



City of New York

## HOME-ARP Allocation Plan (*Revised 12/13/23*)

Contact:

Department of Housing Preservation and Development

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## HOME-ARP Allocation Plan Template

### Guidance

- To receive its HOME-ARP allocation, a PJ must:
  - Engage in consultation with at least the required organizations;
  - Provide for public participation including a 15-day public comment period, and one public hearing, at a minimum; and,
  - Develop a plan that meets the requirements in the HOME-ARP Notice.
  
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
  
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications, as an attachment on either the AD-26 or AD-25 screen, as applicable:
  - Affirmatively Further Fair Housing.
  - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
  - Anti-Lobbying;
  - Authority of Jurisdiction;
  - Section 3; and,
  - HOME-ARP specific certification.

**Participating Jurisdiction:** New York City

**Date:** 12/13/2023

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## Introduction

On March 11, 2021, President Biden signed the American Rescue Plan Act of 2021 (P.L. 117-2) (“ARP”) into law, making funds available under Section 3205 of the ARP for the HOME Investment Partnerships Program (HOME) to provide homelessness assistance and supportive services to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses.

HOME-ARP was created to support specific vulnerable populations through five activities:

1. Development through acquisition, rehabilitation, or new construction and support of affordable housing
2. Tenant-based rental assistance (TBRA)
3. Supportive services
4. Acquisition and development of non-congregate shelter (NCS)
5. Nonprofit operating and capacity building

Congress appropriated \$5 billion, which was allocated to participating jurisdictions (PJs) using the HOME allocation formula. In Federal Fiscal Year (FFY) 2021, HUD awarded the City of New York the amount of \$269,831,517 in HOME-ARP funds for proposed activities through September 30, 2030.

In order to receive the funds, the City is required to develop and submit to HUD a HOME-ARP Allocation Plan, which describes how the HOME-ARP funds would be allocated for eligible activities. The following is the City’s HOME-ARP Allocation Plan.

## Consultation

### **Summary of the consultation process:**

To inform the development of its HOME-ARP Allocation Plan, the New York City Department of Housing Preservation and Development (HPD) held consultation meetings with numerous partners and stakeholders serving the needs of HOME-ARP Qualifying Populations (QPs). Those consulted included the NYC Continuum of Care (CoC), other City agencies, and private organizations serving those experiencing homelessness, survivors of domestic and gender-based violence, people with disabilities, veterans, and other vulnerable populations. These consultations gave HPD the opportunity to hear directly from service providers with first-hand knowledge of the needs, service gaps, and potential initiatives that would be beneficial to the QPs.

HPD conducted virtual consultations primarily through Microsoft Teams between January and February 2023. The initial consultation was held with the NYC CoC by participating in their virtual Steering Committee meeting. HPD then held several virtual information sessions for all other stakeholders to solicit their input.

The feedback received is summarized in the table below. HPD staff will continue to engage stakeholders throughout the implementation of proposed HOME-ARP activities to ensure priority needs of QPs are being met.

Table 1. List of organizations consulted, and summary of feedback received from these entities

Agency/Org. Consulted	Qualifying Population(s) Served	Type of Agency/Org	Method of Consultation	Date of Consultation	Feedback
NYC CoC	1. Homeless	CoC	CoC Steering Committee Meeting via Zoom and email follow-up	1/20/23	<ul style="list-style-type: none"> <li>• More funding needed to expand HRA's Homebase eviction prevention program, which serves people at risk of homelessness or in need of housing stabilization services across New York City</li> <li>• Need for dedicated program and funding for community-based voucher access and benefits management</li> </ul>
NYC Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV)	3. Fleeing or attempting to flee DV, dating violence, sexual assault, stalking, or human trafficking	Public agency addressing needs of QPs	Microsoft Teams Meeting and email follow-up	2/2/23	<ul style="list-style-type: none"> <li>• Need for safe and affordable housing a primary concern for survivors of domestic and gender-based violence</li> <li>• Current permanent housing options not sufficient to meet demand for assistance</li> <li>• Currently takes about 3 years or more to place victims of domestic violence in public housing</li> <li>• Single domestic and gender-based violence survivors have the least amount of available housing options</li> </ul>

Agency/Org. Consulted	Qualifying Population(s) Served	Type of Agency/Org	Method of Consultation	Date of Consultation	Feedback
NYC Department of Veterans' Services	1. Homeless 2. At risk of homelessness 4. Other populations	Public agency addressing needs of QPs  Veterans Group	Microsoft Teams Facilitated Discussion	2/10/23	<ul style="list-style-type: none"> <li>• Need for City agencies providing homeless prevention services and housing counseling services to veterans in-house to become HUD-Approved Housing Counseling Agencies</li> <li>• Access to new housing and access to better housing conditions are 2 of the top 3 needs of NYC veterans</li> </ul>
Services for the Underserved, Inc. (SUS)	3. Fleeing or attempting to flee DV, dating violence, sexual assault, stalking, or human trafficking	DV Service Provider  Veterans Group  Private organization that addresses needs of people with disabilities	Microsoft Teams Facilitated Discussion	2/15/23	<ul style="list-style-type: none"> <li>• Need to fund additional staff for service providers to reduce service delivery delays</li> <li>• More funds needed to supplement current programs like HRA's Homepage program</li> <li>• Aftercare, subsidy recertification, arrears assistance needed</li> </ul>
ADAPT Community Network	1. Homeless 2. At risk of homelessness 4. Other populations	Public/Private organization that addresses Fair Housing, Civil Rights, and Needs of Persons with Disabilities	Microsoft Teams Facilitated Discussion	2/17/23	<ul style="list-style-type: none"> <li>• Need for more funding to help people with disabilities secure stable home environments</li> </ul>

Agency/Org. Consulted	Qualifying Population(s) Served	Type of Agency/Org	Method of Consultation	Date of Consultation	Feedback
Supportive Housing Network of New York (SHNNY)	1. Homeless	Homeless Service Provider  Private organization that addresses needs of people with disabilities	Microsoft Teams Facilitated Discussion	2/17/23	<ul style="list-style-type: none"> <li>No specific recommendations given</li> </ul>
Volunteers of America- Greater New York (VOA-GNY)	1. Homeless 2. At risk of homelessness 4. Other populations	Homeless Service Provider	Microsoft Teams Facilitated Discussion	2/17/23	<ul style="list-style-type: none"> <li>No specific recommendations given</li> </ul>
Doe Fund	1. Homeless 2. At risk of homelessness 4. Other populations	Homeless Service Provider	Microsoft Teams Facilitated Discussion and email follow-up	2/17/23	<ul style="list-style-type: none"> <li>Need for rental assistance in existing housing</li> </ul>
Riseboro	1. Homeless 4. Other populations	Homeless Service Provider	Microsoft Teams Facilitated Discussion	2/17/23	<ul style="list-style-type: none"> <li>No specific recommendations given</li> </ul>
Constructive Partnerships Unlimited	1. Homeless 2. At risk of homelessness 4. Other populations	Public/Private organization that addresses Fair Housing, Civil Rights, and Needs of Persons with Disabilities	1:1 meetings/ conversations	2/17/23	<ul style="list-style-type: none"> <li>No specific recommendations given</li> </ul>

Agency/Org. Consulted	Qualifying Population(s) Served	Type of Agency/Org	Method of Consultation	Date of Consultation	Feedback
Worldwide Veterans and Family Services	1. Homeless 2. At risk of homelessness 4. Other populations	Veterans Group	Microsoft Teams Facilitated Discussion	2/17/23	<ul style="list-style-type: none"> <li>• People living independently for the first time, especially post-incarceration, need assistance adjusting, education on safe and sanitary living, mental health follow-ups</li> <li>• Need housing for veterans</li> </ul>
New Destiny Housing	3. Fleeing or attempting to flee DV, dating violence, sexual assault, stalking, or human trafficking	DV Service Provider	Microsoft Teams Facilitated Discussion	2/13/23	<ul style="list-style-type: none"> <li>• Housing navigation and retention services are essential/effective for formerly homeless</li> <li>• DV survivors need better access to supportive housing; definition of chronicity /homelessness has been barrier</li> <li>• Need for harm-reduction trained staff</li> </ul>
Breaking Ground	1. Homeless 4. Other populations	Homeless Service Provider	Microsoft Teams Facilitated Discussion	2/13/23	<ul style="list-style-type: none"> <li>• Financial assistance with arrears needed for gaps that can't be filled w/ERAP</li> <li>• Post-move in, formerly homeless may become isolated, affects rent payments if no retention/stabilization services</li> </ul>
Project Renewal	1. Homeless	Homeless Service Provider	Microsoft Teams Facilitated Discussion	2/10/23	<ul style="list-style-type: none"> <li>• No specific recommendations given</li> </ul>



Agency/Org. Consulted	Qualifying Population(s) Served	Type of Agency/Org	Method of Consultation	Date of Consultation	Feedback
NYS Division of Homes and Community Renewal (HCR)	All	PHA	1:1 meetings/ conversations	2/10/23	<ul style="list-style-type: none"> <li>Plans to focus on building and converting housing for people earning less than 50 percent of AMI, with and without services for residents</li> </ul>
West Side Federation for Senior and Supportive Housing (WSFSSH)	1. Homeless 2. At risk of homelessness 4. Other populations	Homeless Service Provider	Microsoft Teams Facilitated Discussion	2/24/23	<ul style="list-style-type: none"> <li>Need capital to update existing Single Room Occupancy permanent housing for older adults to age in place</li> <li>Need light-touch services, technology training for all formerly homeless entering permanent housing to ensure they can access available benefits</li> </ul>
Neighborhood Initiatives Development Corporation (NIDC)	1. Homeless 2. At risk of homelessness 4. Other populations	Public/Private organization that addresses Fair Housing & Civil Rights; Homeless Service Provider	1:1 meetings /conversations and email follow-up	2/21/23	<ul style="list-style-type: none"> <li>Homeless relapse prevention requires funding for housing navigation and staffing to support housing retention</li> <li>Need staff providing connection to health and social services and education and practice on safety, problem-solving, financial planning</li> </ul>
New York City Housing Authority (NYCHA)	All	PHA	1:1 meetings and additional follow-ups	2/28/2023 to present	<ul style="list-style-type: none"> <li>Public Housing residents desperately need assistance with rent arrears</li> </ul>

## Public Participation

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

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

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

In addition, as part of the City’s allocation plan, the City proposes that the New York City Housing Authority (NYCHA) as a subrecipient will administer a portion of the City’s allocation for financial assistance, specifically supportive services through the payment of rental arrears, to individuals or families occupying public housing owned by NYCHA. The U.S. Department of Housing and Urban Development (HUD) identified that such proposed use of funds poses an organizational conflict of interest under Section VII.H.2 of the HOME-ARP Notice. Pursuant to the HOME-ARP Notice, a HOME-ARP participating jurisdiction may request from HUD an exception to an organizational conflict of interest, provided that the jurisdiction provides, among other things, written disclosure of the nature of the conflict. *See* HOME-ARP Notice, Section VII.H.4. The City made such a request for an exception to HUD, and pursuant to that request made a public disclosure of the potential organizational conflict of interest.

