

City of New York

HOME-ARP Allocation Plan

DRAFT

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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: 03/31/2023

Introduction

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.

HOME –ARP was created to support specific populations (primarily homeless households and those at risk of homelessness) through five activities:

1. Development 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

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

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 several partners and stakeholders serving the needs of the qualifying populations. Those consulted included the NYC CoC, other City agencies, and private organizations serving the homeless, 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 qualifying populations.

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. 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 qualifying populations are being met.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
NYC Continuum of Care (CoC)	Public/Private org that addresses Fair Housing, Civil Rights, and Needs of Persons with Disabilities	CoC Steering Committee Meeting via Zoom and email follow-up	<ul style="list-style-type: none"> • 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 • Need for dedicated program and funding for community-based voucher access and benefits management
Mayor’s Office to End Domestic and Gender-Based Violence (ENDGBV)	Public agency addressing needs of QPs	Microsoft Teams Meeting and email follow-up	<ul style="list-style-type: none"> • Need for safe and affordable housing a primary concern for survivors of domestic and gender-based violence • Current permanent housing options not sufficient to meet demand for assistance • Currently takes about 3 years or more to place victims of domestic violence in public housing • Single domestic/gender-based violence survivors have the least amount of available housing options

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Department of Veterans Services	Public agency addressing needs of QPs	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> • Need for City agencies providing homeless prevention services and housing counseling services to veterans in-house to become HUD-Approved Housing Counseling Agencies • Access to new housing and access to better housing conditions are 2 of the top 3 needs of NYC veterans
Services for the Underserved, Inc. (SUS)	DV Service Provider	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> • Need to fund additional staff for service providers to reduce service delivery delays • More funds needed to supplement current programs like HRA's Homebase program • Aftercare, subsidy recertification, arrears assistance needed
ADAPT Community Network	Public/Private org that addresses Fair Housing, Civil Rights, and Needs of Persons with Disabilities	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> • Need for more funding to help people with disabilities secure stable home environments
SHNNY	Homeless Service Provider	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> • No specific feedback given
VOA	Veterans Group	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> • No specific feedback given
Doe Fund	Homeless Service Provider	Microsoft Teams Facilitated Discussion and email follow-up	<ul style="list-style-type: none"> • Need for rental assistance in existing housing

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Riseboro	Homeless Service Provider	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> No specific feedback given
Constructive Partnerships Unlimited	Public/Private org that addresses Fair Housing, Civil Rights, and Needs of Persons with Disabilities	1:1 meetings/conversations	<ul style="list-style-type: none"> No specific feedback given
Worldwide Veterans and Family Services	Veterans Group	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> People living independently for the first time, especially post-incarceration, need assistance adjusting, education on safe and sanitary living, mental health follow-ups Need housing for veterans
New Destiny Housing	DV Service Provider	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> Housing navigation and retention services are essential/effective for formerly homeless DV survivors need better access to supportive housing; definition of chronicity /homelessness has been barrier Need for harm-reduction trained staff
Breaking Ground	Homeless Service Provider	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> Financial assistance with arrears needed for gaps that can't be filled w/ERAP Post-move in, formerly homeless may become isolated, affects rent payments, if no retention/stabilization services
Center for Urban Community Services (CUCS)	Homeless Service Provider	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> No specific feedback given

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Project Renewal	Homeless Service Provider	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> No specific feedback given
NYS Division of Homes and Community Renewal (HCR)	PHA	1:1 meetings/conversations	<ul style="list-style-type: none"> Plans to focus on building and converting housing for people <50% AMI, with and without services for residents
WSFSSH – West Side Federation for Senior and Supportive Housing	Homeless Service Provider	Microsoft Teams Facilitated Discussion	<ul style="list-style-type: none"> Need capital to update existing Single Room Occupancy permanent housing for older adults to age in place Need light-touch services, technology training for all formerly homeless entering permanent housing to ensure they can access available benefits
Neighborhood Initiatives Development Corporation (NIDC)	Public/Private organization that addresses Fair Housing & Civil Rights; Homeless Service Provider	1:1 meetings /conversations and email follow-up	<ul style="list-style-type: none"> Homeless relapse prevention requires funding for housing navigation and staffing to support housing retention Need staff providing connection to health and social services and education and practice on safety, problem-solving, financial planning
New York City Housing Authority (NYCHA)	PHA	1:1 meeting	<ul style="list-style-type: none"> Public Housing residents desperately need assistance with rent arrears

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.

