funding source to assist these households. Additional services needed for these households include therapy and substance abuse services, counseling (for adults and children), job readiness, financial planning, affordable childcare and transportation.

Stakeholders recommended legal services for those who do not qualify for Legal Aid (i.e., those with incomes above 250% of the poverty level). Generally, these individuals are between 30-40% AMI.

In terms of those who are fleeing human trafficking, stakeholders reported a need for safe and affordable housing as well as therapy and trauma/therapeutic services.

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

Veterans: The SAGE Report identified 53 homeless veterans. Continuity of assistance is important, so veteran households do not regress and have to start over identifying services and housing options. Providing permanently affordable options with supportive services could help address this need.

According to stakeholders, there is a VASH program, but it only provides a slight subsidy that pays for two years of rent. Services needed for this population include wrap-around supportive services, intensive case management, transportation, and services to address chronic and mental illness. Most veterans assisted through the CoC are housed in Trenton.

Persons with Disabilities: According to the SAGE Report, just over 55% of homeless individuals assisted listed a physical, mental, or chronic health condition. For people with disabilities, accessible housing is a continuing and critical need, ranging from individuals in wheelchairs to medical beds and in-home healthcare services in order to maintain housing stability. There is a severe need for permanent supportive housing that can accommodate persons with disabilities. In addition, there is a need for accessible, particularly one-bedroom and first-floor units, for persons with disabilities. There is also a need for more services for these individuals.

Youth: The SAGE Report reported 117 individuals accessing programs who were aged 18-24. During the January 2022 PIT count, there were 38 sheltered youth and three unsheltered.

According to stakeholders, Anchor Housing, Inc. developed Connect Home which provides vouchers for 20 youth who are aging out of foster care (18-21 year-olds). This program is encountering issues with placing vouchers including difficulty finding landlords to accept the vouchers, the tenant assessment questionnaire that landlords use to screen tenants tends to exclude those with vouchers, and the HUD Fair Market Rents (FMR) are lower than market rate rents. The latter trend is a disincentive for landlords to accept vouchers.

Section 5: Identify Gaps within the Shelter, Housing Inventory, and Service System

Homeless Qualifying Population

In Trenton/Mercer County, nearly 18% of people experiencing homelessness were unsheltered in January 2022, indicating that additional emergency beds and units are needed. Moreover, the number of unhoused people is likely much higher – in rural areas, unhoused individuals will seek shelter in the woods, abandoned farm buildings, or couch-surf, indicating a “hidden homeless population” not captured by PIT counts that perpetuate a cycle of scarcity.

Utilization rates in January 2022 among the county’s 200 emergency shelter beds plus 190 overflow beds was 90%; it was 100% among the 260 rapid rehousing beds, 100% among the 43 beds designated for chronically homeless veterans, and 99% among Other Permanent Housing beds. Based on these trends, additional rapid re-housing, permanent housing, and permanent supportive housing units should be allocated to ensure the needs of the qualifying population can be met. The average shelter stay among this population increased 23.1% from 52 days in 2020 to 64 days in 2021.

At Risk of Homelessness Qualifying Population

The wait times for households to receive their first housing voucher in the Trenton-Princeton MSA (includes all of Mercer County) remain long – individuals must wait for an average of 18 months struggling to find affordable housing before receiving Housing Choice Vouchers. There is a shortage of 5,680 rental units for extremely low-income renter households in Trenton. In addition, nearly 30% of renter households at 0-30% AMI in Trenton are severely cost burdened and pay more than 50% of their monthly income on housing costs. In Mercer County, there are 9,164 persons who receive monthly SSI payments (\$794 in 2021), which may be the sole source of income for many of them. All these households are at risk of homelessness.

In 2021, 18% of persons who exited the homeless system exited to temporary destinations with almost half of these exiting to places not meant for human habitation. The likelihood of these persons returning to homelessness is high.

Qualifying Population of Persons Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Rapid rehousing and transitional housing for this qualifying population were at capacity in January 2022. The Trenton SAGE Report reported nearly 17% of persons assisted had a history of domestic violence with 72.4% actively fleeing domestic violence when they sought assistance. Children account for 40% of those assisted.

Clients fleeing domestic violence are in immediate need of safe emergency shelter. Individual family units with two to three bedrooms are needed for adults fleeing with children. Once stabilized, rental assistance is required maintain safe housing. Additional services needed for these households include therapy and substance abuse services, counseling (for adults and children), job readiness, financial

planning, legal services, affordable childcare and transportation. These same housing and supportive services are needed for persons fleeing, or attempting to flee human trafficking.