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

- ☐ **Date of Public Notice of proposed HOME-ARP allocation plan:** 3/2/2023
- ☐ **Public comment period:** start date: 3/9/2023; end date: 3/24/2023
- ☐ **Public hearing:** 3/15/2023

As detailed below, the public notices of the proposed HOME-ARP allocation plan were published in four local newspapers and translated from English into Spanish, Russian, and Chinese, as outlined in the City’s Citizen Participation Plan. The notice detailed the start of the public comment period, the date of the public hearing as well as how to access additional translation services. The translated versions of the plan draft were uploaded to the consolidated plan webpage as well. These draft translations also included additional language translations.

In addition, the City disclosed a potential organizational conflict of interest pursuant to a request for an exception that the City submitted to HUD. The conflict was disclosed in a public notice published on November 2, 2023 in four local newspapers and translated from English into ten languages. The public was invited to submit written comments from November 3 through November 9, 2023.

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

The City uses diverse notification methods to inform the public. Over 1,000 notifications were emailed to New York City residents, organizations, and public officials inviting comments during the public review period for the HOME-ARP Allocation Plan.

In addition, notices regarding the public hearing on the proposed allocation plan were published in four local newspapers: an English-, a Spanish-, Russian-, and a Chinese-language daily, each with citywide circulation.

Furthermore, the notice of the proposed allocation plan was posted on the Mayor's Office of Operations and NYC Department of Housing Preservation and Development websites. A PDF version of the HOME-ARP Allocation Plan is posted on the Mayor's Office of Operations website for public review and download. The plan is also available to review as translated into ten languages; Arabic, Bengali, Chinese Simplified, Chinese Traditional, French, Haitian-Creole, Korean, Polish, Russian, Spanish, and Urdu.

The City of New York provides a dedicated webpage that allows New York City residents to provide comments. Publication of amended, proposed, and approved plans are posted on the consolidated plan webpage and are available for download.

***Summarize the comments and recommendations received through the public participation process:***

The City did not receive any public comments or recommendations.

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

The City did not receive any public comments or recommendations.

**THE CITY OF NEW YORK**  
**THE MAYOR'S OFFICE OF OPERATIONS, the NYC DEPARTMENT of HOUSING PRESERVATION & DEVELOPMENT and NYC DEPARTMENT OF CITY PLANNING**  
**NOTICE of a PUBLIC HEARING and COMMENT PERIOD on the HOME-ARP Allocation Plan**

TO ALL INTERESTED AGENCIES, COMMUNITY BOARDS, GROUPS, AND PERSONS:

On March 11, 2021, President Biden signed the American Rescue Plan Act of 2021 (P.L. 117-2) ("ARP") into law, for funds appropriated under section 3205 for the HOME Investment Partnerships Program (HOME) to provide homelessness assistance and supportive services which provides relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses.

The Mayor's Office of Operations and NYC Department of Housing Preservation and Development (HPD) are responsible for implementing the HOME-ARP Allocation Plan and have scheduled:

- A 15-day Public Comment Period on the HOME-ARP Allocation Plan from **Thursday, March 9th, 2023 – Friday, March 24th, 2023.**

The public is encouraged to submit written comments to the Department of Housing Preservation and Development HOME ARP Team at [homearp@hpd.nyc.gov](mailto:homearp@hpd.nyc.gov).

- A Public Hearing on **Wednesday, March 15th from 6:00-7:00pm** for the HOME-ARP Allocation Plan.

**The hearing will be held at the following address:**

NYC City Planning Commission Hearing Room  
Lower Concourse, 120 Broadway, Manhattan

**You may also attend the hearing virtually, at the following address:**

Webinar ID: 812 5269 1068

ZOOM link for Public participation:

<https://us06web.zoom.us/j/81252691068?pwd=TKZLeU1MY2d5eUpqeTJ5WUJTRHIVUT09>

The Public Hearing has been scheduled to obtain comments on the HOME-ARP Allocation Plan and on the City's use of federal funds to address the continued impact of the COVID-19 pandemic, and the development of proposed activities. To access this plan, please visit our page at: <https://www.nyc.gov/site/operations/projects/consolidated-plan.page>. All comments and recommendations received shall be reviewed and taken into consideration during the planning process. A summary of the comments and the City's responses will be submitted to HUD for approval in the final HOME-ARP Allocation Plan.

In Federal Fiscal Year (FFY) 2021, the City received from HUD \$269,831,517 in HOME-ARP funds. The City is proposing to allocate these funds in the following purposes through September 30, 2030:

- Rental Housing
- Tenant Based Rental Assistance
- Acquisition of a Non-congregate Shelter
- Social Services
- Administration and Planning

Please inform NYC Department of City Planning if you need a reasonable accommodation, such as but not limited to, sign language interpretation, to participate in the public hearing. Foreign language interpretation will be provided based on available resources. Please email requests to [accessibilityinfo@planning.nyc.gov](mailto:accessibilityinfo@planning.nyc.gov) or call 212-720-3508 at least five business days before the hearing or to the Consolidated Plan email, [conplannyc@cityhall.nyc.gov](mailto:conplannyc@cityhall.nyc.gov).

The public is encouraged to submit written comments to The Department of Housing Preservation and Development HOME ARP Team at [homearp@hpd.nyc.gov](mailto:homearp@hpd.nyc.gov).

To learn more about NYC Department of Housing Preservation and Development please visit us at <http://www.nyc.gov/hpd>.

The City of New York: Eric Adams, Mayor

Dan Steinberg, Director, Mayor's Office of Operations

Adolfo Carrión, Commissioner, NYC Department of Housing Preservation and Development

Date: February 23rd, 2023

**THE CITY OF NEW YORK  
THE MAYOR'S OFFICE OF OPERATIONS,  
NYC DEPARTMENT of HOUSING PRESERVATION & DEVELOPMENT  
NOTICE of a COMMENT PERIOD on the  
Conflict of Interest Public Disclosure**

**TO ALL INTERESTED AGENCIES, COMMUNITY BOARDS, GROUPS, AND PERSONS:**

On March 11, 2021, President Biden signed the American Rescue Plan Act of 2021 (P.L. 117-2) ("ARP") into law. ARP provided, under section 3205 for the HOME Investment Partnerships Program (HOME), for homelessness assistance and supportive services to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses. Congress appropriated \$5 billion, which was allocated to participating jurisdictions using the HOME allocation formula. In Federal Fiscal Year 2021, HUD awarded the City of New York the amount of \$269,831,517 in HOME-ARP funds for proposed activities through September 30, 2030.

In order to receive the allocated funds, the City is required to develop and submit to HUD a HOME-ARP Allocation Plan, which describes how the HOME-ARP funds would be used for eligible activities.

As part of the City of New York's Allocation Plan to receive its allocation of HOME-ARP funds, the City proposes that the New York City Housing Authority (NYCHA) as a subrecipient will use a portion of the City's roughly \$270 million allocation to administer financial assistance, specifically supportive services through the payment of rental arrears, to individuals or families occupying public housing owned by NYCHA. The U.S. Department of Housing and Urban Development (HUD) has identified that such proposed use of funds poses an organizational conflict of interest under Section VII.H.2 of the HOME-ARP Notice, which specifies that a subrecipient may not administer financial assistance, including rental payments, with respect to individuals or families occupying housing owned by the subrecipient, nor may it condition supportive services on an individual's or family's occupancy of a housing unit owned by the subrecipient. See CPD-21-10: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, issued September 13, 2021 (the "HOME-ARP Notice"), Section VII.H.2.

HUD guidance provides that Public Housing Authorities ("PHAs") may not forgive or reduce rental arrears with public housing operating or capital funds, which by regulation are not calculated to make up for arrears or shortfalls in rent. HUD instead encourages PHAs to partner with localities and other partners to aid families in need of assistance. In keeping with such guidance, NYCHA and the City have sought HOME-ARP assistance in order to provide rental arrears relief to eligible families. The payments administered by NYCHA under HOME-ARP will reduce families' past due rent by the amount of the payment, and will therefore provide needed relief to NYCHA's families in arrears. However, any such assistance to reduce families' past due rent will also be funds that NYCHA directs to itself because NYCHA is the housing provider to whom such past rent is due. Because this provision of HOME-ARP assistance involves NYCHA administering payments to itself to reduce the amounts due from NYCHA's public housing tenants, HUD has identified that it is the type of assistance that is prohibited under Section VII.H.2, absent an exception granted by HUD.

