## **HOME-ARP Allocation Plan**



January 2023

#### Consultation

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

See Appendix A for all Stakeholder Consultation materials. Stakeholder comments received throughout these various sessions and individual meetings are summarized in the Feedback Chart in the next section and are referenced appropriately throughout the Needs Assessment & Gaps Analysis.

The City of York engaged in an extensive stakeholder consultation process during the month of June 2022. During this time, the City engaged with a variety of shelter and service providers serving each of the qualifying populations; the Continuum of Care and its various subcommittees focused on subpopulations including but not limited to homeless youth, veterans, re-entry populations; victim service providers; rental assistance providers; York Housing Authority; and the County Coalition on Homelessness.

Each of the focus group sessions City and County staff focused on identifying the Qualifying Populations and their unmet housing and service needs. A brief Power Point presentation on the HOME-ARP program was presented followed by questions meant to engage participants in identifying unmet needs among the qualifying populations they served.

The City also conducted a work session with City staff, members of City Council and the Mayor to summarize the unmet needs heard during the consultation sessions. A summary of the agencies consulted and the feedback generated during the consultations sessions is outlined below.

#### List the organizations consulted:

Focus Group Topic/ Agency	Date of Session	Method of Consultation	Number of Participants	Type of Agency(ies)/Org
2-1-1/Contact Helpline	June 13, 2022 @ 1:00 p.m.	Virtual Interview	2	Homeless service providers (all QPs), victims of domestic violence, veterans' groups  Public or private agencies that address the needs of persons with disabilities
Affordable Housing Development Partners	June 24, 2022 @ 1:00	Virtual Interview	10	Homeless service providers (all QPs), victims of domestic violence, veterans' groups  Public or private agencies that address the needs of persons with disabilities

Focus Group Topic/ Agency	Date of Session	Method of Consultation	Number of Participants	Type of Agency(ies)/Org
Community Action Agency	June 28, 2022 @ 9:00	Virtual Interview	4	Homeless service providers (all QPs), victims of domestic violence, veterans' groups  Public or private agencies that address the needs of persons with disabilities
Fair Housing	June 21, 2022 @ 2:00	Virtual Interview 3		Public or private agencies that address fair housing, civil rights, and the needs of persons with disabilities
Public Housing Authority	June 15, 2022 @ 1:30	Virtual Interview	2	Public Housing Authority
YCCH Emergency Shelter & Street Outreach Committee	June 20, 2022 @ 10:00	Virtual Interview	7	Homeless service providers (all QPs), victims of domestic violence, veterans' groups  Public Agencies that address the needs of all four qualifying populations
YCCH Rental Assistance Providers Meeting	June 17, 2022 @ 1:30	Virtual Interview	12	Homeless service providers (all QPs), victims of domestic violence, veterans' groups  Public Agencies that address the needs of all four qualifying populations

Focus Group Topic/ Agency	Date of Session	Method of Consultation	Number of Participants	Type of Agency(ies)/Org
YCCH Veterans Committee	June 1, 2022 @ 11:00	Virtual Interview	11	Homeless service providers (all QPs)  Veterans' groups  Public Agencies that address the needs of all four qualifying populations
YCCH Youth Committee	June 14, 2022 @ 9:30	Virtual Interview	5	Providers serving the homeless (all QPs)  Public Agencies that address the needs of all four qualifying populations
York County Coalition on Homelessness	March 24, 2022 @ 1:00	Virtual Interview	48	Continuum of Care  Homeless service providers (all QPs), victims of domestic violence, veterans' groups  Public Agencies that address the needs of all four qualifying populations
York County Reentry Coalition	June 28, 2022 @ 1:30	Virtual Interview	12	Homeless service providers (all QPs), victims of domestic violence, veterans' groups  Public Agencies that address the needs of all four qualifying populations
Victims Service Providers	June 27, 2022 @ 10:00	Virtual Interview	3	Homeless service providers (all QPs), victims of domestic violence, veterans' groups

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

General Themes and Trends that emerged from all of the consultation groups include the following:

- There continues to be a large gap in the number of quality affordable and accessible units available for rent in the City.
- Protected classes are generally over-represented among people experiencing homelessness.
- Landlord engagement and risk mitigation funds could be helpful to recruit and encourage more landlords to rent to special needs populations.
- Shelter capacity is limited (both bed and staff capacity); hotel/motel utilization rates are high due lack of shelter bed capacity
- Barriers to accessing housing for special needs populations/ELI households include poor credit, criminal and rental histories; significant requests for security deposit (sometimes 3- and 4-times monthly rent); landlords requiring households have 3x the rent in monthly income
- Private landlords no longer accepting HCV or other rental assistance; porting outside the County takes a lot of time. Many private owners of naturally occurring affordable housing (or owners that had accepted HCV or other assistance) are selling the units to owners who no longer accept assistance or who increase the rent significantly, displacing households who cannot find affordable units elsewhere.
- Supportive services in general are a need-specifically housing locator and housing stabilization services; transportation services; case management
- Sub populations identified as having specific needs include transition age youth (18-24),
   Veterans, Domestic Violence victims, re-entry individuals exiting the prison system

#### Continuum of Care/Coordinated Entry

- There is an increase in unsheltered homelessness in the City, especially among youth (18-24) and elderly, most with co-occurring mental health, substance abuse or physical disabilities
- Transportation services are a need to provide access to employment, services from where affordable housing may be located
- Shelters are moving to sleep-only facilities due to lack of staff capacity to operate around the clock
- Supportive services are needed for re-entrants to help them readjust to society; especially vital for those being released from long stays in state prison.
- Services and housing assistance are needed for families at the intersection of imprisonment/child welfare involvement.
- Services are needed for those with severe behavioral health challenges
- There is a cohort of teens who have left a bad home situation, but aren't emancipated, and can't go to shelter because they're not 18. OCYF has difficulty placing this group with providers. They are living in storage units, at camp sites, in abandoned buildings, etc.
- There is a need for week long, whole-family services serving at-risk youth as well as parents experiencing mental health crises.
- Coordinated Entry has seen increase in calls for shelter, hotel stay assistance, housing locator services
- There is a need for ongoing rental assistance after ERAP assistance is expired/maxed out
- There is a need for homeless prevention, especially with elderly households who can't afford rent increases

Households are struggling to pay both rent <u>and</u> utilities, both of which have increased.
 Households are forced to choose, but not having utilities is a violation of their lease, putting them at risk of eviction

#### **Shelter Providers**

- There has been a significant increase in the number of street homeless/unsheltered population. Street Outreach capacity is limited in order to address the current needs
- It is difficult to move households out of shelter into units due to lack of units in the marketplace (increase in rents, lack of supply and lack of landlords willing to accept special needs populations)
- There are record numbers of families living in hotels who are not able to find permanent housing due to lack of supply, poor credit/rental history, and raising rents. Many of these families could afford some rental payments if they could find a unit.
- There is an increase in people experiencing homelessness who are also disabled
- Shelter capacity is limited-Code Blue shelter unable to open some nights due to lack of staffing capacity
- There is an increase in first-time homeless
- NCS is a need, more COVID-friendly

#### Service Providers

- Connecting individuals quickly to services, particularly mental health and substance abuse services for those exiting the criminal justice system, is a need
- Case management services in shelters need to be improved
- Families in hotels often owe a lot in past utilities, so they can't move into a new unit and put utilities in their name. Funding support for payment of utility arrears is a need. Even without back owed utilities, affording utilities is a big barrier to housing people.
- Hotel prices are increasing forcing households relying on hotels for shelter out
- Accountability in services is critical-many need services but don't want them
- Implementing a better transition from relying on mainstream benefits to self-sufficiency as income increases would ensure more success
- Civil/legal support is needed for households at-risk of eviction-it is questionable that some of the reasons for terminating a lease are allowed
- Services not tied to rental assistance or other activities are a need to ensure continuity and stability
- Biggest barriers to placing households include rental costs, up-front security deposit costs, first/last month rent costs are skyrocketing
- Access to services outside of traditional business hours/days is a need
- Services are required for re-entry population to maintain housing post-release, including budgeting, legal services, case management
- There is a need for rental assistance for currently housed households to prevent evictions as rents rise; couple this assistance with services to ensure sufficiency
- There is a need to connect youth to well-paying employment opportunities