Other Qualifying Populations

The threat of eviction is also present for households at 31-50% AMI due to increased housing cost burden. Although eviction has long been a struggle faced by low- and extremely low-income renters, the economic fallout of the pandemic has impacted many households who do not fall into the lowest income tiers but have a housing cost burden that puts them in danger of eviction. Nearly 68% of Trenton renter households at 31-50% AMI spend more than 50% of their income on housing costs. As rents continue to increase, this population will become more vulnerable to housing instability.

Section 6: Additional Characteristics Associated with Instability and Risk of Homelessness

No additional comments.

Section 7: Priority Needs for Qualifying Populations

The following priority needs were identified for each qualifying population:

- QP1 Homeless:
 - Rapid rehousing
 - Permanent supportive housing for individuals and families experiencing homelessness
 - Tenant-based rental assistance
 - Increased investment in supportive services
- QP2 At Risk of Homelessness:
 - Affordable rental housing
 - Tenant-based rental assistance
 - Increased investment in supportive services
- QP3 Persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking:
 - Emergency shelter beds
 - Transitional housing beds/units
 - Tenant-based rental assistance
 - Increased investment in supportive services
- QP4 Other Qualifying Populations:
 - Housing rehabilitation including accessibility modifications, energy efficient improvements
 - Tenant-based rental assistance
 - Increased investment in supportive services

Section 8: How the Level of Need and Gaps was Determined

In addition to feedback from stakeholder consultation sessions, the following sources were consulted to determine the housing and service needs and gaps for HOME-ARP qualifying populations:

- American Community Survey (ACS), 2017-2021
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2015-2019
- Trenton/Mercer County Continuum of Care Point-in-Time Count, January 2022
- Trenton/Mercer County Continuum of Care 2022 Housing Inventory Count
- City of Trenton HUD ESG SAGE Report 07/01/2021 – 06/30/22

CITY OF TRENTON, NJ

- Coordinated Entry and Assessment System (CEAS) report 01/01/2022-12/31/2022
- United Way of New Jersey (City of Trenton) 2-1-1 Counts
- [Center on Budget and Policy Priorities.](#)
- [Social Security Administration](#)

HOME-ARP Activities

Section 1: Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors

Trenton will utilize open, competitive solicitations for proposals through a Request for Proposals (RFP) and create additional application processes, if necessary, all of which will be in alignment with HOME, HOME-ARP, and OMB regulations, as well as city procurement rules and processes. Information on the qualified populations and program requirements will be included at the time of application/proposal solicitation, submission, and review. In order to be as efficient as possible with the funds, existing solicitation methods will be used to accept applications for HOME-ARP funding. Applicants will be provided with documentation on HOME-ARP-specific requirements as supplements to these existing processes prior to the time of application or during the application process.

In addition to soliciting applications through a HOME-ARP RFP, Trenton may provide HOME-ARP funding to developers that have applied, or will apply, for Low-Income Housing Tax Credit (LIHTC) projects proposed where an unmet need for qualifying populations was identified through the needs assessment.

The RFP for the development of affordable rental housing will include bonus points that leverage other resources, such as project-based rental assistance. Proposals will be evaluated according to criteria such as organizational or developer experience, capacity, demonstrated effective grant management experience, services offered, housing need, project readiness, and leveraged resources, among other factors. The RFP process for both eligible activities will be finalized once HUD approves the city's Allocation Plan.

2. Describe whether the PJ will administer eligible activities directly:

Trenton will not administer its HOME-ARP activities directly other than administration and planning activities.

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

No HOME-ARP administrative funds have been provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

Table 4. Use of HOME-ARP Funding, City of Trenton

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 686,018		
Acquisition and Development of Non-Congregate Shelters			
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$ 2,058,058		
Non-Profit Operating		0 %	5%
Non-Profit Capacity Building		0 %	5%
Administration and Planning	\$ 484,248	15 %	15%
Total HOME ARP Allocation	\$ 3,228,324		

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

The HOME-ARP budget was driven by the priority needs identified as a result of stakeholder consultation and thorough data analysis. Trenton's budget reflects the planned development of affordable rental units and the provision of supportive services. This decision was based on the following priority needs:

- Increased affordable rental housing for individuals and families (all QPs)
- Increased supportive services (all QPs)

Trenton will allocate 63.8% of its HOME-ARP grant toward the development of affordable rental housing for qualifying populations. Another 21.2% of funds will be invested in supportive services for all qualifying populations. The remaining 15% of the HOME-ARP grant will be allocated to program administration.