Pursuant to the HOME-ARP Notice, a HOME-ARP participating jurisdiction may request from HUD an exception to an organizational conflict of interest, provided that the jurisdiction provides, among other things, written disclosure of the nature of the conflict. See HOME-ARP Notice, Section VII.H.4. The City intends to make such a request for an exception to HUD, and pursuant to that request is making this public disclosure.

The public is invited to comment upon the potential conflict of interest posed by NYCHA administering supportive services through the payment of rental arrears to individuals or families occupying public housing owned by NYCHA. Persons wishing to respond are asked to submit their written comments to the Department of Housing Preservation and Development HOME ARP Team at [homearp@hpd.nyc.gov](mailto:homearp@hpd.nyc.gov).

The **5-business day** Public Comment Period on the Conflict of Interest Public Disclosure is scheduled from **November 3<sup>rd</sup>, 2023 – November 9<sup>th</sup>, 2023**.

To learn more about NYC Department of Housing Preservation and Development please visit us at <http://www.nyc.gov/hpd>.

The City of New York: Eric Adams, Mayor  
Dan Steinberg, Director, Mayor's Office of Operations  
Adolfo Carrión, Commissioner, NYC Department of Housing Preservation and Development

Date: November 2<sup>nd</sup>, 2023

## Needs Assessment and Gaps Analysis

Table 2. Housing Needs Inventory and Gap Analysis

Homeless									
	Current Inventory			Homeless Population				Gap Analysis	
	Family	Adults Only	Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family	Adults Only
	# of Beds	# of Beds	# of Beds					# of Beds	# of Beds
Emergency Shelter	31,138	31,786	160						
Transitional Housing	332	2,588	179						
Permanent Supportive Housing	7,711	27,854	4,996						
Other Permanent Housing	555	95	0						
Sheltered Homeless				29,532	28,798	474	4,845		
Unsheltered Homeless				0	3,452	8	0		
<b>Current Gap or Surplus</b>								1,606	-464

**Data Sources:** [2022 NYC Point in Time Count \(PIT\)](#); [2022 Continuum of Care Housing Inventory Count \(HIC\)](#)

As demonstrated by the Housing Needs Inventory and Gap Analysis shown in Table 2, there is a need for additional emergency shelter beds for adults. Every year, hundreds of New York City residents are displaced from their homes due to fires, illegal occupancy, and other hazardous conditions. There is currently a deficit of about 464 adult beds in the City's emergency shelter system for residents displaced by fires and City-issued vacate orders.

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

**QP1: Homeless**

Table 3 below shows the size and demographic composition of New York City's homeless population as of 2022. As the data shows, New Yorkers of color and particularly Black and Hispanic residents are disproportionately impacted by the housing and homelessness crisis.

**Table 3. Demographics of NYC Homeless Population (2022)**

<b>New York City Homeless Population (sheltered &amp; unsheltered)</b>	<b>Homeless Persons</b>	<b>Share Homeless Persons</b>
<b>Total</b>	<b>61,840</b>	<b>100%</b>
<b>Race</b>		
Black or African American	45,686	74%
White	10,696	17%
Asian	746	1%
American Indian/Alaska Native	419	1%
Native Hawaiian/other Pacific Islander	957	2%
Multiple Races	3,336	5%
<b>Ethnicity</b>		
Hispanic / Latino	23,415	38%
Non-Hispanic / Non- Latino	38,425	62%
<b>Gender</b>		
Female	26,715	43%
Male	34,657	56%
Transgender	421	1%
Gender Non-Conforming	44	<1%
Questioning	3	<1%
<b>Subpopulations</b>		
Severely Mentally Ill	9,980	16%
Chronic Substance Abuse	4,576	7%
Veterans	482	1%
HIV/AIDS	2,896	5%
Victims of Domestic Violence	4,845	8%
Unaccompanied Youth	2,094	3%
Parenting Youth	1,500	2%



Children of Parenting Youth	1,669	3%	<b>Data Source:</b>
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[2022 NYC Point in Time Count \(PIT\)](#)

QP2: At Risk of Homelessness

In addition to the homeless population, there are thousands of New Yorkers who are at risk of homelessness. As defined by HUD, these are households who have an income below 30 percent of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, and meet one or more criteria indicating they do not have stable housing, such as households who have moved at least twice during the last 60 days for economic reasons, have been notified that their current housing will be terminated, or “otherwise live[] in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved consolidated plan.”

New York City’s current (2021-2025) approved consolidated plan identifies housing characteristics that have been linked with instability and an increased risk of homelessness as including threat of eviction, not holding a lease, very low income and very high rent burdens, substandard housing, frequent moves in the past year, or recent episodes of homelessness. Comprehensive demographic data is not available for all households in the qualifying population of at risk of homelessness and is notably lacking for households that are facing the threat of eviction, not holding a lease, have had frequent moves in the last year or recent episodes of homelessness. However, American Community Survey (ACS) data provide insight into households with very low income and very high rent burdens, and those living in substandard housing, both of which are housing characteristics linked with instability and an increased risk of homelessness. This ACS data identifies characteristics of households at or below 30 percent of AMI or between 30 and 50 percent of AMI who are experiencing severe housing problems, which include lack of complete kitchen facilities, lack of complete plumbing facilities, severe overcrowding (more than 1.5 persons per room), and a rent burden over 50 percent. Lack of complete kitchen and plumbing facilities and overcrowding are associated with substandard housing, and rent burden over 50 percent is approximate to very high rent burdens.

Table 4. Demographics and Severe Housing Problems of Households Earning 0-50% AMI

New York City Renter Households	0%-30% AMI Households	30%-50% AMI Households	0-30% AMI Households with 1 or more severe housing problems	30-50% AMI Households with 1 or more severe housing problems
<b>Total</b>	<b>675,691</b>	<b>334,894</b>	<b>512,210</b>	<b>135,460</b>
<b>Race/Ethnicity</b>				
<b>Black or African American</b>	173,349	81,847	130,601	27,684
<b>White</b>	132,672	67,804	107,375	39,104
<b>Asian</b>	69,740	34,266	54,598	17,287
<b>American Indian/Alaska Native</b>	607	558	607	558

<b>Pacific Islander</b>	379	0	379	0
<b>Hispanic</b>	271,831	137,468	194,428	45,157
<b>Multi-racial/ Another race, non-Hispanic</b>	27,370	12,951	24,222	5,670

**Data Source:** 2021 American Community Survey (ACS) 1-Year Estimates, Public Use Microdata Sample (PUMS)

As shown in Table 4, there are 512,210 renter households in New York City who are at or below 30 percent of AMI and experiencing one or more severe housing problems. There are an additional 135,460 renter households making between 30 percent and 50 percent of AMI who are experiencing one or more severe housing problems.

As shown in Table 5 below, very high rent burden is one of the most prevalent severe housing problems affecting households earning equal to or less than 30 percent of AMI. Of all New York City renters, 53.4 percent have a rent burden greater than 30 percent, and 29.1 percent pay more than 50 percent of gross income for rent. Extremely low-income households earning equal to or less than 30 percent of AMI are most severely impacted by this problem: among these households, 82.4 percent are experiencing rent burden greater than 30 percent, and 66.7 percent are experiencing severe rent burden greater than 50 percent. Rent burdens are experienced relatively similarly across the major racial and ethnic groups.

0 – 30% of Area Median Income: At this income level, 75.8 percent of renter households experience one or more severe housing problems. Such problems are experienced at similar rates across major racial and ethnic groups.

30 – 50% of Area Median Income: At this income level, Whites and Asians also experience a disproportionate incidence of any severe housing problem at 57.6 percent and 50.4 percent, respectively, compared to the overall rate of 40.4 percent.

Table 5. Rent Burden

<b>Income Level</b>	<b>Total Households</b>	<b>Households with Rent Burden 30%-50%</b>	<b>Share of Rent Burden 30%-50%</b>	<b>Households with Severe Rent Burden &gt;50%</b>	<b>Share of Severe Rent Burden &gt;50%</b>	<b>Total Rent Burden</b>	<b>Total %</b>
0-30% AMI	675,691	105,738	15.6%	450,946	66.7%	556,684	82.4%
30-50% AMI	334,894	150,313	44.9%	116,473	34.8%	266,786	79.7%

**Data Source:** 2021 American Community Survey (ACS) 1-Year Estimates, Public Use Microdata Sample (PUMS)

### QP3: Fleeing or attempting to flee domestic violence or human trafficking

There is well-documented national and local evidence of the intersection between gender-based violence, housing instability, and homelessness. Interpersonal violence is the leading cause of homelessness for women and children, and the need for safe and affordable housing is a primary concern for survivors of

domestic and gender-based violence. In New York City, survivors who enter a domestic violence shelter often cannot find stable housing within the state-mandated time-limited length of stay (180 days) and are discharged to the DHS shelter system, causing more disruption and instability before being able to transition back into permanent housing.

As of March 2023, there are over 4,400 applicants on the Public Housing Waiting list who identified themselves as a victim of domestic violence under the Violence Against Women Act (VAWA). There are also over 1,900 approved transfers for existing public housing households who are victims of domestic violence, dating violence, sexual assault, and stalking under VAWA.

In 2021, the Human Trafficking Hotline received 1,662 signals in New York State about human trafficking, of which 671 were from victims or survivors of human trafficking. Data specific to New York City is unavailable.

