

## **HOME-ARP Allocation Plan Template with Guidance Winston-Salem/Forsyth Housing Consortium**

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

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

### **Consultation**

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

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

The City of Winston-Salem is the Collaborative Applicant for the Winston-Salem Continuum of Care (NC-500) as well as the Lead and System Administrator (LSA) for the community’s Homeless Management Information System (HMIS). As such, the City works closely with non-profit homeless service providers, the Housing Authority of Winston-Salem, and other CoC members in administering the community’s response to homelessness and is aware of the needs in the community.

Community Development Department staff gave a virtual presentation to the CoC Operating Cabinet on December 21, 2021. The Operating Cabinet consists of executive staff of homeless service provider agencies, which includes domestic violence service providers and the Housing

Authority, and solicited their feedback. A copy of the presentation was sent to the CoC distribution list, which includes staff of homeless service provider agencies and interested citizens. The presentation included the amount of HOME-ARP funds the Consortium will receive, an explanation of Qualifying Populations, a description of the activities that may be undertaken, and a request for feedback.

***List the organizations consulted:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
United Way of Forsyth County	Non-profit. Manages CIC, RRH, Prevention in county	Presentation; Ongoing work with CoC	Use of coordinated entry to fill HOME-ARP units, vouchers, and beds.
Housing Authority of Winston-Salem (HAWS)	PHA	Presentation; Ongoing work with TBRA, Permanent Supportive Housing (PSH)	Case managers, reports, updates, etc.
Family Services	DV Service Provider	Presentation; Phone and email conversation	Non-congregate shelter as a better option for DV victims
VA Medical Center	Government	Presentation	
Winston-Salem Human Relations	Government	Email conversation	Training and advertising on fair housing practices that prevent rental or lead to eviction. Eviction diversion services.
Partners Behavioral Health Management	Managed Care Organization	Presentation	Supportive services attached to new construction of housing and housing vouchers
North Carolina Housing Foundation	Non-profit Developer	Email conversation	Interested in refinance/rehab of its existing stock of properties, which are for special needs.

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

Feedback was positive for the HOME-ARP program, in particular how HOME-ARP funds could be used to support respondent programs. The primary need is for affordable housing, including permanent supportive housing, and supportive services.

**Public Participation**

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

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

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

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

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

- ***Date(s) of public notice: 3/3/2022***
- ***Public comment period: start date - 3/3/2022 end date - 3/17/2022***
- ***Date(s) of public hearing: 1/19/2022***

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

The City of Winston-Salem held a virtual public hearing on behalf of the Winston-Salem/Forsyth Housing Consortium on January 19, 2022. The public hearing was advertised through a press release from the City’s Marketing and Communications staff, advertisement in the Winston-Journal and Winston-Salem Chronicle, and posting on the City’s website. The public hearing was recorded and posted on the City’s YouTube channel.

At the public hearing, Community Development Department staff gave a presentation similar to one given to the CoC Operating Cabinet but geared toward a general audience. The presentation included the amount of HOME-ARP funds the Consortium will receive, an explanation of Qualifying Populations, and a description of the activities that may be undertaken. Citizens were also directed to a survey to prioritize need and services.

The draft HOME-ARP Allocation Plan was made available for public review and comment beginning March 3, 2022 and ending March 17, 2022. Its availability was advertised in the Winston-Salem Journal and Winston-Salem Chronicle, and it was posted on the City’s website.

No comments on the draft Plan were received from the public. However, additional information was added as a result of HUD's "Common Issues in HOME-ARP Allocation Plans."

***Describe efforts to broaden public participation:***

The services of the Marketing and Communications Department staff helped to make the public hearing more widely known. The survey helped to increase interest.