5. 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 need to increase the inventory of affordable rental units and expand supportive services in Trenton for HOME-ARP qualifying populations is based on the following:

- An unsheltered count of 94 homeless persons identified during the 2022 PIT count
- The average length of stay in homeless shelters increasing 23.1% from 52 days in 2020 to 64 days in 2021.)
- An average wait time of 18 months across the Trenton-Princeton MSA for families waiting for Housing Choice Vouchers.
- A shortage of 5,680 rental units for extremely low-income renter households in Trenton
- Nearly 30% of renter households at 0-30% AMI in Trenton are severely cost burdened and pay more than 50% of their monthly income on housing costs
- A total of 9,164 persons across Mercer County who receive monthly SSI payments (\$794 in 2021)
- 18% of persons who exited the homeless system exited to temporary destinations with almost half of these exiting to places not meant for human habitation
- Domestic violence rapid rehousing and transitional housing beds at 100% capacity

HOME-ARP Production Housing Goals

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

Trenton estimates it can create 5-6 affordable rental housing units at a cost of \$350,000/unit. This estimate may change depending on project applications and the layering of other funding sources.

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

Trenton estimates the development of 5-6 affordable rental housing units for qualifying populations will assist in increasing the inventory of deeply affordable housing with the goal of:

- Assisting persons who are staying in emergency shelters, transitional housing, and rapid rehousing for several months due to a lack of affordable rental housing as well as those who are cost burdened
- Providing supportive services accessible to all qualifying populations

Preferences

Section 1: 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:

Trenton is not establishing preferences at this time. If the need for establishing a preference for more or more qualifying populations becomes necessary, the city will submit a substantial amendment to its HOME-ARP Allocation Plan.

Section 2: If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Trenton is not establishing preferences at this time. If the need for establishing a preference for more or more qualifying populations becomes necessary, the city will submit a substantial amendment to its HOME-ARP Allocation Plan.

Referral Methods

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

Trenton will use the CoC Coordinated Entry and Assessment System (CEAS) in conjunction with additional methods in identifying persons and families to be referred to the HOME-ARP project since the CEAS does not include all HOME-ARP qualifying populations. In an effort to reach all qualifying populations and provide them with access to HOME-ARP activities, the city will require the activities to use additional referrals from outside organizations. These may include NJ 211 (homeless hotline) and existing shelter providers in Mercer County with waiting lists, among other entities. The referral method will be finalized as part of the implementation process and through the development of a policy and procedure manual to administer the HOME-ARP activity.

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

Trenton will use the CoC Coordinated Entry and Assessment System (CEAS) in conjunction with additional methods in identifying persons and families to be referred to the HOME-ARP project since the CEAS does not include all HOME-ARP qualifying populations. In an effort to reach all qualifying populations and provide them with access to HOME-ARP activities, the city will require the activities to use additional referrals from outside organizations. These may include NJ 211 (homeless hotline) and existing shelter providers in Mercer County with waiting lists, among other entities. The referral method will be finalized as part of the implementation process and through the development of a policy and procedure manual to administer the HOME-ARP activity.

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

Trenton is not establishing a prioritization method at this time. If the need arises, the city will submit a substantial amendment to its HOME-ARP Allocation Plan.

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

Trenton is not establishing a prioritization method at this time. If the need arises, the city will submit a substantial amendment to its HOME-ARP Allocation Plan.

Limitations in a HOME-ARP Rental Housing

1.Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Trenton will not include any limitations for eligibility to its HOME-ARP activities

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

Not applicable.

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

Not applicable.

Appendix A: Stakeholder Consultation Materials



HOME-ARP Stakeholder Consultations



Please join us to discuss the federal HOME-ARP funds received by Mercer County & the City of Trenton, the Qualifying Populations that may receive assistance, and eligible uses of program funding. Stakeholders will be asked how these funds may address community housing needs and gaps in services related to this program.

For additional details about HOME-ARP, [view this video](#).

Tuesday, Jan 10, 2023

10:00-11:00AM Continuum of Care

Meeting link: <https://meet.goto.com/551307053>

Join via phone: +1 (646) 749-3122

Access code: 551-307-053

2:00-3:00PM Homeless, Domestic Violence, and Human Trafficking Service Providers

Meeting link: <https://meet.goto.com/401994173>

Join via phone: +1 (872) 240-3412

Access code: 401-994-173

Wednesday, Jan 11, 2023

10:00-11:00AM Veterans Organizations

Meeting link: <https://meet.goto.com/347965997>

Join via phone: +1 (224) 501-3412

Access code: 347-965-997

2:00-3:00PM Public Housing Authorities

Meeting link: <https://meet.goto.com/311478613>

Join via phone: +1 (571) 317-3122

Access code: 311-478-613

Thursday, Jan 12, 2023

10:00-11:00AM Shelter Providers and Agencies Addressing Needs of At Risk for Homelessness and Persons with Disabilities