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:** 3/2/2023
- **Public comment period:** start date: 3/9/2023; end date: 3/24/2023
- **Public hearing:** 3/15/2023

Describe any efforts to broaden public participation:

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

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

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

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify and gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

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		
Current Gap or Surplus								1,606	-464

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

As the data shows in Table 2, there is a need for emergency shelter especially 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.

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

Homeless Population

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: NYC Homeless Demographics 2022

New York City Homeless Population (sheltered & unsheltered)	Homeless Persons	Share Homeless Persons
Total	61,840	100%
Race		
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%
Ethnicity		
Hispanic / Latino	23,415	38%
Non-Hispanic / Non- Latino	38,425	62%
Gender		
Female	26,715	43%
Male	34,657	56%
Transgender	421	1%
Gender Non-Conforming	44	<1%
Questioning	3	<1%
Subpopulations		
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%

Data Sources: [2022 NYC Point in Time Count \(PIT\)](#)

Those at Risk of Homelessness

In addition to the homeless population, there are also New Yorkers who are at risk of homelessness and experiencing housing instability. As defined by HUD, these are individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or do not have stable housing, like moving at least twice during the last 60 days for economic reasons.

There is a large discrepancy between the number of renter households with incomes below 30% of AMI who have at least one severe housing problem and the number of housing units affordable for households with incomes at the 30% AMI level. According to 2021 American Community Survey data, there are 512,210 renter households making at or below 30% AMI who are experiencing significant crowding (greater than 1.5 persons per room), lacking complete kitchen or plumbing facilities, or facing a cost burden greater than 50 percent of their monthly income. This total exceeds the number of units affordable at the 30% AMI level by 193,237. There are an additional 135,560 renter households making between 30-50% of AMI who are experiencing severe housing problems.

Table 4: Demographics, Those at Risk

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
Total	675,691	334,894	512,210	135,460
Race				
Black or African-American	173,349	81,847	130,601	27,684
White	132,672	67,804	107,375	39,104
Asian	69,740	34,266	54,598	17,287
American Indian/Alaska Native	607	558	607	558
Pacific Islander	379	0	379	0
Hispanic	271,831	137,468	194,428	45,157
Multi-racial/Another Race, non-Hispanic	27,370	12,951	24,222	5,670

Data Source: 2021 ACS 1-Year Public Use Microdata Sample (PUMS)

Table 4 above shows the severe housing needs among all New York City households by racial or ethnic group by level of HUD Area Median Income. Severe housing needs means any one or more severe housing problems: incomplete kitchen or plumbing facilities, severely overcrowded (more than 1.5 persons per room), or cost burden over 50 percent. Here we discuss each of the four HUD income levels looking for disproportionate need by racial/ethnic group by "Severe Housing Problems."

Of all New York City renters, 53.4 percent have a housing cost burden greater than 30 percent. Overall, 29.1 percent pay more than 50 percent of income for gross rent. Most severely impacted are those with extremely low incomes less than 30 percent of AMI, whose median rent burden is an intolerable 81 percent. Cost 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 the incidence of a severe housing problem. 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: Cost Burden

	Total Households	Households with Cost Burden 30%-50%	Share of Cost Burden 30%-50%	Households with Severe Cost Burden >50%	Share of Severe Cost Burden >50%	Total Cost Burden	Total %
0-30% of AMI	675,691	105,738	15.6%	450,946	66.7%	556,684	82.4%
30-50% of AMI	334,894	150,313	44.9%	116,473	44%	266,786	79.7%

Data Source: 2021 ACS 1-Year PUMS

A total of 727,265 renter households with incomes less than 100 percent AMI experience some severe housing problem (lack complete kitchen/plumbing, severe overcrowding, or severe cost burden greater than 50 percent). The problem of severe rent burden is most acute among renters with income less than 30 percent of AMI. In this income category, 65.8 percent have cost burden greater than 30 percent and 61.7 percent pay a severe cost burden greater than 50 percent.

