

ASSURANCES - CONSTRUCTION PROGRAMS

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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 assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

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

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

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Executive Director
APPLICANT ORGANIZATION North Carolina Housing Finance Agency	DATE SUBMITTED 07/08/2022

HOME-ARP CERTIFICATIONS

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

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

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

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

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

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

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

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

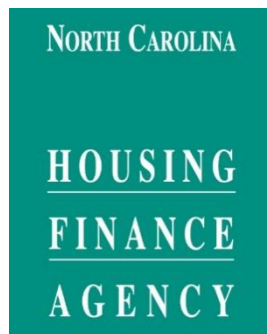


Signature of Authorized Official

06/17/2022
Date

Executive Director
Title

North Carolina Housing Finance Agency



HOME-ARP Allocation Plan

Last revised for Submission to HUD July, 2022

Approved by HUD November, 2022

Consultation

The North Carolina Housing Finance Agency (NCHFA) consulted with stakeholders throughout the development of the HOME-ARP allocation plan through online forums, individual consultations and web-based surveys. Stakeholders were asked to provide input on the needs, service gaps, and potential uses of funds in their communities. NCHFA’s efforts are summarized below.

- NCHFA convened local participating jurisdictions within North Carolina that received HOME-ARP funds to help coordinate the use of funds. Representatives from 20 participating jurisdictions were invited; 13 representatives from 10 participating jurisdictions attended.
- NCHFA held three listening sessions for interested stakeholders, consistent with the required consultations found in [CPD-21-10](#). Sessions were publicized via email, website, and social media. A total of 103 individuals representing at least 40 organizations participated.
- NCHFA created and distributed a survey via email, website and social media. A total of 94 individuals responded.
- NCHFA attended 5 stakeholder meetings to inform participants of the HOME-ARP funding including three with the local leadership group of North Carolina Coalition to End Homelessness, a convening of state and local Human Relation Councils and Commissions and the Governor’s Working Group on Veterans, Service Members and their Families.
- NCHFA staff also held 5 virtual meetings with stakeholders.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Local HOME participating jurisdictions (13 attendees)	Public agencies that address the needs of the qualifying populations <ul style="list-style-type: none"> • All qualifying populations 	Online forum (11/4/21)	<ul style="list-style-type: none"> • Identified services, non-congregate shelter for families and youth, affordable rental housing for households earning less than 30% AMI as priority needs in their communities • In many communities, voucher holders were unable to find housing • High cost of land and construction prices make development difficult
NC Emergency Solutions Grant Program, NC Department of Health and Human Services	Public agencies that address the needs of the qualifying populations <ul style="list-style-type: none"> • Homeless service providers 	Virtual meeting (11/10/21)	<ul style="list-style-type: none"> • Several regional committees across the state lack sufficient shelter capacity. In addition to geographic coverage, there is an unmet demand within specific populations. • Extend financial assistance for households receiving ESG-CV to prevent homelessness

			<ul style="list-style-type: none"> • Support a flexible housing fund for low-income households • Increase non-profit capacity
NC Office of Recovery and Resiliency, NC Department of Public Safety	Public agencies that address the needs of the qualifying populations <ul style="list-style-type: none"> • All qualifying populations 	Virtual meeting (11/19/21)	<ul style="list-style-type: none"> • Extend rental assistance to HOPE households to prevent homelessness • Create more affordable housing rental units
NC Coalition to End Homelessness	Homeless service providers & domestic violence service providers	Virtual meetings 12/2/21 2/26/22 6/15/22	<ul style="list-style-type: none"> • Provide funding for services, rental assistance in permanent supportive housing • Increase permanent supportive housing for the homeless • Provide access to Targeted Units for homeless service providers • Work with landlords on tenant selection policies
Public Housing Authorities (28 attendees)	Public housing agencies	Online forum (12/8/21)	<ul style="list-style-type: none"> • Preservation and rehabilitation of existing public housing is needed • Finding landlords that are willing to accept vouchers is an ongoing challenge • Affordable 1- and 2-bedroom rental units are needed • Payment standards are too low in some counties • Funding for job training and other programming is needed
Continuums of Care and Service Providers (63 attendees)	Public agencies that address the needs of the qualifying populations <ul style="list-style-type: none"> • Continuums of Care • Homeless service providers 	Online forum (12/9/21)	<ul style="list-style-type: none"> • Several counties in the Balance of State have no emergency housing • Permanent supportive housing and rental units for households below 30% AMI are the greatest need

			<ul style="list-style-type: none"> • Lack of affordable housing creates challenges for finding placements for homeless • More intensive case management and support services are needed • Mismatch between needs of specific populations experiencing homelessness and shelter types
Opportunity and Well-Being Division, Office of Healthy Opportunities & Transitions to Community Living, North Carolina Department of Health and Human Services	<p>Public agencies that address the needs of the qualifying populations</p> <ul style="list-style-type: none"> • Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities 	Virtual meeting (12/17/21)	<ul style="list-style-type: none"> • Extend rental assistance to households in the HOPE and Back@Home programs to prevent homelessness • Expand support services in permanent supportive housing
Veteran Services of the Carolinas	Veterans' group	Virtual meeting (1/11/22)	<ul style="list-style-type: none"> • Need for landlord engagement in accepting rental subsidies and a shortage of affordable units • Employment and financial skills training are needed • Specific populations (men with children, registered sex offenders, people with pets) have difficulties accessing shelter
Fair housing advocates, disability advocates and civil rights organizations (13 attendees)	Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities	Online Forum (1/13/22)	<ul style="list-style-type: none"> • Waiting lists for housing choice vouchers and targeted units are long • Lack of affordable housing is the biggest barrier • Rental assistance programs started in response to a pandemic are coming to an end and there is infrastructure to distribute rental assistance
Office of Policy and Office of Healthy	Public agencies that address the needs of	Virtual Meetings	<ul style="list-style-type: none"> • Shared insights on needs for rental units, support

<p>Opportunities, NC Department of Health and Human Services</p>	<p>the qualifying populations</p> <ul style="list-style-type: none"> • Homeless service providers • Domestic violence service providers • Public or private organizations that address fair housing, civil rights and the needs of persons with disabilities 	<p>2/24/2022 3/29/2022 4/13/2022 4/27/2022</p>	<p>services, rental assistance and non-congregate shelters (NCS). NC DHHS is supportive of increased investments in rental development, support services and rental assistance. Their support for NCS was stronger for the geographies where no shelter is currently in place.</p>
<p>Senior Consultant for the Technical Assistance Collaborative and Independent Reviewer for North Carolina’s Department of Justice Olmstead Settlement</p>	<p>Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities</p>	<p>Virtual Meetings 5/9/2022 6/6/2022</p> <p>Phone Calls 5/11/2022 5/12/2022</p>	<ul style="list-style-type: none"> • North Carolina is currently under the Olmstead Settlement requiring the state to expand access to community-based services and supportive housing for individuals living with disabilities • The DOJ Independent Reviewer indicated NC Housing Finance Agency should focus the HOME-ARP funds on increasing the supply of affordable rental housing in North Carolina
<p>Survey respondents (94 respondents)</p>	<p>Various</p>	<p>Online Survey (11/23/22 – 4/1/22)</p>	<ul style="list-style-type: none"> • Development and preservation of affordable housing ranked highest in priority among eligible activities • All responses included as an attachment

A full table of stakeholders is included in the appendix along with written comments collected during listening sessions and survey responses.

Feedback Summary:

Feedback received from the above consultations and survey results addressed several of the State's plan design questions, allowing a more refined approach to the allocation of resources across the eligible uses. The primary pieces of information that influenced our design were:

- The broadly articulated need for the development of more affordable housing units is reflected in the total funds the State plans to dedicate to rental housing development.
- The need for some form of subsidy to allow for the affordability of the units is reflected in the inclusion of operating costs in the project award, which will allow the rents to be affordable to the tenants with extremely low incomes through the duration of the affordability period.
- The lack of an emergency shelter in over 20 counties and mismatch of shelter service populations with need in other counties in North Carolina is reflected in the allocation of resources to create two to three non-congregate shelters in these under- and unserved counties.
- The need for support services for many households in the qualified populations is reflected in the requirement of support services capacity in the application for rental development.

Public Participation

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

- **Date(s) of the public notice:** NCHFA announced the start of the HOME-ARP Allocation Plan public comment period on Friday, July 1st, 2022.
- **Public Comment period:** The HOME-ARP Allocation Plan public comment lasted from July 1, 2022 to July 15, 2022 at 5:00 pm EST.
- **Dates(s) of public hearing:** A public hearing for the HOME-ARP Allocation Plan was held on Thursday, July 14th, 2022 from 2:00 pm – 3:30 pm EST.

Describe the public participation process:

NCHFA pursued multiple avenues to ensure public awareness of the HOME-ARP Allocation Plan and encourage participation in the plan development process. NCHFA created a HOME-ARP specific webpage (<https://www.nchfa.com/about-us/home-american-rescue-plan>) on its website to post information about the program and will keep this page updated as funds become available. The HOME-ARP allocation plan, HOME-ARP Allocation Plan summary and notice of public hearing are posted on NCHFA's website. To increase participation in the public comment period, NCHFA sent email notification of the public hearing and comment period to over 1,500 (1,506) email addresses curated from a list of Agency partners who receive HOME funding, local and state partners and other stakeholders. The email blast included 1,325 successful deliveries with a 34.3% (approximately 454) open rate. In addition, NCHFA partnered with the Department of Commerce to share the allocation plan and public notice on their website (<https://www.nccommerce.com/documents/draft-home-arp-amendment-2021-cdbg-annual-action-plan-and-cdbg-2021-2025-consolidated-plan>) and with their listservs including city and county managers and other stakeholders. All comments received in writing or verbally during the public comment period were posted to NCHFA's HOME-ARP webpage for the general public to view. In total,

NCHFA received comments from seven different organizations and individuals. NCHFA staff were available to take comments via phone, email, or mail.

A virtual public hearing took place on July 14th from 2:00 – 3:30 pm. The public hearing consisted of a presentation describing the allocation plan process and proposed HOME-ARP funded program which lasted approximately 25 minutes. After which, the public were invited to provide their comments to be documented and considered as part of the plan development. In total, 57 registrants attended. This included eight NCHFA staff and some duplicated attendees as a few participants chose to call in and join virtually.

Describe the efforts to broaden public participation:

NCHFA pursued multiple paths to broaden HOME-ARP public input. In addition to the allocation plan summary and notice being shared in English, both documents were translated into Spanish. These documents were made available on the NCHFA HOME-ARP webpage with links translated into Spanish and distributed as part of the email blast notifying the public of the comment period. Translation services, including Spanish and other languages, were available for any member of the public who called in to submit a comment on the plan or ask a clarifying question.

NCHFA has a strong state-wide partner network who received notices of the public comment period and may have shared the information with additional local partners. Throughout the consultation process, NCHFA spoke extensively with a variety of homeless service and housing providers. Many of these partners also participated in the public comment period.

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

Comments received during the public participation process supported NCHFA's use of the HOME-ARP funds to develop additional affordable rental units and geographically targeted non-congregate shelter. Several respondents expressed concern related to the limited number of anticipated units juxtaposed to the high demand for the HOME-ARP funds. NCHFA recognizes the units developed utilizing HOME-ARP will not entirely fill the affordable housing gap in North Carolina. However, the rental units offer a unique opportunity for North Carolina to provide operating assistance ensuring deeply affordable housing for vulnerable populations while ensuring project longevity. Other respondents asked NCHFA to consider small-scale projects in rural regions where developers may face financial challenges increasing capacity or securing other funding sources. NCHFA anticipates that projects within rural communities will be smaller in nature and intends to offer technical assistance to developers with more limited capacity to help increase a diverse range of project applicants. Additionally, one respondent expressed a desire for HOME-ARP rental projects to accept vouchers. NCHFA intends to accept rental assistance in HOME-ARP units as this will lower the need for operating assistance while the qualified population voucher holder resides in the unit.

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

NCHFA carefully considered all comments and feedback received regarding the HOME-ARP Allocation Plan. Most recommendations were incorporated into the plan or thoroughly discussed with the interested parties to reach alternative solutions. One respondent asked NCHFA to consider inflationary costs in the anticipated operating assistance for rental projects. While inflationary costs are not

expressly incorporated into the operating assistance, the current calculation assumes zero income for all tenants and no outside subsidies. In all likelihood throughout the 15-year affordability period, some tenants will pay an affordable rent while other tenants may have tenant-based rental assistance alleviating some of pressure on the operating assistance.

The North Carolina Coalition to End Homelessness (NCCEH) provided valuable feedback throughout the consultation and public comment periods. NCCEH advocated for NCHFA to prioritize literally homeless and chronically homeless individuals among the qualifying populations and utilize coordinated entry to fill rental units. As a state PJ, NCHFA is in a challenging position as it related to preferencing one qualifying population above another. While all qualifying populations have demonstrated need for housing, the degree of need varies geographically. As a result, project applicants will identify the greatest need within their communities, which may be those who are literally homeless or chronically homeless. Based on NCHFA's experience with the North Carolina Supportive Housing Development Program, many of the applicants are nonprofit, mission-driven developers who inherently serve members of the qualifying populations. After conversations with the Balance of State Continuum of Care, representing 79 of North Carolina's 100 counties, NCHFA determined utilizing coordinated entry was not feasible. Most coordinated entry systems currently serve literally homeless individuals and domestic violence survivors, excluding the other qualifying populations. Coordinated entry systems across different North Carolina CoCs are not organized in a way to easily included all qualified populations. As a result, coordinated entry will not be required at a state level.