Table 6. HRA Domestic Violence Shelter Census

Household Type	Count
Single Adults	114
Adults in Families	1,494
Children in Families	2,346
Total	3,954

**Data Source:** [Local Law 37 HRA- Report – Open Data](#), as of December 2022

#### QP4: Other Populations

New York City is home to a diverse population with a range of needs when it comes to housing stability. In addition to the qualifying populations covered above, there are other populations for whom providing supportive services or assistance would prevent the family's homelessness or would serve those at the greatest risk of housing instability. While comprehensive data on the needs of all households in the qualifying population of other populations (QP4) is not available, the City has leveraged those data sources that are available to assess the needs of various groups that fall under QP4.

#### Households at Greatest Risk of Housing Instability

The qualifying population of "other populations" includes households at greatest risk of housing instability that do not qualify under any of the other three HOME-ARP qualifying populations, earn less than or equal to 50 percent of AMI, and meet one of several criteria listed in the regulatory definition "at risk of homelessness," including being "notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days" or "otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, *as identified in the recipient's approved consolidated plan*" (emphasis added). As discussed, New York City's approved consolidated plan identifies several housing characteristics as being linked with instability and an increased risk of homelessness, including but not limited to threat of eviction, very low income and very high rent burdens.

Data from the New York City Housing Authority (NYCHA) indicate that tens of thousands of households living in NYCHA housing fall under the qualifying population of at greatest risk of housing instability due to mounting pandemic-related rental arrears that overwhelmingly surpass the households' ability to pay, explicit de-prioritization of public housing residents in New York's Emergency Rental Assistance Program (ERAP), the end of the State's pandemic eviction moratorium, the inability under federal policy for Public Housing Agencies (PHAs) to forgive rental arrears, an increasing threat of eviction due to the public housing funding model's reliance on rent collection, and unique barriers to accessing other assisted housing should a public housing household be evicted.<sup>1</sup> Therefore, while there is an unmet need among renters citywide for the assisted housing NYCHA provides, a substantial portion of households in the qualifying population of greatest risk of housing instability currently reside in NYCHA public housing. These households earn no more than 50 percent of AMI and live in housing that has characteristics associated with instability and an increased risk of homelessness, including being extremely or very low income, having an overwhelming combined burden of rent and outstanding rental arrears, experiencing threat of eviction from public housing due to unpaid rental arrears associated with the COVID-19 pandemic, and facing unique barriers to obtaining future federally assisted housing should the household be evicted from public housing or still owe a debt to a PHA. As explained below, the federal regulatory model for PHAs requires that PHAs rely on tenant rents to fund operations, and NYCHA depends on rents for approximately 30 percent of its operating budget. Moreover, NYCHA is prohibited by federal policy from forgiving any past due rent. With growing rental arrears stemming from the pandemic contributing to a mounting operating deficit, NYCHA has had to begin significantly increasing the number of eviction actions it brings against households who are unable to pay their arrears. The undeniable hardship of eviction is especially compounded for public housing residents, who by virtue of being evicted from public housing or still owing a debt to a PHA would face unique and significant additional barriers to obtaining subsequent federally assisted housing. The reliance of a PHA on rental revenue for its operating budget, the inability under federal policy for a PHA to forgive rent, and the specific housing barriers placed on individuals who have been evicted from public housing or continue to owe a debt to a PHA combine to ensure that a public housing unit occupied by an extremely or very low income household facing threat of eviction due to a severe and overwhelming combined burden of rent and outstanding rental arrears is a housing unit that has characteristics associated with instability and an increased risk of homelessness.

Approximately 70,000 NYCHA households have rental arrears and are now facing the threat of eviction as a result. NYCHA households are some of the lowest-income households in the city, with an average gross income of only \$25,239. Approximately 95 percent of residents served by NYCHA are people of color. Seventy-nine percent of NYCHA households in arrears have an income not exceeding 50 percent of AMI, and the average household income among this group is just \$20,842. Public housing households in arrears with an income not exceeding 50 percent of AMI owe an average of \$5,637 in rental arrears per household. In comparison, the average monthly rent for these households is \$519, meaning that the average arrears owed is nearly eleven times greater than the average monthly rent. The average family in

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<sup>1</sup> The City and NYCHA continue to assert that, due to the same pandemic-related rental arrears and related barriers discussed in this section, many NYCHA residents who have incomes at or below 30 percent of AMI, lack sufficient resources or support networks to prevent them from moving to a shelter, and have either been notified that their right to occupy their housing will be terminated or otherwise live in housing that has characteristics associated with instability and increased risk of homelessness meet the definition for the qualifying population of "at risk of homelessness" (QP2).

arrears with an income not exceeding 50% AMI therefore effectively owes nearly a year's worth of rent each month—the current month's rent plus an amount of arrears that is eleven times greater than the current month's rent. Twenty-seven percent of the households in arrears are senior heads of household, and the majority of these seniors in arrears live alone. Forty-five percent of the households in arrears are working, approximately half of which have children under 18 years old. Thirty-six percent of households in arrears whose income does not exceed 50 percent of AMI are on a fixed income. Approximately 27 percent of households in arrears whose income does not exceed 50 percent of AMI live in the Bronx, 31 percent in Brooklyn, 29 percent in Manhattan, and 12 percent in Queens and Staten Island.

NYCHA's resident population includes individuals who are veterans, including at least 239 veteran households who previously experienced homelessness. In addition, as of November 2023 there were 504 residents who reported receiving income from V.A. benefits or military wages. NYCHA's population also includes individuals who are victims of domestic violence, dating violence, sexual assault or stalking; NYCHA gives priority to victims of domestic violence in admissions under its Tenant Selection and Assignment Plan. NYCHA's Emergency Transfer Program and Plan—developed based on guidance from HUD—also allows such existing residents to apply for an emergency transfer of apartments. Additionally, NYCHA provides such residents with information about resources and hotlines that provide guidance and assistance to victims of domestic violence.

NYCHA residents can submit an Interim Recertification when they lose income. During the pandemic, between March 2020 and December 2022, NYCHA residents submitted more than 70,000 interim recertification requests. However, the unique circumstances of the pandemic—including increased expenses—nonetheless exacerbated the rental arrears crisis for many NYCHA residents. The pandemic significantly impacted New York City's economy, with the effect felt particularly strongly by low-income New Yorkers. More than half (57%) of low-wage workers in New York City lost employment income during the height of the pandemic. Many public housing households nationwide and in New York City also experienced increased expenses during and in the wake of the pandemic, such as increased medical expenses, expenses related to cleaning supplies, expenses related to childcare or caring for family members, expenses related to remote learning, and expenses for other safety and precautionary measures. In addition, surveys indicate that a relatively high proportion of NYCHA residents were essential workers, putting them at greater risk of COVID-19 exposure because they were unable to shelter in place. Periods of high inflation during the pandemic further inflated expenses, exacerbating the financial hardships many were already experiencing. Increased expenses pose a particular problem for very low-income residents, for whom basic expenses consume a higher proportion of total income than they do for higher-income households. Households on fixed incomes, which again represent 36 percent of NYCHA residents in arrears with incomes less than 50 percent of AMI, also face particular difficulties in the face of rising expenses against unchanging monthly incomes. Faced with persistently increasing expenses, the imposition of an eviction moratorium and the prospect of government assistance for rental arrears may have led to some confusion among residents about whether they should pay rent for certain months.

Despite the increased costs from the pandemic faced by many low-income public housing residents, when New York State ultimately designed its rental arrears assistance program, it explicitly deprioritized public housing residents. With only limited funds available for the State program, none of the 30,000 NYCHA households who applied for New York's emergency rental assistance program initially received any assistance. A recent State budget allocation to the rental assistance program provides assistance to cover a portion of some NYCHA residents' arrears debt, but not enough to address the full extent of the arrears

crisis for tens of thousands of NYCHA residents, for whom more assistance is sorely needed. ERAP funding is only projected to cover 30 percent of the outstanding arrears.

In all, rental arrears among NYCHA residents have increased four-fold since March 2020, from approximately \$127 million to just over \$533 million by the end of October 2023. NYCHA was established to provide housing to low- and moderate-income New Yorkers; pursuing eviction against families for nonpayment of rent runs counter to its mission. However, the federal regulatory model for PHAs—including notably the funding formula—requires that PHAs rely on rent payments by households to fund operations and does not make up for any shortfalls in rent collections. Households' rent payments typically account for approximately 30 percent of NYCHA's operating budget. NYCHA is also prohibited by federal policy from forgiving any amount of unpaid rent. With growing rental arrears contributing to a mounting operating deficit, NYCHA has no choice but to pursue evictions to address its budget shortfall, and it will continue to significantly increase its enforcement actions. Since New York's eviction moratorium ended in January 2022, NYCHA has initiated legal action against more than three thousand households, and the pace at which NYCHA commences nonpayment proceedings is steadily accelerating.

As mentioned above, the undeniable hardship of eviction is especially compounded for public housing residents, who would face additional barriers to obtaining subsequent federally assisted housing due to owing a continued debt to a PHA and having a record of eviction from a PHA. Federal regulations establish debts owed to a PHA as grounds for denial of admission to federally assisted housing, and each of the New York City-based PHAs indeed treat debts owed to a PHA as a mandatory bar to admissions. As a result, for as long as evicted public housing households are unable to pay off their arrears debt, they will struggle to be readmitted to other federally assisted housing. Even if they are able to pay off their debts, the mere fact of an eviction from public housing serves as an additional barrier to admission into federally assisted housing for years, possibly even decades (see 24 CFR 982.552(c)(1)(ii), (iii)). In addition, if evicted, many public housing residents may particularly struggle to find affordable housing in their same neighborhood, resulting in further displacement. A 2019 report by the New York University Furman Center found that 58.8 percent of NYCHA developments were located in gentrifying neighborhoods, meaning neighborhoods that were low-income in 1990 and experienced above-median rent growth between 1990 and 2014, and 27.1 percent of NYCHA developments were in higher-income neighborhoods.<sup>2</sup> Therefore, for extremely low-income households, an eviction from public housing would limit future housing options in a city that already has a severe shortage of affordable housing, putting these residents at a particular risk of homelessness without the safety net federally assisted affordable housing provides.