The New York City Housing Authority (NYCHA), the largest public housing authority in North America, was created in 1935 to provide decent, safe, affordable housing for low- and moderate-income New Yorkers. NYCHA is home to about 1 in 16 New Yorkers in over 177,569 apartments within 335 housing developments through conventional public housing, Section 8, and PACT programs as of December 2022. NYCHA apartments make up 11.2% of all rental apartments citywide. In addition, NYCHA provides Section 8 rental assistance vouchers to low-income families living in private apartments. As of December 2022, 94,677 families are receiving NYCHA Section 8 rental assistance.

Table 6: Demographic Data: Conventional Section 9 Public Housing

Type	Applicant Wait List Size
# of Apartments	162,143
# of Developments	277
# of Families	154,927
# of Authorized Residents	331,879
# of Buildings	2,206
Average Gross Income	\$25,239

Data Source: NYCHA Tenant Data and Property Directory, as of December 31, 2022

While NYCHA provides critical resources for New Yorkers who are at risk of homelessness, the need for those resources far surpasses supply, as evidenced by lengthy wait times for public housing and Section 8. Wait times are especially lengthy for standard or non-emergency priority applicants and transfers. A 2017 detailed analysis estimated wait times from initial application submission to rental by apartment size for applicants with a non-emergency (N4 priority) and found that the weighted average was 19.4 years. Emergency priority applicants (including those currently experiencing homelessness in DHS shelter) have higher priorities and are reached first, which means their wait times are more variable and shorter. The average wait time for those on the preliminary wait list for a NYCHA Section 8 voucher is 16.0 years.

Table 7: Applicants for NYCHA Public Housing Assistance

Type	Applicant Wait List Size
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Public Housing Applicants*	263,621
Section 8 Applicants**	15,243

Data Source: Analysis of NYCHA data sources by NYCHA's Performance Tracking and Analytics Department (PTAD)

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

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

Table 8: Estimated Public Housing Wait Time in Years for an N4 Standard Priority Applicant

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: Analysis of NYCHA data sources by NYCHA's Performance Tracking and Analytics Department (PTAD)

In addition to the need for the deeply affordable housing provided by NYCHA among the broader citywide population, there are tens of thousands of New Yorkers currently living in NYCHA public housing who earn less than 30 percent of AMI and are experiencing housing instability due to pandemic-related rent arrears. NYCHA households are some of the lowest-income in the city, with an average gross income of only \$25,239. As of February 2023, there were over 71,000 public housing households with rent arrears, totaling over \$450M.

Fleeing or attempting to flee domestic violence or human trafficking

There is well-documented national and local evidence of the intersection of gender-based violence and homelessness. In fact, 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 homeless shelter system causing more disruption before obtaining permanent housing.

Table 9: HRA Domestic Violence Shelter Count (as of December 2022)

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 – OpenData](#)

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, including the homeless and those at risk of homelessness. The following table outlines key programs offered by the City for qualifying populations.