#### Rental Assistance Providers

• Additional tenant-based rental assistance, targeted to certain subpopulations participating in self-sufficiency programs, are a need

- General lack of affordable inventory
- Landlord incentives could help encourage landlords to participate in HCV and other rental assistance programs
- Transportation is a barrier for folks accessing services
- Behavioral health services paired with rental assistance/RRH are a need
- Non-Congregate shelter for youth, especially parenting youth, is a need

#### Domestic Violence/Victim Service Providers

- Need for civil/legal guidance on housing issues, ranging from whether someone is being illegally
  evicted, to whether the landlord can increase the rent, through understanding a lease and what
  you are agreeing to.
- Shelter is a need, but cognizant of the expense and difficulty in identifying ongoing sustainable operating funds.
- There is a need for long-term to permanent subsidy to assist households that will never be able to maintain FMR in the current market, or on disability income alone
- There is a lack of inventory in which to place victims

#### Veteran Housing and Service Providers

- There is a growing population of senior Veterans with fixed incomes experiencing difficulty finding housing.
- Accessibility continues to be a challenged for disabled Veterans across all housing types-shelter through permanent rentals.
- There is a growing need for support for activities of daily living and representative payee services, particularly among the elderly and elderly Veterans who don't require personal care, assisted or skilled living.
- Continuity of assistance is important so Veteran households don't regress and have to start over identifying services and housing options-particularly among households at 50-80% AMI.
- Prevention services are critical to ensuring stability-forcing a household into homelessness in order to assist the household is costly and inefficient.
- Transportation services for those in rural areas are a need.
- Intensive case management/street outreach/health navigation teams for unsheltered homeless populations are a need.

#### Agencies that address Fair Housing and Civil Rights

- Housing supply is limited, particularly for those with physical disabilities.
- People fleeing domestic violence don't experience tenant protections for breaking a lease early, making it difficult to flee and/or creating poor rental history.
- Landlord engagement and risk mitigation funds could be helpful to recruit more landlords to rent to special needs populations.

#### Public Housing Authority

- Landlords unwilling to rent to qualifying and other special needs populations due to poor credit/rental history
- Housing inventory limited

- Availability of robust supportive services may or may not act as assurance for landlords otherwise unsure of renting to QPs/special needs populations
- Offering incentives to households to participate in services helps maintain stability-this is successful in the FSS program
- CONE open to developing units

#### **Public Participation**

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: 1/11/2023

Public comment period: start date -1/18/2023 end date -2/3/2023

Date(s) of public hearing: 1/25/2023

#### Describe the public participation process:

The City of York published a notice in the York Daily Record informing the public of the availability of the HOME-ARP Allocation Plan, as well as the public hearing, on January 11, 2023. A copy of the notice and Plan were also made available on the City's Website. The Plan was available for a 15 day period, and the City conducted a public hearing on January 25, 2023. The public hearing was held in person, with a virtual option. Comments on the Plan were accepted via US mail, e-mail, telephone or at the public hearing.

#### Describe efforts to broaden public participation:

The City of York offered multiple opportunities and methods for interested parties to provide comment and participate in the public participation process (such as virtually, in person, written or verbal comments). Language services for the Limited English Proficient were available upon request. Reasonable accommodations to allow broader participation by LEP persons or persons with disabilities in the hearing either in person or virtually were made available.

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

One participant in the public hearing wanted to know when the RFP would be circulated for any type of housing development using these funds. The City indicated the RFP would be issued after the submission and approval of the HOME-ARP Allocation Plan by HUD.

It was strongly suggested that a level of supportive services be established when dealing with housing development for this targeted population. The City responded that other resources would be made available for services connected to the housing developed with HOME-ARP.

Another participant in the public hearing wanted to know if these funds could be used to establish some type of home ownership program for the targeted population. The City indicated that homeownership activities are not an eligible HOME-ARP activity, but that the City currently has a HOME-funded homeownership program.

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

The City recognizes that supportive services are a critical component to success and stabilization in housing. The City has determined that other resources would be made available for services connected to the housing developed with HOME-ARP; therefore services are not included in the HOME-ARP budget at this time.

#### Needs Assessment and Gaps Analysis

Like many communities, the city of York, PA has insufficient inventory of affordable housing overall with a lack of adequate transitional housing options as indicated by an average length of stay in 2021 of over ten months. Longer lengths of stay may increase the need for beds, as there is less movement for new clients to be able to use those resources. This could also point to a need for additional housing inventory, as fewer available options lead to less turnover in shelter and transitional housing beds.

Where possible, data specific to the City of York was used. However, the Continuum of Care covers both the City of York and York County.

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

	Homeless												
	Current Inventory			Homeless Population			Gap Analysis						
	Far	nily	Adult	s Only	Vets	Family	Adult			Far	nily	Adult	s Only
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	HH (at least 1 child)	HH (w/o child)	Vets	Victims of DV	# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	90	29	131	-	-								
Transitional Housing	88	27	10	-	-								
Permanent Supportive Housing	54	14	180	-	43								
Other Permanent Housing	222	82	83	-	21								
Sheltered Homeless						42	105	10	19				
Unsheltered Homeless						10	58	3	0				
Current Gap													

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

The City of York also has a need for affordable housing. The shortage of units both affordable and available for renter households at or below 30% area median income (AMI) increases housing insecurity and rent pressure on extremely low-income households.

#### **Housing Needs Inventory and Gap Analysis Table**

	Non-Homeless		
	Current Inventory	Level of Need	Gap Analysis
CITY OF YORK	# of Units	# of Households	# of Households
Total Rental Units	10,860		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,945		
Rental Units Affordable to HH at 50% AMI (Other Populations)	4,364		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,120	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,115	
Current Gaps			4,075

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

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

#### Homeless as defined in 24 CFR 91.5

The number of York residents that meet the definition of homeless under 24 CFR 91.5 was derived from the 2022 PIT Count, conducted by the York County Coalition on Homelessness on January 26, 2022. The PIT Count identified a total of 358 persons experiencing homelessness in 2022, up from 237 persons (+51%) identified in 2021. Of the counted homeless individuals 261 (72.9%) were sheltered and 97 (27.1%) were unsheltered.

Per the Pathways to Home Coordinated Entry (CE) System, 771 unduplicated households accessed the system during 2021. Of those households, 640 (83%) met Literally Homeless criteria. At the end of 2021, 159 households remained on the CE Literally Homeless queue awaiting referral (20.6% of annual total households). Only 275 (36%) of the total annual households were confirmed housed by the end of 2021. This suggests a need for more housing options.

The type of households accessing CE in 2021 were 497 (64%) families with children and 274 (36%) singles/couples. Most households accessing CE, 49.4%, did not fall into a subpopulation.

The households who were considered Literally Homeless per the 2021 CE, 640 total, 270 (42.3%) were White, 149 (23.3%) were multi-Racial, and 139 (21.7%) were Black/African American. There were 192 (30%) Hispanic households identified.

Between January 1, 2021-December 31, 2021, a total of 2,466 homeless persons were served by the York Continuum of Care.

Program	Persons Served
Emergency Shelter	1,051
Permanent Supportive Housing and Supportive Housing	182
Rapid Re-Housing	1,145
Transitional Housing	88
Total	2,466

According to the FY2021 Performance Measurement Module, 1,302 individuals experienced homelessness for the first time. This is a 22.7% decrease from 2020, which had 1,685 persons experiencing homelessness for the first time. These measures took into account persons entering emergency shelter, transitional housing, safe haven, and permanent housing programs. In total, there were 1,596 individuals who experienced homelessness, and while the number of individuals was down from 2020, the average length of stay rose by 50 days, from 272 to 322.

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

According to 2014-2018 CHAS data, in York there are 10,860 rental units of which only 1,945 are affordable to households making 30% area median income (AMI). Households earning between 0-30% area median income total 3,725. Factoring in that only 52% of the affordable units are housing those

with the appropriate income, the gap (the number of housing units needed) for those earning 30% AMI or less is 2,695 units.

Based on HMIS data for the calendar year January 1, 2021-December 31, 2021, 56.7% of leaver households exited to temporary destinations. Exiting to a temporary destination may indicate greater risk of returning to the homeless system.

