

# HOME-ARP ALLOCATION PLAN



City of  
**NEW HAVEN**

---

---

## TABLE OF CONTENTS

Introduction .....	3
Consultation & Engagement.....	4
Public Participation.....	9
Needs Assessment & Gaps Analysis .....	10
Eligible Activities .....	25
HOME-ARP Refinancing Guidelines.....	28
Housing Production Goals .....	28
Preferences.....	28
Conclusion .....	28

---

## Introduction

The American Rescue Plan (ARP) was signed into law on March 11, 2021, which provided federal funding to relieve the impact, aid recovery, and address long-term recovery because of the impacts of COVID-19. Congress appropriated \$5 billion specifically to address the need for homelessness assistance and supportive services to be administered through U.S. Department of Housing and Urban Development (HUD) existing HOME Investment Partnerships Act (HOME) Program. The City of New Haven (City) was allocated \$ 4,852,875 million in a grant called the Home Investment Partnerships Grant American Rescue Plan (HOME-ARP). The purpose of the HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities.

HOME-ARP funds are limited to the activities:

1. Development and support of affordable housing
2. Tenant-based rental assistance (TBRA)
3. Provision of supportive services
4. Acquisition and development of non-congregate shelter units

HOME-ARP funds assist "qualifying populations":

1. Sheltered and unsheltered homeless populations
2. Those currently housed populations at risk of homelessness
3. Those fleeing or attempting to flee domestic violence or human trafficking
4. Other families requiring services or housing assistance or to prevent homelessness
5. Those at greatest risk of housing instability or in unstable housing situations

The City has developed and will submit an Allocation Plan, which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan must be informed through stakeholder consultation and community engagement. This Plan was developed in accordance with federal regulations and the guidance contained in Community Planning and Development Notice CPD-21-10.

This plan outlines and describes how the City determined priorities including:

- 1) Consultation and public participation processes
  - 2) Needs assessment of the qualifying populations
  - 3) Gaps in local housing, shelter inventory, and service delivery systems
  - 4) Planned uses and eligible activities
  - 5) Housing production goals
- 

## Consultation & Engagement

The Allocation Plan (Plan) was prepared in consultation with agencies whose clientele includes HOME-ARP qualifying populations and public participation processes. In the development of the Plan, New Haven engaged with stakeholders and asked for input concerning the HOME-ARP grant, eligible activities, and the proposed budget. The City solicited feedback to identify unmet needs and gaps in housing or service delivery systems. An evaluation of service providers determined the HOME-ARP eligible activities currently taking place within the City's jurisdiction and potential opportunities for administering HOME-ARP. The City engaged with the Balance of State Continuum of Care (CoC), homeless and domestic violence service providers, veterans' groups, public housing agencies ("PHAs"), public agencies that address the needs of the qualifying populations, and public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities. New Haven also deployed a HOME-ARP provider survey for community partners to give their input on how to utilize HOME-ARP funds and on the needs and challenges that arise when working to address homelessness and housing instability. New Haven will continue to meet with stakeholders, including consumers, throughout the implementation of the HOME-ARP activities to assess the ongoing needs of stakeholders and clients. New Haven will collaborate to develop and implement projects that will help mitigate homelessness.

Please see Appendix A for organizations contacted and methodology for engagement. Summarization of the consultation process and results is outlined throughout the Plan.

The responses from one-on-one listening sessions, CoC presentation, survey respondents, and primary data review were the basis for determining the City's proposed HOME-ARP activities, uses of funds, and the composition of the Plan.

### Provider Survey

A survey was distributed by email and in paper version which implored agencies to rank accessibility and availability of eligible activities and coordinated access and system quality for qualifying populations. A copy of the survey template and summarization of results is attached as Appendix B. The City identified a focus on evaluating both accessibility and availability of services, housing, and shelter. The distinction below addresses the definitions used for each:

- **Accessibility:** A client may be *eligible* for a program, service, or housing but *cannot access* whether due to a language barrier, criminal background, physical limitation, lack of transportation, poor credit, limited income, etc.
- **Availability:** The number of clients seeking the program, service, or housing *exceeds the number of* available units, openings, etc.
- **Coordinated Access:** The way a client would move between services, transition from one provider to another, or the ease of the existing service provider network.
- **System Assessment:** Consider where gaps are within the existing service provider network and what areas there may be for improvement.

Results for the provider survey are summarized throughout the Plan in the Gaps & Needs Assessment.

## Targeted Consultation

### Greater New Haven Regional Alliance – Thursday, December 8

The City’s technical consultant met with the Alliance to discuss the HOME-ARP Allocation Plan and provide information on upcoming opportunities for engagement and consultation. Participants shared feedback:

- Housing production and stock has slowed significantly with the huge gap between FMR and current market rates
- Suburban communities must be held accountable for housing production and affordability
- Tenants seeking units are deterred from the outset because of the application fees and, to ultimately get turned down, can be traumatic having to go through all the steps

### Public Housing Authority, Executive Director – Friday, January 20

The technical consultant met with the Housing Authority to review the portfolio and discuss challenges, barriers, gaps, and needs for tenants in the city. The Housing Authority has a lease rate/occupancy rate of 96% in Public Housing and 99% for the voucher holders. They receive \$3M in capital funds from HUD which is not enough for operating and capital needs. The wait list is always open and has a homeless preference. The waitlist has 55,000 people on it at present. It takes about seven years for family units to open and about three years for Elderly/Disabled. The Housing Authority maintains 147 ADA units with a total portfolio of approximately 6,000 families. The 6,000 is spread between Public Housing, Housing Choice Vouchers (Section 8) and Low-Income Housing Tax Credit (LIHTC) developments. About 80% of their portfolio has undergone either a RAD conversion or LIHTC re-development. There are some scattered site developments and have two projects under demo-reconstruction to build a HUD 202. They are working with a local Community Housing Development Organization (CHDO) to develop some new units in a mixed-use building.