Meeting link: <https://meet.goto.com/552388117>

Join via phone: +1 (872) 240-3311

Access code: 552-388-117

2:00-3:00PM Organizations Addressing Civil Rights and Fair Housing

Meeting link: <https://meet.goto.com/950583725>

Join via phone: +1 (224) 501-3412

Access code: 950-583-725

For more information, please contact:

Mercer County: Ed Pattik, epattik@mercercounty.org

City of Trenton: Maria Richardson, mrichardson@trentonnj.org

Type of Organization	Contact Name	Title	Name of Organization	HOME-ARP Qualifying Populations Served
Continuum of Care Serving Participating Jurisdiction	Maria Richardson	Acting Director	Health & Human Services	All QPs
	Nikki Mosgrove	CoC Lead	Health & Human Services	QP1, QP3
	Jeff Mascoll	Executive Director	Mercer County Board of Social Services	All QPs
Emergency Shelter Providers (including DV providers)	Sarah Steward	CEO	HomeFront	QP1, QP3
	Barret Young	CEO	Rescue Mission of Trenton	QP1
	Natalie Nelson	Executive Director	Womanspace, Inc.	QP3
	Kevin McHugh	Executive Director	Helping Arms, Inc.	QP3
	Kim McNear	Executive Director	Anchor House	QP1
Homeless/Supportive Service Providers	Derry Holland	CEO	Oaks Integrated Care, Inc	All QPs
	Marlene Collins	Executive Director	Catholic Charities	All QPs
	Barret Young	CEO	Rescue Mission of Trenton	QP1
	Natalie Nelson	Executive Director	Womanspace, Inc.	QP3
	David Fox	Executive Director	Arm in Arm	All QPs
Veteran's Groups	Kelly McGuinness	Northern NJ SSVF Field Supervisor	Soldier On	Veterans in all QPs
	Jennifer Stivers	Director SSVF	Community Hope	Veterans in all QPs
	Medina Wilson	Division Chief	Mercer County Veterans Services	Veterans in all QPs
	Jason Coveleski	Social Worker	US Dept of Veteran Affairs, HUD VASH	Veterans in all QPs
	Mr. Will Smith	Director	Office of Veterans Services	Veterans in all QPs
Public Housing Authorities	Jelani Garrett	Executive Director	Trenton Housing Authority	QP1, QP2, QP3
	Janel Winter	Director	NJ Department of Community Affairs	QP1, QP2, QP3
	Janice Blakely-Williams	Director	Hamilton Housing Authority	QP1, QP2, QP3
	John Clark	Executive Director	Princeton Housing Authority	QP1, QP2, QP3
	Allen Keith LePrevost	Executive Director	Hightstown Housing Authority	QP1, QP2, QP3
Public Agencies that address needs of person's experiencing homelessness (Health & Human Service Providers, HOPWA providers, MH/SA providers, etc.)	Marygrace Billek	Director	Mercer County Department of Human Services	All QPs
	Maria Richardson	Acting Director	City of Trenton Department of Health & Human Services	All QPs
	Rhodalyne Jones	Director	Princeton Department of Human Services	All QPs
	Sarah Steward	CEO	HomeFront	QP3
Public or Private Agencies that address Fair Housing, Civil Rights and the needs of persons with disabilities	Stacy Noonan	Managing Attorney	Community Health Law Project	All QPs
	Janice Chapin	Esquire	Central Jersey Legal Services	All QPs
	Marygrace Billek	Director	Mercer County Department of Human Services, ADRC	All QPs



HOME-ARP ALLOCATION PLAN: PUBLIC INPUT/PARTICIPATION



Mercer County, NJ
City of Trenton, NJ

January 10
January 11
January 12

1

AGENDA

What is HOME-ARP?

Allocation amount

Qualifying populations

Eligible activities

Next steps

Discussion

2

THE HOME-AMERICAN RESCUE PLAN (ARP)

SEC. 3205. HOMELESSNESS ASSISTANCE AND SUPPORTIVE SERVICES PROGRAM.

Provides \$5 billion of supplemental HOME funds to assist individuals or households who are homeless, at risk of homelessness and other vulnerable populations by providing housing, rental assistance, supportive services, and non-congregate shelter.