According to stakeholders, there is a need for on-going rental assistance, particularly once the Emergency Rental Assistance Program is exhausted or expired. Stakeholders also indicated hotel/motel utilization rates are high due to lack of shelter bed capacity, plus hotel prices are increasing further straining households relying on them for shelter.

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

In the 2022 PIT Count, 19 individuals in the system were identified as survivors of domestic violence. According to the 2021 CE, 220 households were fleeing domestic violence which was 35% of the total 771 households who accessed the system. The was the largest subpopulation of all households assessed.

Per the HMIS, 421 (17.1%) individuals had a history of domestic violence and 144 were actively fleeing domestic violence.

In 2021, the YWCA served two victims of human trafficking. Both individuals utilized the transitional housing program. There is an anticipated increase in the needs to assist persons in such situations. YWCA staff is undergoing special training to be prepared.

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

Those at greatest risk of housing instability include 2,560 renter households with an annual income less than or equal to 30% AMI and experiencing severe cost burden. This represents 25.3% of all renter households in York. In addition, 335 renter households earn 30%-50% AMI and pay more than 50% of their income on housing.

Other populations at greater risk of housing instability, as identified in the 2022 PIT Count include 80 persons with serious mental illness, 34 persons with a substance use disorder, 13 veterans, and 19 experiencing domestic violence. The following is a breakdown of these populations sheltered and unsheltered status:

	Shelte	ered	Unsheltered	Total	
	Emergency	Transitional	Offshertered		
Adults with a Serious Mental Illness	48	8	24	80	
Adults with a Substance Use Disorder	22	1	11	34	
Veterans	10	0	3	13	
Domestic Violence	17	2	0	19	

According to HMIS data, 88 people were living in transitional housing during the period of January 1, 2021-December 31, 2021; of these 45 or over 51% were Black, African American, or African. During the same time period, 1145 people were receiving rapid rehousing assistance; of these, 39.9% were Black, African American, or African, highlighting that this segment of the population is over-represented among people experiencing homelessness. Nearly 25% were Hispanic. Of households that exited Rapid Rehousing programs during this period, 41.1% of adult leavers had no cash income, putting these households at greater risk of returning to homelessness if unable to support ongoing housing payments.

During the period January 1, 2021-December 31, 2021, 1035 households exited to temporary destinations. Households receiving temporary assistance are more likely to return to homeless or face greater risk of housing instability than those exiting to permanent destinations. Furthermore, 562 households, or 30.8% of all exits, exited to places not meant for human habitation which signals immediate returns to homelessness.

Per the 2021 CE, youth households were the second largest subpopulation to access the system. There were 78 households (12% of the total annual households assessed) who were youths. Veterans who accessed the CE system made up 2% with 11 households assessed.

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):

The Housing Authority of the City of York owns and manages 530 public housing units. There are 392 units for the elderly and 365 units for families. Additionally, the Housing Authority administers 1,402 Housing Choice Vouchers, but these support the York County-wide area; however, the Housing Authority indicated that privately owned affordable rentals are limited and very few landlords are accepting Section 8 vouchers. there is a need for a landlord incentive program, to make it more appealing for landlords to accept housing vouchers.

The York County 2022 Housing Inventory Chart (HIC) indicated 139 emergency shelter beds and 34 family units were available. In addition, the HIC identified 4 transitional housing beds and 20 family units; 193 Permanent Supportive Housing beds and 18 family units; 51 Rapid Rehousing beds and 74 family units.

Due to 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 York 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 housing market and inventory is rapidly changing.

Describe the unmet housing and service needs of qualifying populations:

#### Homeless as defined in 24 CFR 91.5

Per the CE System in 2021, 771 unduplicated households accessed the system. Of those households, 83% were homeless. At the end of 2021, 20.6% of households remained on the CE Literally Homeless queue awaiting referral. Furthermore, just 36% of the total annual households were confirmed housed by the end of 2021. This suggests a great need for more affordable housing options.

HMIS indicated 2,466 individuals served by the homeless system during the period of January 1, 2021-December 31, 2021. According to the 2022 HIC, York County has 193 Permanent Supportive Housing beds and 18 family units. The County also has 139 emergency shelter beds and 34 family units, 4 transitional housing beds and 20 family units. This available inventory is insufficient to meet the needs of the population experiencing homelessness.

All stakeholders consulted for this process expressed the same overwhelming need: affordable rental housing. They identified a need for additional TBRA, especially if it is tied to a self-sufficiency program. Additionally, there is a need for Rapid re-housing that is connected to supportive services, which should be tied to the County's Risk Mitigation Program to encourage landlords to participate in rental assistance programs for qualifying populations. In addition, stakeholders reported a record number of families living in hotels who are not able to find permanent housing due to lack of supply, poor credit/rental history, and increasing rents. Many of these families could afford some rental payments if they could find a unit, according to shelter providers.

According to stakeholders, intensive case management, street outreach or health navigation teams for unsheltered homeless populations are needed to connect unsheltered individuals and households to shelter and other housing options. However, stakeholders and shelter providers indicated shelters are moving to sleep-only facilities due to lack of staff capacity to operate around the clock, indicating a greater need for staffing and funding capacity, in addition to bed capacity to serve an increase in unsheltered homeless population.

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

According to 2014-2018 CHAS data, there is a gap of 4,075 affordable units for York. This indicates that the supply of affordable housing units is insufficient for households earning 0-30% AMI and those earning 30-50% AMI. As a result, these households reside in housing units that are more costly than what would be considered affordable to them. Furthermore, this does not consider additional costs such as transportation, childcare, and accessibility modifications for individuals with disabilities. With 3,120 rental households in York considered at risk of homelessness, these additional costs further exacerbate the limited access to affordable housing in the city. The consultation process also confirmed that the supply of affordable options for housing low-income households is insufficient to meet growing needs among the qualifying populations.

The table below shows a detailed breakdown of the CHAS data for rental households:

	Total		Cost bur	dened	Severely Cost burdened		
	#	%	#	%	#	%	
Total Renters	10,105	ı	5,305	52.5%	2,905	28.7%	
Very Low-Income Renters (0-50% AMI)	6,430	63.6%	4,955	49%	2,895	28.6%	
30-50% AMI	2,390	23.7%	1,760	17.4%	335	3.3%	
Extremely Low-Income Renters (0-30% AMI)	4,040	40%	3,195	31.6%	2,560	25.3%	

Stakeholders also reported that supportive services such as affordable childcare, transportation, employment training and housing counseling along with tenant-based rental assistance are in great need for all qualifying populations, but especially those at-risk of homelessness.

Poor rental history is often identified as a barrier for households accessing affordable households. Rental assistance and legal services for eviction prevention were identified as needed services to help salvage tenancies and prevent poor rental history from becoming a barrier for future tenancies. Coupling this assistance with services to ensure sufficiency has proven to be a successful model, as forcing a household into homelessness in order to assist the household has proven costly and inefficient for providers in the City.

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

Victims of domestic violence are identified by the 2021 CE System as the top subpopulation who accessed services, indicating a need for dedicated resources, including shelter. Per the HMIS, 17.1% of individuals served during 2021 had a history of domestic violence and 5.6% were actively fleeing domestic violence. There is a strong need for housing and services dedicated for survivors of domestic violence. Transitional housing has been identified as a successful model for individuals fleeing domestic violence and human trafficking, particularly when finding permanent affordable housing is difficult.

According to stakeholders, there is an overall lack of inventory in which to place victims. Shelter is a need, but it there are challenges with the expense and identifying on-going, sustainable operating funds. There is also a need for long-term to permanent subsidies to assist households that will never be able to maintain fair market rent or are reliant on disability income with no other sources. Additionally, individuals fleeing domestic violence do not have experience with tenant protections and are breaking lease agreements early which makes it difficult to flee and/or is creating a poor rental history.

## 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 HMIS, during the period of January 1, 2021-December 31, 2021, 1,825 individuals exited the homeless system. Of these, 56.7% exited to temporary destinations, including transitional housing and temporarily staying with friends or family. Households without permanent housing may be more likely to experience returns to homelessness. Even among households exiting to permanent

destinations, 16.5% exited to rentals without ongoing subsidy. Together, these suggest a need for both affordable housing units, as well as tenant based-rental assistance to support extremely low-, and low-income households.