A summarization of the Housing Authority’s portfolio will be included as a final appendix attachment.

2023 Fair Market Rent (FMR) for the following unit sizes:

Efficiency	1-Bed	2-Bed	3-Bed	4-Bed
\$ 1,200	\$ 1,334	\$ 1,629	\$ 2,001	\$ 2,258
<a href="https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2023_code/2023summary.odn">https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2023_code/2023summary.odn</a>				

Challenges and barriers reported include voucher holders having issues finding units because of competition with market rate renters with no restrictions. The quality of the units available will not pass inspection. The City does have a security deposit program that helps tenants with their move but coming up with funds to move is an issue for tenants. Onboarding someone into the voucher program and getting connected with services they need is a challenge. It is easier to maintain services with on-site developments and tenants.

**McKinney Vento Care Coordinator + Coordinator of Parent Engagement– Monday, January 9**

New Haven Public Schools has 42 schools and “projects” for outplacing students totaling nearly 20,000 students. The district currently has 486 students under McKinney-Vento with the following breakdown:

Shelter	Doubled-Up	Unsheltered	Hotel	Unaccompanied– Doubled-Up	Unaccompanied– Shelter
98	233	4	96	54	1

The staffing team provides a wide range of services and accommodations including, but not limited to:

- Academic
- Transportation
- Before/after school program
- Early intervention service connection
- Vaccinations
- Community partners (connect to services)
- Street outreach
- Basic needs

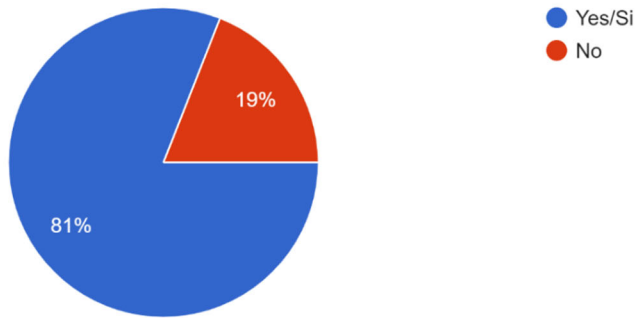
The greatest challenges and barriers to students and parents within the current delivery system:

- Gap between hotline and agencies; difficulty navigating and maintaining accurate availability
- Waiting for placement or referrals to programs
- Lack beds with wraparound services
- Difficulty with transportation; not a centralized location for service
- High burden on parents to transport to all services
- Cost burden to accessing housing

The engagement teams maintain a robust and open line of communication between parents and students. They provided the below survey response for their most recently completed outreach. The complete results are included as Appendix C.

Did you feel supported during this school year 2021-2022? ¿Sintió que fue apoyado durante este año escolar 2021-2022?

63 responses



### **BHcare, Inc, Director of Domestic Violence Programs – Wednesday, January 11**

This is a certified community behavioral health clinic which is the primary resource for victims of violence in the region. The agency’s domestic violence and victim advocacy programs are dedicated to increasing awareness of domestic violence and its effect on the community, empowering those victimized by providing advocacy and safe and effective services, and to working for social change to eliminate domestic violence. The agency serves 19 towns, operating two shelters and a hotline. Staff reported an increase in hotline calls through the pandemic and many more coming forward seeking services. It was recognized that clients have a greater wraparound need (food, hygiene, jobs, childcare, etc.) to be successful in maintaining housing. There is still a great deal of stigma and lack of outreach/understanding on available services for those experiencing violence. The agency strives to educate, engage the public, and execute outreach to bring awareness to the issue and services. A great need with limited funding is resources for those underemployed or just over the income threshold for services. Victims of violence may be employed but cannot afford to leave because they fall within a gap – too much income to qualify for programs but not enough income to sustain housing without subsidies. Overall, like many providers, there is simply not enough dollars to go around, and agencies are struggling to meet the demand.



---

## Public Participation

In accordance with New Haven’s Citizen Participation Plan (See Appendix D) and to give reasonable notice and an opportunity to comment, New Haven will solicit public input to both solicit input into the development of the Plan (Consultation); and seek comment on the draft Plan (Public Participation).

On February 1, 2023, a notice regarding the public comment period of the draft HOME-ARP allocation plan was published in the NH Register. The draft Plan was made available for public review and comment from 2/1/2023 to 3/3/2023. The proof of publication and complete notice is attached as Appendix E. The draft plan was available for review on the City of New Haven’s website at [www.newhavenct.gov](http://www.newhavenct.gov) under Government\Budgets & Financing\Federal Reports. The public was invited to submit written comments by mail or hand delivery to City of New Haven, Community Services Administration Office, 165 Church Street, New Haven, CT 06510, Attention: Velma George, or by email to [vgeorge@newhavenct.gov](mailto:vgeorge@newhavenct.gov).

### Public Hearing – Schedule

City of New Haven – Public Hearing – In-Person	February 15, 2023	6:00 PM
--	-------------------	---------

To broaden public participation, additional outreach was conducted via email and social media. In the public notice, the City specified accommodation and interpretation for anyone needing support in order to fully participate in the public hearing. The public hearings will both be in-person. The in-person meeting location is served by public transportation and is ADA accessible. The City offered a variety of avenues for members of the public to participate in by commenting on the draft plan. These included mail and email options for written comments, telephoned comments, and to comment orally at the scheduled public hearing.