Needs Assessment and Gaps Analysis

The NC Housing Finance Agency conducted a quantitative analysis of the housing available to households experiencing homelessness and the remaining gaps in the housing services systems. The tables below include homeless and housing data provided by HUD to help inform the housing needs in North Carolina. The first two tables include data for individuals experiencing homelessness on one particular night in January. The total number of individuals experiencing homelessness in a given year will be significantly higher. The third table identifies beds available on a year-round basis. The calculated gap is based on individuals experiencing homelessness throughout the year and the beds and housing available year-round.

Homeless Households by Household Type, North Carolina				
	Emergency Shelter	Transitional Housing	Unsheltered	Total
Persons in households without children	3,421	952	2,325	6,698
Persons in households with at least one adult and one child	1,665	645	214	2,524
Persons in households with only children	26	13	18	58
Total Homeless Households	5,112	1,610	2,558	9,280

Source: Point in Time Count (PIT) 2020

Demographic Summary by Race, North Carolina						
	Emergency Shelter	Transitional Housing	Unsheltered	Total Homeless	Percent of Homeless Population	Percent of Total Population
Black or African American	2,855	929	973	4,757	51.3%	22.2%
White	1,988	596	1,476	4,060	43.7%	70.6%
Asian	24	2	4	30	0.3%	3.2%
American Indian or Alaska Native	43	17	33	93	1%	1.6%
Native Hawaiian or Other Pacific Islander	11	0	9	20	0.2%	0.1%
Multiple races	191	66	63	320	3.5%	2.3%
Total	5,112	1,610	2,558	9,280	100%	100%

Source: Point in Time Count (PIT) 2020

	Current Housing and Emergency Shelter Inventory, North Carolina				
	Family		Adults Only	Child-Only	Total Year-Round beds
	# of Beds	# of Units	# of Beds	# of Beds	
Emergency Shelter	2,282	541	3,614	36	5,932
Safe Haven	15	5	0	5	20
Transitional Shelter	880	315	1,086	10	1,976
Permanent Supportive Housing	2,476	732	3,698	0	6,174
Rapid Re-Housing	1,172	375	434	0	1,606
Other Permanent Housing	274	84	113	0	387
Grand Total	7,099	2,052	8,945	51	16,095

Source: Continuums of Care Housing Inventory Count (HIC) 2020

Gap Analysis of Rental Housing, North Carolina			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total rental units	1,473,840		
Rental units affordable to HH at 30% AMI	171,550		
Rental units affordable to HH at 50% AMI	455,190		
0 – 30% AMI Renter HH w/ 1 or more severe housing problems		210,125	
30 – 50% AMI Renter HH with 1 or more severe housing problems		188,710	
Current Gaps			353,005

Source: Comprehensive Housing Affordability Strategy (CHAS), 2014 – 2018

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

HOME-ARP funds must be used to primarily benefit individuals or families from the following qualified populations.

- Homeless
- At-risk of homelessness
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Other populations where providing supportive services or assistance would prevent homelessness or serve those with the greatest risk of housing instability
- Veterans and families that include a veteran family member that meet one of the preceding categories

Homeless population

Households can become homeless after a period of housing instability or due to an unpredicted situation that causes them to flee or lose housing. Without access to permanent, stable housing, some households may experience ongoing cycles of housing instability and homelessness. Using HUD's definition of "homeless"¹, NCHFA will consider a family or individual to be homeless if they meet any of the following:

- Lack a permanent and adequate home or are living in a shelter designated to provide temporary living arrangements
- Will imminently lose their permanent home or temporary living arrangements due to lack of resources or support network
- Are under the age of 25 and do not have a permanent home

According to the 2020 Point in Time (PIT) Count, a total of 9,280 North Carolinians experienced homelessness on one night in January 2020. Of those experiencing homelessness, 6,722 people (72%) were sheltered while 2,558 (28%) were unsheltered. The Annual Count, one of six System Performance Measures required by HUD, captures the number of people experiencing homelessness across 12 months in emergency shelter and traditional housing. According to this number, 19,478 North Carolinians sought shelter in 2020. Most people (61%) in emergency and transitional shelters were experiencing homelessness for the first time. An estimated 27,350 North Carolinians experienced homelessness in 2020.²

Adults with no children account for most people experiencing homelessness; 75% of people experiencing homelessness were adults above age 24 while 18% were under 18. Adults over 24 were more likely to be unsheltered whereas children were more likely to be sheltered. Most children experiencing homelessness were accompanied by at least one adult; only 1% of children were without an adult.

Of those experiencing homelessness, 14% were chronically homeless, meaning they had experienced homelessness for at least a year, or repeatedly, and had a disabling condition such as substance abuse,

¹ [http://uscode.house.gov/view.xhtml?req=\(title:42%20section:11302%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:42%20section:11302%20edition:prelim))

² <https://www.csh.org/wp-content/uploads/2013/08/Estimating-the-Need.pdf>

severe mental illness or physical disability. Survivors of domestic violence accounted for 9% of this population, as did veterans.

Due to historic and systemic racism, Black, Indigenous and People of Color experience homelessness at a disproportionate rate in communities across the country. According to the Racial Disparities and Disproportionality Index created by the Corporation for Supportive Housing, Black people and Native American people are overrepresented in the North Carolina homeless system, while White, Asian and Latinos are underrepresented. Whereas Black people represent 20% of the total population of the state; they make up 50% of the population experiencing homelessness. Meanwhile, White people represent 66% of the total population but 44% of those experiencing homelessness. However, White people have higher than expected unsheltered homelessness given their proportion of the population. The percentage of people who identify as Hispanic, Asian or Native American stays consistent in the overall sheltered and unsheltered populations.

Individuals and families at risk of homelessness

HUD defines those at risk of homelessness as individuals or families who have an annual income below 30 percent of median family income, do not have sufficient support networks or resources to prevent them from becoming homeless or live in unstable conditions as demonstrated by frequent moves or living in another's home due to hardship.

According to the latest CHAS data (2014-2018), North Carolina has 441,175 households earning below 30% of area median family income. Of those extremely low-income households, 64% or 282,480 are renter households. The majority (73%) of extremely low-income renters are cost burdened (i.e. spending more than 30% of their income in housing costs) and 63% of extremely low-income renters are severely cost-burdened (i.e. spending more than 50% of their income on housing costs). Housing cost burden is not experienced evenly by all demographic groups. For example, 19% of White renter households are cost burdened while 24% of Black households, 15% of Asian households and 27% of Hispanic households pay more than 30% of their income on housing. In addition to cost-burden, overcrowding or the lack of kitchen or plumbing facilities could be indicative of unstable conditions. Most extremely low-income renters (74%) experience at least one of these housing challenges.

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

According to the North Carolina Council for Women and Youth Involvement, service providers across the state received 126,608 calls and chats to their hotline and provided in person or remote services for 78,941 people between July 2020 and June 2021.³

Of those receiving services, 4,716 reported experiencing homelessness or housing insecurity. The following demographics were identified from clients who disclosed demographic information:

- 82% identified as women, 13% as men, and 5% as other or unknown.
- 38% identified as White, 32% as Black/African American, 1% as Native American, 1% as Asian, and 8% as some other race or two or more races, and 20% chose not to disclose their race.
- 9.8% identified as Hispanic/Latino

³ <https://ncadmin.nc.gov/about-doa/divisions/council-for-women/women-statistics>

- 13% were under 18, 71% were between 18 and 59, 5% were over 60, and 11% did not disclose their age.

The most common services provided for clients were information, advocacy, counseling and referrals. Shelter services including dedicated facilities, local safe homes and hotels were provided for 8,577 clients but 3,799 referrals were made to other shelters due to lack of capacity.

Other populations requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability

Households who have previously qualified as “homeless”, are currently housed due to temporary or emergency assistance or need additional housing assistance or supportive services to avoid a return to homelessness also qualify for HOME-ARP. Additionally, HUD defines those at greatest risk of housing instability as households with an annual income less than 30% AMI who are paying more than 50% of their income towards housing or households with an annual income less than or equal to 50% AMI that meet certain conditions like living in another’s home, a hotel or motel, or moving multiple times in two months.

While a comprehensive estimate of households meeting this definition is difficult, a few available data points are indicative of need. North Carolina’s Emergency Rental Assistance Programs, including the HOPE Program and the 12 entitlement community programs, have assisted over 178,000 households financially impacted by the pandemic with rent and utilities.⁴ Between December 2020 and December 2021, NC-211, an information and referral service provided by the United Way of North Carolina, received over 94,700 calls (42% of all calls) requesting information and services related to housing and shelter. Of those housing and shelter requests, 24% were requesting information about shelters, 22% wanted information on low-cost housing and 47% were looking for rental assistance.⁵ These figures indicate additional need for resources and services to assist households experiencing housing instability.

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

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

For households experiencing homelessness, a wide array of interventions is needed, from expanded outreach efforts to intensive case-management. The Center for Supportive Housing estimated 22,500 supportive housing units, defined as affordable housing with flexible services, are needed in North Carolina.⁶ This estimate included individuals across different systems including homelessness, incarceration, child welfare and other institutional settings.

Individuals who are discharged from Adult Care Homes, state psychiatric hospitals or diverted from Adult Care Homes often need access to supportive housing to prevent homelessness or housing

⁴ Treasury ERA1 Oct spreadsheet

⁵ NC 211 Counts Retrieved 12/7/21: <https://nc.211counts.org/>

⁶ <https://www.csh.org/supportive-housing-101/data/#data-reports>

instability. In FY 2021, access for these populations choosing supportive housing was difficult for 50% of these individuals.⁷

An underlying cause of housing instability and homelessness is the gap between housing costs and what households can afford to pay. Between 2021 and 2022, rents in North Carolina increased, on average, 20% or \$200.⁸ Increases in rent disproportionately impact low-income households whose earnings are insufficient to afford market rents.⁹ Consequently, 63% of renters earning less than \$50,000 are cost burdened, meaning they spend more than 30% of their income on housing.¹⁰

For these households at risk of homelessness or experiencing housing instability, stakeholders across the state identified the following needs:

- Increased supply of affordable permanent supportive housing and rental housing
- Increased supply of non-congregate shelter, especially in communities without a shelter
- Discharge planning for people released from institutional care (e.g. hospitals, prison, foster care)
- Additional staff capacity for case management and support services including training in house-centered case management, SSI/SSDI Outreach, Access, and Recovery and other effective practices
- Low-barrier shelters and crisis services
- Increased emergency shelter capacity that allow specific populations for whom there are not enough beds in current shelters or no shelters in their area that allow certain populations
- Coordination of crisis response system including referral linkages between crisis response system and supportive housing
- Housing navigation and support services to help households find housing and connect with resources
- Resources for intensive case management
- Short-term subsidies for rent and utilities for households that have received an eviction notice or are experiencing financial hardship
- Extension of rental subsidies enacted through other federal COVID response programs
- Moving costs, security deposits and first month's rent for homeless households to move into housing and households with housing choice vouchers
- More landlords and rental properties that accept housing choice vouchers
- More 1-bedroom or 2-bedroom units
- Rehabilitation of existing housing stock

As part of the consultation process NCHFA posted a survey to all local and state partners requesting feedback on the greatest housing and service needs in North Carolina. According to the 94 survey responses collected between November, 2021 and March, 2022, development of affordable rental units

⁷ Knisley, M.B. (2021) FY 2021 Final Annual Report of the Independent Review in the Matter of United States of America v. The State of North Carolina.

⁸ <https://abc11.com/rent-prices-increase-north-carolina-affordable-housing/11533489/>

⁹ <https://reports.nlihc.org/sites/default/files/oor/files/reports/state/nc-2021-oor.pdf>

¹⁰ ACS 2015-2019

was the most prevalent top ranked need to address homelessness.¹¹ Both urban and rural respondents indicated developing additional rental units as crucial to serving individuals experiencing homelessness. The other top identified need in serving the homeless community is the lack of affordable rental units, emergency shelters and supportive services. NCHFA aims to address these needs through our HOME-ARP Program.

Although interventions will vary by household, the qualifying populations broadly share the need for affordable and available permanent housing, a coordinated and flexible homeless assistance system, wrap-around services for those with intensive needs, and access to services and resources to prevent homelessness or further housing instability.

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

In fiscal year 2021, the state of North Carolina received an annual allocation of approximately \$95 million in federal formula grant funding, including the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) grant, Emergency Solutions Grants (ESG), Housing Opportunities for Persons with HIV/AIDS (HOPWA) and National Housing Trust Fund. Administered through various state agencies, these funds are utilized to increase housing affordability and availability through the development and preservation of rental housing, funding for transitional housing and emergency shelter, as well as provision of support services. The Service providers in the state's twelve Continuum of Care Programs also received nearly \$30 million in grant funding from HUD in 2020. These awards went to 131 community-based housing and service providers in the state to support a broad array of interventions designed to assist individuals and families experiencing homelessness.