Supportive services for re-entrants to help them readjust to society were identified as especially vital for those being released from long stays in state prison. Housing placement and stabilization services would assist this at-risk population obtain and maintain housing, including budgeting, legal services, case management. In addition, stakeholders noted the importance of quickly connecting re-entry populations with community-based mental health and substance use services.

**Veterans:** Per HMIS data during the period from January 1, 2021-December 31, 2021, 52 veterans were homeless. Of those, 37 exited from homelessness 20 (54%) to temporary destinations. Continuity of assistance is important, so veteran households don't regress and have to start over identifying services and housing options. Providing permanent affordable options for veterans could help address this need. During the 2022 PIT, three veterans were determined to be unsheltered indicating a barrier in accessing these resources or difficulties by service providers in engaging veterans. These barriers may include co-occurring mental health and/or substance abuse disorders, lack of income or rental history, or criminal history.

Stakeholders identified a growing population of senior veterans with fixed incomes having trouble finding housing. Prevention services and continuity of all services are needed to ensure stability to keep veterans housed.

Persons with Disabilities: According to HMIS, 188 individuals with physical disabilities were homeless. 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. Overall, there is a severe need for permanent housing that can accommodate persons with disabilities. This typically includes bathroom equipped with grab bars, installation of handrails, walk-in showers and tubs, along with handicapped accessible doors and cabinets. Medical respite care was identified as a need for individuals discharging from hospital settings. Other needs of this population to maintain housing stability are the same as everyone else: access to employment and accessible public transportation.

According to stakeholders, there is an increase in persons with disabilities who are homeless. Increase in mental health issues as it relates to homelessness. Non-congregate shelter for youth (18-24), especially youth with children of their own. Protected classes are generally over-represented among people experiencing homelessness. Stakeholders also identified veterans, victims of domestic violence, and individuals who have recently exited the prison system as other populations experiencing difficulties finding housing. There is an increase in unsheltered homelessness in the City, especially among youth (18-24) and elderly, most with co-occurring mental health, substance abuse or physical disabilities.

There is a need for whole-family services serving at-risk youth as well as parents experiencing mental health crises. Stakeholders also suggested needs for behavioral health services paired with rental assistance and/or rapid rehousing. Transportation was also identified as a barrier for qualifying populations, especially for youth aged 18-24 who have children. Additionally, there is a need to connect youth to well-paying employment opportunities, which potentially requires transportation.

Landlord engagement and incentives were identified by stakeholders as needs due to the growing number of landlords unwilling to rent to qualifying and special needs populations due to poor credit/rental history. Risk mitigation funds and other incentives could be helpful to recruit more landlords to rent to special needs populations. Additionally, incentives could help encourage landlords to participate in HCV and other rental assistance programs.

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

According to York County PA 2-1-1 Counts from January 1, 2022, through July 31, 2022, the service received over 2,000 contacts every month. These contacts outpaced the corresponding months for 2021 by hundreds, and in some months by double. 2,108 requests for the seven months were made for housing and shelter assistance. Over 46% of these requests were made regarding rental assistance. While most requests were adequately met, unmet request rates were high for those seeking rental assistance (6% unmet), temporary housing solutions through shelter (5% unmet) and home repair or maintenance needs for low-income homeowners (5% unmet). Home repair/maintenance includes adaptations for safety and disability access, general upkeep, and weatherization. This suggests an unmet need for supportive services and reinforces stakeholder comments indicating a lack of affordable and accessible housing options.

Since PIT and HIC data only provide a snapshot of persons experiencing homelessness on a single night, a broader picture can be provided through data currently presented in City of York's Annual Performance Report (APR) for January 1, 2021-December 31, 2021, 2,466 households stayed at least one night in emergency shelter (ES), permanent supportive housing (PSH), permanent housing (PH), rapid rehousing (RRH), or transitional housing (TH).

Exits from the Homelessness System							
	% Exits to Positive # of Households Exited Destinations to Positive Destinations		Total # of Households Exited				
By Household type							
Adult-only Households	21.4%	186	869				
Households with Children	35.6%	324	909				
Child-only Households	0.0%	0	3				
By Pathway							
ES	19.6%	179	912				
PSH + PH	41.1%	23	56				
RRH	36%	292	811				
TH	43.5%	20	46				
All Households	28.2%	514	1825				

Only 28.2% of households exiting the homeless system exited to positive housing destinations. This suggests that there is an overall lack of permanent housing resources for all household types that

entered the homelessness system, especially for those who were only able to access emergency shelter or rapid re-housing resources.

According to stakeholders, there is a need for legal guidance ranging from whether someone is being legally evicted to whether the landlord can increase the rent, through understanding the lease and to what the individual is agreeing.

2014-2018 CHAS Data identified 3,120 renter households in York with income below 30% AMI. There are 2,115 renter households between 31-50% AMI, and there is a total 4,075 unit-gap in housing in units both affordable and available for households below 50% AMI. This suggests that households are experiencing cost burden and severe cost burden by occupying units that are not affordable to them, putting them at greater risk of housing stability and homelessness.

Supportive Services are needed including employment training. Supportive service providers expressed interest in opportunities to partner behavioral health work with rapid rehousing programs to stabilize individuals' mental health and housing at the same time. Shelter capacity is limited (both bed and staff capacity); hotel/motel utilization rates are high due lack of shelter bed capacity. An overwhelming issue identified by stakeholders was the lack of affordable housing increasing due to landlord selling once affordable properties rendering them no longer affordable. Additionally, there are fewer and fewer landlords accepting housing choice vouchers and other rental assistance.

A specific subpopulation identified by stakeholders was families, particularly those housed in hotels, often owe money in past utilities. This prohibits them from moving into a new unit as they are unable to put utilities in their name. For any household struggling to pay rent and/or utilities, not having utilities is a violation of their lease and puts them at risk of eviction. Funding support for utilities, even for those who do not owe arrears, is needed as it is a significant barrier to obtaining and maintaining housing stability.

The York County Coalition on Homelessness identified the need for preventative services for those at risk of homelessness, as well as an increased need for permanent supportive housing and rapid rehousing for those who are literally homeless and/or fleeing domestic violence.

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:

Enter narrative response here.

#### Identify priority needs for qualifying populations:

Based on stakeholder consultations and data analysis, rental housing that is affordable and accessible to individuals and households at 0-30% AMI is the priority need. An adequate inventory of deeply subsidized housing for Qualifying Populations is a priority due to landlord barriers and escalating rental costs. Coupled with this is a priority for rental assistance and supportive services (including case management, legal services and homeless prevention services) to assist the homeless identify and access housing and become stably housed, as well as to prevent homelessness among households who

are at greatest risk. Additionally, individuals need to be connected to services quickly, particularly mental health and substance abuse services, especially for those exiting the criminal justice system.

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:

In addition to feedback from stakeholders and consultation sessions, the following plans and data sources were consulted to determined needs and system gaps for HOME-ARP qualifying populations:

- American Community Survey (ACS), 2016-2020
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018
- York County Coalition on Homelessness 2022 Point-In-Time Count
- York County Coalition on Homelessness Housing Inventory County (HIC)
- York County Coalition on Homelessness Coordinated Entry System (CES)
- York County CoC Annual Performance Report (APR)
- 2021 System Performance Measures
- United Way of Pennsylvania's 2-1-1 Counts

To evaluate the size and demographic composition of qualifying populations within its boundaries, the City enlisted the help of the York County/City CoC HMIS Lead to provide data on homelessness and other qualifying populations. The City utilized CHAS, ACS and HIC data to identify the current affordable inventory in the City, as well as to determine the gap in housing availability. HMIS data on the percentage of households exiting the homeless system to unknown or temporary destinations and rates of return to homelessness were also used to determine the availability affordable housing inventory. In addition, the City utilized 2-1-1 requests as well as stakeholder feedback to identify service needs for the City.

#### **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 City of York Bureau of Housing Services will invite any Developer/Owner that is looking to apply for funding and/or other resources from the City for the new construction, substantial rehabilitation, and/or preservation of affordable housing to submit a proposal for funding. The proposed activity, including the proposed qualifying population(s) to be served, will be evaluated in accordance with the City's HOME-ARP allocation priorities, preferences and prioritization (if any), and projects that address qualifying populations will be considered. The City is not currently establishing preference or priority as part of its scoring criteria for HOME ARP proposals for funding. Should the City establish preference or priorities, a substantial amendment may be duly publicized and submitted to HUD for review. Applicants for HOME-ARP must meet the minimum program eligibility and threshold requirements. Depending on the nature of the proposed activity, site inspections may be conducted by City staff. An evaluation of the site's feasibility, financial underwriting and developer capacity assessment will be completed and considered as part of the review process.