### Social Media

- Detailed description will be included in the final version as a summarization of all public outreach for comment.

### Continuum of Care/Coordinated Access Network (CAN)

- Detailed description will be included in the final version as a summarization of all public outreach for comment.

## Public Networks

Surveys were also distributed to key agencies that aid the City's homeless, those at risk of homelessness, and others in the qualified populations identified by the U.S. Department of Housing and Urban Development. The Public Hearing consisted of a 15-minute presentation, an open forum for public comment, questions and answers from City staff and technical consultant.

## Consumer Engagement

In conjunction with the public participation, the City will meet with consumers of service providers to solicit feedback for existing delivery systems and share their views on affordable housing, residents' access to and knowledge of services for qualifying populations and eligible activities. The event will be hosted at New Haven Free Public Library Ives Branch, Community Program Room on Tuesday, February 14, 2023, at 10am and 2 pm. Comments from the in-person sessions are summarized below:

## Summary of Comments

**Written:** Any written comments received will be recorded here.

**Public Hearing:** Any public comments received will be recorded here.

In the event any comments are rejected or not incorporated, narrative will outline an explanation.

[All written and oral comments are expected to be accepted]

---

## **Needs Assessment & Gaps Analysis**

The assessment examines the size and composition of qualifying populations within New Haven and surrounding areas, identifies available resources, evaluates unmet housing and services needs of these populations, and addresses existing gaps. The City has highlighted gaps within its current shelter and housing inventory, as well as the service delivery system. In the needs assessment and gaps analysis, New Haven used current data, including Comprehensive Housing Affordability Data (CHAS), 2021 Point in Time Count (PIT Count), 2020 CoC Housing Inventory Count (HIC), and other available data sources. One of the most important and relevant sources of information was from a recent study released by state-wide partners.

## Housing Connecticut's Future: Meeting the State's Affordable and Accessible Housing Needs

The Metropolitan Housing and Communities Policy Center released a report in February 2021, *Housing Connecticut's Future: Connect Housing Assessment Current and Future Trends in Affordable and Accessible Housing Supply and Needs* (Report). The Urban Institute, in conjunction with The Connecticut Department of Housing and the Department of Social Services, commissioned this study, the first comprehensive look at affordable and accessible housing needs in the state, in May 2020. The research team gathered and analyzed data from state, federal, and public sources to describe and project trends in Connecticut's affordable and accessible housing supply and needs across different population groups.

The primary authors, Christie Stewart, Peter A. Tatian, Lydia Lo, Kelly Davila, Fay Walker, summarized the findings as follows:

*After growing through most of the past decade, Connecticut's population is projected to decline over the next two decades, reflecting three demographic trends: relatively more people migrating out of the state, rather than into it; an aging population; and a decline in white population. As populations change, demand for specific housing unit types will change as well. To create housing that meets affordability needs, Connecticut must address decreased rates of new construction, thousands of units with expiring Section 8 project-based rental assistance, LIHTC, and other forms of assistance, and an 86,000-unit gap in affordable housing needed for very-low-income households. Although the total number of very-low-income households will decline through 2040, the decrease will not be enough to close the affordability gap. Lack of standard accessible unit tracking and data makes it difficult to get a clear, comprehensive picture of the accessible housing supply in the state. Based on available data, most privately produced units meeting the state's highest accessibility standard, as well as accessible units within federally assisted housing, tend to be in counties with urban areas. Roughly one third of all low-income households in the state have someone with a disability, indicating a much greater need for housing that is both assisted and accessible. Largely because of an aging population, Connecticut will see an increasing need for housing units that are accessible for people with mobility and sensory disabilities.*

To address these challenges, the study team recommends the following actions.

**Committing to data-driven, proactive investment:** *The state’s current investment process does not ensure the right volume of units at the right cost bands in the right locations. A data-driven, proactive investment and policy approach could target specific populations in each county where the need for housing at designated cost bands and accessibility levels is greatest.*

**Regional Planning:** *Applying a geographic lens to housing investments would help Connecticut balance local needs against a larger, statewide strategy to more equitably and rationally distribute the costs and benefits of economic growth. A regional planning approach would promote patterns of development, both privately and publicly funded, that are sustainable and forward-looking and that leverage other community assets such as schools, transit, and public amenities.*

**Prioritization of resources based on need:** *Connecticut’s targeted plan to address homelessness has earned Connecticut a national reputation as a leader on this issue. Taking a similarly targeted approach to the production, preservation, and protection of affordable and accessible housing for cost burdened residents could transform the state’s ability to make its vision of ensuring housing for everyone a reality.*

New Haven, as a regional hub, and populous urban area, is key in these report findings. It is an essential tool to guide strategies and implementation of affordable permanent housing.

The full report can be found on the Urban Institute’s website:

[Housing Connecticut's Future: Meeting the State's Affordable and Accessible Housing Needs | Urban Institute](#)

## SIZE AND DEMOGRAPHIC COMPOSITION OF QUALIFYING POPULATIONS

An overview of New Haven’s demographics lays a foundation for context of the size and demographic of the qualifying populations.

New Haven has a total city population of 134,023 with the following further breakdown of key demographics.