In response to the coronavirus pandemic, the federal government provided additional relief funding through several acts of legislation including the CARES Act, Coronavirus Response and Supplemental Appropriations Act, and the American Rescue Plan. Funding was provided for emergency rental assistance (\$1.1 billion), emergency housing vouchers (1,296 vouchers), homelessness response through the Emergency Solutions Grant (\$54.4 million), mortgage assistance and foreclosure prevention through the Homeowner Assistance Fund (\$273 million) and housing counseling and stability through the Housing Stability Counseling Program (\$2.8 million).

Beyond federal resources, the State of North Carolina provides funding for housing and homelessness related activities through appropriations for the North Carolina Housing Trust Fund (NCHTF), Workforce Housing Loan Program and NC Department of Health and Human Services. In conjunction with the Low-Income Housing Tax Credit and state funds, NCHFA utilizes HOME and NCHTF to create and preserve affordable rental units. Properties receiving tax credits are required to participate in the Targeting Program, which sets aside between 10% and 20% of units for people with disabilities. NCHFA also offers the Supportive Housing Development Program to help nonprofit organizations and local governments build and rehabilitate emergency and permanent housing for people who are experiencing homelessness or have disabilities or other special needs such as substance use recovery. NCHFA

¹¹ 94 responses do not represent every local PJ, municipal government, or stakeholder in North Carolina and is simply a sample. Some PJs are represented multiple times in the survey through the survey as different staff members provided feedback.

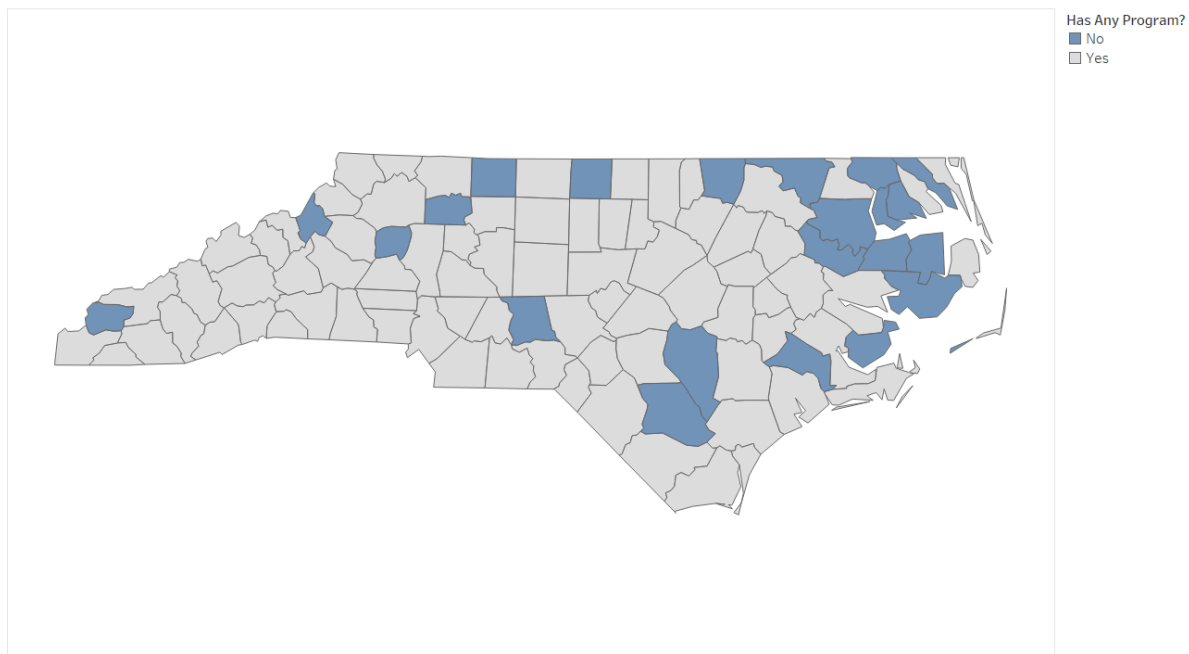
partners with DHHS to provide integrated permanent supportive housing options to North Carolinians across the state through the Integrated Supportive Housing Program (ISHP) and Transitions to Community Living Program (TCL). In 2021, the State supported TCL with \$16.4 million in Transition to Community Living Vouchers for 2,122 households, as well as \$10.6 million in Key Rental Assistance to 2,193 households.

The emergency and permanent housing available to low-income individuals with disabilities and those experiencing homelessness is insufficient to meet the needs of all eligible households. According to the 2020 HUD Continuum of Care Housing Inventory Count, North Carolina has a total of 7,928 year-round beds in emergency, safe haven and transitional housing, including 3,177 family beds, 861 family units and 4,700 emergency housing beds for adults. Throughout the state, there are nearly 6,200 permanent supportive housing (PSH) beds for families and adults with an additional 732 PSH units. 1,547 rapid re-housing beds and units are available to families experiencing homelessness and an additional 434 are dedicated to homeless adults. While housing providers across the state work diligently to serve people experiencing homelessness, the current emergency and permanent housing stock does not meet the need of the approximately 27,000 North Carolina individuals who experienced homelessness in 2020.

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

There is uneven access to crisis housing in North Carolina. According to 2020 Housing Inventory Counts, twenty-two counties in the state have no emergency shelter, rapid-rehousing, transitional housing or permanent supportive housing (PSH). Several other counties may only have crisis housing available for specific populations (i.e. fleeing domestic violence, veterans, families with children). Five counties only have shelters for individuals fleeing domestic violence. Three counties have PSH projects which only serve veterans. ESG administrators identified five regional committees (1, 2, 6, 8, 11) covering thirty-one counties that lack shelter capacity.

Twenty-two counties do not have any shelters



Map based on Longitude (generated) and Latitude (generated). Color shows details about Has Any Program?. Details are shown for All counties. The view is filtered on Latitude (generated) and Longitude (generated). The Latitude (generated) filter keeps non-Null values only. The Longitude (generated) filter keeps non-Null values only.

Source: NCHFA analysis of 2020 HIC data – Data may be updated prior to program implementation to reflect to most up to date information and updates from local Continuums of Care.

An underlying cause of homelessness and housing instability is the shortage of affordable rental housing across the state. Based on HIC and CHAS data, the NC Housing Finance Agency calculated a gap of over 350,000 units affordable and available to households earning less than 50% of the area median income. Although North Carolina has 137,107 federally supported rental units through LIHTC, Section 8, Public Housing and USDA programs, the number of North Carolinians in need of housing assistance far exceeds the resources of existing programs. In addition, 5% of these federally subsidized homes face expiring affordability restrictions in the next five years and 3,880 public housing units need immediate investment.¹² In addition, public housing authorities across the state have substantial waiting lists with wait times of up to several years. Meanwhile, households who receive Housing Choice Vouchers may face barriers to using their voucher including, lack of available units, lack of landlord participation, availability of public transit, discrimination by landlords, and prohibitive costs like security deposits. Consequently, in 2020 there were 69,928 authorized Housing Choice Vouchers for North Carolinians of which 86% were utilized,¹³ leaving almost 10,000 voucher holders without stable housing. Communities across the state need more permanent and affordable rental housing that accepts vouchers.

In addition, the service delivery system in North Carolina is fragmented and in transition. The state has gone from a public Medicaid, regionally-based service delivery system, to a privatized Medicaid system with a broader provider network and varied points of access. The state has not expanded Medicaid, so many persons experiencing homelessness are not eligible for services.

¹² https://preservationdatabase.org/wp-content/uploads/2021/08/PD-Profile_2021_NC.pdf

¹³ <https://www.huduser.gov/portal/datasets/assthsg.html>

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

NCHFA will utilize the definitions of other qualifying populations provided in the HUD Notice CPD-21-20. NCHFA will consider households experiencing housing cost burden and households living in substandard housing to qualify under the “other population” category. According to HUD’s Comprehensive Housing Affordability Strategy 2014-2018 data, 619,625 North Carolina renter households, of all income levels, experience housing cost burden or live in substandard housing (i.e., lacking complete kitchen facilities, lacking complete plumbing facilities, or overcrowding). These households face unstable and unsafe housing conditions leading to greater risk of homelessness.

Identify priority needs for qualifying populations

Low-income households across North Carolina face barriers accessing affordable housing. While NCHFA has opted to not prioritize within the qualifying population, we recognize our role in helping to address the full spectrum of housing needs. Individuals experiencing homelessness or at risk of homelessness need access to a variety of housing interventions ranging from emergency non-congregate shelters, transitional housing to permanent rental housing. All qualifying populations will be eligible to apply for the housing which meets their current needs.

The state of North Carolina is currently under a Department of Justice (DOJ) Olmstead Settlement Agreement, which requires the state to develop and provide community-based housing options and services to individuals for persons with disabilities who reside in adult care homes and state psychiatric hospitals, as well as diversion from adult care homes. The state created the Transitions to Community Living (TCL) initiative to address the Olmstead Settlement Agreement. Individuals identified under TCL are likely members of one of the eligible qualifying populations and will be admitted into the HOME-ARP program accordingly.

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

The level of need and gaps in inventory and systems were determined by analyzing multiple data sources and through consultation with stakeholders. NCHFA used two measures to understand homelessness in North Carolina – the Point-in-Time Homeless Count & Survey (PIT Count) and System Performance Measures (SPMs). Both measures are estimates and undercount the number the people who may experience homelessness. Additionally, there are populations experiencing homelessness that are not fully captured within existing measures, including doubled up households, and people temporarily staying in hotels or motels or those living in institutional care settings. To estimate the number of people at risk of homelessness or experiencing housing instability, NCHFA used CHAS and American Community Survey to estimate the number of cost-burdened renters as well as households receiving Emergency Rental Assistance and calls to NC-211.

Analysis of the Housing Inventory Count revealed geographic gaps in crisis housing and shelter capacity. Consultation with stakeholders, including Continuums of Care and ESG administrators, confirmed findings from the analysis. The Corporation for Supportive Housing calculated the need for supportive

housing by state. Shortage of affordable rental units was determined using CHAS data and analysis from the National Low-Income Housing Coalition.

Lastly, NCHFA consulted with stakeholders through listening sessions, meetings, and an online survey to better understand issues on the ground in communities across the state. PHAs, Continuums of Care, and service providers provided anecdotal evidence of need as well as the number of households on waiting lists and shortages of rental housing.

HOME-ARP Activities

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

NCHFA will use HOME-ARP funds for rental development and non-congregate shelter. Eligible uses for rental development will include acquisition, construction and rehabilitation. Acquisition of land or demolition is only permissible when HOME-ARP rental development will occur. Eligible uses for non-congregate shelter projects include acquisition of land and new construction or acquisition and/or rehabilitation of existing structures. Funding will be allocated through a competitive application process open to all eligible applicants, including non-profit, for profit and government entities. Funds may be awarded in multiple rounds, until all funds are disbursed.

A Notice of Funding Availability (NOFA), along with Application Guidelines and Instructions, will be posted on the NCHFA website and shared with stakeholders. These materials will describe the amount of funding available, eligibility criteria, funding requirements, selection criteria, and application process in further detail.

Applications will be processed and reviewed by NCHFA staff. All applications that meet or exceed threshold requirements, such as organizational capacity and experience, as well as financial stability, will be scored based on the project criteria. Rental project applications will be evaluated against other rental applications and likewise for non-congregate shelter projects. The projects will be ranked according to their total score. The applications ranked the highest and that are within the amount of funds available to the Program will be recommended to NCHFA's Board of Directors for financing approval.

Some of our program decisions will be informed by geographic need, such as the presence of emergency shelters in the region or availability of other HOME-ARP funds for development. Applications for non-congregate shelter received from counties with no existing shelter will be given priority. Applications for non-congregate shelters in other counties may be accepted but would not be given a priority. Non-congregate shelter applications located in counties entirely covered by a local participating jurisdiction may not be accepted.

Applications for rental projects located within local participating jurisdictions may be required to have a commitment of leveraged funds that will contribute to the sources of the proposed project. Although not required, rental applications from areas not served by a local participating jurisdiction may receive rating points for any funds leveraged for the proposed project. Additional priority points for rental applications may be established as the notice of funding availability is finalized.

If any portion of the PJ’s HOME-ARP administrative funds were provided to a subrecipient or contract 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

Not applicable. NCHFA did not contract any portion of its HOME-ARP administrative funds to a subrecipient or contractor prior to HUD’s approval of the allocation plan.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$0	0.00%	
Acquisition and Development of Non-Congregate Shelters	\$6,000,000	9.15%	
Tenant Based Rental Assistance (TBRA)	\$0	0.00%	
Development of Affordable Rental Housing	\$49,752,118	75.85%	
Non-Profit Operating	\$0	0.00%	5.00%
Non-Profit Capacity Building	\$0	0.00%	5.00%
Admin and Planning	9,838,609	15.00%	15.00%
Total HOME-ARP Allocation	\$65,590,727	100.00%	

Additional narrative, if applicable: NCHFA will allocate \$49,752,118 to the development and operations of affordable rental housing and \$6,000,000 to acquisition and development of non-congregate shelters. If sufficient qualified applications are not received for one use, funds may be used to fund qualified applications for the other use or reserved for a subsequent competition.