For the reasons above, many NYCHA households in arrears that have an annual income less than or equal to 50 percent of AMI fall under QP4 as those at greatest risk of housing instability, due to being extremely or very low income, having a severe and overwhelming combined burden of rent and outstanding rental arrears, and facing the threat of eviction, which, as mentioned above, are housing characteristics linked with instability and an increased risk of homelessness. These housing characteristics were and are compounded by the explicit de-prioritization of public housing residents in New York's Emergency Rental Assistance Program (ERAP), the end of the State's pandemic eviction moratorium, the inability under federal policy for a PHA to forgive rental arrears, an increasing threat of eviction due to the public housing funding model's reliance on rental revenue, and barriers to accessing other assisted housing should a

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<sup>2</sup> NYU Furman Center, *How NYCHA Preserves Diversity in New York's Changing Neighborhoods*, p. 3 (April 2019), [https://furmancenter.org/files/NYCHA\\_Diversity\\_Brief\\_Final-04-30-2019.pdf](https://furmancenter.org/files/NYCHA_Diversity_Brief_Final-04-30-2019.pdf)

public housing household be evicted. In sum, the reliance of a PHA on rental revenue for its operating budget, the inability for a PHA to forgive rent, and the additional housing barriers placed on individuals who have been evicted from public housing or who continue to owe a debt to a PHA combine to ensure that a public housing unit occupied by an extremely or very low income household facing threat of eviction due to a severe and overwhelming combined burden of rent and outstanding rental arrears is a housing unit that has characteristics associated with instability and an increased risk of homelessness.

In addition to threat of eviction and having a very low income and very high rent burden, New York City's approved consolidated plan further identifies substandard housing, frequent moves in the last year, and recent episodes of homelessness as other housing characteristics that may be linked with instability and an increased risk of homelessness. Table 4 shows the prevalence of severe housing problems, which in addition to having a rent burden greater than 50 percent include lack of complete kitchen and plumbing facilities and substandard housing—issues that are associated with the characteristics listed above. As reflected in Table 4, of the 1,010,585 households citywide earning up to 50 percent of AMI, 647,670 (or 64 percent) are experiencing one or more severe housing problems.<sup>3</sup>

Further, households earning less than or equal to 30 percent of AMI and paying more than 50 percent of monthly household income toward housing costs also fall under QP4 as at greatest risk of housing instability. As shown in Table 5, there are 675,691 households citywide earning 30 percent AMI or less. Of these households, 450,946 (or 66.7 percent) have a severe rent burden of more than 50 percent.

## Veterans

Veterans and families that include a veteran family member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance under QP4. Veterans are unfortunately not immune to the problem of housing instability that plagues many New York City residents. Despite their service to their country, many veterans struggle to find affordable and stable housing in a city with high housing costs. This can lead to a range of negative outcomes, including homelessness and housing insecurity. Some veterans may also struggle with mental health issues, substance abuse, or other challenges that can make it even harder to maintain stable housing. Addressing the issue of veteran homelessness and housing instability in New York City requires a multifaceted approach, including efforts to increase the availability of affordable housing, improve access to healthcare and supportive services, and provide targeted assistance to veterans in need.

Table 7. NYC CoC Veterans Shelter Status

CoC Name	Homeless Veterans, 2022	Emergency Shelters Homeless Veterans, 2022	Transitional Housing Homeless Veterans, 2022	Safe Haven Homeless Veterans, 2022	Sheltered Total Homeless Veterans, 2022	Unsheltered Homeless Veterans, 2022
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<sup>3</sup> Figures presented here represent all households with an income up to 50 percent of AMI. However, many households earning equal to or less than 30 percent of AMI that live in housing with characteristics that have been linked with instability and an increased risk of homelessness may meet the definition for at risk of homelessness (QP2) and therefore would not fall under the qualifying population of other households at greatest risk of housing instability (QP4).

New York City CoC	482	328	107	39	474	8
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**Data Source:** HUD User Point in Time Data Estimates of Homelessness: 2011-2022 PIT Veterans Counts by CoC

### **Medically Vulnerable Individuals Exiting Healthcare Facilities**

Households that are earning less than or equal to 50 percent of AMI and exiting a publicly funded institution or system of care, such as a health-care facility, a mental health facility, foster care or youth facility, or correction program or institution, fall under the QP4 population of at greatest risk of housing instability. In New York City, this includes thousands of very low-income, medically vulnerable individuals who are experiencing homelessness, become temporarily housed in a healthcare facility due to the need for in-patient healthcare, and are then discharged from the care facility without stable housing to return to, often resulting in an exit to shelter.

While precise data on this qualifying subpopulation is not available, data from NYC Health + Hospitals (H+H) is the best available source. H+H is the nation's largest public hospital system, providing care to 1.3 million New Yorkers each year. It is the primary health care provider to New Yorkers experiencing homelessness, who have a high prevalence of chronic health conditions and increased risk of acute care utilization. The link between housing stability and health outcomes is clear, especially for individuals who are medically vulnerable due to frequent inpatient admissions, diagnoses of chronic diseases, and/or dependence of activities of daily living. H+H patients experiencing homelessness are more likely to have an inpatient visit and stay three times longer across their admissions. H+H patients experiencing homelessness also visit the Emergency Department (ED) three times more often than non-homeless patients.

H+H shares nearly 30,000 mutual clients with the NYC Department of Homeless Services (DHS) and understands the vital importance of housing to a person's health outcomes. Upon review of H+H's 2022 population health data, 7.5 percent (2,256) of mutual H+H/DHS patients are medically vulnerable with frequent inpatient admissions, diagnoses of heart failure, end stage renal disease, liver cirrhosis, lung disease with oxygen dependence, metastatic cancer, and/or dependence for activities of daily living. This is an unmet need in the NYC supportive housing continuum as we do not take into consideration medical need when supporting those who are homeless, instead the primary focus is housing those with serious mental illness and/or substance abuse disorder. Those who do not meet this threshold of eligibility have few options to access supportive housing to meet their needs.

### ***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:***

The City's multiple housing and homeless agencies, which include the Department of Housing Preservation and Development, the Department of Homeless Services (DHS), the Human Resources Administration (HRA), and the New York City Housing Authority (NYCHA), have the shared responsibility of providing access to affordable, permanent, stable housing for all New Yorkers. The following table outlines key programs currently offered by the City to assist HOME-ARP qualifying populations.



Table 8. Services

Service	Program Description
<b>Homeless Shelter System</b>	DHS provides temporary transitional housing to all New Yorkers verifiably experiencing homelessness, including families with children and single adults.
<b>Emergency Shelters</b>	HPD's Emergency Housing Services (EHS) unit provides emergency relocation services and rehousing assistance to households who have been displaced from their homes as a result of fires or city-issued vacate orders. Displaced households are placed in family centers and single-room-occupancy hotels in Manhattan, Bronx, Brooklyn, and Queens.
<b>Project No Violence Again (NoVA)</b>	Through Project NoVA, DHS addresses the needs of domestic violence survivors seeking temporary emergency shelter in the City of New York. NoVA social workers stationed at in-take centers and in several DHS shelters provide confidential services including individual and group counseling, advocacy, referrals, and information to clients affected by domestic violence.
<b>Homebase</b>	HRA's Homebase program provides New Yorkers experiencing housing instability in the community with various homeless prevention services and aftercare services to families and individuals exiting NYC DHS shelter to permanent housing.
<b>City Family Homelessness and Eviction Prevention Supplement (CityFHEPS) Rental Assistance</b>	The CityFHEPS rental assistance program provides eligible New Yorkers with financial assistance to cover the rent, helping New Yorkers experiencing homelessness exit shelter and into permanent housing and helping eligible New Yorkers experiencing housing instability remain in their homes.
<b>HOME Tenant-Based Rental Assistance (TBRA)</b>	The HRA HOME TBRA Program, funded by HUD's HOME Investment Partners Program through HPD, helps eligible families in shelter and chronically street homeless people afford the cost of rent. Funding is limited, so not every household in shelter or street homeless person who meets the eligibility rules gets rental assistance under this program.
<b>NYC 15/15 Rental Assistance Program</b>	The NYC 15/15 program is a New York City-funded rental assistance program that assists eligible families or individuals that are homeless or at risk of homelessness by providing an affordable apartment and supportive services to help them move toward the goal of long-term stability. The program aims to fund and develop 15,000 new units of supportive housing in New York City over the next 15 years.
<b>Emergency Housing Voucher (EHV) Program</b>	Funded by HUD, the EHV Program helps families and individuals who are experiencing homelessness; at-risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; or recently homeless and at high risk of

Service	Program Description
	housing instability to find housing by subsidizing a portion of rent based on their income.
<b>Supportive Housing Loan Program (SHLP)</b>	Through SHLP, HPD makes loans to non-profit and for-profit developers of permanent supportive housing with on-site social services. Projects developed with SHLP funding must provide 60 percent of units for homeless, disabled individuals or homeless families with a disabled head-of-household. The remaining 40 percent can be rented to households from the community earning up to 60 percent of the Area Median Income.
<b>NYCHA</b>	NYCHA serves over 330,000 residents in 161,585 apartments within 274 housing developments through Section 9 public housing. NYCHA also serves 30,852 authorized residents in 15,984 units within 61 developments that have been converted under the Permanent Affordability Commitment Together (PACT) program. NYCHA provides housing opportunities for homeless families through placements from the DHS shelter system. In addition, NYCHA connects residents to opportunities in financial empowerment, business development, career advancement, and educational programs.