White/ Caucasian	Black/African American	Asian	Native Hawaiian	American Indian	Other	Two or More	Hispanic/ Latino
43,775	43,160	9,176	127	1,290	20,465	16,030	41,068
<a href="https://data.census.gov/">https://data.census.gov/</a>							

Population Increase/Decrease (Since 2010)	Poverty Rate	Families in Poverty	Highest Population Age Cohort	Population 65+	% Population 65+ living in Poverty	Median Income
+1.2%	23.30%	15.00%	15-24	16,131	17.40%	50,568

HUD requires HOME-ARP funds be used to primarily benefit individuals and families in specified HOME-ARP “qualifying populations.” Qualifying populations include, but are not limited to, the following:

### SHELTERED AND UNSHELTERED HOMELESS POPULATIONS

- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

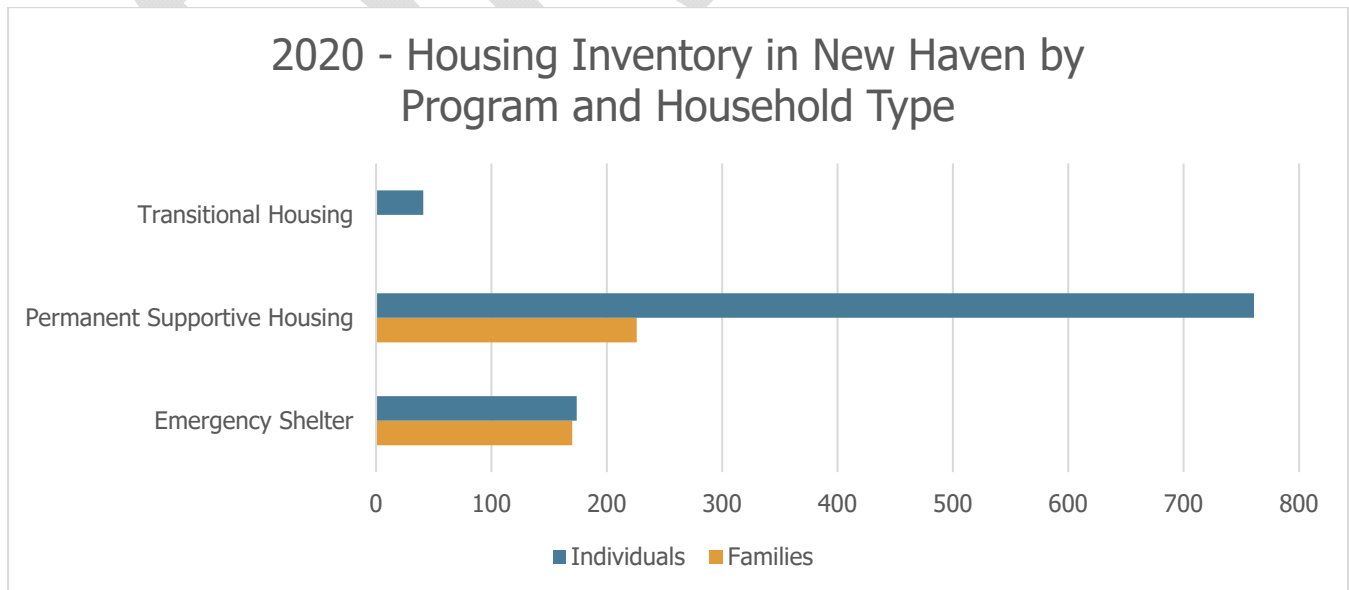
## HOMELESS POPULATIONS

In accordance with HUD’s definition of homeless for the HOME-ARP grant under 24 CFR § 91.5, New Haven will consider a homeless family or individual to include:

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

1. An individual or family who lacks a fixed, regular, and nighttime residence as defined in 24 CFR § 91.5
2. A person or family who will imminently lose their primary residence within 14 days from the date of application for assistance with no subsequent residence identified and lacks resources or support networks
3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition but who qualify under 24 CFR § 91.5
4. Any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, has no other residence, and lacks the resources and family networks

While the amount of people estimated to be experiencing homelessness may be underrepresented due to COVID-19, the following information includes the basis for the needs assessment and gap analysis for HOME-ARP qualified populations based on the latest available data. The HUD 2020 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report and CT 2020 Point-in-Time Count New Haven CoC Summary are both included as Appendix F & G respectively.



## Connecticut Coalition to End Homelessness (CCEH): CT Point-in-Time Count 2021

The most recent available PIT, 2021, reveals a decline in both the sheltered individual and family populations yet showed an *increase* in the unsheltered individual population. There were no families found to be unsheltered. This is the eighth year in a row that the overall PIT count has declined in Connecticut. Since 2007, PIT tallies have shown a decline of 42% in the single-night counts of homelessness in Connecticut. Family homelessness declined by 24% and there was a 31% decline in children experiencing homelessness on the night of PIT year over year. 2021 PIT count, however, reflects a 32% increase in this population. The unsheltered population cannot be compared to previous years' results as a different methodology was implemented due to safety concerns over COVID-19. The unsheltered data is managed by professional outreach teams who are familiar with this population and engage with them year-round. The method employed provided accurate data on demographics, disabling conditions, and chronic homelessness since it is entered and verified by outreach staff throughout the year. Given the restrictions in the HUD reporting requirements for the unsheltered, it is likely that these numbers are often under-representations of this population in the PIT.

According to the National Alliance to End Homelessness, the Balance of State of Connecticut's estimated number of individuals experiencing homelessness, as of 2020, is **3,235**.