NCHFA may use up to 5% of the administrative funds to provide technical assistance to assist less experienced applicants applying for HOME-ARP funds. NCHFA may reallocate unspent admin funds to program funding. Through years of experience administering federal programs, NCHFA has come to understand that more experienced applicants with additional resources, typically based in local participating jurisdiction regions, are more able to apply for public funding. Oftentimes, it is a challenge for community partners in communities in non-participating jurisdictions to apply for federal programs because of limited local capacity and pre-development experience. Technical assistance will support potential applicants in identifying eligible projects, explaining the requirements of various funding sources and provide other supportive functions to allow the applicant to submit a completed proposal. Applications submitted with the support of the technical assistance will be scored using the same thresholds as all other applicants.

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its Needs Assessment.

NCHFA has identified the need to develop affordable rental housing as its top priority for the use of HOME-ARP funding. The quantitative and qualitative analyses identified the state's lack of affordable, rental units contributes most significantly to housing instability. The local partners from across various sectors indicated the lack of available units as a major issue when attempting to secure housing for their clients, even those with rental assistance. As discussed above, applicants from areas not represented by a local participating jurisdiction with their own HOME-ARP funds, and those with specific geographic need will be given additional points in the review process.

NCHFA will prioritize applications for NCS development from counties that do not have a shelter. According to 2020 Housing Inventory Counts, twenty-two counties in the state have no emergency shelter, rapid-rehousing, transitional housing or permanent supportive housing. Several other counties may only have crisis housing available for specific populations (i.e. fleeing domestic violence, veterans, families with children). Five counties only have shelters for individuals fleeing domestic violence. Three counties only have HUD-VASH programs. ESG administrators identified five regional committees covering 31 counties that lack shelter capacity.

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

Households experiencing homelessness or housing instability require a range of interventions and supports to remain stably housed. NCHFA's outreach efforts and data analysis surfaced many of the challenges and potential strategies for addressing homelessness and housing instability in communities across our state. Although there are significant needs for every HOME-ARP eligible activity, increasing the supply of affordable rental housing and building additional shelter capacity in rural communities, not served by a local PJ, were consistently identified by stakeholders and reinforced by data findings.

NCHFA analyzed the gaps in the current housing and shelter inventory to frame the HOME-ARP program design. Through conversations with local PJs, regional partners and other state agencies providing housing and homeless services, NCHFA identified the most crucial housing needs. While need for every eligible activity exists across North Carolina, NCHFA prioritized rental development and non-congregate shelter to most effectively address the existing gaps in housing inventory while maximizing NCHFA's expertise in financing housing development.

There is a shortage of over 350,000 affordable rental units for households earning below 50% AMI. Homeless services providers, public housing authorities, partner state agencies and other stakeholders identified a lack of affordable units as a central barrier to addressing homelessness. Households who receive rental assistance, such as housing choice vouchers, may still face difficulties locating housing in a timely manner due to high housing costs and limited number of landlords participating in rental assistance programs. Additionally, local public housing authorities shared that they have significant wait lists for housing and need financing to preserve existing affordable units. NCHFA's experience developing supportive housing targeted to households earning less than 30% AMI has highlighted the difficulties developers face ensuring proper cash flow when the rents are affordable to lower-income households unless projects can structure higher rents and depend on extremely low-income applicants to obtain an external rental subsidy to afford the unit. As a result, NCHFA has determined that offering

operating assistance will help successfully develop deeply affordable units and eliminate the need for applicants to search for and obtain a source of rental assistance in order to afford the unit while ensuring the projects are a success throughout the 15-year compliance period.

The Needs Assessment highlights the limited supply and uneven distribution of emergency housing across the state. NCHFA intends to help fill this gap by placing specific emphasis on adding to emergency shelters to areas with no shelters or regions with shelters that do not meet the demographics of the homeless population. For example, some communities have a domestic violence shelter with a small eligible population while there is a significant number of men experiencing homelessness in need of a shelter. Non-congregate shelters represent an ideal remedy to emergency housing shortages. Beyond meeting health considerations during the pandemic, they also present an opportunity to house multiple homeless populations depending on project structure and layout.

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

NCHFA anticipates creating 165 affordable rental units utilizing the HOME-ARP funds. This goal is based on an estimate of \$225,000 per unit in development and construction costs and \$80,000 per unit in capitalized operating assistance for the entire 15-year compliance period and serve qualifying populations. NCHFA intends to capitalize the operating reserve for the project in a separate interest-bearing account. Based on discussions with affordable housing providers and the Agency's experience, an operating assistance reserve is essential to ensuring the project is sustainable throughout the compliance period. While most qualifying populations do not have income-based eligibility criteria, they will likely be earning less than 30% of the area median income. As a result, any affordable rents would be less than the rents needed to cover the operating costs for the property, making the operating assistance reserve necessary to ensure deep affordability for the compliance period. With the \$6 million allocated to non-congregate shelter development, NCHFA anticipates funding two to three shelters.

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

The 165 affordable rental units NCHFA predicts developing will be supplemented by additional non-congregated shelter development utilizing the remainder of the HOME-ARP funds. Throughout the listening sessions NCHFA heard the lack of affordable rental units is a major barrier to addressing homelessness. While 165 additional affordable units will not fully address the housing gap in North Carolina, offering operating assistance on all HOME-ARP projects will streamline access to these units by eliminating the need for applicants to first secure a source of rental assistance before applying for the housing units and will ensure these units are well maintained for at least 15 years. Additionally, many regions, especially those in more rural areas, lack emergency shelters to house people experiencing homelessness. NCHFA aims to address both of these needs through achieving our goal of developing affordable rental units and non-congregate shelters.

Preferences

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

The State's HOME-ARP funds may serve all qualifying populations, with prioritization given on a project level based on demonstrated need, while ensuring compliance with fair housing, civil rights and other anti-discriminatory laws. Funding at the state level will not be prioritized for specific qualifying populations or a subset of members of a qualify population over another. Given that needs vary across the state and different areas will have both different needs and different capacity to meet those needs, any prioritization will be done at a project level to best address the needs of the local community. Funds will be awarded based on the elements of the NOFA demonstrating feasibility, capacity and need.

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

The PJ does not intend to preference one qualified population over another.

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

The PJ does not intend to preference one qualified population over another.

Appendix

Agency/Org Consulted	Type of Agency/Org	Method of Consultation
U.S. Department of Justice Independent Reviewer	Federal Government	Virtual Meeting
First Health of the Carolinas	Homeless service provider	Online Forum
Family Services of Davidson County	Homeless service provider	Online Forum
Fifth Street Ministries	Homeless service provider	Online Forum
Michigan Coalition Against Homelessness	Continuum of Care	Online Forum
North Carolina Coalition to End Homelessness	Continuum of Care	Online Forum
Outreach Mission	Homeless service provider	Online Forum
Partners Health Management	Homeless service provider	Online Forum
Alliance West	Homeless service provider	Online Forum
Northwest CoC	Continuum of Care	Online Forum
Orange County Partnership to End Homelessness	Continuum of Care	Online Forum
Spiritual Destiny International Ministries	Homeless service provider	Online Forum
Winston-Salem/Forsyth County CoC	Continuum of Care	Online Forum

City of Durham	Continuum of Care	Online Forum
Wake County	Continuum of Care	Online Forum
Guilford County CoC	Continuum of Care	Online Forum
City of New Bern	Local government	Online Forum
North Carolina Coalition Against Domestic Violence	Domestic violence service provider	Online Forum
Cape Fear Council of Government	Continuum of Care	Online Forum
United Way of Lincoln County	Homeless service provider	Online Forum
Sanford Housing Authority	Public housing agency	Online Forum
Department of Health and Human Services	Public agency	Online Forum
Onslow County	County government	Online Forum
Family Resource Center South Atlantic	Homeless service provider	Online Forum
Raleigh/Wake Partnership to End Homelessness	Continuum of Care	Online Forum
Kintegra Health	Homeless service provider	Online Forum
Brick Capital Community Development Corporation	Developer	Online Forum
Mecklenburg County	Continuum of Care	Online Forum
Wake County	Local government	Online Forum
City of Concord	Local government	Online Forum
City of Greensboro	Local government	Online Forum
City of Asheville	Local government	Online Forum
City of Raleigh	Local government	Online Forum
City of Greenville	Local government	Online Forum
City of Rocky Mount	Local government	Online Forum
Cumberland County	Local government	Online Forum
City of High Point	Local government	Online Forum
City of Wilmington	Local government	Online Forum
Orange County	Local government	Online Forum
City of Lenoir	Local government	Online Forum
Wilson Housing Authority	Public housing agency	Online Forum
Durham Housing Authority	Public housing agency	Online Forum
Greensboro Housing Authority	Public housing agency	Online Forum
Moore County	Public housing agency	Online Forum
Burlington Housing Authority	Public housing agency	Online Forum
North Carolina Commission for Indian Affairs	Public housing agency	Online Forum
Monroe Housing Authority	Public housing agency	Online Forum
Eastern Carolina Human Services Agency	Public housing agency	Online Forum
Washington Housing Authority	Public housing agency	Online Forum
Piedmont Triad Regional Council	Public housing agency	Online Forum
Washington Housing Authority	Public housing agency	Survey

Statesville Housing Authority	Public housing agency	Survey
Burlington Housing Authority	Public housing agency	Survey
Wilson Housing Authority	Public housing agency	Survey
Sandhills Community Action Program, Inc.	Public housing agency	Survey
Beaufort County United Way	Homeless service provider	Survey
Center for Homeownership & Economic Development Corporation	Homeless service provider	Survey
Cleveland County Abuse Prevention Council	Domestic violence service provider	Survey
Catawba Valley Healthcare	Healthcare providers	Survey
Gaston County Schools	Educational Institutions	Survey
Alexander County Schools	Education Institutions	Survey
Shelter Task Force	Homeless service provider	Survey
Dulatown Outreach Center	Homeless service provider	Survey
Foothills Regional Commission	Council of Governments	Survey
The Greater Mount Air Ministries of Hospitality	Homeless service provider	Survey
Displaced Roses	Homeless service provider	Survey
Hope in the End	Homeless service provider	Survey
The Bridge Community, Inc.	Homeless service provider	Survey
New Hope Homelessness and Poverty Ministry	Homeless service provider	Survey
Exodus Homes	Homeless service provider	Survey
Greater Hickory Cooperative Christian Ministry	Homeless service provider	Survey
Diakonons Inc.	Domestic violence service provider	Survey
Alliance Health	Healthcare providers	Survey
City of Gastonia	Local government	Survey
United Way of Lincoln County	Homeless service provider	Survey
Gaston County DHHS	Other public agency	Survey
Family Promise of Davie County	Homeless service provider	Survey
Carolina Caring	Healthcare providers	Survey
Surry Homeless and Affordable Housing Group	Homeless service providers	Survey
Lincoln County Coalition Against Domestic Violence	Domestic violence service provider	Survey
Cleveland County Rescue Mission	Homeless service provider	Survey
Hope United	Domestic violence service provider	Survey
Supportive Housing Communities	Homeless service providers	Survey
Pasquotank County Realtor	Other	Survey
Good Sheppard Center	Homeless service provider	Survey

Good Shepherd Center	Homeless service provider	Survey
Mountain Housing Opportunities	Developer	Survey
Friendship Community Development Corporation	Homeless service provider; Developer	Survey
CASA	Developer	Survey
North Carolina Coalition to End Homelessness	Continuum of Care	Survey
Halcon Development, LLC	Developer	Survey
Mt. Airy Men's Shelter	Homeless service provider	Survey
Thrive	Homeless service provider	Survey
River City Community Development Corporation	Homeless service provider; Continuum of Care	Survey
McDowell Mission Ministries (Rapid Rehousing)	Homeless service provider; Continuum of Care	Survey
Onslow Community Outreach	Homeless service provider	Survey
Lumberton Christian Care Center	Homeless service provider	Survey
Safe Space, Inc	Domestic violence service provider	Survey
United Way of Forsyth County, Inc.	Continuum of Care	Survey
Family Care Center of Catawba Valley, Inc.	Homeless service provider	Survey
Spiritual Destiny International Ministries, Inc	Org - fair housing, civil rights, persons with disabilities; veterans' group	Survey
Western Piedmont Regional Housing Authority	Public housing agency	Survey
Piedmont Triad Regional Council	Public housing agency; regional government	Survey
Reinvestment Partners	Homeless service provider	Survey
Disability Rights NC	Org - fair housing, civil rights, persons with disabilities	Survey
Sunrise for Recovery and Wellness	Resident; Homeless service provider	Survey
Alliance of Disability Advocates	Org - fair housing, civil rights, persons with disabilities	Survey
Crisis Ministry of Davidson County	Homeless and domestic violence service provider	Survey
Family Care Center of Catawba Valley, Inc.	Homeless service provider	Survey
Socialserve	Org - other	Survey
Durham People's Alliance Housing Action Team.	Org - other	Survey
Town of Waynesville Taskforce on Homelessness	Other public agency	Survey
Ashe County Project on Aging	Other public agency	Survey
North Carolina Coalition to End Homelessness	Homeless service provider	Survey

Sanford Housing Authority and Central Carolina Strategic Developers	Public housing agency	Survey
Gang Free Inc	Homeless service provider	Survey
Hope House Foundation	Homeless or domestic violence service provider	Survey
NC-506 Continuum of Care	Continuum of Care	Survey
NC-509 Continuum of Care	Continuum of Care	Survey
Veteran Services of the Carolinas	Veterans' group	Virtual Meeting
NC Emergency Solutions Grant DHHS	Other public agency	Virtual Meeting
NC Human Relations Commission	Other public agency	Online Forum
The Arc of North Carolina	Org - fair housing, civil rights, persons with disabilities	Online Forum
Alliance of Disability Advocates	Org - fair housing, civil rights, persons with disabilities	Online Forum
Disability Rights, NC	Org - fair housing, civil rights, persons with disabilities	Online Forum
NCDHHS	Org - fair housing, civil rights, persons with disabilities	Online Forum
Disability Rights, NC	Org - fair housing, civil rights, persons with disabilities	Online Forum
NC Human Rights Relation (NCHRC)	Other public agency	Online Forum
Charlotte Center for Legal Advocacy	Org - fair housing, civil rights, persons with disabilities	Online Forum
NC Office for Recovery and Resiliency	Other public agency	Online Forum

Requester: Andrea Kurtz

Subject: Comments on HOME-ARP

Description:

I like the emphasis for shelter development to be non-congregate shelter, but if you are going to have shelters built in areas that have no shelter currently, it would also be helpful to accompany that investment with some capacity building investment for the organization building/managing the shelter. Currently no HOME ARP funds are allocated to capacity building. Whether it is an existing non-profit expanding services, or a new non-profit organization, operating a shelter and following best practices will take a steep learning curve. Investment on building the capacity up front will be beneficial in the long run.