City of Trenton HOME-ARP Allocation \$3,228,324
Mercer County HOME-ARP Allocation \$2,369,704

3

QUALIFYING POPULATIONS

Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act

At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary

Other populations who do not qualify under any of the populations above but meet one of the following criteria:
 (a) Other families requiring services or housing assistance to prevent homelessness
 (b) Those at greatest risk of housing instability

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HUD HOME-ARP DEFINITION HOMELESS



an individual or family who lacks a fixed, regular, and adequate nighttime residence



an individual or family with a primary nighttime residence that is a public or private place not meant for human habitation, including a car, park, abandoned building, bus or train station, airport, or camping ground



an individual or family living in shelter designated to provide temporary living arrangements



an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided



an individual or family who will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels

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HUD HOME-ARP DEFINITION AT RISK OF HOMELESSNESS

Income at or below 30% AMI,
Lacks sufficient resources to attain
housing stability and meets at least
one of these criteria:



Multiple Moves: Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance



Doubled Up: Is living in the home of another because of economic hardship



Hotel/Motel: Lives in a hotel or motel and the cost is not paid for by charitable organizations or by federal, state, or local government programs for low-income individuals



Overcrowded Housing: Lives in a single room occupancy (SRO) or efficiency apartment unit where two or more persons reside or where there are more than one-and-a-half persons per room



Exiting Institution: Is exiting a publicly funded institution or system of care (e.g., jail, prison, psychiatric hospital, etc.)

6

ELIGIBLE ACTIVITIES



PRODUCTION
OR
PRESERVATION
OF AFFORDABLE
HOUSING



TENANT-BASED
RENTAL
ASSISTANCE
(TBRA)



SUPPORTIVE
SERVICES,
HOMELESS
PREVENTION
SERVICES, AND
HOUSING
COUNSELING



PURCHASE AND
DEVELOPMENT
OF NON-
CONGREGATE
SHELTER



NONPROFIT
OPERATING
AND CAPACITY
BUILDING

7

DISCUSSION/INPUT

8

NEXT STEPS

Comments from these stakeholder consultations will be considered when drafting the HOME-ARP Allocation Plan

15-day public comment period and public hearing on Draft HOME-ARP Allocation Plan planned for late February (date TBD)

Submission of the HOME-ARP Allocation Plan anticipated before March 31

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FOR MORE INFORMATION

For additional information, contact:

Mercer County: Ed Pattik, Director- Housing & Community Development

epattik@mercercounty.org

City of Trenton: Maria Richardson, Director- Department of Recreation

MRichardson@TrentonNJ.org

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Mercer County and Trenton, NJ HOME ARP Stakeholder Session #1- Continuum of Care

January 10, 2023, 10:00am- Virtually via Goto Meeting

Total Attendees: 12

I. HOME ARP Program Overview Powerpoint Presentation by M&L

II. Stakeholder Input on Needs

Note: Comments made apply to both the city and county:

- Need for safe, affordable housing especially permanent affordable rental housing units for those at 0-30%AMI.
- Increase in demand for units/landlords that will rent to persons with criminal history. Many landlords do not want to rent to these persons.
- Lack of housing for persons with medical issues but who are not yet eligible/or qualify for assisted living facilities.
- Housing is needed for persons who are disabled.
- Housing providers are finding it necessary to send people to other surrounding counties to be housed due to lack of supply of affordable units.
- Almost every hotel/motel in the City is filled with persons who are unable to find affordable rental housing. These households are the most at risk population for homelessness and are currently self- paying.
- Housing is also needed for persons suffering from substance abuse issues.
- 1BR units almost impossible to find in both city and county.
- In both the City and County, there is a need for 2, 3 and 4 BR new affordable units with wrap-around services attached.
- Services needed include:
 - Case Management
 - Mental Health Services
 - Life skills
 - Homeless prevention services
- Rental assistance is needed in both the city and county.
- Shelters are full, especially family shelters w/children, and stays are longer (more than 90 days) due to lack of affordable housing to move people to once they become stabilized.
- Providers having trouble finding landlords who can make necessary repairs to their units to allow for people to move into them. Funding for rehab could be used to increase the number of units in addition to new construction.
- Lack of units for youth aging out of foster care (18-24 y/o).
- There is a need to recruit new landlords for participating in affordable housing programs.

- Voucher holders can't find units for 2-3 years due to lack of units/landlords willing to accept vouchers.
- Potential Projects/development/redevelopment sites:
 - Vacant Marriott Hotel in downtown Trenton.
 - Former YWCA building in downtown Trenton.
- Barrier- Many landlords require potential tenants with no rental history to pass rigorous assessment that many can't pass. This precludes them from renting units from landlords.
- Non-payment of rent is biggest risk to housing stability due to high eviction rates.
- CoC priority projects include those that will produce more permanent rental housing or projects that will provide more permanent supportive rental units in both the City and County.
- Need more service provision in the County.