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

Questions and comments received from the public hearing primarily centered on understanding the eligible activities and how HOME-ARP funds could be used. Issues included whether supportive services could be funded without construction or rehabilitation activities, the HOME-ARP restriction period, leveraging requirements for construction projects, the purchase and renovation of abandoned hotels as non-congregate shelter, and the eligibility of using HOME-ARP funds to rehab existing shelter. Staff responded to eligibility and emphasized the importance that an entity receiving HOME-ARP has the financial and management capacity to undertake the project and to comply with HOME-ARP regulations, including through the restriction period.

Other comments included encouraging transparency in the decision-making process and that the City or HAWS should be more directly involved in managing residential property. Staff underlined that decisions are made by the City Council.

One commenter stated a desire to see new construction with supportive services attached, as well as more supportive services attached to housing vouchers. This comment has been made in other forums including in the Continuum of Care and among City staff.

An online survey was available following the public hearing. The survey asked respondents to prioritize the following four eligible program activities and the following four subpopulations of qualifying populations:

- Rental Housing
- Tenant-Based Rental Assistance
- Supportive Services
- Non-Congregate Shelter
  
- Households Experiencing or At Risk of Homelessness
- Veterans and their Families
- Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and/or Human Trafficking
- Youth Ageing Out of Foster Care

The highest priorities for program activities were rental housing and supportive services. The highest priority subpopulation was Households Experiencing or At Risk of Homelessness, and the second priority was Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and/or Human Trafficking.

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

No comments or recommendations were explicitly rejected. Participants were informed that City Council will have the final authority to accept or reject requests for funding, and that City staff were available to support applicants in furthering their understanding of HOME-ARP regulations prior to submitting funding proposals.

**Needs Assessment and Gaps Analysis**

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

**OPTIONAL Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	77	20	292	292	0								
Transitional Housing	0	0	57	57	24								
Permanent Supportive Housing	76	24	255	255	147								
Other Permanent Housing						n/a	n/a	n/a	n/a				
Sheltered Homeless						19	276	43	10				
Unsheltered Homeless						0	139	8	0				
<b>Current Gap</b>										n/a	n/a	n/a	n/a

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

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

**Homeless as defined in 24 CFR 91.5**

According to the 2021 Point in Time count, there were 462 homeless individuals in 415 households. Of those individuals, 128 were female, 333 male, and 1 transgender. They were

nearly equally divided by race with 222 White and 234 Black, 13 of the total were Hispanic/Latino, and 146 were chronically homeless. Additional data show that approximately 50% of homeless individuals have a disability, which can include chronic illness, developmental conditions, physical conditions, mental health conditions, and substance use disorders.

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

According to the most recent Comprehensive Housing Affordability Strategy (CHAS) Data (2014-2018), 56,410 of 146,685 households in Forsyth County were renter households, and 22,555 of those renter households, 40.0%, were at or below 50% of HUD Area Median Family Income (HAMFI) and 12,580, 22.3%, were at or below 30% of HAMFI. Of renter households, 15,565 households, 27.6%, had at least 1 of 4 Severe Housing Problems, which indicates severe cost burden. Severe cost burden is when the ratio of housing costs to household income is 50% or greater. Also, 55.3% of households at or below 50% HAMFI had severe cost burden. These households could be at risk of homelessness or in need of rental housing.

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

Family Services, Inc. is the lead provider of domestic violence and sexual assault response services in Forsyth County. In 2021, Family Services served 1,505 domestic violence and/or sexual assault victims. A total of 152 survivors stayed at its emergency domestic violence congregate shelter, which included 86 adults and 66 children, an average length of stay of 31 nights, and total nights of stay of 4,896. The other 1,353 were served through the Bridges to Hope Family Justice Center of Forsyth County, a collaboration of Forsyth County government, Forsyth County District Attorney's Office, civil and criminal court, police departments and sheriff's office, Legal Aid, and service provider agencies serving domestic violence, sexual assault, and human trafficking victims. Family Services served 17% more DV clients in 2021 than the year before.

The Forsyth County anti-human trafficking Rapid Response Team served an average of 15 human trafficking victims per year in 2021 and 2020. (Data from World Relief Triad. Does not reflect scope of all human trafficking victims served by World Relief but only those who had had a case that rose to the level of the Rapid Response Team).