With the emphasis on the development of affordable units, it would be helpful to the goals of ending homelessness that a) there be a requirement that these units all accept supportive housing payments whether they are vouchers, rapid re-housing, or other rental assistance and b) that there be coordination with the communities coordinated assessment programs to help facilitate access to the units for people who are transitioning out of homelessness.

Thanks

Andrea Kurtz, JD

Andrea Kurtz, JD
Senior Director, Housing Strategies
301 N. Main St Suite 1700
Winston-Salem, NC 27101
336-721-9373
andrea.kurtz@uwforyth.org



Chip Crumpler

Seems like it is going to be very competitive with the limited number of units available for funding with the limited grant funds.

Section: Needs Assessment and Gaps Analysis comment

The map titled: *Twenty-two counties do not have any shelter* (page 14), does not accurately reflect the delivery of services or shelter in the Northwest CoC's geographic area covering Avery, Ashe, Alleghany, Wilkes, Watauga, Mitchell and Yancey. Based on the title of the map, the data is incorrect, as only Watauga County operates a non DV emergency shelter and Wilkes has a limited stay 10 bed shelter (2020 HIC). No other county in the Northwest region has a non DV emergency shelter. Additionally, based on the key provided adjacent to the map that lists program availability in the coverage area, services and housing supports are offered in all 7 counties in the Northwest CoC. The statement that "only five regional committees (1, 2, 6, 8, 11) covering thirty-one counties that lack shelter capacity" does not fully represent the state, as this data point only represents one CoC out of the twelve in NC.

--

Christiana Glenn Tugman, Esq.
34 Fenner Avenue
Asheville, NC 28804
Tel: (828) 215-7819
CGTugman@gmail.com

Section: HOME ARP Production Housing Goals (page 19)

The draft plan indicates that only 165 units of affordable rental housing may be created with HOME ARP across the state with an anticipated \$225,000 per unit development and construction cost. The draft plan further states that \$80,000 per unit in capitalized operating assistance will be utilized for the 15 year compliance period with no use of other resources/leveraging (voucher assistance, e.g.) to serve qualifying populations under the plan. The affordability compliance period should be greater than 15 years and the complete absence of any other leveraging is inconsistent with affordable housing development practices. Development of affordable housing in areas that have higher levels of voucher assistance available but lack affordable units would increase utilization of HOME ARP funds.

Christiana Glenn Tugman, Esq.
34 Fenner Avenue
Asheville, NC 28804
Tel: (828) 215-7819

Doug Ledson

With inflationary costs elevating on all developments, including larger metro areas, is there anything being considered for this?

Tonya Freeman from BUCM Burke County

- Talk more about the rental projects and how you expect it to look like
- 165 units over 100 counties doesn't seem like many can be benefited, so I agree w/ Steve, small scale would be most impactful
- Would private property developers be eligible to apply for rental development?



July 15, 2022

NC Housing Finance Agency
3508 Bush Street
Raleigh, North Carolina, 27609

To Ms. Annie Baumann-Mitchell,

This correspondence is intended to serve as public comment related to NCHFA's HOME-ARP allocation plan released on 7/1/22. The North Carolina Coalition to End Homelessness (NCCEH) appreciates the scale and scope of NCHFA's public input process related to the creation of its HOME-ARP plan, and thanks NCHFA for working with us to ensure that feedback from direct service providers, CoC staff, and other community stakeholders was considered in the formulation of the plan. NCCEH agrees with the proposed HOME-ARP allocation plan's emphasis on the creation of new affordable units and non-congregate shelter in counties currently without low-barrier shelter options. NCCEH's feedback on the HOME-ARP input process and allocation plan follows.

NCCEH's biggest concern is that the HOME-ARP allocation plan as currently presented, does not prioritize amongst the four eligible qualifying populations (QPs). Based on statistics presented in the proposed HOME-ARP plan, North Carolina had 9,280 people experiencing homelessness as of the 2020 Point in Time (PIT) count and 282,480 renters at or below 30% AMI, of which 63% were severely cost-burdened and most at-risk of homelessness. Multiplying the number of extremely low-income renters by .63 indicates an expected value of roughly 177,963 people most at-risk of homelessness in the state. This figure is over nineteen times the number of people who were experiencing literal homelessness at the time of the 2020 PIT count, and without prioritization within the QPs, all of these groups (including those fleeing domestic violence) will be competing for the 165 proposed rental units.

Homelessness is being seen increasingly as a public health crisis with adverse impacts across a range of factors including physical health, mental health, substance use, employment, and developmental milestones in children. The vast majority of coordinated entry (CE) systems in the state prioritize literal homelessness using the HUD definition since the demand for emergency shelter and subsidized housing far exceeds the supply. **Using a "first come, first served" approach will very likely privilege higher-functioning households with internet access and natural supports. This dynamic makes it far more likely that future residents of the proposed units will be whiter; have fewer conditions that put people at higher risk of death without safe, affordable housing such as mental illness, substance abuse disorders, chronic physical health issues, intellectual and developmental disabilities, and violence; and have**

higher incomes than the homeless population as a whole. To put people literally experiencing homelessness on par with people at-risk of homelessness is a false equivalency that rejects the best practice of triaging and prioritizing scarce resources that the homeless services system has utilized for many years. **NCCEH strongly recommends that NCHFA create a preference for literal homelessness amongst the four QPs and given the acute needs of people who experience long-term or chronic homelessness, that NCHFA adopt an additional preference within the literal homelessness category for households experiencing chronic homelessness as defined by HUD.** Adopting these priorities has the additional benefit of making it far more likely that NCHFA will be able to work with CE systems in filling affordable units once they are available.

The following was shared by the NC ESG Office regarding our recommendation above:

“On any given night in North Carolina, just over 9,000 people are experiencing homelessness. Fourteen percent (14%) of those are chronically homeless which means they have been homeless for at least one year or have had multiple episodes of homelessness over several years and have a disabling condition. People who meet the chronic definition of homelessness are some of the most vulnerable among the homeless population and are the most likely not to survive if they remain homeless. This often means they experience more barriers to obtaining and maintaining housing. Because of their vulnerability and barriers to housing, most communities in North Carolina have prioritized them as those most in need of housing assistance, and they are at the top of the waiting lists for housing opportunities and services. This prioritization through the coordinated access/coordinated entry system in each community helps to ensure that the most at risk in our communities are housed as quickly as possible and have access to the needed financial assistance and supports. Data has shown that utilizing this model of identifying and prioritizing those most vulnerable has proven to be an effective approach throughout the state of North Carolina which is why HUD requires its use for those receiving HUD funds. In addition to the data, the ESG office frequently hears from subrecipients and other stakeholders in the community who reiterate the need for this type of approach to prioritizing housing in order to ensure safe, affordable housing is available for those who are most in need and most at risk of not surviving their homeless experience.”

The strongest data that we have to support preferencing households experiencing homelessness comes from the forthcoming research from Dr. Mike Fliss at UNC-CH. His preliminary summary of the study (“Preliminary findings of linkage of NCCEH HMIS enrollment records to NC death certificates, 2014 to 2019, by Mike Dolan Fliss & Esther Chung, UNC Injury Prevention Research Center, 2022. Funded by Duke Endowment Opioid Collaboratory”) states:

“Residents experiencing homelessness had 7.0 times the all-cause mortality of the NC general population. Though small numbers limit some interpretations, numerous injury outcomes seemed elevated in either or both percent of deaths and Standardized Mortality Ratio, including med-drug overdose, certain cancers (lung, colon), alcohol-associated causes, motor vehicle/pedestrian crashes, and firearm assaults.”

This study includes Durham, NC BoS, and Orange CoC Data and compares that to state levels of mortality. This finding reinforces the urgency for preferencing both the literally homeless QP and the chronically homeless population within the homeless QP since chronically homeless households combine extended periods of homelessness with a diagnosed disabling condition and this population is traditionally the most vulnerable when viewed with a public health lens.

While the public input solicited for the HOME-ARP plan was extensive, NCCEH is concerned that the input of certain stakeholders was prioritized in the actual creation of the plan. **NCCEH believes that providers and stakeholders that do not belong to or explicitly serve any of the four QPs should not be included in the public input phase as a matter of process.** Our hope is that themes and trends emerge when a larger group of advocates, providers and stakeholders is included in the process and that the aggregate feedback, rather than the wishes of a single advocate, is used to inform the creation of the plan. While NCCEH cannot argue with the emphasis on the creation of new affordable units and for temporary shelter in communities without shelter options, the agency is concerned that some stakeholders had undue and inappropriate influence over the process.

A final concern relates to the ongoing service needs for those households that are lucky enough to secure rental housing in the new affordable units. For our homeless services system, affordable housing and services go hand and hand. The vast majority of households in our system are at or below 30% AMI and struggle with one or more disabling conditions such as mental health disorders, chronic physical health conditions, intellectual developmental disabilities, and substance use disorders. Without adequate service funding to address household needs once permanently housed, we risk people cycling back into homelessness and further exacerbating these issues. The lack of services also risks damaging relationships with landlords and property owners who house these individuals and families without support. The lack of available supportive services makes eviction more likely and has the potential to lead to problematic interactions with neighbors, police involvement, and ongoing challenges for property managers. Households served through the HOME-ARP program may not be eligible to receive services through the state's Medicaid Standard or Tailored Plans. This reality leaves these households virtually without services support as they transition into permanent housing. While this issue will not manifest until the new units are built and occupied, **NCCEH urges NCHFA to engage the LME/MCOs and other supportive services providers as early as possible in the project planning process to ensure that the ongoing service needs of this population are adequately addressed in permanent housing.**

We understand that the NCHFA is balancing a host of concerns as it considers statewide needs related to the HOME-ARP funding. As you juggle these competing priorities, we ask that you continue to use NCCEH as a resource to ensure that the state considers the special needs of people at or below 30% AMI which includes people experiencing homelessness. We welcome the opportunity to discuss this feedback in more detail in the coming weeks and months. I can

be reached at ryan.fehrman@ncceh.org or by phone at 919-360-8219. Thank you for being a key partner in our efforts to end homelessness in North Carolina.

Best Wishes,

A handwritten signature in black ink, appearing to read 'R. J. Fehrman', with a long horizontal flourish extending to the right.

Ryan J. Fehrman



July 13, 2022

Executive Committee

Jerry Hurwitz
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Kathy Denlinger
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Cindy Kuhne
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Matt Thompson
Laurie Whalin

Executive Director

Katrina Knight, MSW

*Please remember
Good Shepherd Center
in your will and
estate plans.*

North Carolina Housing Finance Agency
Attn: Annie Baumann-Mitchell
3508 Bush St
Raleigh, NC 27609

Dear Annie,

As the Executive Director of Good Shepherd Center, the largest provider of homeless services in the Cape Fear region, and as the Chair of our regional Housing Coalition, I am excited for the implementation of the HOME-ARP Plan and its targeted efforts to create safe, affordable housing for our most vulnerable neighbors across North Carolina. As a lead provider in our community, I urge NCHFA to consider prioritizing chronically homeless persons with disabilities when identifying which populations will be served by the construction of new units. In Wilmington and across North Carolina, this especially vulnerable population is the most under-resourced, and the lack of Permanent Supportive Housing that can meet their unique needs places an inordinate strain not only on homeless services providers and housing agencies, but on the entire emergency services system in our community.

In our community, Permanent Supportive Housing is the greatest need and the heaviest lift, both financially and in providing supportive services. Further, a lack of partner organizations either willing to take on the financial risk, or able to provide ongoing property management and intensive supportive services, leaves willing providers unable to meet the need without significant outside financial investments such as the HOME-ARP funds.

More daunting than the production and operation of PSH units is securing the ongoing rental subsidy and operating expenses that often exceed the modest rental income that makes these units affordable for tenants, many of whom can contribute no more than \$225 towards their rent and utilities without being cost-burdened. We appreciate the foresight to set aside operational reserves in the HOME-ARP Allocation Plan to ensure the success of the selected projects – as PSH projects are often the least likely to pencil, yet the most vital to addressing our state's housing gaps, again I urge you to prioritize Permanent Supportive Housing for chronically homeless adults with disabilities in the project selection process.