---

### INDIVIDUALS AND FAMILIES AT RISK OF HOMELESSNESS & RESIDENTS LIVING IN HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS

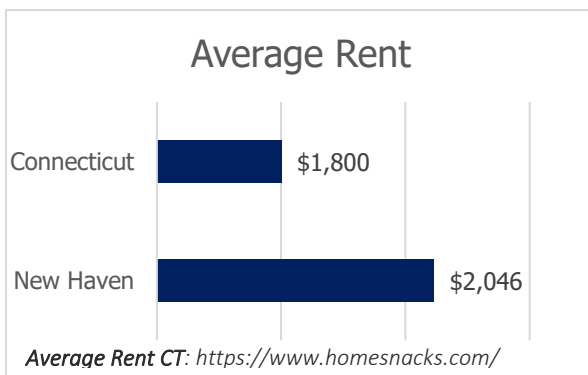
*An individual or family who has an annual income below 30 percent of median family income for the area and does not have sufficient resources or support networks.*

---

Individuals and families experiencing housing instability is a complex problem. It results in a variety of issues including frequent house shifting, trouble paying rent, overcrowding, living with relatives, and homelessness. In addition to being low-income without available resources, individuals, and families, according to the definition, also meet one of the following conditions, as per 24 CFR § 91.5:

1. Has moved 2 or more times in the 60 days immediately preceding the application for homeless prevention assistance because of economic hardship
2. Is living in the home of another because of economic hardship

3. Has been notified in writing that their housing or living situation will be terminated withing 21 days after the date of application for assistance
4. Lives in a hotel or motel without receiving assistance through a program for low-income individuals
5. Lives in a single-room occupancy (SRO) or efficiency with in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room
6. Leaving a publicly funded institution or system of care
7. Lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan



HOME-ARP qualifying populations also include other populations who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI

and are experiencing severe cost burden or have an income less than 50% AMI and meet a certain condition, like living in someone else’s home or living in a hotel due to an economic hardship.

The information brings context to the housing instability throughout the city and county. New Haven is predominantly a renter’s market with very low vacancy rates. This creates an unstable environment for individuals and families with unstable housing situations. There are few options for mobility and exiting homelessness or an unstable environment to housing is limited.

Location	Occupied Housing Units
New Haven	56,373
Connecticut	1,418,069

Location	Vacancy Rate
New Haven	3.10%
Connecticut	7.00%

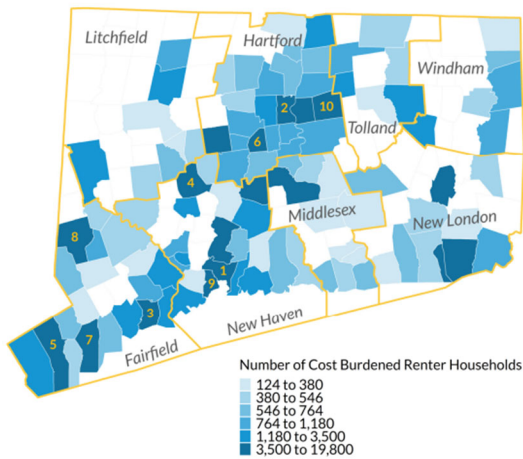
Location	% Renters	% Owners
New Haven	72.00%	28.00%
Connecticut	33.40%	66.60%



The median income in New Haven is \$50,568 which, in comparison to the average rent, results in an unstable environment for renters who may be cost burdened or cannot afford or accommodate a financial crisis.

The Comprehensive Housing Affordability Strategy ("CHAS") data summary level created on January 10, 2023; New Haven County, Connecticut generated from the 2015-2019 ACS is included as Appendix H.

Demographic	Rent	Own	TOTAL	% of Pop
Household Income <= 30% HAMFI	14,085	1,540	15,625	11.66%
Household Income >30% to <=50% HAMFI	6,800	1,810	8,610	6.42%
Household Income >50% to <=80% HAMFI	6,155	2,295	8,450	6.30%
Cost Burden <=30%	15,885	8,200	24,085	17.97%
Cost Burden >30% to <=50%	7,840	2,795	10,635	7.94%
Cost Burden >50%	10,705	2,705	13,410	10.01%



The cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

Type	Mod-Severe Cost Burden	Severely Cost Burdened
Renter	8,727	10,264
Owner	2,668	2,537

## FLEEING OR ATTEMPTING TO FLEE DOMESTIC VIOLENCE OR HUMAN TRAFFICKING

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit.

## OTHER POPULATIONS

OLDER ADULTS				
City/Town	Population 65+	% Population 65+ living in Poverty		
New Haven	16,131	17.40%		
DISABILITY				
City/Town	Elderly	Non-Elderly		
New Haven	6822	11,235		
VETERANS				
City/Town	All Veterans	White	Black or African American	White, Non-Hispanic/Latino
New Haven	2,386	958	1,208	895
CITIZENSHIP				
City/Town	Naturalized	Non-Citizen		
New Haven	8,604	18,607		

The complete workbook of demographic data is included Appendix I.

## UNMET HOUSING AND SERVICE NEEDS OF QUALIFYING POPULATIONS

Many of the needs of the qualifying populations are similar and include the need for a flexible response system, available housing that is affordable, wraparound services, and supportive services or assistance that could prevent homelessness or greater housing instability.

The following reviews the needs of each qualifying population.

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

Survey respondents of New Haven providers indicated the following rank of need within the current delivery system (1 being greatest, ranking to least need):

1. Chronically Homeless
2. Imminent Homeless
3. At-Risk of Homelessness
4. Temporary Housing
5. Housed but Unstable
6. Housed with Subsidy
7. Transitional Housing
8. Permanent Supportive Housing

### HOMELESS POPULATIONS

Unsheltered populations experience a wide range of needs disproportionately impacting their health and wellbeing which include immediate issues such as:

- Exposure to weather, extremes in temperature
- Lack of access to healthcare
- Social isolation
- Inadequate management of pre-existing health conditions
- Unstable basic needs – lack of access to food and hygiene

To address the need of the unsheltered populations, service providers must prioritize rapid response, access, and availability of beds. Long-term needs include ensuring that housing is low barrier, removing as many conditions such as employment, income, criminal record, treatment, or sobriety, as possible. New Haven, in conjunction with Coordinated Access Networks (CAN) has seen success in reducing the number of people experiencing chronic and literal homelessness by prioritizing the most vulnerable households first.