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

The City of York will not administer and oversee its eligible activities directly. Rather, it will enter into HOME Agreements with developers of affordable rental housing projects, and execute subrecipient agreements with service providers. The City will provide oversight and management of its developer and subrecipient agreements.

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:

The City of York will not be distributing any portion of its HOME – ARP administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

#### Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$#		
Acquisition and Development of Non- Congregate Shelters	<b>\$</b> #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 1,683,533		
Non-Profit Operating	\$#	# <b>%</b>	5%
Non-Profit Capacity Building	\$#	# <b>%</b>	5%
Administration and Planning	\$ 297,093	15 %	15%
Total HOME ARP Allocation	\$ 1,980,626		

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 data analysis. The City of York will distribute 85% of its HOME-ARP allocation for the development of affordable rental housing. An overall lack of affordable rental units was one of the most frequently identified unmet needs among stakeholders. Tight rental markets and high rents make it extremely difficult for housing and service providers to find units that are affordable and in decent condition for their clients. The Bureau of Housing Services is prioritizing the creation of affordable housing units for qualified populations. HOME – ARP funds will be used for individuals or families from all of the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability.

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 affordable rental housing inventory in the City of York is severely limited, a challenge that existed long before and has been exacerbated by the pandemic. There is increased competition for fewer affordable units throughout the City. Privately owned units are no longer available for affordable housing in many places as landlords are no longer willing to accept rental assistance or have tenant selection policies that act as barriers for special needs populations. Shelters lack bed capacity for households experiencing homelessness, primarily because it is increasingly challenging to move folks out of shelter into permanent housing due to lack of affordable inventory. Therefore, the City's emphasis with HOME ARP funds will be to create new units to add to the affordable housing inventory in the City.

#### **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:

It is anticipated that the City's HOME ARP funds will be used to create 8 new units affordable to households at or below 30% AMI.

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:

It is anticipated that the City's HOME ARP funds will be used to create 8 new units affordable to households at or below 30% AMI. The City's priority goal established by this Allocation Plan is to increase the number of affordable housing units in the City. Providing funds for rental housing production directly supports the advancement of that goal.

#### **Preferences**

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

The City of York will not establish a preference; all qualifying populations will be eligible to apply for assistance under the City's HOME-ARP assisted program(s). Any preferences established in the future will be described in an amendment to this Allocation Plan and will not violate any fair housing, civil rights, or nondiscrimination requirements at the federal, state, or local level, which includes but is not limited to requirements found in 24 CFR 5.105(a).

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:

No preferences are established.

#### Referral Methods

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 of York will use the Coordinated Entry system as an indirect referral source, in addition to other referral sources such as local nonprofits, municipalities and private sources to identify other qualifying populations. The CE will be used for intake in order to add eligible applicants to a HOME-ARP project waiting list, which will be selected from in accordance with the preference and prioritization described above. Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project.

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):

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be placed on the project(s) waiting list and admitted in chronological order.

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):

Referrals accepted from the CE process established by the CoC will prioritize eligibility according to the CoC's assessment and prioritization. This survey measures vulnerability and prioritizes those with the greatest risk. Those determined to have the highest vulnerability, and need for permanent housing, and interested in applying will be identified as an eligible and offered the opportunity to apply for housing through the HOME-ARP project. However, as indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project.

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):

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be placed on the project(s) referral list and admitted in chronological order. Source of referral will not give one applicant preference or prioritization over another.

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

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 of York is not establishing limitations on eligibility.

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 City of York is not establishing limitations on eligibility.

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.

#### **HOME-ARP Refinancing Guidelines**

The City of York does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing in order to rehabilitate the units with HOME-ARP funds.

#### Appendix A: Consultation Materials

#### City of York HOME-ARP Consultation Summary

In conjunction with the York County Planning Commission, M&L participated in several stakeholder consultation sessions designed to identify the unmet needs of HOME-ARP qualifying populations.

#### **General Themes and Trends**

- There continues to be a large gap in the number of quality affordable and accessible units available for rent in the City.
- Protected classes are generally over-represented among people experiencing homelessness.
- Landlord engagement and risk mitigation funds could be helpful to recruit and encourage more landlords to rent to special needs populations.
- Shelter capacity is limited (both bed and staff capacity); hotel/motel utilization rates are high due lack of shelter bed capacity
- Barriers to accessing housing for special needs populations/ELI households include poor credit, criminal and rental histories; significant requests for security deposit (sometimes 3- and 4-times monthly rent); landlords requiring households have 3x the rent in monthly income
- Private landlords no longer accepting HCV or other rental assistance; porting outside the County takes a lot of time. Many private owners of naturally occurring affordable housing (or owners that had accepted HCV or other assistance) are selling the units to owners who no longer accept assistance or who increase the rent significantly, displacing households who cannot find affordable units elsewhere.
- Supportive services in general are a need-specifically housing locator and housing stabilization services; transportation services; case management
- Sub populations identified as having specific needs include transition age youth (18-24), Veterans, Domestic Violence victims, re-entry individuals exiting the prison system

#### Continuum of Care/Coordinated Entry

- There is an increase in unsheltered homelessness in the City, especially among youth (18-24) and elderly, most with co-occurring mental health, substance abuse or physical disabilities
- Transportation services are a need to provide access to employment, services from where affordable housing may be located
- Shelters are moving to sleep-only facilities due to lack of staff capacity to operate around the clock
- Supportive services are needed for re-entrants to help them readjust to society; especially vital for those being released from long stays in state prison.
- Services and housing assistance are needed for families at the intersection of imprisonment/child welfare involvement.
- Services are needed for those with severe behavioral health challenges
- There is a cohort of teens who have left a bad home situation, but aren't emancipated, and can't go to shelter because they're not 18. OCYF has difficulty placing this group with providers. They are living in storage units, at camp sites, in abandoned buildings, etc.
- There is a need for week long, whole-family services serving at-risk youth as well as parents experiencing mental health crises.
- Coordinated Entry has seen increase in calls for shelter, hotel stay assistance, housing locator services

- There is a need for ongoing rental assistance after ERAP assistance is expired/maxed out
- There is a need for homeless prevention, especially with elderly households who can't afford rent increases
- Households are struggling to pay both rent <u>and</u> utilities, both of which have increased.
   Households are forced to choose, but not having utilities is a violation of their lease, putting them at risk of eviction

#### **Shelter Providers**

- There has been a significant increase in the number of street homeless/unsheltered population. Street Outreach capacity is limited in order to address the current needs
- It is difficult to move households out of shelter into units due to lack of units in the marketplace (increase in rents, lack of supply and lack of landlords willing to accept special needs populations)
- There are record numbers of families living in hotels who are not able to find permanent housing due to lack of supply, poor credit/rental history, and raising rents. Many of these families could afford some rental payments if they could find a unit.
- There is an increase in people experiencing homelessness who are also disabled
- Shelter capacity is limited-Code Blue shelter unable to open some nights due to lack of staffing capacity
- There is an increase in first-time homeless
- NCS is a need, more COVID-friendly

#### Service Providers

- Connecting individuals quickly to services, particularly mental health and substance abuse services for those exiting the criminal justice system, is a need
- Case management services in shelters need to be improved
- Families in hotels often owe a lot in past utilities, so they can't move into a new unit and put utilities in their name. Funding support for payment of utility arrears is a need. Even without back owed utilities, affording utilities is a big barrier to housing people.
- Hotel prices are increasing forcing households relying on hotels for shelter out
- Accountability in services is critical-many need services but don't want them
- Implementing a better transition from relying on mainstream benefits to self-sufficiency as income increases would ensure more success
- Civil/legal support is needed for households at-risk of eviction-it is questionable that some of the reasons for terminating a lease are allowed
- Services not tied to rental assistance or other activities are a need to ensure continuity and stability
- Biggest barriers to placing households include rental costs, up-front security deposit costs, first/last month rent costs are skyrocketing
- Access to services outside of traditional business hours/days is a need
- Services are required for re-entry population to maintain housing post-release, including budgeting, legal services, case management
- There is a need for rental assistance for currently housed households to prevent evictions as rents rise; couple this assistance with services to ensure sufficiency
- There is a need to connect youth to well-paying employment opportunities