Please feel free to reach out to me for questions or clarification, and thank you for all you make possible for our state.

Sincerely,

Katrina R. Knight, MSW

**Notice of Public Comment Period and Virtual Public Hearing for the State of North Carolina
HOME-American Rescue Plan Allocation Plan, a substantial amendment to the 2021-2025
Consolidated Plan and 2021 Annual Action Plan**

AGENCIES:

North Carolina Department of Commerce
North Carolina Housing Finance Agency

ACTION: Notice is hereby given that the HOME-American Rescue Plan (HOME-ARP) Allocation Plan, a substantial amendment to the 2021-2025 Consolidated Plan and the 2021 Annual Action Plan, has been drafted by the NC Housing Finance Agency. The draft may receive several updates prior to submission to the U.S. Department of Housing and Urban Development.

SUMMARY: The 2021-2025 Consolidated Plan and 2021 Annual Action Plan will be amended by the contents of the HOME-ARP Allocation Plan. The HOME-ARP Allocation Plan summarizes the research and consultation conducted to develop the associated program and summarizes the intended uses of the HOME-ARP funds. A summary of the HOME-ARP allocation plan is attached to this notice.

AVAILABILITY OF REVIEW MATERIALS: A copy of the HOME-ARP Allocation Plan will be available for review from Friday, July 1st, 2022, to Friday, July 15th, 2022. Documents are attached to this message and will be available on the North Carolina Housing Finance Agency website at <https://www.nchfa.com/about-us/home-american-rescue-plan>. Individuals requiring reasonable accommodations may contact NC Housing Finance Agency at 919-877-5700 or toll free at 800-393-0988.

PUBLIC HEARING: A virtual public hearing to present the plan will be held on Thursday, July 14th from 2:00pm to 3:30 pm.

Join on your computer or mobile app

[Click here to join the meeting](#)

Or call in (audio only)

[+1 323-433-2154](tel:+13234332154), [640571705#](tel:+1640571705) United States, Los Angeles
Phone Conference ID: 640 571 705#

COMMENT PERIOD: Comments concerning the documents stated in this notice should be made during the required comment period. The HOME-ARP Allocation Plan comment period is from Friday, July 1st, 2022, to Friday, July 15th, 2022. Written comments will be accepted until 5:00 PM on the comment period closing date and may be emailed to nchomearpcomment@nchfa.com, faxed to 919-877-5701, or mailed to 3508 Bush Street, Raleigh, North Carolina, 27609, attention Annie Baumann-Mitchell. See attachment for more details.

**Aviso de período de comentarios públicos y audiencia pública virtual del estado de Carolina del Norte
Plan de Asignación del Plan de Rescate Estadounidense HOME, enmienda sustancial al Plan
Consolidado de 2021-2025 y al Plan de Acción Anual de 2021**

AGENCIAS:

Departamento de Comercio de Carolina del Norte
Agencia de Financiamiento de la Vivienda de Carolina del Norte

ACCIÓN: Por medio de la presente se comunica al público general que el Plan de Asignación del Plan de Rescate Estadounidense HOME (HOME-ARP), enmienda sustancial al Plan Consolidado de 2021-2025 y al Plan de Acción Anual de 2021, ha sido redactado por la Agencia de Financiamiento de la Vivienda de Carolina del Norte. El borrador puede ser actualizado varias veces antes de que sea enviado al Departamento de Vivienda y Desarrollo Urbano de EE. UU.

RESUMEN: El Plan Consolidado de 2021-2025 y el Plan de Acción Anual de 2021 serán enmendados por el contenido del Plan de Asignación del HOME-ARP. El Plan de Asignación del HOME-ARP resume la investigación y las consultas llevadas a cabo para desarrollar el programa asociado y resume los usos previstos de los fondos del HOME-ARP. Se adjunta a este aviso un resumen del Plan de Asignación del HOME-ARP.

DISPONIBILIDAD DE MATERIALES DE REVISIÓN: Del viernes 1º al viernes 15 de julio de 2022, se podrá revisar una copia del Plan de Asignación del HOME-ARP. Los documentos se adjuntan a este mensaje y también se encuentran en el sitio web de la Agencia de Financiamiento de la Vivienda de Carolina del Norte: <https://www.nchfa.com/about-us/home-american-rescue-plan>. Las personas que requieran adaptaciones razonables pueden comunicarse con la Agencia de Financiamiento de la Vivienda de Carolina del Norte llamando al 919-877-5700 o llamando gratuitamente al 800-393-0988.

AUDIENCIA PÚBLICA: El jueves 14 de julio, de 2:00 p.m. a 3:30 p.m. se llevará a cabo una audiencia pública virtual para presentar el plan.

Asista a la reunión desde su computadora o aplicación móvil
[Haga clic aquí para asistir a la reunión](#)

O llame para asistir por teléfono (solo audio)
[+1 323-433-2154](tel:+13234332154), [640571705#](tel:+1640571705) Estados Unidos, Los Ángeles

ID de la conferencia telefónica: 640 571 705#

PERÍODO DE COMENTARIOS: Los comentarios relacionados con los documentos mencionados en este aviso se deben hacer durante el período previsto. El período de comentarios del Plan de Asignación del HOME-ARP es del viernes 1º de julio al viernes 15 de julio de 2022. Se aceptan comentarios escritos hasta las 5:00 p.m. de la fecha de cierre del período de comentarios. Los comentarios se pueden enviar por correo electrónico a nchomearpcomment@nchfa.com, por fax a 919-877-5701, o por correo postal a 3508 Bush Street, Raleigh, North Carolina, 27609, atención de Annie Baumann-Mitchell. En el archivo adjunto hay más detalles.

HOME-ARP Summary

The North Carolina Housing Finance Agency received \$65,590,727 million in [HOME-ARP](#) funds through the American Rescue Plan Act of 2021 to assist people experiencing homelessness, those at risk of becoming homeless and other vulnerable populations. These funds are intended to reduce homelessness and housing insecurity and may be used to develop rental housing and non-congregate shelter, provide supportive services or offer tenant based rental assistance. U.S. Department of Housing and Urban Development (HUD), which oversees the HOME-ARP funds, requires all state and local recipients to submit a plan summarizing the intended use of the funds. This notice provides a summary of the NC Housing Finance Agency's HOME-ARP Allocation Plan for the state. The complete plan can be found at <https://www.nchfa.com/about-us/home-american-rescue-plan>.

The plan consists of three key elements: the needs assessment, a quantitative analysis of the state's housing needs for individuals experiencing homelessness; extensive consultations with key stakeholders; and an outline of the program that will utilize the HOME-ARP funds.

The needs assessment found 9,280 individuals experienced homelessness in North Carolina, either residing in a homeless shelter or other place not meant for human habitation, on one night in January, according to the 2020 Point in Time Count. In total, more than 27,000 North Carolinians experienced homelessness at some time in 2020. Low-income households are at greater risk of homelessness as they are disproportionately cost-burdened, meaning they spend more than 30% of their income on housing, which puts them at greater risk of homelessness. Over one million low-income North Carolina renter households (those earning less than 50% of the area median income) are housing cost burdened.

The NC Housing Finance Agency consulted with a variety of stakeholders through virtual meetings, listening sessions and online surveys to help inform the HOME-ARP Allocation Plan. These groups included local public housing agencies, local HOME participating jurisdictions (PJ) who received their own HOME-ARP funds, Continuum of Care organizations and service providers. Additional discussions were held with statewide organizations such as the NC Coalition to End Homelessness, Veteran Services of the Carolinas, NC Office of Resiliency and Recovery and the NC Department of Health and Human Services, among others. A full list of stakeholders can be seen in the plan.

The severe lack of affordable and available rental units in North Carolina was the most consistent message received from all stakeholders. If a household is able to secure a rental subsidy, they are often unable to utilize a voucher due to lack of landlord participation and insufficient unit availability, making affordability a central concern. Additionally, stakeholders identified significant geographic gaps in the emergency shelter services. Specifically, 22 counties have no shelter of any kind, while other regions that do have shelters available do not serve all of the populations in need in that area. The need for supportive services to help households locate and maintain housing was another prevalent concern among many stakeholders.

The quantitative and qualitative analysis clearly demonstrates the need for all four of the HOME-ARP eligible uses (rental development, non-congregate shelter development, supportive services and tenant-based rental assistance). However, since need far outstrips the funding, the needs assessment helped to prioritize the potential uses. As a result, the State's HOME-ARP Program will focus on rental development and geographically targeted non-congregate shelter development.

The majority of the HOME-ARP funds, \$49,752,118, will be allocated to the development and operation of rental units. The Agency anticipates generating 165 rental units supported by an operating reserve for the entire 15-year compliance period. The operating reserve will eliminate the need for any type of additional rental subsidy, ensuring affordable rents for all low-income households in the developments, including those with no income. It is anticipated that most of the qualifying populations will earn less than 30% of the area median income. As a result, the affordable rents for qualified households will be lower than what it may cost to maintain the building and units. The operating reserve will fill the gap between what tenants can pay and the costs required to manage the property for 15-years. Rental development applications will be accepted for projects across the state. However, leveraging of local funds is a requirement for applications received from areas served by a local PJ and optional for applications received from areas not served by a local PJ.

The NC Housing Finance Agency will allocate \$6,000,000 for the development and acquisition of non-congregate shelter, anticipating the production of two to three projects. Funds for non-congregate shelters are reserved for areas not served by a local PJ, or areas with no existing shelter.

The Agency is aware that qualified applicants from areas with fewer resources, who may be less familiar with the complex requirements of federal funds, may need more time to make a successful application come together. As a result, the Agency will use up to \$3,279,536, of the \$9,838,609 administrative funds, to hire a consultant(s) to assist these applicants in applying for HOME-ARP funds.

For more information about the HOME-ARP funds or to read the HOME-ARP Allocation Plan in its entirety, please visit <https://www.nchfa.com/about-us/home-american-rescue-plan>.

Resumen del plan HOME-ARP

La Agencia de Financiamiento de la Vivienda de Carolina del Norte recibió \$65,590,727 millones en fondos del [HOME-ARP](#) en virtud de la Ley del Plan de Rescate Estadounidense de 2021 para ayudar a las personas sin hogar o en peligro de perder su hogar y a otras poblaciones vulnerables. Estos fondos son para reducir la falta y la inseguridad de vivienda y pueden usarse para desarrollar viviendas arrendables y refugios no colectivos, prestar servicios de apoyo, u ofrecer asistencia de renta basada en el arrendatario. El Departamento de Vivienda y Desarrollo Urbano de EE. UU. (Housing and Urban Development, HUD), que supervisa los fondos del plan HOME-ARP, requiere que todos los beneficiarios estatales y locales presenten un plan que resuma el uso previsto de los fondos. Este aviso contiene un resumen del Plan de Asignación del HOME-ARP de la Agencia de Financiamiento de la Vivienda de Carolina del Norte para el estado. El plan completo se puede encontrar en este sitio <https://www.nchfa.com/about-us/home-american-rescue-plan>.

El plan consta de tres elementos fundamentales: una evaluación de necesidades, que es un análisis cuantitativo de las necesidades de vivienda del estado para personas sin hogar; amplias consultas con las principales partes interesadas; y un resumen del programa que utilizará los fondos del plan HOME-ARP.

Según el Recuento en Cierta Momento de 2020, la evaluación de necesidades indicó que, en una noche de enero, en Carolina del Norte había 9,280 personas sin hogar residiendo en refugios para personas sin hogar o en lugares no destinados a la habitación humana. En total, más de 27,000 habitantes de Carolina del Norte carecían de hogar en algún momento de 2020. Los grupos familiares de bajos ingresos corren un mayor riesgo de quedarse sin hogar debido a su desproporcionada carga de costo de vivienda: más del 30% de sus ingresos. En Carolina del Norte hay más de un millón de grupos familiares de arrendatarios de bajos ingresos (que ganan menos del 50% de la mediana del ingreso local) agobiados por el costo de la vivienda.

A través de reuniones virtuales, sesiones de escucha y encuestas en línea para informar el Plan de Asignación del HOME-ARP, la Agencia de Financiamiento de la Vivienda de Carolina del Norte consultó a diversas partes interesadas. Entre estos grupos había agencias locales de vivienda pública, Jurisdicciones Participantes (Participating Jurisdictions, PJ) en programas HOME locales que reciben sus propios fondos del plan HOME-ARP, organizaciones del programa Continuo de Asistencia (Continuum of Care, CoC), y proveedores de servicios. También se conversó con organizaciones estatales tales como la Coalición de Carolina del Norte para Terminar con la Falta de Vivienda, los Servicios para Veteranos de Carolina del Norte y Carolina del Sur, la Oficina de Resiliencia y Recuperación de Carolina del Norte, y el Departamento de Salud y Servicios Humanos de Carolina del Norte, entre otros. En el plan se puede ver una lista completa de las partes interesadas.