Often even more vulnerable, a subpopulation of the homeless qualified population is those who are chronically homeless. These are usually individuals who lack a fixed, regular, and adequate nighttime residence for extended periods of time. Chronically homeless individuals live in a place not meant for human habitation or living in an emergency shelter over a year, or on at least 4 separate occasions of homelessness in the last 3 years. These individuals typically need affordable housing assistance with long-term support services that are designed to build independent living and tenancy skills and connect people with community-based health care, treatment, and employment services.

The City recognizes the need to expand access to deeply affordable housing, low-barrier housing and rapid rehousing, including supportive services, to serve this population. Any housing option must be flexible, client centered, accessible and combined with wraparound support necessary to help clients remain in permanent, safe housing.

Gaps are reflected in the FY2021 - Performance Measurement Module (Sys PM) included in Appendix J.

## INDIVIDUALS AND FAMILIES AT RISK OF HOMELESSNESS

Individuals and families at risk of homelessness may need housing assistance that could vary from eviction assistance, diversion assistance, or rent and utility assistance in addition to other types of supportive services. Households who need assistance with maintaining or finding housing to prevent homelessness will benefit from services assist individual and families at risk of homelessness include

- Short-term subsidies
- Security deposits and first month's rent
- Case management services
- Landlord/Tenant mediation or education services

No county in Connecticut has a sufficient supply of affordable housing units to meet the needs of their very low-income households. And although the total number of very-low-income households will decline through 2040, the decrease will not be enough to close the current gap. Relatively few housing units are affordable to low-income (31–50 percent of median income) and very low-income (30 percent or less of median income) households. The shortage is particularly acute for very low-income households, which may include people working as childcare workers and cashiers, or people who are unemployed. Since the private housing market rarely can provide housing that is affordable for them, households in the very low-income band often require housing assistance (Housing Connecticut's Future: Meeting the State's Affordable and Accessible Housing Needs).

### FLEEING OR ATTEMPTING TO FLEE DOMESTIC VIOLENCE OR HUMAN TRAFFICKING

The shelter utilization is always full, and in some instances, was over capacity. The pandemic resulted in a rise in shelter needs while simultaneously limiting space available in shelter due to public health and spacing guidelines. Creating better access to short-term shelter and housing as well as increasing the supportive services available could help stabilize this qualifying population.

### RESIDENTS LIVING IN HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS

Residents who have been previously homeless or are currently using some type of rental assistance may need the assistance to continue for a short or long period of time. Funding existing services and housing assistance programs is important to the housing stability of these individuals and families. In addition, the City of New Haven and surrounding region has a lack of quality affordable housing available for residents in need causing cost burdens leading to housing instability. There is also a need to assist residents living in unstable housing situations increase their income, build savings, and acquire assets through additional supportive services in the community. The HOME-ARP Consultation Survey found that fair housing barriers, barriers for persons with disabilities, and language barriers often impact the housing options available to these qualifying populations.

## CURRENT RESOURCES AVAILABLE TO ASSIST QUALIFYING POPULATIONS

The City of New Haven receives an annual allocation of approximately \$6.5 million in federal formula grant Funding, including the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME) Grant, the Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with Aids (HOPWA). New Haven utilizes funding to assist families with obtaining affordable homes, supportive services, rental assistance, emergency shelter and other services. These services can and often benefit qualifying populations. For instance, although the City uses CDBG to fund public services to the greatest extent possible, which can help stabilize individuals and families by providing services like healthcare, childcare, job training, and homeless services, there is a cap of 15% of the total grant amount of CDBG that can be used for public services. The City works with community partners to leverage resources and build up systems to serve residents. Housing and Homeless Services can be accessed through Coordinated Access Networks (CAN), which consist of community providers across the state who work with DMHAS eligible heads of households and individuals experiencing homelessness. Persons are prioritized for housing services based on an assessment to be completed after calling 2-1-1.

## GAPS IN CURRENT SHELTER, HOUSING INVENTORY & SERVICE DELIVERY SYSTEM:

The following information was pulled from survey respondent’s narrative responses:

SYNTHESIS OF TRENDS IN PROVIDER FEEDBACK	
BARRIERS	CHALLENGES
<ul style="list-style-type: none"> <li>- There are far too many homeless individuals seeking housing because of affordable location availability, that adding to the number because of limited supports compounds the issue.</li> <li>- Language</li> <li>- Wait time when contacting 211, feeling disrespected when they finally can speak to someone about their need, feeling deceived when they hear services are available but then realize the services are not accessible to them (too many rules).</li> <li>- Addiction</li> <li>- Mental Health</li> <li>- No Vital Documents</li> <li>- No phone/email</li> <li>- Unsure how to advocate for themselves or begin the process of obtaining an apartment</li> <li>-</li> </ul>	<ul style="list-style-type: none"> <li>- Complications in navigating entitlement system</li> <li>- Rent being too high</li> <li>- Having a criminal record makes it impossible to get an apartment.</li> <li>- Lack of employment.</li> <li>- Not being able to fill out an application.</li> <li>- Not having a computer to complete applications online.</li> <li>- Not having a home address or phone number to add to the application.</li> <li>- background checks, low income, substance use disorder</li> <li>- Inadequate funding levels for rental assistance needed</li> </ul>
GAPS	NEEDS
<ul style="list-style-type: none"> <li>- Intensive services for those with complex mental health/SA issues are not available from most homeless providers.</li> <li>- Coordination of support to address medical and social conditions.</li> <li>- Not enough housing available at an affordable price</li> </ul>	<ul style="list-style-type: none"> <li>- Deeply affordable housing</li> <li>- Long term care continuums for people that suffer from multiple chronic conditions. Multiple levels of care that can be accessed seamlessly could support people with histories of homelessness that suffer from several misunderstood conditions. Uniform guidance and practices from the Department of Social Services on who and how to access resources would be helpful.</li> <li>- Addiction and mental health interventions</li> <li>- Case Workers not overloaded so they can assist clients, hire more case workers who can provide a bit more hand holding.</li> </ul>