***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***

According to the most recent CHAS Data (2014-2018), 56,410 of 146,685 households in Forsyth County were renter households, and 22,555 of those renter households, 40.0%, were at or below 50% of HUD Area Median Family Income (HAMFI) and 12,580, 22.3%, were at or below 30% of HAMFI. Of renter households, 15,565 households, 27.6%, had at least 1 of 4 Severe Housing Problems, which indicates severe cost burden. Severe cost burden is when the ratio of housing costs to household income is 50% or greater. Also, 55.3% of households at or below 50% HAMFI had severe cost burden. Rent costs have risen 14% in the past year; however, the average income has remained the same. These households could be at risk of homelessness or in need of rental housing.

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

Number and types of beds available to qualifying populations are shown in the gaps analysis above. The most recent funding allocations are:

- \$188,585 in Emergency Solutions Grant (ESG) entitlement. Of these, 53.9% is used for emergency shelter operations and street outreach and 46.1% for rapid rehousing.
- \$2,348,774 in Continuum of Care funds, which are used for permanent supportive housing, rapid rehousing, joint transitional housing/rapid rehousing, coordinated intake, HMIS, and planning.
- \$211,432 in ESG funds from the North Carolina Department of Health and Human Services (NCDHHS) and used for emergency shelter operations, rapid rehousing, and HMIS.
- The City of Winston-Salem has used CARES Act funds, both \$2,708,005 in ESG-CV entitlement and \$1,792,116 in ESG-CV from NCDHHS, to supplement these activities. These funds were used to provide non-congregate emergency shelter during winter 2021 to prevent the spread of COVID-19. These funds have also been used to start homelessness prevention and diversion programs, since these have been identified as needs.
- The City of Winston-Salem has used HOME funds annually for TBRA for very low-income households. HOME funds have also provided gap financing of affordable rental housing, most of which was financed with Low Income Housing Tax Credits.

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

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

The Homeless Need Inventory and Gap Analysis Table indicates that the current inventory may be sufficient to accommodate the homeless population. However, Forsyth County has seen an increase in the number of individuals experiencing homelessness since the beginning of the COVID-19 pandemic. This is partly due to the expansion of street outreach. An important service need for sheltered and unsheltered homeless is supportive services connected to housing to help them obtain and maintain housing stability

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

For households currently housed and at risk of homelessness or housing instability, a need is supportive services and short-term financial assistance to help them maintain housing stability. The City has used ESG-CV and CDBG-CV funds to start a homelessness prevention and diversion program, but those funds will soon end. However, short-term rental assistance may not be able to bridge the gap of housing instability when the available housing is not affordable; therefore, there is a need to create more affordable housing units.

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

A domestic violence provider identified the need for non-congregate shelter for its clients, noting that privacy in a client's own unit contributes to housing stability as do supportive services, such as counseling. Due to the low housing market and increase in market rate costs, domestic violence providers are unable to locate units individuals they serve can afford. There is a need of affordable rental units and a need of increased supportive services to keep those placed into housing housed.

***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***

Affordable housing is another unmet housing need for all qualifying populations. According to the most recent American Community Survey (ACS) (2019), an estimated 5,406 renter-occupied housing units have monthly housing costs of less than \$500, and an estimated 24,388 renter-occupied housing units have monthly housing costs of less than \$800. Such units would be appropriate for qualifying populations. The City of Winston-Salem completed a Housing Study and Needs Assessment in 2018. The study projected a need for 14,000 affordable housing units, and that need goes beyond qualifying populations.

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

The main gap in the current shelter inventory is that there is no non-congregate shelter options to assist those with high barriers and needs. There is also a lack of supportive services connected to permanent supportive housing. Supportive services that are needed include mental health and substance abuse services, life skills classes, and a peer support specialist on site or a case manager for qualifying populations. The main gap in the current housing inventory is an insufficient number of units affordable to households under 50% AMI.