La grave falta de viviendas arrendables asequibles y disponibles en Carolina del Norte fue la afirmación más frecuente de las partes interesadas. Aunque un grupo familiar consiga un vale de subsidio de renta, a menudo no puede utilizarlo porque el propietario no participa en el programa de vales o no hay viviendas disponibles, lo cual conduce a que la asequibilidad sea un problema central. Además, las partes interesadas indicaron que había vacíos geográficos significativos en los servicios de alojamiento de emergencia. Específicamente, en 22 condados no hay refugios de ningún tipo, y en las regiones en que los hay, los refugios no atienden a todas las poblaciones locales necesitadas. La necesidad de servicios de apoyo de grupos familiares para la ubicación y la conservación de la vivienda fue otro problema frecuente mencionado por muchas partes interesadas.

El análisis cuantitativo y cualitativo demuestra claramente la necesidad de las cuatro funciones válidas del plan HOME-ARP (desarrollo de viviendas arrendables, desarrollo de alojamientos no colectivos, servicios de apoyo, y asistencia de renta basada en el arrendatario). Sin embargo, como la necesidad supera ampliamente el financiamiento, la evaluación de necesidades permitió priorizar las posibles funciones. Como resultado de esto, el plan HOME-ARP del estado se centrará en el desarrollo de viviendas arrendables y el desarrollo de refugios no colectivos geográficamente específicos.

La mayoría de los fondos del plan HOME-ARP, \$49,752,118, se asignarán al desarrollo y operación de viviendas arrendables. La Agencia calcula que puede generar 165 viviendas arrendables respaldadas por una reserva operativa para todo el período de validez de 15 años del plan. La reserva operativa elimina la necesidad de subsidios de renta adicionales y garantiza rentas asequibles para todos los grupos familiares de bajos ingresos en las urbanizaciones en que se implementan los desarrollos de viviendas arrendables, incluidos los que carecen de ingresos. Se anticipa que la mayoría de las poblaciones elegibles ganan menos del 30% de la mediana del ingreso local. Como resultado de esto, las rentas asequibles para los grupos familiares elegibles serán más bajas de lo necesario para mantener el edificio y las unidades. La reserva operativa cubrirá la diferencia entre lo que los arrendatarios pueden pagar y los costos necesarios para administrar la propiedad durante 15 años. Se aceptarán solicitudes de desarrollo de renta para proyectos en todo el estado. Sin embargo, la contribución de fondos locales es un requisito para las solicitudes provenientes de zonas atendidas por una PJ local y opcional para las solicitudes provenientes de zonas no atendidas por una PJ local.

La Agencia de Financiamiento de la Vivienda de Carolina del Norte asignará \$6,000,000 para el desarrollo y la adquisición de viviendas no colectivas, anticipando la producción de dos o tres proyectos. Los fondos para refugios no colectivos se reservan para zonas no atendidas por una PJ local o zonas donde no hay refugios.

La Agencia es consciente de que los solicitantes elegibles de áreas con menos recursos, que pueden estar menos familiarizados con los complejos requisitos de los fondos federales, pueden necesitar más tiempo para presentar la solicitud. A raíz de esto, la Agencia utilizará hasta \$3,279,536, de los \$9,838,609 de fondos administrativos, para contratar consultores que ayuden a estos solicitantes a solicitar fondos del plan HOME-ARP.

Para ver más información sobre los fondos del HOME-ARP o leer el Plan de Asignación del HOME-ARP en su totalidad, vaya a <https://www.nchfa.com/about-us/home-american-rescue-plan>.

NC HOME-ARP Allocation Plan Public Hearing

An Amendment to the 2021-2025 Consolidated Plan & 2021 Annual
Allocation Plan

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Welcome to the HOME-ARP Allocation Plan Public Hearing!

To assist:

- **Mute** your device
- **Wait** for the public comment period to speak
- **Note** phone-in callers will be prompted to speak first
- **Type** your name in the chat if using the web format
- **E-mail** comments to NCHOMEARPComent@nchfa.com
- **Note** NCHFA will not be responding to comments directly

Agenda

- HOME-ARP Review
- Allocation Plan Review
 - Needs Assessment & Gap Analysis
 - Stakeholder Consultation
 - NC HOME-ARP Program
- Comments

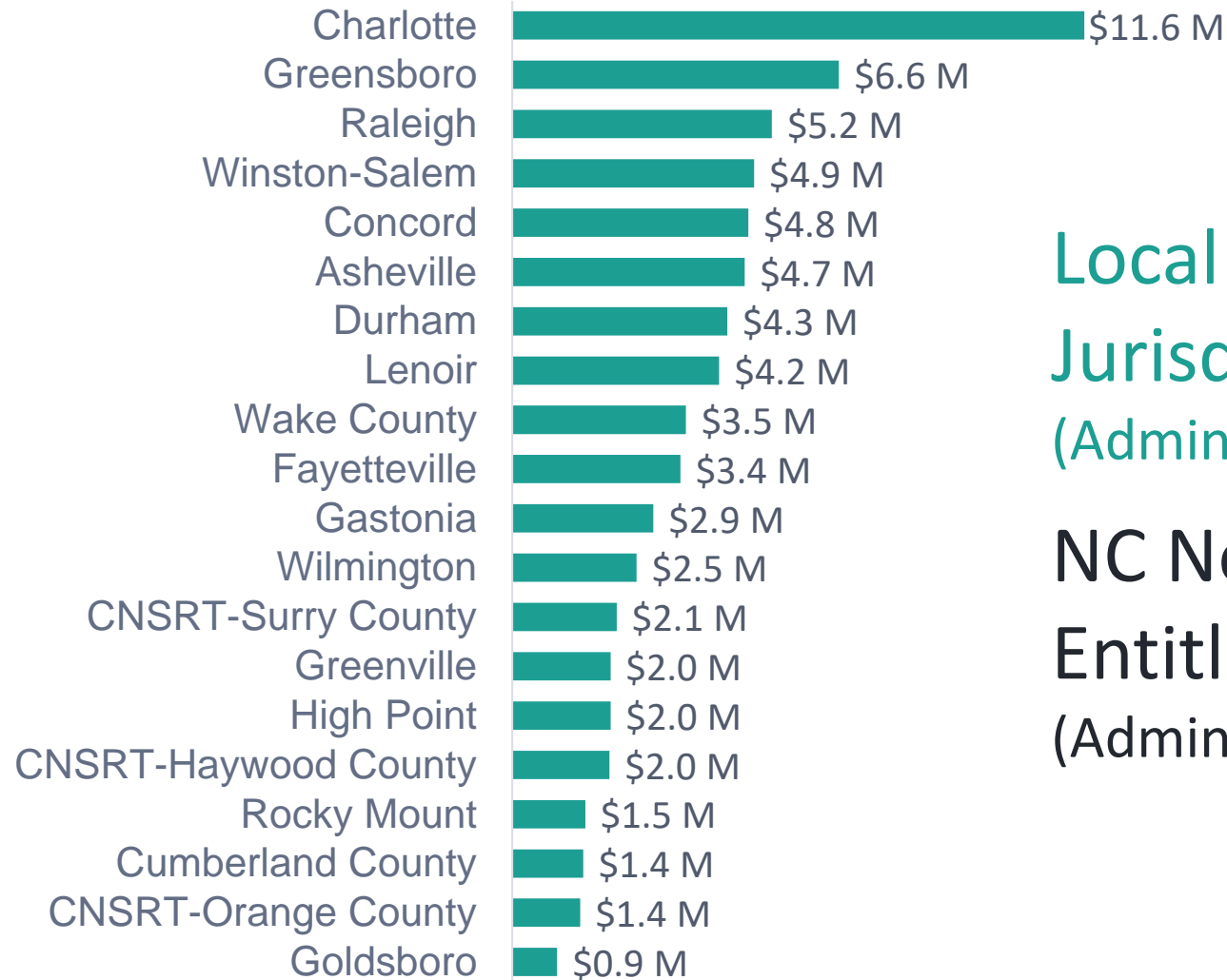
What is HOME-ARP?

The **American Rescue Plan (ARP)** authorized \$5 billion administered by U.S. Department of Housing and Urban Development (HUD) to help communities across the country **address homelessness and affordable housing**.

Unique features:

- Flexible eligibility
- Covers expenses that may not be addressed by other sources
- Funding must be fully expended by 2030

NC Received \$137.4 M in HOME-ARP



Local Participating Jurisdictions
(Administered locally)

\$71.8 M

NC Non-Entitlement Areas
(Administered by NCHFA)

\$65.6 M

HUD HOME-ARP Eligible Activities

- Production or preservation of affordable rental housing
- Tenant-based rental assistance (TBRA)
- Supportive services, homeless prevention services and housing counseling
- Purchase/renovation and development of non-congregate shelter

Qualifying Populations

Category	Definition
Homeless	<ul style="list-style-type: none"> • Individual or family that lacks a fixed, regular or adequate nighttime residence or will imminently lose their primary nighttime residence • Unaccompanied youth
At Risk of Homelessness	<ul style="list-style-type: none"> • Has an annual income below 30% MFI • Does not have resources or support networks to prevent homelessness • Moved frequently, lives in a hotel/motel/SRO, is exiting a publicly funded institution or system of care
Fleeing domestic violence, dating violence, sexual assault, stalking or human trafficking	<ul style="list-style-type: none"> • Includes cases where individual or family believes there is a threat of imminent harm
Other Populations	<ul style="list-style-type: none"> • Other families requiring services or housing assistance to prevent homelessness • Households at greatest risk of housing instability

**Veterans and families that include a veteran that meet criteria described above are eligible for assistance*

Purpose of the Public Hearing

Purpose: *To present and receive comments on the HOME-ARP Allocation Plan*

The HOME-ARP Allocation Plan is an amendment to the 2021-2025 Consolidated Plan and 2021 Annual Action Plan.

The Consolidated Plan describes the State's 5-year priorities to address community development and housing needs of North Carolina.

The Annual Action Plan provides a concise summary of the actions and activities needed to achieve the goals laid out in the Consolidated Plan.

Note: A copy of the North Carolina Citizen Participation Plan is available for review at www.nccommerce.com and www.nchfa.com.

Needs Assessment & Gap Analysis

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Homelessness Housing Needs

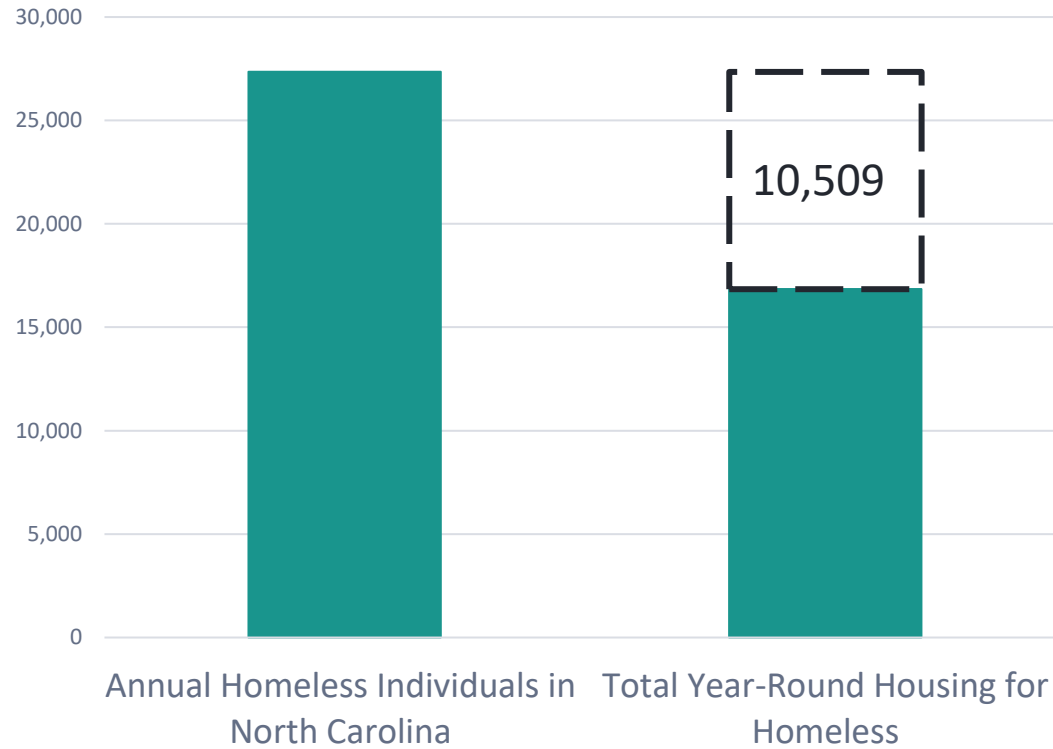
- Homeless Population (2020)

- 9,280 people experienced homelessness on one night in January.
- Black and Native American people are overrepresented in the NC homelessness system.
- 14% of the homeless population are chronically homeless.

- Individuals/Households at Risk of Homelessness

- 282,480 North Carolina renters are extremely low-income, meaning they earn less than 30% of the area median income.
- 73% of these extremely low renters are cost burdened.