#### **Rental Assistance Providers**

- Additional tenant-based rental assistance, targeted to certain subpopulations participating in self-sufficiency programs, are a need
- General lack of affordable inventory
- Landlord incentives could help encourage landlords to participate in HCV and other rental assistance programs
- Transportation is a barrier for folks accessing services
- Behavioral health services paired with rental assistance/RRH are a need
- Non-Congregate shelter for youth, especially parenting youth, is a need

#### Domestic Violence/Victim Service Providers

- Need for civil/legal guidance on housing issues, ranging from whether someone is being illegally
  evicted, to whether the landlord can increase the rent, through understanding a lease and what
  you are agreeing to.
- Shelter is a need, but cognizant of the expense and difficulty in identifying ongoing sustainable operating funds.
- There is a need for long-term to permanent subsidy to assist households that will never be able to maintain FMR in the current market, or on disability income alone
- There is a lack of inventory in which to place victims

#### Veteran Housing and Service Providers

- There is a growing population of senior Veterans with fixed incomes experiencing difficulty finding housing.
- Accessibility continues to be a challenged for disabled Veterans across all housing types-shelter through permanent rentals.
- There is a growing need for support for activities of daily living and representative payee services, particularly among the elderly and elderly Veterans who don't require personal care, assisted or skilled living.
- Continuity of assistance is important so Veteran households don't regress and have to start over identifying services and housing options-particularly among households at 50-80% AMI.
- Prevention services are critical to ensuring stability-forcing a household into homelessness in order to assist the household is costly and inefficient.
- Transportation services for those in rural areas are a need.
- Intensive case management/street outreach/health navigation teams for unsheltered homeless populations are a need.

#### Civil Rights

- Housing supply is limited, particularly for those with physical disabilities.
- People fleeing domestic violence don't experience tenant protections for breaking a lease early, making it difficult to flee and/or creating poor rental history.
- Landlord engagement and risk mitigation funds could be helpful to recruit more landlords to rent to special needs populations.

#### **Public Housing Authority**

- Landlords unwilling to rent to qualifying and other special needs populations due to poor credit/rental history
- Housing inventory limited
- Availability of robust supportive services may or may not act as assurance for landlords otherwise unsure of renting to QPs/special needs populations
- Offering incentives to households to participate in services helps maintain stability-this is successful in the FSS program
- CONE open to developing units

#### Participating Agency

#### Affordable Housing Advocates

Creating Opportunities in Neighborhood Environments (CONE)

York County Habitat for Humanity

**Community Progress Council** 

Tenfold

Pennsylvania Human Relations Commission

Housing Authority of the City of York ('York Housing Authority')

York County Emergency Management

Asbury United Methodist Church

YMCA of York County

York County Veterans Affairs YWCA of Greater Harrisburg

Volunteers of America

Veterans Administration Medical Center (Lebanon)

York County CareerLink - Veteran Services

**Bell Socialization Services** 

**Bethany Christian Services** 

Center for Independent Living

Children's Aid Society (York C.A.R.E.S & Cornerstone Youth Home)

Contact Helpline/2-1-1

Covenant House

Educating Children & Youth Experencing Homelessness (McKinney-Vento)

Friends & Neighbors of PA

Hanover YWCA

Healthy York Coalition

LifePath Christian Ministries

**New Hope Ministries** 

United Way of York County

Valley Youth House

WellSpan Health

YMCA of the Roses

York/Adams MH-IDD

York County Human Services

York County Probation

York County Reentry Coalition

York YWCA

York County Prison

York County DA

York Co Domestic relations York County Planning Commission

highlighted cell indicates CoC member

#### Agency/Org Type

Public or private agencies that address the needs of persons with disabilities PHA; Providers serving the homeless, victims of domestic violence, veterans' groups

Providers serving the homeless, victims of domestic violence, veterans' groups Providers serving all four qualifying populations

Public or private agencies that address fair housing, civil rights, and the needs of persons with disabilities Public or private agencies that address fair housing, civil rights, and the needs of persons with disabilities PHA

Public Agency serving all four qualifying populations

Providers serving the homeless, victims of domestic violence, veterans' groups

Providers serving the homeless, victims of domestic violence

Public Agency serving homeless, at risk of homeless Veterans

Providers serving the homeless, veterans' groups

Providers serving the homeless, veterans' groups

Public Agency serving homeless, at risk of homeless, Veterans

Providers serving the homeless, veterans' groups

Providers serving all four qualifying populations

Providers serving all four qualifying populations

Public or private agencies that address the needs of persons with disabilities; Veterans groups

Providers serving all four qualifying populations

Providers serving the homeless, victims of domestic violence

Providers serving all four qualifying populations

Public Agency serving all four qualifying populations

Public Agency serving all four qualifying populations

Public Agency serving at risk of homelessness, other at risk

Providers serving at risk of homelessness, other at risk

Providers serving all four qualifying populations

Public Agency serving at risk of homelessness, other at risk

Public Agency serving at risk of homelessness, fleeing domestic violence/trafficking

Public Agency serving at risk of homelessness, other at risk

Contniuum of Care Collaborative Applicant; public agency serving all four qualifying populations

HOME-ARP Allocation Plan



# Agenda

What is HOME-ARP?

Defining the Qualifying Populations

**Eligible Activities** 

Summary of Consultation Themes

Discussion of Unmet Needs of Qualifying Populations

Wrap-up and Next Steps

# 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

## **HOME-ARP Allocation**

City of York \$1,980,626

York County \$3,070,455

## 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 In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability

## 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



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



Income at or below 30% AMI; Lacks sufficient resources to attain housing stability; AND



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.);

## Five Eligible Activities









PRODUCTION
OR
PRESERVATION
OF AFFORDABLE
RENTAL
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

## Consultation Themes and Findings

Rising rents and low vacancy rates have dramatically decreased available stock of privately owned rental housing. Private landlords are no longer willing to accept housing assistance payments

All four QPs have complex needs that require long-term access to affordable housing coupled with supportive services

There are significant supportive service needs, including case management, legal/landlord tenant mediation services, employment training, transportation

Shelter capacity is limited (both bed and staff capacity); hotel/motel utilization rates are high due lack of shelter bed capacity

Protected classes are generally over-represented among people experiencing homelessness.

Sub populations identified as having specific needs include transition age youth (18-24), Veterans, Domestic Violence victims, re-entry individuals exiting the prison system

## Discussion Topics

What do you see as the most critical gaps and needs in effective housing and service delivery system?

What other resources are available to address these unmet needs?

What limitations or challenges exist with these funding sources/programs?

How can HOME ARP be used to address these unmet needs?

What opportunities exist to partner with other entities for implementation?

What are your priorities, what role does Mayor/Council wish to play moving forward?

# Next Steps and Timeline

Draft Needs Assessment and Gaps Analysis through September/October

Draft Allocation Plan through October

Public Display in late October/early November

Submit to HUD in December

## Appendix B: Citizen Participation

### NOTICE OF PUBLIC HEARING CITY OF YORK, PENNSYLVANIA HOME-ARP ALLOCATION PLAN

Notice is hereby given that the City of York, Pennsylvania has prepared its HOME-ARP Allocation Plan. This Plan describes how the City intends to allocate \$1,980,626 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 will place its HOME-ARP Allocation Plan on public display January 18-February 3, 2023 at City Hall, 101 South George Street, York PA 17401. Notice is also given that the City of York will hold a public hearing on January 25, 2023, at 6:00 p.m. in Council Chambers at City Hall 101 S George St. York, PA 17401.

The public is invited to attend this meeting and provide input on the plan. The City of York 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 the City of York at 717-849-2264 at least five working days before the hearing. Individuals with a hearing impairment shall contact the Deaf Center at TDD 717-848-6765.

Persons wishing to submit comments or questions can do so at the public hearing. Written comments may be submitted to the Bureau of Housing Services, P.O. Box 509, York, PA 17405 or by email to <a href="mailto:jcrosby@yorkcity.org">jcrosby@yorkcity.org</a>. Comments received before 4:00 p.m. February 3, 2023, will be considered.