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:***

The leading characteristics associated with housing instability are low household incomes and increasing rents. The economic results of the COVID-19 pandemic have led to job losses and a slow recovery for frontline service workers. When households pay more than 30% of their annual income in housing costs, the likelihood for financial hardship, including housing instability and homelessness, increases. The demand for housing is greater than the supply of housing, which has driven up rents. Average rents have risen approximately 14% in the last year, which disproportionately affects low-wage and minority renters. Finally, landlords who are willing to accept housing vouchers have decreased, leaving many vouchers unused due to the low FMR rates compared to the market rate costs.

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

The priority needs are permanent supportive housing and services and units of permanent housing within a larger project with possible services. These priorities benefit all qualifying populations.



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

The Continuum of Care used a variety of local and federal data sources to inform its understanding of community need. Locally, PIT and HIC surveys were crucial in determining the availability of units and beds to meet the needs of local citizens experiencing homelessness. The American Community Survey (ACS) data informed the statement of need concerning affordable housing and the degree to which renters are cost-burdened in the area.

**HOME-ARP Activities**

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

The method to select entities to carry out projects will depend on the type of project. Tenant based rental assistance and supportive services would be through an application process, which could be the City’s annual request for proposal or a separate process specifically for the HOME-ARP funds. Proposals for rental housing and non-congregate shelter projects would be received on an ongoing basis, and the City may choose to publish a request for proposal(s). Funding for non-profit operation expenses and non-profit capacity building may be considered and reviewed on an as-needed basis.

***Describe whether the PJ will administer eligible activities directly:***

The City plans to use subrecipients or developers to undertake eligible activities.

***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 portion of HOME-ARP funds will be provided to a subrecipient or contractor to administer the entire HOME-ARP program.

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

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$439,432		
Acquisition and Development of Non-Congregate Shelters	\$75,000		
Tenant Based Rental Assistance (TBRA)	\$50,000		
Development of Affordable Rental Housing	\$3,550,000		
Non-Profit Operating	\$20,000	0.4%	5%

Non-Profit Capacity Building	\$20,000	0.4%	5%
Administration and Planning	\$733,135	15%	15%
<b>Total HOME-ARP Allocation</b>	<b>\$4,887,567</b>		

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

The allocation of funds listed above are projections based on current priorities. The allocation may change based on changing needs and priorities or the funding needs of individual projects.

***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 needs identified in the gap analysis and the data collected from the CHAS, ACS and the housing study conducted by the City of Winston-Salem confirm that the primary need is for affordable housing, including permanent supportive housing.

## **HOME-ARP Production Housing Goals**

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

The estimated total number of HOME-ARP units in rental housing is 48. The estimated number of HOME-ARP TBRA units is 6 units.

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

The production goal is to provide 288-360 total units. The estimated number of HOME-ARP rental housing units is based on the way the City uses HOME funds in rental housing. HOME-assisted units generally comprise 6-8 units in an affordable multifamily development, mostly developed with Low Income Housing Tax Credits. The City typically commits \$400,000-\$600,000 to a development, which is 5-10% of the total project cost. Using this calculation, HOME-ARP funds would produce 6 developments with a total of 36-48 HOME-ARP units and 288-360 total units, making a significant contribution to the community's affordable housing stock.

## **Preferences**

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

that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

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

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

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

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

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

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular**

**qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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

The City anticipates giving preference to chronically homeless households at this time. However, this would depend on the type of funding requests received. For example, a DV service provider requesting funds to develop a non-congregate shelter would only serve DV households and they would not have to be chronically homeless.

***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:***

The priority needs are permanent supportive housing and services and units of permanent housing within a larger project with possible services. Chronically homeless households are the primary users of permanent supportive housing and would benefit the most from supportive services to achieve and maintain housing stability.

## **Referral Methods**

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

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

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

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,

3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

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

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

The City intends to use a direct referral method in HOME-ARP projects and activities.

***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):***

The City does not intend to use the coordinated entry process.