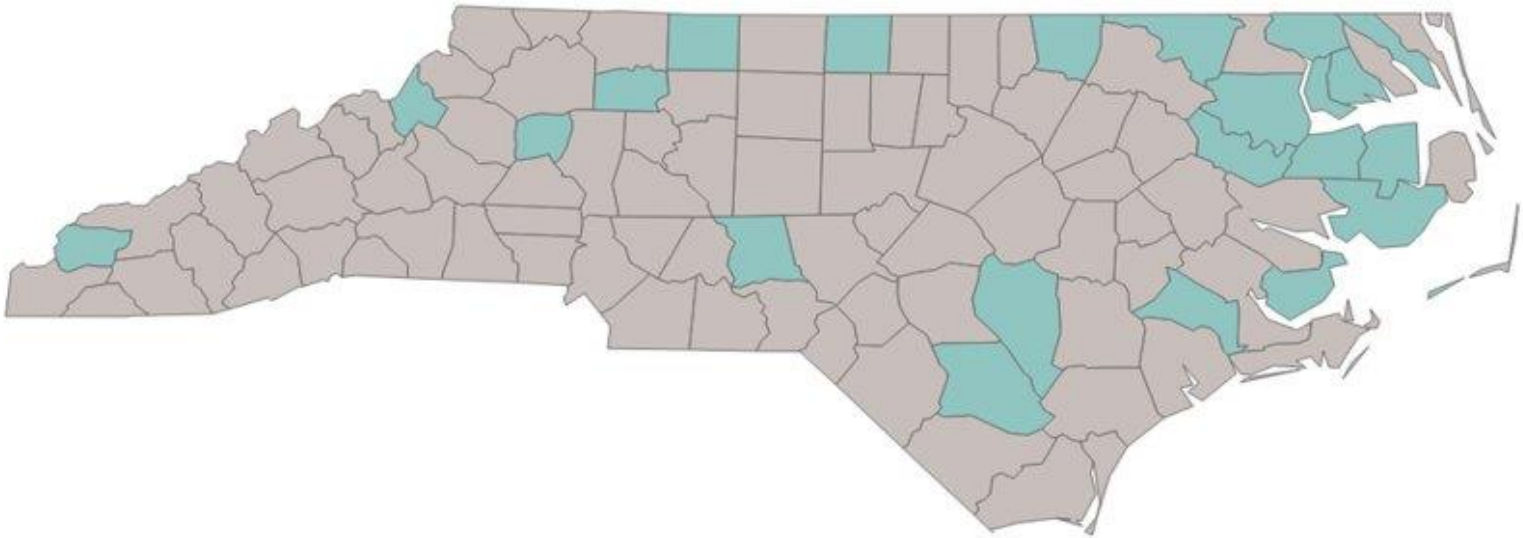
Homelessness Housing Gap



Other Housing Needs

- Individuals fleeing domestic violence or dating violence
 - 4,716 domestic violence survivors reported experiencing housing insecurity
- Other populations requiring assistance to prevent homelessness
 - NCCORR assisted 178,000 households financially impacted by the pandemic
 - 42% of all calls made to NC-211 were made by individuals requesting assistance with housing

Twenty-two counties do not have any emergency shelter



Consultation

Consultation



94 responses through our online survey

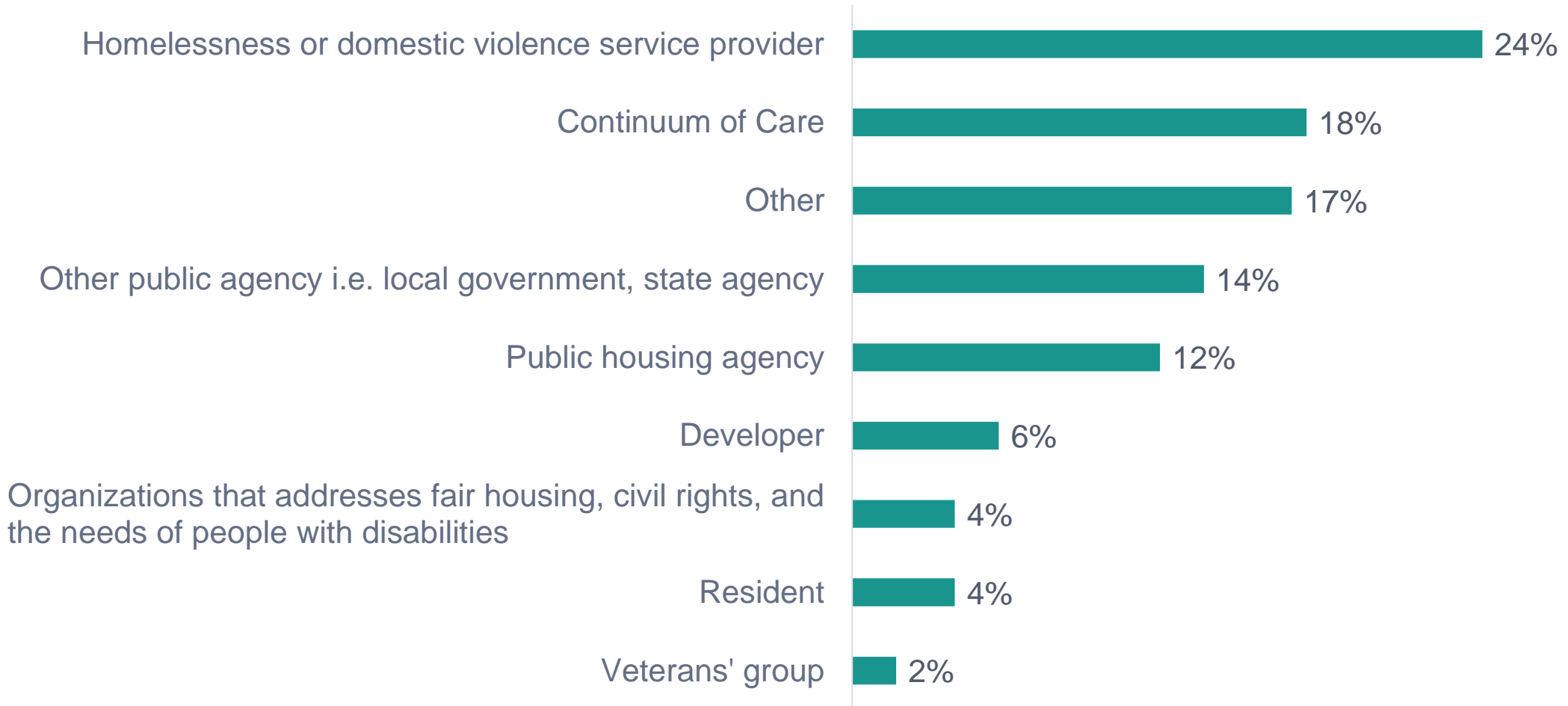


10 stakeholder meetings



103 participants in **3** listening sessions

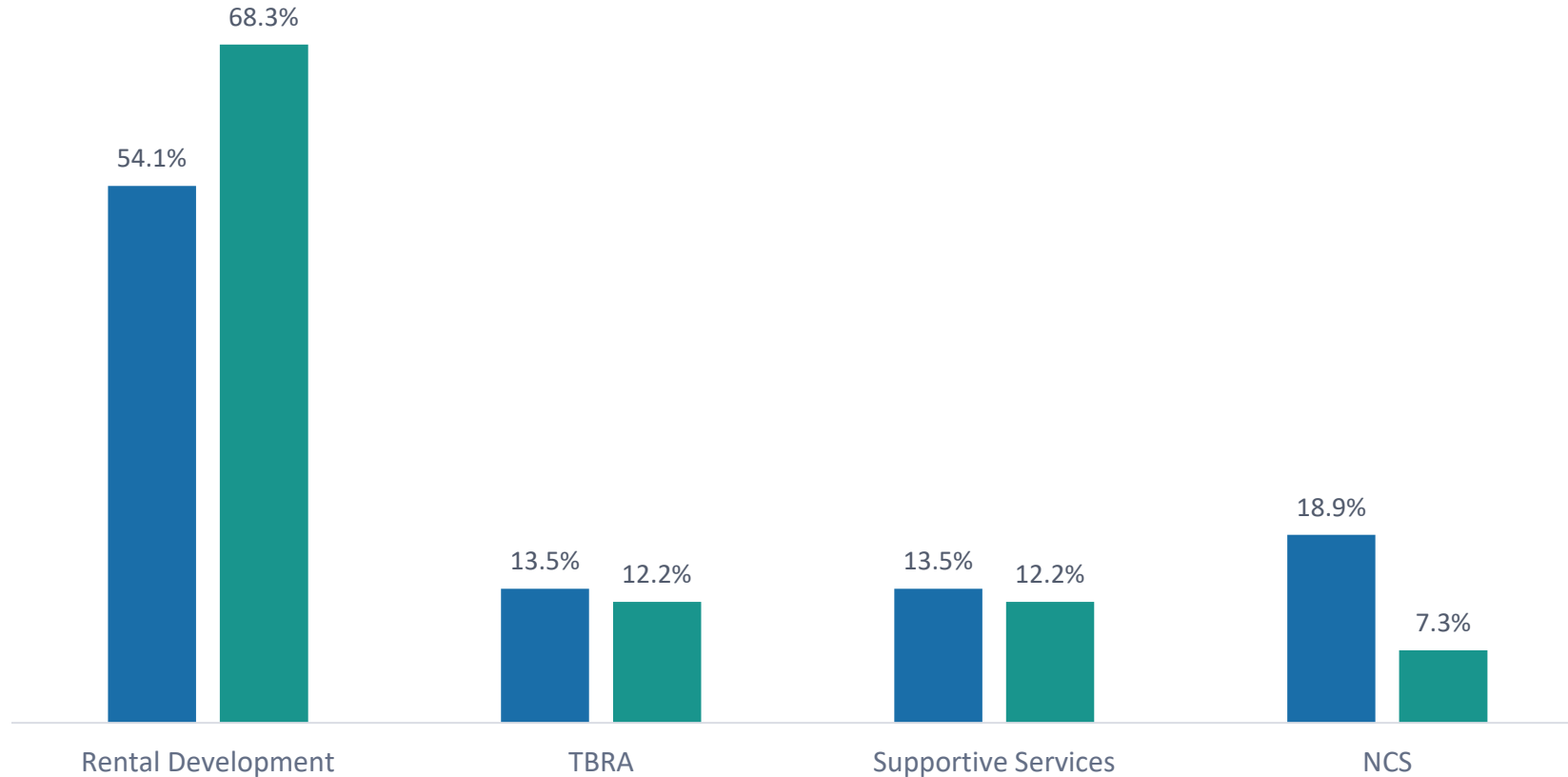
Type of Stakeholder



Consultation Feedback Themes

- Increase supply of affordable and available rental units
- Lack of supportive services
 - Locate and maintain housing
 - Case management
 - Wrap around services
- Geographic gaps in emergency shelter services
- Barriers utilizing rental subsidies

Rental development was perceived has highest need in rural and urban communities



Source: NCHFA analysis of online survey responses

NC HOME-ARP Program

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North Carolina's Planned Uses

1. Rental development, rehabilitation or acquisition
 - 15-year operating assistance included
 - Units affordable to extremely low-income households within the qualifying population with no tenant-based rental assistance needed.
2. Non-congregate shelter development or acquisition and/or rehabilitation of existing structures to create non-congregate shelters.
3. Admin
 - NCHFA may use up to 3,275,486 (5% of total award) to provide technical assistance to less experienced applicants interested in HOME-ARP funds.

NC Qualifying Populations

- NC HOME-ARP funds will serve all qualifying populations.
- Prioritizations may be given on a project level based on demonstrated need.
- All HOME-ARP projects will adhere to all fair housing, civil rights & other anti-discriminatory laws.

Budget

	Funding Amount	Percent of Grant
Supportive Services	\$0	0.00%
Acquisition & Development of Non-Congregate Shelter	\$6,000,000	9.15%
Tenant Based Rental Assistance (TBRA)	\$0	0.00%
Development of Affordable Rental Housing	\$49,752,118	85.85%
Nonprofit Operating	\$0	0.00%
Non-profit Capacity Building	\$0	0.00%
Admin & Planning	\$9,838,609	15.00%
Total HOME-ARP Allocation	\$65,590,727	100.00%

Rental Development Costs

Rental Development Cost (per unit)	Rental Operating Assistance (per unit for 15 years)	Total Cost per unit for 15 years	Total Rental Development Funds	Total Units *
\$225,000	\$80,000	\$305,000	49,752,118	165

*NCHFA estimation

Rental Development 15-Year Impact

Rental Units	165
Households served per year	165
Months of operating subsidy per year	$12 \times 165 = 1,980$
Months of operating subsidy for 15 years	$1,980 \times 15 = 29,700$
Total impact	29,700 months of affordable housing provided

Non-Congregate Shelter Costs

Non-Congregate Shelter Development Cost *	Total NCS Funds	Total Projects
\$2,000,000	\$6,000,000	3

*NCHFA estimation

NCS projects will be evaluated against other NCS projects.

Applications for NCS projects in counties with no emergency shelter will be given priority.

Applications in counties with existing shelters that are not located in a local PJ will be accepted by not given priority.

Applications for NCS in areas served by a local PJ will not be accepted.

Applications for Rental projects will be evaluated against other rental projects.



Applications for Rental Projects in areas not served by a local PJ are not required to leverage funds for the project.



Applications for Rental Projects located within a Local Participating Jurisdiction (PJ) are required to have a commitment of leveraged funds for the project.

Next Steps

- Public comment period ends Friday, July 15th at 5:00 pm
- Analyze public feedback
- Finalize the Allocation Plan
- Submit Allocation Plan to HUD
- HUD Approves NC Allocation Plan
- Release NOFA and begin accepting applications

Comments?

Please note, NCHFA is collecting comments and will not be answering program specific questions at this time.

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