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

As outlined above, the City of New York has an array of emergency housing, supportive services, and rental assistance programs in place to assist qualifying populations. The City also finances the creation and preservation of affordable housing, including affordable units that serve individuals and families in all four qualifying populations. However, there is still a significant need for more resources to expand existing programs and create new ones. The needs assessment and gaps analysis, evaluation of existing resources, and feedback received during stakeholder engagement demonstrate gaps in the provision and availability of supportive services, emergency shelter, rental subsidies, and affordable rental units.

A lack of housing, particularly stable, affordable housing, is a key cause of significant unmet needs across the qualifying populations. For example, while 675,691 households in the city are earning less than or equal to 30 percent of AMI, there are only 318,973 housing units citywide that are affordable at the 30 percent of AMI level. The number of renter households earning less than or equal to 30 percent of AMI and experiencing one or more severe housing problems (512,210) exceeds the number of units affordable at the 30 percent of AMI income level by 193,237. With a dearth of housing options that are affordable to hundreds of thousands of extremely low-income and very low-income households, these households are more likely to experience, and are at greater risk of, homelessness and housing instability.

The affordable housing needs of New Yorkers are emphasized by wait times for the New York City Housing Authority (NYCHA). NYCHA is one of the few, critical sources of housing affordable to households at or below 30 percent of AMI. The largest public housing authority in North America, NYCHA was created in 1935 to provide decent, safe, affordable housing for low- and moderate-income New Yorkers. As of March 2023, NYCHA is home to about one in 17 New Yorkers, in over 177,569 apartments within 335 housing

developments through Section 9 and mixed finance developments, and Permanent Affordability Commitment Together (PACT) programs. NYCHA apartments make up 8 percent of all rental apartments citywide. In addition, NYCHA provides Section 8 rental assistance vouchers to low-income families living in private apartments. As of March 2023, 95,628 families are receiving NYCHA Section 8 rental assistance.

Table 9. Summary of NYCHA Section 9 Public Housing (excludes Section 8 and PACT programs)

# of Apartments	161,585
# of Developments	274
# of Families	151,835
# of Authorized Residents	330,000
# of Buildings	2,411
Average Gross Income of Households	\$25,605

**Data Source:** NYCHA Data as of March 2023

While NYCHA provides critical housing resources for households experiencing homelessness and at risk of homelessness, the need for these resources far surpasses supply, as evidenced by lengthy wait times for both Section 9 and Section 8. Wait times are especially lengthy for standard or non-emergency priority applicants and transfers. A 2017 analysis estimated wait times for public housing applicants with a non-emergency priority from initial application submission to rental, by apartment size, and found that the weighted average was 19.4 years. Emergency priority applicants, including those currently experiencing homelessness in a Department of Homeless Services (DHS) shelter, have higher priorities and are reached first, meaning their wait times are more variable and shorter. For a NYCHA Section 8 voucher, the average wait time for those on the preliminary wait list is 16.0 years.

Table 10. Applicants for NYCHA Public Housing Assistance

Type of Applicant	Applicant Wait List Size
Public Housing Applicants*	274,745
Section 8 Applicants**	17,576

**Data Source:** NYCHA

\* Public housing wait list requires renewal every two years; otherwise, the application expires.

\*\*The Section 8 wait list closed in 2007 and anyone who wanted to remain had to file during that period. The majority of the applications are from this time. This excludes other more recent applicants who filed for PACT wait lists.

Table 11. Estimated Public Housing Wait Time in Years for Non-Emergency Applicants

Apartment Size	Average Wait Time in Years
Studio	15.6
1 Bedroom	3.9
2 Bedrooms	24.2
3 Bedrooms	14.4
4 Bedrooms	31.9
5 Bedrooms	2.5
Weighted Average	19.4

*Data Source: NYCHA*

As the lack of housing and affordable housing in the city is the primary cause of struggle for many, the City has a range of tools in place to finance the development of more affordable housing. At the same time, the City has many other, more immediate interventions in place to help households in qualifying populations access and retain stable housing in an exceedingly supply-constrained environment, which include but are not limited to emergency shelter, supportive services, and rental assistance. To assess the gaps in current resources available to assist qualifying populations, the City considered unmet needs for these types of supports as well as the underlying need for affordable housing.

### Emergency Shelter

As identified in the Housing Needs Inventory and Gaps Analysis, there is a gap in the inventory of emergency shelter beds serving homeless New Yorkers. Each year, hundreds of households are displaced from their homes due to fires, illegal occupancy, and other hazardous conditions. There are about 1,500 of these events every year, and the Department of Housing Preservation and Development (HPD) provides emergency shelter and rehousing support for displaced households. In some instances, in addition to losing their homes, these New Yorkers are forced out of their neighborhoods and away from day-to-day activities and support networks. In addition to the need for more shelter beds, there is a need to ensure that households in need of emergency shelter can access it closer to their communities.

### Supportive Services

The prevalence of homelessness, rent burden, severe housing problems, housing instability, and increased risk of homelessness among extremely and very low-income households indicates a critical need for homelessness prevention, housing stabilization, and retention services. With so few alternative housing options that would be affordable to these households should they lose their current housing, there is an immediate need for services and supports to provide a bridge for people who are currently struggling.

Homebase is the City's primary tool for addressing housing stabilization and homelessness prevention needs, providing tens of thousands of households each year with a range of services including eviction prevention, connections to emergency financial assistance, public benefits enrollment, job placement

assistance, and more. Demand for these critical services has far surpassed what the program is currently scaled to provide. Response times for client referrals to Homebase from HPD have lengthened from 48 hours to 4 weeks. During consultations for this plan, some stakeholders shared concerns about funding for Homebase remaining flat over the years while demand for services has been steadily increasing and recommended providing additional funds to expand the program.

Beyond the need for greater capacity for existing tools such as Homebase, there is a gap in current services to address the unique housing stabilization needs of some households within the qualifying populations, including those with pandemic-related rent arrears in public housing and medically vulnerable individuals who are exiting public healthcare facilities without stable housing to return to.

### **Housing Stabilization Services for NYCHA Residents in Arrears**

There is a gap in the service delivery system when it comes to housing stabilization services for tens of thousands of public housing residents in rent arrears. As a result of the pandemic, NYCHA households cumulatively have over \$533 million in arrears as of the end of October 2023, which puts these households at severe risk of losing their housing. As described above, approximately 70,000 public housing households are in arrears. Of those residents in arrears earning less than or equal to 50 percent AMI, the average household owes more than \$5,600 in arrears, well above the average monthly rent bill of these residents of just over \$500. NYCHA households are some of the lowest income in the city, and many households in arrears are headed by seniors, have children under 18, are on a fixed income, or are not currently working. Due to these constraints, most NYCHA residents with rent arrears are unable, and will remain unable, to address their needs and pay off their arrears independently.

While the U.S. Department of the Treasury launched the Emergency Rental Assistance Program (ERAP) to assist renters economically impacted by the COVID pandemic, New York was the only state to de-prioritize subsidized residents in receiving ERAP funds. In addition, HUD funding for public housing also cannot alleviate the rental arrears these residents face. HUD guidance provides that PHAs may not forgive or reduce rental arrears with public housing operating or capital funds, which by regulation are not calculated to make up for arrears or shortfalls in rent, and instead encourages PHAs to partner with localities and other partners to aide families in need of assistance.

As a result, with most households unable to pay off their arrears independently, and with external financial assistance lacking, there is a massive unmet need for financial assistance for public housing residents to address their rent arrears and restabilize their housing.

The undeniable hardship eviction causes on families is also compounded for public housing residents, who face additional barriers in obtaining subsequent federally assisted housing due to owing a continued debt to a PHA. This adds onto the barrier of having an eviction record, which will also dissuade private landlords from leasing to these families. Federal regulations establish debts owed to a PHA as grounds for denial of admission to federally assisted housing, and each of the New York City-based PHAs indeed treat debts owed to a PHA as a mandatory bar to admissions. As a result, for as long as evicted public housing households are unable to pay off their arrears debt, they will struggle to be readmitted to other federally assisted housing in New York City. Even if they are able to pay off their debts, the mere fact of an eviction from public housing serves as an additional barrier to admission into federally assisted housing for years, possibly even decades (see 24 CFR 982.552(c)(1)(ii), (iii)). In addition, if evicted, many public housing

residents may particularly struggle to find affordable housing in their same neighborhood, resulting in further displacement. A 2019 report by the New York University Furman Center found that 58.8 percent of NYCHA developments were located in gentrifying neighborhoods, meaning neighborhoods that were low-income in 1990 and experienced above-median rent growth between 1990 and 2014, and 27.1 percent of NYCHA developments were in higher-income neighborhoods.<sup>4</sup> For all of these reasons, for extremely low-income households, an eviction from public housing would limit future housing options in a city that already has a severe shortage of affordable housing, putting these residents at a particular risk of homelessness without the safety net federally assisted affordable housing provides.

### **Housing Stabilization Services for Medically Vulnerable Individuals**

There is a gap in the service delivery system when it comes to supportive services for medically vulnerable individuals who are exiting healthcare facilities and lack stable housing to return to. Through programs such as NYC 15/15 and the Supportive Housing Loan Program, the City provides affordable housing with on-site supportive services for formerly homeless households with a severe mental illness and/or substance use disorder (see Table 8). These programs have provided a pathway to stable housing for thousands of homeless New Yorkers who have a higher service need than is typically provided in multifamily residential housing. Medically vulnerable individuals with frequent in-patient admissions, diagnoses of chronic health conditions such as heart failure, and/or dependence for activities of daily living also have a higher service need, yet require a different type of services than is offered in traditional supportive housing, and often do not qualify for this housing as a result.