III. Next steps and timeframe for completion

Domestic Violence, Human Trafficking
January 10, 2023, 2:00 pm- Virtually via Goto Meeting

Total Attendees: 7

- Stakeholders including Central NJ Legal Services which provides services to victims of domestic violence and victims of human trafficking
-

I. HOME ARP Program Overview Powerpoint Presentation by M&L

II. Stakeholder Input on Needs

Note: Comments made apply to both the city and county:

- Need for safe, affordable housing especially 1BR rental housing units. Rent is generally unaffordable:
 - 1BR - \$1,300 per month
 - 2BR - \$2,000 per month
 - 3BR - \$2,500 per month

It should be noted that that average for a person with SSI is only \$800 per month.
- Need for accessible first floor affordable rental units.
- Service needs includes:
 - case management
 - mental health services for those who are between 25-55 y/o.
- Needs for those experience domestic violence:
 - Clients fleeing domestic violence need immediate safe emergency shelter and sometimes shelters are not the best for persons with children who are fleeing.
 - Some units are too small for victims. They may be in a 1BR unit and ultimately need a 2/3BR unit if they have children.
 - Need for longer term housing which is private so abuser do not know where they live.
 - Sometimes abusers will stop paying family court ordered rents as required by judge which can cause an eviction of the domestic violence victim. Also, there is no emergency funding source to assist these households to help avoid eviction.
 - Service needs include:
 - Therapy Services
 - Substance abuse services
 - Counseling
 - Counseling for children
 - Job readiness
 - Financial planning
 - Legal services
 - **Gap-** funding for legal services for persons who do not qualify for legal aid from the state (i.e. those making more than 250% of poverty line). This is

generally those persons who are between 30-40% AMI who could benefit from legal services who do not currently qualify.

- Need for affordable childcare and transportation for persons fleeing domestic violence.
- Needs for those experience Human Trafficking:
 - Need for safe and affordable housing especially for this sub population.
 - Need for therapy especially at it relates to trauma/therapeutic services.
- At Risk of Homeless Needs:
 - Huge need in the City for homeless prevention for those facing eviction.
 - Landlords have become more strict after the pandemic and will evict faster now that the moratorium has expired.
 - Loss of job can also be a cause for eviction.
 - Increase of rents/non-payment of rent and inflation over the last year has increased evictions.

III. Next steps and timeframe for completion

Mercer County and Trenton, NJ HOME ARP Stakeholder Session #3- Veterans

January 11, 2023, 10:00 am- Virtually via Goto Meeting

Total Attendees: 2

Soldier On – Non-profit org participated in Meeting

I. HOME ARP Program Overview Powerpoint Presentation by M&L

II. Stakeholder Input on Needs

- Have a VASH program but it only provides a shallow subsidy that pays for rent but only for two years. Hard to find landlords to accept voucher due to rent reasonableness (i.e. rents too high to comply with rent reasonableness levels).
- High recidivism rates for vets due to need for wrap around services needed to keep them housed.
- Most in demand units are for 1BR/studio affordable rental units.
- Service Needs include:
 - Intensive Case Management
 - Financial literacy – which Soldier On provides.
 - Services to address chronic mental illness.
- VA getting ready to roll out landlord incentive program. This program will provide bonuses to landlords who provide units to vets.
- At-Risk of Homelessness Issues include:
 - Poor financial literacy
 - Evictions due to high rents/non-payment of back rent
- Housing Instability Issues:
 - Low income
 - Not properly budgeting for essential items like rent and food.
 - One crisis forces non-payment of rent which could lead to evictions.
 - Job loss and ability to keep a job due to mental health issues
- Most vets are being served and housed in the City.
- Transportation is needed as part of wrap around services especially as it relates to keeping medical appointments.

III. Next steps and timeframe for completion

Mercer County and Trenton, NJ HOME ARP Stakeholder Session #4- Trenton Housing Authority

January 11, 2023, 2:00 pm- Virtually via Goto Meeting

Total Attendees: 1 Authority

Note: Princeton Housing Authority, Hamilton Housing Authority and Mercer County Housing Authority did not respond to multiple requests for participation in the process. Hightown Housing Authority did not participate in the sessions but sent a chart with their demographic information.

I. HOME ARP Program Overview Powerpoint Presentation by M&L

II. Stakeholder Input on Needs

- Trenton HA is a public housing authority only.
- The state would have to administer/grant any requests for PBVs.
- Currently working on conversions of PH units to RAD over a number of phases.
- Frazier Court II is the next development to convert. HA wants to redevelop into 24 units. This may be a demo/full redevelopment project but planning is still underway to determine how to proceed.
- HA has a homeless and working preference.
- THA could use TBRA assistance to help address needs for affordable housing.
- THA currently beginning to implement a Choice Neighborhood Grant in the North Trenton Neighborhood. This project has a plan for 537 units to be redeveloped/developed.
- The new Turner Point development provides five units for persons fleeing domestic violence. Service provided by Women's Space (<https://womanspace.org/>).
- Based on the HA waiting list, biggest need is for 1 BR units.
- Job loss is a major contributor to at risk of homelessness.
- As a result of the pandemic, the THA has a significant backlog of unpaid back rent (over \$1 million) which may ultimately result in evictions.
- Service Needs:
 - Transportation
 - Vo Tech Skills Training
 - Education
 - Mental Health Services
 - Childcare
- THA has a Self Sufficiency Program with approximately 30 participants. Program offers:
 - Help residents establish goals
 - Establish an escrow to assist with purchase of house or vehicle
 - This is a Five Year program
 - Provides credit counseling
 - Parenting classes
 - Financial Literacy