## PRIORITY NEEDS FOR QUALIFYING POPULATIONS

HOME-ARP qualifying populations often have many competing needs. In the HOME-ARP Consultation Survey, stakeholders indicated a variety of needs for qualifying populations, including 1) housing, such as shelter, short-term housing, permanent supportive housing, and rental and utility assistance, and 2) supportive services, such as medical care, counseling, substance abuse service, case management, childcare, transportation, legal services, and job training. The needs overlap but also vary amongst these populations, and the following information covers the priority needs for each of the qualified populations.

The focus is long-term to foster resiliency amidst the most vulnerable populations. As a result, New Haven recognizes the need to prioritize the creation and rehabilitation of deeply affordable, low-barrier, accessible rental housing to address the aging and disabled populations.

Families and individuals who are very or extremely low-income require a wide range of services and support to remain stably housed. Responses on system gaps and strategies to address issues consistently identified through these efforts and reinforced with the data in this document included:

1. Increasing the supply of housing available and affordable to our most vulnerable populations
2. Expanding supportive services to help vulnerable populations access housing and remain stably housed

All four of the qualifying populations would benefit from an increased number of affordable housing units and increased affordability in the housing market. High rent, limited availability, and lack of accessibility results in increased instability among cost burdened and low-income renters and those at risk of homelessness. The lack of affordable rental units and permanent supportive housing causes a bottleneck in the availability of safe housing options, creating longer episodes of homelessness and leading to fewer households becoming stably housed overall. The greatest need and area to address homelessness is deeply affordable housing.





**Increase Supply:** The Homeless and Housing Inventory and Gaps Analysis included above shows significant gaps in the supply of affordable housing available to households earning 50% of AMI or below. Even when homeless or at-risk households have access to resources like rental assistance vouchers or emergency rental assistance, many of them are unable to find an available unit in their price range or a landlord willing to accept subsidies or “high-risk” renters. To address this need, New Haven will dedicate a portion of its HOME-ARP funds to producing accessible and affordable housing for eligible populations, particularly extremely low-income and homeless households. These resources will be available to acquire, produce, and preserve housing.

**Expand Services:** Organizations providing supportive services to families and individuals who are homeless or at risk of homelessness are already facing a critical shortage of staff to meet the increasing needs of these vulnerable populations. Without supportive services, many households are unable to sustain housing and landlords are often less likely to serve these populations without these kinds of wrap-around services in place. The City intends to dedicate a portion of HOME-ARP funds to expand supportive services for eligible populations, divert households from homelessness by addressing emergency costs that could result in the loss of housing, and leverage additional federal resources that can sustain this work over the long-term.

---

## Eligible Activities

### METHODOLOGY FOR SOLICITING APPLICATIONS, SELECTING DEVELOPERS, AND/OR SERVICE PROVIDERS

As with HOME funds, HOME-ARP funds will promote public/private partnerships as a vehicle for preserving and expanding the stock of affordable housing. HOME-ARP funds may be leveraged with private and public funding sources to support activities for supportive services, tenant-based rental assistance, and the development of non-congregate shelters. New Haven will continue to support eligible activities through partners, like the Housing Authority and other agencies, to assist very low-income households. The lack of inventory and beds within the delivery system is a constraint in housing and addressing the complex issues across the spectrum of the qualified populations in New Haven.

The City cannot anticipate all available public or private funds but will ensure known or future funds are maximized to leverage the use of any such resources as they become available. HOME-ARP funds will be awarded

to City departments or nonprofit or for-profit organizations, based on the merit of proposals received prior to or during the grant implementation period. For development activities and supportive services, greater preference is given to proposals that have other sources of equity and financing and are in line with New Haven’s priorities. The locations of activities will be determined after subrecipients are selected. The City of New Haven will not release funds from the HOME-ARP allocation to a subrecipient prior to HUD's acceptance of the HOME-ARP allocation. Once the allocation plan has been accepted, the City will execute contracts for those who will be awarded.

Planned use of HOME-ARP funding is summarized below.

USE OF HOME-ARP FUNDING			
	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 502,875		
Acquisition/Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 4,000,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 350,000	7 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 4,852,875</b>		

The budget is an estimate of the expected activities the City will carry out over the life of the HOME-ARP budget period (Sept 30, 2030).

**Supportive Services:** Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service. Supportive services must be necessary to assist program participants obtain and maintain housing including, but not limited to, education, childcare, job training, legal services, housing counseling, mental health, and transportation.

**Acquisition and Development of Non-Congregate Shelter:** A non-congregate shelter (NCS) is one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require

occupants to sign a lease or occupancy agreement. HOME-ARP funds may be used to acquire and develop HOME-ARP NCS for individuals and families in qualifying populations

**Tenant-Based Rental Assistance (TBRA):** HOME-ARP funds may be used to provide tenant-based rental assistance to qualifying households (“HOME-ARP TBRA”). In HOME-ARP TBRA, the PJ assists a qualifying household with payments to cover the entire or insufficient amounts that the qualifying household cannot pay for housing and housing-related costs, such as rental assistance, security deposits, and utility deposits. HOME-ARP TBRA assisted households may choose to rent a unit in a HOME-ARP rental project or any other eligible rental unit. HOME-ARP TBRA is a form of rental assistance that is attached to the household and not a particular rental unit.