City Council is expected to act on the proposed HOME-ARP Allocation Plan at their regularly scheduled meeting on February 7, 2023 at 6:00 P.M. in City Hall 101 South George Street, York, PA. The City's HOME ARP Allocation Plan will be submitted to HUD on or before March 31, 2023.

City of York, PA

By Order of: Michael Helfrich, Mayor

City of York

RUN AS DISPLAY AD Wednesday January 11, 2023

BILL TO: City of York

Bureau of Housing Services

P.O. Box 509 York, PA 17405

### NEED PROOF OF PUBLICATION ASAP

# york daily record

CITY OF YORK BUREAU OF HOUSING 101 S GEORGE ST YORK, PA 17401 ATTN DEBORAH P Publication Cost: \$393.80 Ad No: GCI1001285 Customer No: 106016 PO#: PUBLIC NOTICE # of Affidavits: 1

This is not an invoice

### Affidavit of Publication

## Proof of Publication State of Pennsylvania

York Daily Record, York Dispatch and York Sunday News is the name of the newspapers(s) of general circulation published continuously for more than six months at its principle place of business, 718 Poplar Street, Lebanon, PA. The printed copy of the advertisement hereto attached is a true copy, exactly as printed and published, of an advertisement printed in the regular issues of the said The Lebanon Daily News published on the following dates, viz: Date of Publication:

1/11/2023

I, being first duly sworn upon oath depose and say that I am a legal clerk and employee of York Daily Record, York Dispatch and York Sunday News and have personal knowledge of the publication of the advertisement mentioned in the foregoing statement as to the time, place and character of public

Subscribed and sworn to before on January 11th, 2023:

Notary, State of Wisconsin, County of Brown

My commission expires

KATHLEEN ALLEN Notary Public State of Wisconsin

#### NOTICE OF PUBLIC HEARING CITY OF YORK, PENNSYLVANIA HOME-ARP ALLOCATION PLAN

Notice is hereby given that the City of York, Pennsylvania has prepared its HOME-ARP Allocation Plan. This Plan describes how the City intends to allocate \$1,980,626 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 will place its HOME-ARP Allocation Plan on public display January 18-February 3, 2023 at City Hall, 101 South George Street, York PA 17401. Notice is also given that the City of York will hold a public hearing on January 25, 2023, at 6:00 p.m. in Council Chambers at City Hall 101 S George St. York, PA 17401.

The public is invited to attend this meeting and provide input on the plan. The City of York 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 the City of York at 717-849-2264 at least five working days before the hearing. Individuals with a hearing impairment shall contact the Deaf Center at TDD 717-848-6765.

Persons wishing to submit comments or questions can do so at the public hearing. Written comments may be submitted to the Bureau of Housing Services, P.O. Box 509, York, PA 17405 or by email to <a href="mailto:jcrosby@yorkcity.org">jcrosby@yorkcity.org</a>. Comments received before 4:00 p.m. February 3, 2023, will be considered.

City Council is expected to act on the proposed HOME-ARP Allocation Plan at their regularly scheduled meeting on February 7, 2023 at 6:00 P.M. in City Hall 101 South George Street, York, PA. The City's HOME ARP Allocation Plan will be submitted to HUD on or before March 31, 2023.

City of York, PA

By Order of: Michael Helfrich, Mayor City of York

PA-GCI1001285-01

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Public Notices Public Notices

PUBLIC NOTICE

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MICHALE SCHIB, ATTORALY

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2023 Morites in hereby given that BarDistrict Silven Sil Ford Mustang, 2002 94,154 ml., Convertible, Manual, Very good cond., Brown w Block Leather Int., Power Locks, Power Seath, Power Steeling, Premium Soland, Remote Keyless Entry, Classic plates 94500, 17313 Tem (717)501-8222

Public Notices 2

Estate Notices

Late of: Dover Township

Notice is hereby given that tet-ters Testamentary have been granted in the following estate. All persons indebted to the sald mental and the sald person indebted to the sald without delay to the Executor samed below. Southeast of the Secutor of the Secutor annet below. Southeast of the Secutor of York County, Pennsylvania, (died October 21, 2022), tesile G. Leach, Executor and Midnal Food Secutor of the Secutor of the Secutor of the Food Secutor of the Secutor of the Secutor of the Food Secutor of the Secutor of the Secutor of the Food Secutor of the Secutor of the Secutor of the Food Secutor of the Secutor of the Secutor of the Food Secutor of the Secutor Attorney James N. Clymer John Milton Ebaugh, late of Heldel-berg Township, County of York, Pennyhvasia, deceased, Johene Ebaugh Runge, Executirs, do Kurt A. Blake, Es-quire of Blake & Schambacher Law Firm, LLC, 27 East Mildelphia Street, York, Pennyhvania 17401,

In re: Change of Name of Sarah Christine Eppinger a Minor 17043.

EXECUTOR'S NOTICE

Estate of Katile B. Moore abda Katile
Base Moore, late of Shrewsbury
Township, York County, PA, deceased.

Letters Testamentary on said estate having been granted to the undersigned, all persons indebted thereto are requested to make payment, and those having class or deviating against the same, will present them without delay for settlement to the undersigned on histhand R. Camer, Ungold. 479 Ber. 279, Junewalson, ZA 17181, and Po Ber. 279, Junewalson, ZA 17181,

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Kent Albert Moore Michael R. Caum, Attorney (747) 237-8039

Thank you, Liane Petersen, for buying that

Public Notices

Academy of York Charter School

Notice is hereby given that the Board
of School Directors of the School
Billistic of the Cry of York has school
Billistic of the Cry of York has school
Billistic of the Cry of York Charter School.
The Healing will be held on Tuesday,
January 17, 2023 beginning at 6.30 pm in the cafetings at William Penn High
School, 101 West College Avenue,
York, PA 17201.

Time will be set aside to receive public comments from residents of the School District. The School District reserves the right to limit the amount of time of any comments.

Brandon J. O'Donnel, Altorray

EKECUTOR'S NOTICE

First of Down E. Ryer, of Dalbartown
Borough, deceased.

Letters Testamentary on side estate
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them without delay for settlement to
Liquine, 110 South Northern Way,
York, PromyNytan 17402, Inspections at the business office of the Southern York Country School Obstrict during regular business hours, SOUTHERN YORK COUNTY SCHOOL DISTRICT

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City of York PA

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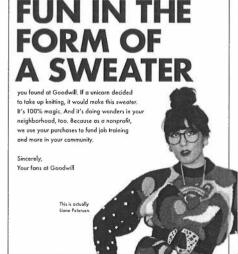
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## City of York HOME ARP Public Hearing Opening Statement

The purpose of this hearing is to solicit feedback on the City of York's HOME ARP Allocation Plan. In conjunction with the York County Planning Commission, the City and its consultant participated in several stakeholder consultation sessions designed to identify the unmet needs of HOME-ARP qualifying populations. These include people experiencing or at risk of homelessness, and individuals fleeing domestic violence, dating violence, sexual assault or human trafficking. The city also analyzed data from numerous sources to identify the unmet needs and gaps in the affordable housing inventory for the City. Combined, these qualitative and quantitative analyses informed the City's Allocation Plan. The proposed budget is as follows:

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$#		
Acquisition and Development of Non- Congregate Shelters	\$#		
Tenant Based Rental Assistance (TBRA)	\$#		
Development of Affordable Rental Housing	\$ 1,683,533		
Non-Profit Operating	\$#	# %	5%
Non-Profit Capacity Building	\$#	# %	5%
Administration and Planning	\$ 297,093	15 %	15%
Total HOME ARP Allocation	\$ 1,980,626		

The HOME-ARP budget was driven by the priority needs identified as a result of stakeholder consultation and data analysis. The Bureau of Housing Services is prioritizing the creation of affordable housing units for qualified populations. HOME – ARP funds will be used for individuals or families from all four of the qualifying populations.

At this time, the City will entertain questions or comments on the proposed Allocation Plan.

# HOME-ARP Allocation Plan





## Agenda

What is HOME-ARP?