Table 10: Services

Service	Program Description
Homeless Shelter System	DHS provides temporary transitional housing to all New Yorkers verifiably experiencing homelessness, including families with children and single adults.
Emergency Shelters	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.
Project No Violence Again (NoVA)	Through Project NoVA, DHS addresses the needs of domestic violence victims 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.
Homebase	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.
CityFHEPS	The CityFHEPS rental assistance program provides New Yorkers in need with financial assistance to cover the rent, helping New Yorkers experiencing homelessness exit shelter and into permanent housing and helping New Yorkers experiencing housing instability remain in their homes.
HOME TBRA	The HRA HOME Tenant-Based Rental Assistance (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.
NYC 15/15 Rental Assistance Program	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

Service	Program Description
	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.
Emergency Housing Voucher (EHV) Program	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 housing instability to find housing by subsidizing a portion of rent based on their income.
Supportive Housing Loan Program (SHLP)	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% of units for homeless, disabled individuals or homeless families with a disabled head-of-household. The remaining 40% can be rented to households from the community earning up to 60% of the Area Median Income.
NYCHA	NYCHA serves over 339,900 residents in 162,143 apartments within 277 housing developments through the conventional public housing program (Section 9). NYCHA also serves 29,789 authorized residents in 15,426 units within 58 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 for HOME-ARP qualifying populations. However, there is still a significant need for more resources to expand existing programs and create new ones. An evaluation of existing programs and the feedback received during stakeholder engagement show that there is a great need for more supportive services, emergency shelter, rental subsidies, and affordable rental units.

Supportive Services

Over the last few years, HPD has worked to expand homeless housing opportunities across the spectrum of the agency’s development finance and assistance programs. Through these programs, the agency makes hundreds of placements per year in homeless set aside units. In 2021, New York City also received 7,788 Emergency Housing Vouchers (EHV) for homeless households, enabling an unprecedented number of households to move from shelter into permanent housing.

While these resources are beneficial and stabilizing for homeless clients and the City more broadly, the level of security and support offered to formerly homeless tenants across different housing types varies widely. There is a need to provide consistent housing retention and stabilization services for homeless

households placed into HPD units or with an Emergency Housing Voucher, who will not otherwise receive services to aid their successful transition from shelter to permanent housing. While the City has attempted to serve these households on an as-needed basis through referrals to HRA's Homebase program, Homebase has not been scaled to address the large number of new placement types HPD has created and response times for referrals have lengthened from 48 hours to 4 weeks. During our consultations, 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.

There is also a clear need for financial assistance for tens of thousands of residents in public housing. As a result of the pandemic, NYCHA's low-income households have struggled to pay their rent and cumulatively have over \$466 million in arrears as of December 2022. Over 71,000 households are in arrears with 20% of households owing more than \$10,000 each. NYCHA households are some of the lowest-income in the city, with an average gross income of only \$25,239. Twenty-six percent of the households in arrears are senior head of households, and the majority of the seniors in arrears live alone. Fifty percent of the households in arrears are working with an almost even split of households with children under 18 and household without children under 18. Due to these constraints, most NYCHA residents with rent arrears are unable, and will remain unable, to address their needs independently.

While New York State launched the Emergency Rental Assistance Program (ERAP) to assist renters economically impacted by the COVID pandemic, subsidized residents were de-prioritized as part of ERAP, and no subsidized tenants have received rent arrears assistance through the program. As a result, there is a massive unmet need for financial assistance for public housing residents to address their rent arrears and restabilize their housing.

Emergency Shelter

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 HPD provides emergency shelter and rehousing support for displaced households. In some instances, in addition to losing their homes, these New Yorkers are also forced out of their neighborhoods and away from day-to-day activities and support networks. There is a need to ensure we can keep those in need of emergency shelter closer to their communities.

Tenant-Based Rental Assistance

Even with the various rental subsidy programs already available to rent burdened New Yorkers, the need far exceeds available vouchers. As we pointed out earlier in this document, 53.4% of New York City renters have a housing cost burden greater than 30%. Overall, 29.1% pay more than 50% of income for gross rent. The most severely impacted are those with extremely low incomes less than 30% of AMI, whose median rent burden is an intolerable 81%. An evaluation of current programs shows that there's a clear need for more rental assistance – something confirmed by stakeholders during consultations.