### **Tenant-Based Rental Assistance**

There is a gap in the existing service delivery system when it comes to rental assistance, especially for households that do not meet the criteria for preferences applied to existing voucher programs. Even with the various rental subsidy programs already available to rent burdened New Yorkers, the need far exceeds available vouchers. Many existing rental assistance programs have preferences for households who are currently experiencing homelessness, include a veteran, or are subject to an eviction proceeding. Severely rent burdened low-income households that do not satisfy any of these criteria face the uncertainty of long waitlists. This unmet need has left extremely low-income households especially vulnerable, a vulnerability which is even more troubling when considering the economic dislocation caused by the pandemic. The 2021 New York City Housing and Vacancy Survey (NYCHVS) found that 16.7 percent of households in City-financed, privately-owned, newly constructed affordable housing reported less income in 2020 than in 2019, more than twice the share of all extremely low-income households.<sup>5</sup>

Feedback received from the Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV) provided one example of the gaps in existing rental assistance programs. ENDGBV highlighted the ways in which current permanent housing options are insufficient to meet the needs of survivors of domestic- and gender-based violence in the community. One program that has been a game changer for this population

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<sup>4</sup> NYU Furman Center, *How NYCHA Preserves Diversity in New York's Changing Neighborhoods*, p. 3 (April 2019), [https://furmancenter.org/files/NYCHA\\_Diversity\\_Brief\\_Final-04-30-2019.pdf](https://furmancenter.org/files/NYCHA_Diversity_Brief_Final-04-30-2019.pdf)

<sup>5</sup> The U.S. Census Bureau reviewed all of the 2021 NYCHVS estimates that appear here for unauthorized disclosure of confidential information and approved the disclosure avoidance practices applied to this release. CBDRB-FY22-199 and CBDRB-FY22-POP001-0101

is the Emergency Housing Voucher (EHV) Program. According to ENDGBV, the lead agency for EHV implementation for this population, for the first time, survivors of domestic and gender-based violence were considered a priority group for Section 8 with no other documentation needed to apply for this valuable housing resource (beyond an assessment from a referring domestic/gender-based violence agency). To date, 1,468 EHVs have been issued through this allocation, surpassing the original allotment by 300 vouchers, and at least 130 more are expected before the program officially closes. This clearly demonstrates the enormous need for additional rental assistance for this QP.

### Development of Affordable Rental Units for Homeless Households

As laid out in *Housing our Neighbors: A Blueprint for Housing and Homelessness*, the continued shortage of housing options contributes to our ongoing affordability and homelessness crisis. The lack of housing, particularly affordable housing, puts New Yorkers at greater risk of housing instability and makes it more difficult for residents experiencing homelessness to regain stable housing. Even though the City has expanded the availability and purchasing power of housing vouchers for tens of thousands of homeless New Yorkers, there are simply not enough available homes, making it difficult for households with vouchers to find an apartment to move into. There is a dire need to develop more supportive housing units to place more homeless households.

***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:***

Characteristics of housing associated with instability and increased risk of homelessness are described in the City’s consolidated plan as including:

- Threat of eviction
- Not holding a lease
- Very low income and very high rent burdens
- Substandard housing
- Overcrowded conditions
- Recent episodes of homelessness

Substandard housing is defined as lacking complete plumbing or kitchen facilities.

Overcrowded conditions are defined as having 1.01-1.5 people per room. Severely overcrowded conditions are defined as having >1.51 people per room.

Extremely low-income households (earning 0-30 percent of AMI) and very low-income households (earning 31-50 percent of AMI) experience substandard housing, severe overcrowding, and rent burden over 50 percent at disproportionately high rates. As stated above, 75.8 percent of Extremely low-income renter households experience the incidence of a severe housing problem.

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

Through data analysis and the public consultation processes described above, the City identified supportive services, rental assistance, and emergency shelter as priority needs for qualifying populations in New York City. While the lack of housing and particularly affordable housing is the root cause of many



unmet needs, the development of new affordable housing takes years, and there are hundreds of thousands of qualifying families and individuals who need immediate assistance to exit or prevent homelessness, access or retain stable housing.

Extremely low- and very low-income households citywide are more likely to experience severe rent burden and other problems that further increase the risk of housing instability and homelessness, including substandard housing, threat of eviction, and recent episodes of homelessness, among others. In the wake of the COVID-19 pandemic, hundreds of thousands of residents citywide, including over 70,000 households in public housing, are facing the threat of eviction due to rent arrears. With so few housing options available that these households can afford, supportive services to stabilize qualifying families and individuals in their current housing is a priority need across qualifying populations. A lack of available rental assistance vouchers leaves many individuals and households who would benefit from rental assistance to exit or prevent homelessness without access to a voucher, creating a priority need among qualifying populations for tenant-based rental assistance. Given the limited number of low-cost units that are accessible to households with vouchers in the market, tenant-based rental assistance is especially needed for households who could use a voucher to remain stably housed in their current unit. Finally, the City identified a deficit of 464 adult beds in the City's emergency shelter system for homeless households, pointing to non-congregate shelter as another priority need.

***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:***

To identify the level of need and gaps in its shelter and housing inventory and service delivery systems, the City leveraged a wide range of data sources including the 2022 New York City point-in-time (PIT) count, the CoC Housing Inventory Count, American Community Survey (ACS) estimates, and internal data from City agencies including HPD, NYCHA, and HRA. This analysis was further informed by consultations with stakeholders including City agencies, the NYC CoC, PHAs serving the PJ, and housing and social service providers serving QPs citywide.

## 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:***

Service providers will be identified and contracted through standard City procurement processes, as applicable to the nature of services being sought. The City will also administer eligible activities directly as needed, and partner with other agencies and local Public Housing Authorities as sub-recipients of eligible funding.

The non-congregate emergency shelter will be acquired through the New York City Department of Citywide Administrative Services (DCAS), which is responsible for acquiring and managing the city's real estate portfolio. DCAS acquires property for the city government through several methods, including negotiated acquisition, surplus property transfer, or public auction.

With respect to a program described below that will provide financial assistance for households with rental arrears and contains a preference for eligible public housing households, the City will partner with local Public Housing Authorities as sub-recipients of eligible funding to administer assistance under this program to public housing residents; the City will administer assistance directly as needed to non-public housing residents, should funds remain for the program after the exhaustion of applicants who qualify for the public housing preference.

***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:***

As the City recovers from the financial impacts of the COVID-19 pandemic, hundreds of thousands of New Yorkers are experiencing homelessness, struggling to maintain their current housing, or otherwise lacking affordable and stable housing. The needs assessment and gaps analysis clearly demonstrate a need for additional shelter and supports to help QPs access and maintain stable affordable housing. To fill gaps in the current system and meet unmet needs, the City plans to allocate HOME-ARP funds to eligible activities including supportive services, acquisition and development of non-congregate shelter, and tenant-based rental assistance.

Supportive services funds will be leveraged to meet needs through activities including but not limited to housing stabilization and homelessness prevention services, financial assistance to address rent arrears, housing navigation assistance, and other supports to help QPs become and remain stably housed.

HOME-ARP funds allocated to Tenant-Based Rental Assistance will help fill unmet rental assistance needs by providing financial assistance to extremely low-income, severely rent-burdened households who are at risk of homelessness or at greatest risk of housing instability but cannot be served by other rental assistance programs due to the lack of available vouchers. Severely rent-burdened households are defined by HUD as households that are paying more than 50 percent of their income on rent.

The City also recognizes a gap in access to emergency shelter beds for individuals and families experiencing homelessness as well as individuals fleeing situations of domestic or dating violence and trafficking. HOME-ARP funds allocated for Acquisition and Development of a Non-Congregate Shelter will help fill this gap, to ensure that these populations have access to emergency shelter during the transition back into permanent housing.

Table 12. Use of HOME-ARP Funding

Eligible Activities	Funding Amount	Percent of Grant	Statutory Limit
Supportive Services	\$181,102,577		
Acquisition and Development of Non-Congregate Shelter	\$25,000,000		
Tenant Based Rental Assistance (TBRA)	\$30,000,000		
Development of Affordable Rental Housing	\$0		
Non-Profit Operating Assistance	\$0	0%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$33,728,940	12.5%	15%
<b>Total HOME ARP Allocation</b>	<b>\$269,831,517</b>		

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

Not applicable

## HOME-ARP Production Housing Goals

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

The NYC Department of Housing Preservation and Development (HPD) will not be utilizing HOME-ARP to produce rental housing.

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

Not applicable

## Preferences

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).

- PJs are not required to describe specific projects to which the preferences will apply.
- A *preference* provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference.
- A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance.

### **Supportive Services**

Under HUD's HOME-ARP Notice, "A PJ may establish reasonable preferences among the qualifying populations to prioritize applicants for HOME-ARP projects or activities based on the PJ's needs and priorities, as described in its HOME-ARP allocation plan." In addition, the allocation plan must include a "description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population." The Plan must also include a description of any method of prioritization by which a PJ will determine how two or more eligible applicants qualifying for the same or different preferences will be selected for HOME-ARP assistance. Accordingly, to ensure that programs designed to fill identified gaps in the existing service delivery system achieve their intended goals, the City intends to implement preferences for two supportive service programs planned for utilization of HOME-ARP funds. While all four qualifying populations will be eligible to apply for these two supportive services programs, the City will use the preferences described below. Other supportive service programs utilizing HOME-ARP funds will be administered without preferences to households in all four qualifying populations.

The City will use a preference among qualifying individuals and families for a program that will prevent eviction and homelessness by providing financial assistance for households with rental arrears to stabilize their housing. This preference will be for the subpopulation of residents in public housing with rental arrears who fall within the qualifying population of at greatest risk of housing instability (QP4) due to having an annual income that is less than or equal to 50 percent of AMI and living in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the City's approved consolidated plan.<sup>6</sup> As a method of prioritization, eligible households qualifying for this preference will be prioritized for assistance based on income, in ascending order starting with the lowest income as adjusted for household size. After the exhaustion of all applicants who qualify for this preference, other applicants in all qualifying populations will be reached for participation in the chronological order in which applications are received.