Allocation Plan Process to Date

**HOME-ARP Qualifying Populations** 

Needs Identified by Stakeholders

Proposed HOME-ARP Budget

**Next Steps** 

# The HOME-American Rescue Plan

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 \$1,980,626 (York County is also receiving \$3,070,455)

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

Deadline for spending HOME-ARP funds is September 2030

# Overview Planning Process



City and County conducted 12 focus group sessions targeted to required stakeholders and CoC subcommittees



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

## 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 In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability

# Stakeholder Identified Needs

Rising rents and low vacancy rates have dramatically decreased available stock of privately owned rental housing. Private landlords are no longer willing to accept housing assistance payments

All four QPs have complex needs that require long-term access to affordable housing coupled with supportive services

There are significant supportive service needs, including case management, legal/landlord tenant mediation services, employment training, transportation

Shelter capacity is limited (both bed and staff capacity); hotel/motel utilization rates are high due lack of shelter bed capacity

Protected classes are generally over-represented among people experiencing homelessness.

Sub populations identified as having specific needs include transition age youth (18-24), Veterans, Domestic Violence victims, re-entry individuals exiting the prison system

# Needs Identified through Data Analysis

Increase in homeless identified in PIT from 2020-2022

High number of people exiting the homeless system to temporary destinations; only 28% exited to positive (permanent) housing destinations

Victims of DV are largest subpopulation accessing the Coordinated Entry System; Youth households are second largest subpopulation to access CES

63% of Extremely Low-Income renters in the City experience severe cost burden

# Proposed Home-ARP Budget

Eligible Activities	Funding Amount
Supportive Services	\$ 0
Acquisition & Development of Non-Congregate Shelters	\$ 0
Tenant Based Rental Assistance	\$ 0
Development of Affordable Rental Housing*	\$ 1,683,533.00
Non-Profit Operating Expenses	\$ 0
Non-Profit Capacity Building	\$ 0
Administration & Planning**	\$ 297,093.00
TOTAL HOME-ARP ALLOCATION	\$ 1,980,626.00

- \* Proposing minimum 8 new affordable rental units
- \*\* Limited to 15% of total grant

# Next Steps and Timeline

Public Display/Comment period January 18-February 3, 2023

Public Hearing conducted January 25, 2023

Council Consideration/Approval February 7, 2023

Submit to HUD before March 31, 2023

## Appendix C: SF424s and Certifications

### Council of the City of York, PA Session 2023 Resolution No. 7

Click here to view plan.

INTRODUCED BY: Sandie Walker DATE: February 7, 2023

### A RESOLUTION

## OF THE COUNCIL OF THE CITY OF YORK SUBSTANTIAL AMENDMENT TO THE FY 2021 ANNUAL ACTION PLAN TO APPROVE THE HOME-ARP ALLOCATION PLAN

WHEREAS, under Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2), the Secretary of the U.S. Department of Housing and Urban Development is authorized to extend financial assistance to communities to address the need for homelessness assistance and supportive services; and

WHEREAS, the U.S. Department of Housing and Urban Development has advised the City of York (hereinafter "the City") that it is eligible to receive \$1,980,626 in HOME-ARP funds; and

WHEREAS, the City has prepared a HOME-ARP Allocation Plan, which identifies how the City determined unmet needs of the HOME-ARP Qualifying Populations, and summarizes how the City will allocate the HOME-ARP funds; and

WHEREAS, a draft of the HOME-ARP Allocation Plan was on display from January 18 through February 3, 2023, and the City held public hearings on said Allocation Plan and the comments of various agencies, groups and citizens were taken into consideration in the preparation of the final document.

### NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF YORK:

- 1. That the HOME ARP Allocation Plan is hereby in all respects approved and a copy of said Allocation Plan directed to be filed with minutes of this meeting.
- 2. That it is cognizant of the conditions that are imposed in the undertaking and carrying out of community development activities with federal financial assistance, including those relating to (a) the relocation of site occupants and, (b) the prohibition of discrimination because of race, color, age, religion, sex, disability, familial status, or national origin, and other assurances as set forth under the certifications.
- 3. That the Mayor of the City of York is authorized to file an application for financial assistance with the U.S. Department of Housing and Urban Development in the amount of \$1,980,626 for the HOME-ARP Program.
- 4. 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 the review of this Application.
- 5. That the Mayor is authorized to execute on behalf of the City the formal grant contracts, amendments, and other documents relating to the City's HOME-ARP Allocation Plan.

	-		
Resolved and adopted th	e day of Februa	ry 2023.	
PASSED FINALLY: F	ebruary 7, 2023		BY THE FOLLOWING VOTE:
YEAS: Dennis	Buckingham	,Rivera	,Walker – 4
NAYS: None	_•	5	mobe show
ATTEST:		Sandie W	Valker, President of Council
N. James F	Im		

Dianna L. Thompson, City Clerk

### HOME-ARP CERTIFICATIONS

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

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

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

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

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

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

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

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

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<u>Mayor</u> Title

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424					
* 1. Type of Submission  Preapplication  Application  Changed/Correct	New Continuation		Revision, select appropriate letter(s):  Other (Specify):		
* 3. Date Received:	4. Applicant Identifier:				
5a. Federal Entity Ident	tifier:		5b. Federal Award Identifier: M-21-MP-42-0214		
State Use Only:					
6. Date Received by St	tate: 7. State Applicati	on Id	entifier:		
8. APPLICANT INFOR	RMATION:				
* a. Legal Name: Cit	ty of York				
* b. Employer/Taxpaye	er identification Number (EIN/TIN):		* c. UEI:		
236001908		]	EVGRD76VFUL5		
d. Address:					
* Street1:	101 South George Street				
* City:	York				
County/Parish:	York				
	* State: PA: Pennsylvania				
Province:					
1	USA: UNITED STATES				
* Zip / Postal Code: 17401-1409					
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Prefix:	* First N	_			
Middle Name:					
* Last Name: Cros	sby				
Suffix:					
Title: Deputy Director					
Organizational Affiliation	Organizational Affiliation:				
* Telephone Number: 717-849-2884 Fax Number: 717-849-2329					
* Email: jcrosby@	yorkcity.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:
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:
M-21-MP-42-0214
* Title:
HOME-ARP
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
HOME-ARP
Attach supporting documents as specified in agency instructions,
Add Attachments Delete Attachments View Attachments

Application	n for Federal	Assistance	∋ SF-424					
16. Congress	iona! Districts	Of:						
* a. Applicant	10				* b. P	rogram/Proj	ect 10	
Attach an addi	tional list of Progr	ram/Project C	ongressional Distric	ts if needed.				
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17. Proposed	Project:	77.00						
* a. Start Date:	09/20/2021					* b. End D	ate: 09/30/2030	
18. Estimated	l Funding (\$):					***********		
* a. Federal			1,980,626.00	***************************************				
* b. Applicant	***************************************	***************************************						
* c. State		ete tipa i						
* d. Local								
* e. Other								
* f. Program In	come	t and the						
* g. TOTAL		~	1,980,626.00					
* 19. Is Applic	ation Subject to	Review By	State Under Exec	utive Order 123	72 Process?	***************************************		
a. This ap	plication was m	ade available	to the State unde	er the Executive	Order 12372 P	rocess for	review on	
b. Program	m is subject to E	.O. 12372 bi	ut has not been se	elected by the St	ate for review.			
C. Program	n is not covered	by E.O. 123	72.					
* 20. Is the Ap	plicant Delinqu	ent On Any	Federal Debt? (If	"Yes," provide	explanation in	attachmen	ıt.)	
Yes	⊠ No							
If "Yes", provi	de explanation a	and attach	_					
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*Email: mhel	frich@yorkci	ty.org						
* Signature of A	uthorized Repres	entative:	Moling	Miller		***************************************	* Date Sign	ed: 2/16/23

OMB Number: 4040-0007 Expiration Date: 02/28/2025

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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:

- 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.
- 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.
- 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.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- 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.
- 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.

- 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 seg.); (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).
- 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.).
- 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.
- 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."
- 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
Milalhufof	Mayor
APPLICANT NAME	DATE SUBMITTED
City of York	2/16/23

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## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 404n-0009 Expiration Date: 02/28/2025

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

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

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

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

- 1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- 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.
- 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 nondiscrimination 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.
- 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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- 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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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE.
Windst Hunful	Mayor
APPLICANT NAME	DATE SUBMITTED
City of York	2/16/23

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