An example is the feedback received from the Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV) about current permanent housing options not being sufficient to meet the demand for help that they and community-based domestic and gender-based violence prevention organizations are seeing from this population. One program that has been a game changer for this population is the Emergency

Housing Voucher (EHV) Program. According to ENDGBV, 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). ENDGBV has been the lead agency on the allocation and prioritization for this population. The original allocation for this population was 1,168 EHVs, but 1,468 EHVs have been issued. Although the City is close to issuing all its EHVs, at least 1,600+ EHVs are expected to be issued for this population before the program officially closes. This clearly demonstrates the enormous need for additional rental assistance for qualifying populations.

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 and 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. (Citation: <https://www.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf>). 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 defined in the City Consolidated Plan as:

- 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 (ELI) households (earning 0-30% AMI) and very low-income (VLI) households (earning 31-50% of AMI) experience substandard housing, severe overcrowding, and cost burden over 50 percent at disproportionately high rates. As stated above, 75.8 percent of ELI 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 as a top priority for QPs. There are 567,419 ELI and VLI households citywide

experiencing severe housing cost burden, and these households are more likely to face additional factors that increase the risk of homelessness, including substandard housing, threat of eviction, and recent episodes of homelessness. In the wake of the COVID-19 pandemic, hundreds of thousands of residents including 71,000 households in public housing are facing the threat of eviction due to rent arrears. With the influx of rental assistance for homeless households provided by federal Emergency Housing Vouchers (EHVs), there is a greater need for stabilization and retention services to ensure that these households do not return to shelter. The vast majority of stakeholder feedback reemphasized these supportive service needs.

The City also identified the addition of emergency shelter beds for adults as a priority need for QPs. There is currently a deficit of 464 adult beds in the City’s emergency shelter system. ***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 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 would be identified through procurement processes and the City will administer eligible activities directly as needed, and directly partner with other agencies and local Public Housing Authorities as sub-recipients of eligible funding.

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.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$181,102,577		

Acquisition and Development of Non-Congregate Shelters	\$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%
Total HOME ARP Allocation	\$269,831,517		

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:

Based on the unmet need for supportive services for homelessness prevention identified in the gap analysis, the City’s primary goal is to fund eligible supportive services activities including housing retention and stabilization services for formerly homeless households, financial assistance to address rent arrears, and other prevention services for households at risk of homelessness. HOME-ARP funds allocated to Tenant-Based Rental Assistance will also further homelessness prevention goals by providing financial assistance to ELI and VLI severely rent-burdened households who cannot be served by other rental assistance programs due to the lack of available vouchers.

The City also recognizes a gap in access to emergency shelter beds for adults experiencing homelessness. HOME-ARP funds allocated for Acquisition and Development of a Non-Congregate Shelter will help fill this gap, to ensure that homeless individuals have access to emergency shelter and to alleviate capacity burden placed on existing shelters within the City’s inventory.

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.

Social Services Funds:

A portion of the social services funds may include a preference for households in which at least one household member is over the age of 55 within the qualifying populations of Homeless, At-Risk of Homelessness, and Other.

Tenant Based Rental Assistance:

NYC intends to limit eligibility to those who are rent burdened or severely rent burdened, and thereby focus the program on households who are at great risk of housing instability.

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:

Social Services Funds:

Use of a preference for a portion of the social services funds will ensure that older adults in qualifying populations, who also have a higher service need than is typically offered in multifamily residential buildings, are able to safely and stably age in place once provided housing.

Tenant Based Rental Assistance:

The City's most recent Housing and Vacancy Survey found that more than half of the city's renters are rent-burdened, with a majority of those with annual incomes less than \$25,000 were severely rent burdened. 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.

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:

Social Services Funds:

While the plan identifies a preference for a portion of the social services funds, it does not exclude other qualifying populations from being served through the HOME-ARP funds, consistent with the unmet needs and gaps identified for qualifying populations identified in this plan.

Tenant Based Rental Assistance:

HPD will use TBRA funds to assist households at greatest risk of housing instability living in HPD housing, as a pilot to inform future program design.

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