III. Next steps and timeframe for completion

Mercer County and Trenton, NJ HOME ARP Stakeholder Session #5- Shelter Providers and Organizations Serving Those At Risk of Homelessness
January 12, 2023, 10:00 am- Virtually via Goto Meeting

Total Attendees: 10

Participants included Central NJ Legal Services and the Oaks

IV. HOME ARP Program Overview Powerpoint Presentation by M&L

V. Stakeholder Input on Needs

- The City/County needs an emergency shelter for young people between the ages of 18-24 who have aged out of the foster care system.
- Lack of affordable housing for very low income persons, homeless persons, and those who are at risk of homelessness.
- Rents are unattainable in both the City and the County.
- Service Needs include:
 - Case Management
 - Mental Health Services
 - Addiction/substance abuse services
- County Human Services Department provides funding supportive services such as case management and services for seniors but these are only for those who are already housed. Need more resources to provide services to those who are homeless.
- Need for more service to assist with housing for households/individuals with criminal background issues and also units for these types of households.
- Services are also needed for persons with medical issues that do not qualify for supportive services and are between 25-61.
- Also a need for accessible, affordable rental units for persons with disabilities
- Need to provide education for tenants on how to be good renters. Also need early intervention to prevent loss of housing.
- There are Rapid Re-Housing Programs but issues/barriers include:
 - Takes 6-8 months to find affordable rental unit with a landlord willing to accept voucher. This is especially true for families.
 - Some landlords have bias against these types of households and won't rent to them.
 - Many people living in hotels and motels in the City for a long time before finding permanent housing. Waiting list of 141 persons for this program.
 - Need more funding for Rapid Re-housing programs with necessary services attached and more landlords willing to participate.
- Shelter Providers Provided the following comments:
 - They echoed the needs of the others in the session.

- 19% of the populations in the County is African American but 68% of those experience homelessness in the County.
- Lack of affordable rental housing.
- Shelter stays are much longer due to lack of affordable permanent supportive housing.
- Rents have gone up rapidly but FMRs are not keeping pace with the market rents.
- Many seniors are now being displaced since the increase in rent and are now going to shelters to be housed once displaced.

VI. Next steps and timeframe for completion

Mercer County and Trenton, NJ HOME ARP Stakeholder Session #6- Fair Housing and Civil Rights
January 12, 2023, 2:00 pm- Virtually via Goto Meeting

Total Attendees: 4

Participants included Central NJ Legal Services and Anchor House

I. HOME ARP Program Overview Powerpoint Presentation by M&L

II. Stakeholder Input on Needs

- Challenges to Avoiding Discrimination:
 - Hard to place vouchers with landlords which causes people to look in other areas for affordable housing.
 - Landlords will not accept ERAP checks and then claim they never received them.
 - Rents are being raised to levels that are unaffordable for LMI persons.
 - Lack of affordable housing
 - Landlords trying to evict people so they can get newer tenants at higher rents.
- Anchor House, Inc. developed a project called Connect Home which has 20 vouchers for youth aging out of foster care (ages 18-21 y/o). They are encountering similar issues with placing vouchers for project including:
 - Difficulty finding units and landlords who will accept vouchers
 - The Tenant Assessment Questionnaire that landlords use to screen tenants almost always automatically excludes the tenants with vouchers from obtaining a lease.
 - The FMRs for vouchers are not high enough to meet market rate rents which limits the number of available units in the market place.
- Issues related to At-Risk of housing/Barriers:
 - It tenants get behind on rent or, if they are receiving a rent subsidy and the agency delays in getting the subsidy to the landlord, there is a risk of eviction of the tenant.
 - The time that it takes DCA (state voucher provider) to issue the letter to persons to show landlords that they have a rental subsidy makes it difficult for landlords to determine how much they will be reimbursed for rent. This causes many landlords to not accept vouchers or work with individual with vouchers.
 - Need more homeless prevention programs.
 - Persons with disabilities have a difficult time getting landlords to make reasonable accommodations such as ramps.

III. Next steps and timeframe for completion

Appendix B: Public Participation Materials

[will be inserted upon completion of public participation]

NOTICE OF PUBLIC HEARING
THE CITY OF TRENTON, NJ
HOME-ARP ALLOCATION PLAN

Notice is hereby given that the City of Trenton, NJ (City) has prepared its HOME-ARP Allocation Plan. This Plan describes how the City intends to allocate \$3,228,324 in HOME-ARP funds, authorized by the American Rescue Plan in April 2021.