Separately from the preference and program described above, the City will use a preference among qualifying individuals and families for a program that will provide housing stabilization services for medically vulnerable individuals to ensure access to and retention of permanent stable housing. This preference will be for the subpopulation of residents who are medically vulnerable and lack stable housing within the qualifying populations of homeless (QP1), at risk of homelessness (QP2), or other populations

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<sup>6</sup> Should HUD agree that some NYCHA residents in arrears may also qualify as at risk of homelessness (QP2), then this preference would additionally be for qualifying public housing residents in QP2.

at greatest risk of housing instability (QP4). As a method of prioritization, priority will be given for households qualifying for this preference that are referred to housing by NYC Health + Hospitals (H+H). After the exhaustion of applicants who qualify for this preference, other applicants in all qualifying populations will be reached for participation in the chronological order in which applications are received.

### **Tenant Based Rental Assistance**

The City will use a preference among qualifying individuals and families for HOME-ARP TBRA. This preference will be for the subpopulation of residents in HPD-financed, privately owned, new construction affordable housing earning less than or equal to 30 percent of AMI and experiencing severe rent burden (i.e., paying more than 50 percent of monthly household income to rent) within the qualifying populations of at risk of homelessness (QP2) or other populations at greatest risk of housing instability (QP4). After the exhaustion of applicants who qualify for this preference, other applicants in all qualifying populations will be reached for participation in the chronological order in which applications are received.

### **Non-Congregate Shelter**

The City proposes to utilize HOME-ARP funds for the acquisition of non-congregate shelter without preferences.

***If a preference was identified, explain how the use of a preference or method or 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 assessment and gap analysis:***

In 2020, the City of New York released its comprehensive fair housing plan, “Where We Live NYC,” which introduced six goals aimed at addressing persistent disparities identified through engagement with communities across the five boroughs. The third of these goals is to preserve affordable housing and prevent displacement of long-standing residents, which includes commitments aimed at protecting tenants facing economic challenges, harassment, and evictions. An important component of housing choice is the ability to choose to remain in one’s home and community, making anti-displacement work an important fair housing goal. In New York City, financial hardships exacerbated by the pandemic and rising housing costs have resulted in more than half of renter households paying over 30 percent of their income towards housing costs and a third paying over 50 percent, and many low-income households with high arrears, leaving many New Yorkers at risk of displacement.

NYCHA provides a critical affordable housing option for low-income New Yorkers. Many NYCHA residents, however, were de-prioritized for emergency rental assistance in the wake of the pandemic, and many are still unable to clear mounting arrears. The threat of arrears makes this population especially vulnerable to displacement, compounded by the fact that in the event of eviction, due to rising housing costs in most neighborhoods where NYCHA developments are located, many would struggle to find comparable affordable housing nearby. Many residents of City-financed, privately-owned, new construction affordable housing find themselves in a similarly precarious situation, reporting a reduction in household income during the pandemic at twice the rate of all extremely low-income households per the 2021 NYCHVS. Due to the economic pressures caused by the pandemic these households are likely struggling to keep up with monthly housing costs. Additionally, many of these

households do not meet the preferences of existing rental assistance programs (e.g., veteran status, current homelessness), leaving them vulnerable to housing insecurity, especially during economic downturns.

The City's proposed use of funds for supportive services and rental assistance aims to ease displacement pressure through preferences for extremely and very low-income households at the greatest risk of housing instability (QP4) and at risk of homelessness (QP2). This includes a preference for NYCHA residents with rental arrears, who are disproportionately extremely and very low-income. Additionally, the TBRA program's preference for extremely low-income, severely rent burdened households in City-financed, privately owned, new construction affordable housing offers families assistance who do not typically have access to alternative sources of aid. Targeting the provision of supportive services and rental assistance to these households supports both the needs of the qualifying populations identified for HOME-ARP assistance and the City's fair housing plan's anti-displacement goal by providing households with the funds they need to be able to remain in their homes and communities."

### **Supportive Services**

Use of a preference for a program that will prevent eviction and homelessness by providing financial assistance for households with rental arrears will ensure that the program addresses the unmet need for such assistance among qualifying individuals and families in public housing. As identified in the needs assessment and gaps analysis, tens of thousands of households in the qualifying population of at greatest risk of housing instability (QP4) are living in NYCHA public housing and have rent arrears due to COVID-19. These extremely and very low-income residents are especially vulnerable to the impacts of housing instability and homelessness and would face increased barriers to finding alternative housing if evicted, but New York's existing program to assist New Yorkers with pandemic-related rent arrears (ERAP) deprioritized public housing residents—the only state ERAP program to do so. The preference for this program will therefore be for the subpopulation of residents in public housing with rental arrears who fall within the qualifying population of at greatest risk of housing instability (QP4) due to having an annual income that is less than or equal to 50 percent of AMI and living in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the City's approved consolidated plan. A method of prioritization within this preference that prioritizes assistance based on income, in ascending order starting with the lowest income as adjusted for household size, will ensure that those who have the least financial resources and are likely to face the greatest difficulty in finding alternate housing should they be evicted, are assisted first. As discussed in the gaps analysis, very low income is a housing characteristic linked with instability and an increased risk of homeless, and households at the lowest income levels face an extreme shortage of affordable housing.

Use of a preference for a program that will provide housing stabilization services for medically vulnerable individuals will ensure that the program fills the gap in existing services for these individuals, who have a higher service need than is typically offered in multifamily residential buildings. As identified in the needs assessment and gaps analysis, thousands of medically vulnerable individuals without stable housing cycle between hospitals and homeless shelters with 7.5% of mutual DHS/H+H clients having frequent inpatient admissions, or diagnoses of heart failure, end stage renal disease, liver cirrhosis, lung disease with oxygen dependence, metastatic cancer, and/or dependence for activities of daily living. Use of a preference for this program will address the unmet need for services to help medically vulnerable individuals in the

qualifying populations of homeless (QP1), at risk of homelessness (QP2), and at greatest risk of housing instability (QP4) safely and stably transition to permanent affordable housing and successfully retain that housing moving forward. Services provided through this program will include coordination of care with clinical providers and social services and provide a bridge to initiation of needed home care services in permanent, affordable housing. A method of prioritization within this preference that prioritizes assistance for referrals from NYC Health + Hospitals will allow the program to more seamlessly and effectively target households that will benefit from the specific types and level of services provided.

### **Tenant Based Rental Assistance**

The City's 2021 New York City Housing and Vacancy Survey (NYCHVS) found that more than half of the city's renters are rent burdened, and a majority of those with annual incomes less than \$25,000 are severely rent burdened (i.e., paying more than 50 percent of household income to rent). This highlights the need for additional tools to reduce the rent burden of tenants across the city who are rent burdened or severely rent burdened. However, there are over 450,000 extremely low-income households earning less than or equal to 30 percent of AMI who are severely rent burdened, and HOME-ARP funded TBRA will only serve approximately 300 households through to September 30, 2030. Meanwhile, the extremely limited number of low-cost housing units in the city that are accessible to households with rental vouchers is an ongoing challenge which compounds the lack of available vouchers themselves.

Based on NYCHVS data and other sources, HPD believes that extremely low-income New Yorkers living in newly constructed affordable housing are becoming rent burdened over time as well, because their incomes are not keeping pace with even the limited annual rent increases allowed for affordable units. Currently there are not sufficient alternatives available to ensure that City-financed, income-restricted affordable housing stays affordable. The NYCHVS findings also show that new construction affordable housing residents were more likely to report a reduction in income during the pandemic, from which many may not have recovered. While many of these households would not meet the requirements for existing rental assistance programs, they could also benefit from rental assistance without having to compete with other vouchered households in the market for the limited supply of available units.

Use of a preference for TBRA for individuals and families in the qualifying populations of at risk of homelessness (QP2) and at greatest risk of homelessness (QP4) who are earning less than or equal to 30 percent of AMI, severely rent burdened, and living in City-financed, privately-owned, new construction housing will address the unmet need for rental assistance among these households as a pilot to inform future program design.

***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:***

### **Supportive Services Funds**

The plan identifies preferences for two supportive services programs proposed to utilize HOME-ARP funds but does not exclude other qualifying populations from being served by these programs or funds, consistent with the unmet needs and gaps identified in this plan. After the exhaustion of applicants who qualify for a preference for a given program, all other applicants in all qualifying populations will be reached for participation in that program in the chronological order in which applications are received.

Other supportive services programs proposed to utilize HOME-ARP funds will be implemented without preferences and address the unmet need for housing stabilization, homelessness prevention, housing retention, and other services across all four qualifying populations. These programs will assist households in qualifying populations successfully transition to permanent housing, maintain tenancy in their unit, and/or achieve connections to additional services that will further bolster housing stability.

#### **Tenant-Based Rental Assistance**

The plan identifies a preference for HOME-ARP TBRA but does not exclude other qualifying populations from being served by TBRA, consistent with the unmet needs and gaps identified in this plan. After the exhaustion of applicants who qualify for the preference given for HOME-ARP TBRA, all other applicants in all qualifying populations will be reached for participation in TBRA in the chronological order in which applications are received.

#### **Non-Congregate Shelter**

The City proposes to utilize HOME-ARP funds for the acquisition of non-congregate shelter without preferences.

### HOME-ARP Refinancing Guidelines

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

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

NYC will not be using HOME-ARP funds to refinance existing debt.

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

Not applicable

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

Not applicable

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

Not applicable

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



Not applicable

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

Not applicable