***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):***

The City does not intend to use the coordinated entry process.

### **Limitations in a HOME-ARP rental housing or NCS project**

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

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

identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.

- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

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

The City anticipates limiting admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS, such as chronically homeless households.

***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:***

The priority needs are permanent supportive housing and services and units of permanent housing within a larger project with possible services. Chronically homeless households are the primary users of permanent supportive housing and would benefit the most from supportive services to achieve and maintain housing stability.

***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):***

Eligibility could be limited depending on the type of funding requests received. For example, a DV service provider requesting funds to develop a non-congregate shelter would only serve DV households.

## **HOME-ARP Refinancing Guidelines**

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

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

There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. If the City were to do so, the City's policy would be that the project not have an acquisition cost in excess of sixty percent (60%) of the total replacement costs, which is in line with the North Carolina Housing Finance Agency 2022 QAP.

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

There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. If the City were to do so, the City would conduct a review of the project proposal, including management practices, scope of work, financing, and operating proforma.

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

There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. If the City were to do so, new investment would be to maintain current affordable units, but could also be used to create additional affordable units.

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

There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. If the City were to do so, the minimum compliance period would be 15 years.

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

There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. If the City were to do so, HOME-ARP funds would not be used to refinance multifamily loans made or insured by any federal program, including CDBG.

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

The City may add or revise requirements in its guidelines at a later time.

**Application for Federal Assistance SF-424**

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> _____ <b>* Other (Specify):</b> _____
---	---	--

<b>* 3. Date Received:</b> 04/08/2022	<b>4. Applicant Identifier:</b> M-21-DP-37-0204
--	--

<b>5a. Federal Entity Identifier:</b> _____	<b>5b. Federal Award Identifier:</b> _____
--	---

**State Use Only:**

<b>6. Date Received by State:</b> _____	<b>7. State Application Identifier:</b> _____
---	---

**8. APPLICANT INFORMATION:**

<b>* a. Legal Name:</b> City of Winston-Salem	
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 56-6000241	<b>* c. UEI:</b> GUMTASM49KL4

**d. Address:**

<b>* Street1:</b> P.O. Box 2511
<b>Street2:</b> _____
<b>* City:</b> Winston-Salem
<b>County/Parish:</b> _____
<b>* State:</b> NC: North Carolina
<b>Province:</b> _____
<b>* Country:</b> USA: UNITED STATES
<b>* Zip / Postal Code:</b> 27102-2511

**e. Organizational Unit:**

<b>Department Name:</b> _____	<b>Division Name:</b> _____
-------------------------------	-----------------------------

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

<b>Prefix:</b> Ms.	<b>* First Name:</b> Marla
<b>Middle Name:</b> Y.	
<b>* Last Name:</b> Newman	
<b>Suffix:</b> _____	
<b>Title:</b> Community Development Department Director	
<b>Organizational Affiliation:</b> _____	
<b>* Telephone Number:</b> 336-734-1259	<b>Fax Number:</b> _____
<b>* Email:</b> marlan@cityofws.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 Partnership

**\* 12. Funding Opportunity Number:**

2021

\* Title:

HOME-American Rescue Plan

**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-American Rescue Plan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="4,887,567.00"/>
* 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="4,887,567.00"/>

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

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

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

\*\* I AGREE

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

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:

\* Date Signed:

## 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 Lee D. Garrity 	TITLE City Manager
APPLICANT ORGANIZATION City of Winston-Salem	DATE SUBMITTED 4-5-22 

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

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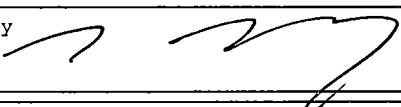
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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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 Lee D. Garrity 	TITLE City Manager
APPLICANT ORGANIZATION City of Winston-Salem	DATE SUBMITTED 4-5-22

## **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

Lee D. Garrity  
City Manager  
\_\_\_\_\_

Title

4-5-22

\_\_\_\_\_  
Date