In order to obtain the views of citizens, public agencies, and other interested parties, the City has placed its proposed HOME-ARP Allocation Plan on public display at the City of Trenton, Department of Recreation, Natural Resources and Culture, 319 E. State Street, Trenton, NJ, and online at <https://www.trentonnj.org/> for 15 days beginning February 20, 2023 and ending March 6, 2023.

Notice is also given that the City of Trenton will hold a public hearing on Monday, March 6, 2023 at 10:00 AM virtually. Persons wishing to participate virtually may join via the following link:

<https://meet.goto.com/941119517>

You can also dial in using your phone.
Access Code: 941-119-517
United States: +1 (224) 501-3412

Instruction for how to join the public hearing may also be obtained by visiting the City's Website at: [at https://www.trentonnj.org/](https://www.trentonnj.org/).

The City will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact Ms. Maria Richardson at mrichardson@trentonnj.org, at least 8 hours in advance of the hearing date and time.

Comments on the proposed HOME-ARP Allocation Plan can be submitted the following ways:

1. Written comments can be mailed or hand delivered to the City of Trenton, Department of Recreation, Natural Resources and Culture, 319 E. State Street, Trenton, NJ and must be received by 4:00 p.m. March 6, 2023.
2. Written comments can be e-mailed to mrichardson@trentonnj.org by 4:00 p.m. on March 6, 2023
3. A public hearing with virtual participation option will be held on March 6, 2023, at 10:00 a.m. To participate in the hearing, join using the instructions above.

Comments received before 4:00 p.m. March 6, 2023, will be considered. Additionally, City Council will approve of the HOME ARP plan at its regularly scheduled meetings on March 7th and March 9, 2023 which will occur at City Council Chambers at 5:30pm. The City's HOME ARP Allocation Plan will be submitted to HUD on or before March 31, 2023.

Publication date: February 19, 2023
2/19/23 THE TIMES \$45.24

City of Trenton, NJ HOME-ARP Allocation Plan

Public Hearing March 6, 2023



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Agenda

What is HOME-ARP?

Allocation Plan Process to Date

HOME-ARP Qualifying Populations

Needs Identified by Stakeholders

Needs Identified by Analysis

Proposed HOME-ARP Budget

Next Steps

2

The HOME-American Rescue Plan (ARP)

Provides \$5 billion of supplemental HOME funds targeted to individuals or households who are homeless, at risk of homelessness

These are separate from other ARPA funds the City received and may have allocated to housing and services

City's HOME-ARP allocation is \$3,228,324

Deadline for submitting HOME-ARP Allocation Plan is March 31, 2023

Deadline for spending HOME-ARP funds is September 2030

3

Overview of Planning Process

City conducted six focus group sessions targeted to required stakeholders

City solicited needs from CoC and Homeless Service Providers

Analyzed numerous data sources to identify the priority needs of the Qualifying Populations

Developed HOME-ARP budget based on priority needs and other resources available to the City

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Qualifying Populations

Homeless

Defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (includes sheltered and unsheltered homeless)

At-risk of Homelessness

Defined in section 401(1) of the McKinney-Vento Homeless Assistance Act

Fleeing, or attempting to flee:

Domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary

Other populations who do not qualify under any of the populations above but meet one of the following criteria:

(a) Other families **requiring services or housing assistance to prevent return homelessness**

(b) Those at **greatest risk of housing instability**

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Stakeholder Identified Needs

Additional affordable housing for households at 0-30% AMI are accessible

Permanent Supportive Housing

Shelter Resources for all Qualifying Populations, including DV victims

Service Needs: Homeless/Eviction prevention services; Case Management, Mental Health/Substance Abuse; Chronic Mental Illness; Life skills; Financial literacy; Transportation

Increase of accessible units for persons who disabled and elderly

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Proposed Home-ARP Budget

Eligible Activities	Funding Amount
Supportive Services	\$ 686,000.00
Acquisition & Development of Non-Congregate Shelters	\$ 0
Tenant Based Rental Assistance	\$ 0
Development of Affordable Rental Housing	\$ 2,058,058
Non-Profit Operating Expenses	\$ 0
Non-Profit Capacity Building	\$ 0
Administration & Planning*	\$ 484,248.00
TOTAL HOME-ARP ALLOCATION	\$ 3,228,324.00

- * Limited to 15% of total grant

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Questions



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Next Steps and Timeline

Public Comments accepted through
March 6th

City Council will Consider Approving Plan at
meetings on March 7th and March 9th

Submit to HUD by March 31