**Development of Affordable Rental Housing:** Grant funds may be used to pay development hard costs, the actual cost of reconstructing or rehabilitating housing, related soft costs, and acquisition of real property.

**Non-Profit Operating:** Grant funds, for a selected project, may be used to support the non-profits operations including, but not limited to, salaries, wages, and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment; and materials and supplies.

**Capacity Building Assistance:** Capacity building expenses are defined as reasonable and necessary general operating costs that will result in expansion or improvement of an organization’s ability to successfully carry out eligible HOME-ARP activities.

**Administration:** Generally, funds are available for the City of New Haven’s staff salaries, wages, and related costs to implement the HOME-ARP program.

---

## HOME-ARP Refinancing Guidelines

The City of New Haven does not intend to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

---

## Housing Production Goals

It is anticipated that the HOME-ARP allocation will support the creation of affordable housing units for qualifying populations and leverage as many as affordable housing units as possible with available resources, serving households across the service delivery system. A more detailed overview of the goals will be included as a final appendix attachment based on public comment and community input.

---

## Preferences

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

The City of New Haven intends to give preference for HOME-ARP funded activities to homeless individuals and families as defined in 24 CFR 91.5 (1). This includes individuals or families who lack a fixed, regular, and adequate nighttime residence. Preference will not be given to specific subpopulations.

---

## Conclusion

### Action Items

- Ongoing collaboration with area partners and CAN to identify, develop, and implement projects
- Address root cause of housing instability and homelessness – housing.
- Identify barriers to development at a regional level and foster relationships, leverage funds, and incentivize affordable development of non-congregate shelter

While the City intends to give preference to affordable rental housing development and supportive service projects serving those experiencing homelessness, the City intends to coordinate various funding sources to make a holistic investment across the continuum additional opportunities will be made available during the same funding process. New Haven received ARPA funds which, in part, are addressing needs which align with the Plan. There is a portion of the ARPA allocation which is also available for housing and may be leveraged, in part, with HOME-ARP. The City's HOME and CDBG annual entitlement funds are allocated and will continue to inform community-wide efforts and initiatives for years to come.

DRAFT

## APPENDIX

- A. Consultation – Overview
- B. Organization Survey – Respondent Results
- C. YFCE Feedback Survey
- D. New Haven’s Citizen Participation Plan
- E. Public Notice
- F. HUD 2020 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report
- G. CT 2020 Point-in-Time Count New Haven CoC Summary
- H. Comprehensive Housing Affordability Strategy
- I. Demographic Data
- J. FY2021 - Performance Measurement Module (Sys PM)

## Methodology

In addition to feedback received through surveys and consultation sessions, several data sources and community plans were reviewed to determine the needs, system gaps, and demographics for HOME-ARP qualifying populations.

The data represented throughout the Plan is a compilation of the most recent and publicly available data, including: 2021 Point in Time, the 2015-2019 CHAS and HMIS. This data was primarily utilized to demonstrate housing inventory and demographic data among qualifying populations, where available.

Additionally, data collected from local organizations, service providers and public housing agencies largely informed the identification of gaps in needs, service delivery and possible misrepresentation or undercounting among the above reference data sources. Further consultation with local officials and members of the CoC aided in the identification of unmet needs, primarily in the areas of homelessness and supportive services.

Further needs related to other populations were identified via various reports and case studies including:

- A. HUD 2020 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report
- B. HUD 2021 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report
- C. Housing Connecticut's Future Meeting the State's Affordable and Accessible Housing Needs
- D. Comprehensive Housing Affordability Strategy
- E. Greater New Haven Community Index 2019
- F. Fy2021 - Performance Measurement Module (SYS PM)

## Public Hearing:

In compliance with United States Department of Housing and Urban Development (HUD) regulations, the City of New Haven will be holding one (1) Public Hearing to receive public comments on the draft HOME-ARP Allocation Plan (Plan).

The City of New Haven was allocated \$4,852,875 for eligible activities including:

1. Production or Preservation of Affordable Housing
2. Tenant-Based Rental Assistance (TBRA)
3. Supportive Services, including services defined at 24 CFR 578.53(e), homeless prevention services, and housing counseling.
4. Purchase and Development of Non-Congregate Shelter
5. Administrative and Operating Funding

The Plan is a guide to the City's eligible activities, qualifying populations, preferences, and programs, for meeting local housing needs and goals. The Plan will be made available for public review on February 1, 2023, both online at the City's website [www.newhavenct.gov](http://www.newhavenct.gov) under Government\Budgets & Financing\Federal Reports and in hard copy format at the Community Services Administration Office, 2nd floor, 165 Church Street Monday through Friday from 9:00 A.M. to 5:00 P.M.

Written comments should be addressed to City of New Haven, Community Services Administration Office, 165 Church Street, New Haven, CT 06510, Attention: Velma George, or by email to [vgeorge@newhavenct.gov](mailto:vgeorge@newhavenct.gov).

All written comments must be received prior to 5:00 PM on Friday, March 3, 2023.

The Public Hearing will be open to residents to learn more about the Plan and provide feedback.

Wednesday, February 15, 2023, at 6:00 p.m. in the Aldermanic Chambers, 165 Church Street.

To request reasonable accommodation, including an interpreter, for this meeting or to ask questions, please contact Velma George.

**Email:** [vgeorge@newhavenct.gov](mailto:vgeorge@newhavenct.gov)

**Phone:** 203-946-6033