

**Washtenaw Urban County
HOME-American Rescue Plan (HOME-ARP)
Allocation Plan**

SUBSTANTIAL AMENDMENT

October 4, 2023

*Approved by Urban County Executive Committee: September 6, 2023
Approved by Board of Commissioners: October 4, 2023*

Washtenaw Urban County

HOME-ARP Allocation Plan Template with Guidance

Substantial Amendment

September 6, 2023: *Revised and Approved by Urban County Executive Committee*

October 4, 2023: *Approved by Board of Commissioners*

The [6/30/23 proposed amendment](#) to the original HOME-ARP Allocation Plan was updated after consideration of the input received throughout the public comment period (July 5 – August 4, 2023) and to balance the immediate and long-term housing and service needs of Washtenaw County. The resulting [8/30/23 proposed amendment](#) updated the funding table to allocate an equal 40% to affordable housing development and supportive services while maintaining the 15% for administration and planning (statutory cap), and 5% for Non-Profit operating costs (statutory cap). The administration and planning allocation is based on anticipated staffing costs for compliance and monitoring functions over the life of the grant, which runs through September 30, 2030.

The changes to the August 30, 2023 Proposed Substantial Amendment, as made by the Urban County Executive Committee on September 6th prior to their ultimate approval, are indicated within the document as strikethroughs. Those changes can be found on pages 19-20. These changes are as follows:

- Increase to the Affordable Housing Development allocation from 40% to 48% of overall HOME-ARP grant;
- Decrease the Supportive Services allocation from 40% to 32% of the overall HOME-ARP grant;
- Remove the words “not in the pipeline” where Plan indicated that an RFP would solicit proposals for future developments *not in the pipeline*.

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- 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.

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.

Template:

Original Plan:

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

Washtenaw County Office of Economic and Community Development (referred to as OCED) consulted with community partners to determine the needs of the community.

These consulted entities provide housing and services to the eligible populations of the HOME-ARP program on an on-going basis and have relevant knowledge on the needs, service gaps, and potential activities that would best benefit qualified populations. Entities consulted include those who work with families or individuals experiencing homelessness, are at-risk of homelessness, and other vulnerable qualifying populations such as veterans.

Throughout this consultation process, the entities articulated their gap in services and housing needs by providing written and verbal comments. The following table summarizes the feedback received.

OCED will continue to meet with entities throughout the implementation of the HOME-ARP activities to assess the ongoing needs of our community and will continue to work together to develop strategies that will help address chronic homelessness.

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

List the organizations consulted:

Consultation Chart:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Avalon Housing	Supportive Services Shelter	Email	<ul style="list-style-type: none"> • Strongest need is affordable /supportive housing development. • Given the limited nature of the HOME ARP funds, using the funds to build supportive housing that will remain operating as supportive housing well into the foreseeable future

			<p>seems a good use of otherwise time-limited dollars.</p> <ul style="list-style-type: none">• Avalon has a number of supportive housing developments in the pipeline which have funding gaps that could be up to the \$4 million of total funding.• Another gap is in supportive services funding for supportive housing developments— particularly those outside of the City of Ann Arbor.• Suggest that projects receiving HOME-ARP funds for developing supportive housing that is located outside of the City of Ann Arbor also received HOME-ARP funds for supportive services for these developments.• If TBRA is an interest, suggest looking to expand the existing Rapid Rehousing program rather than creating a new program.• Suggest at least 75% of available funds go toward development of supportive housing.• MSHDA HOME ARP requires a housing development to have at least 35% units qualify as eligible HOME-ARP populations; Avalon suggests the County HOME ARP echoes that
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			by targeting the supportive housing resident population for these units-- under 30% AMI, experiencing homelessness, etc.
Ann Arbor Housing Commission	Public Housing Authority	Email	<ul style="list-style-type: none"> • Data show a significant gap in the amount of housing that is available in the community that is affordable to households under 30% AMI and between 31% - 50% AMI. • Best way to solve this problem is to add more housing. • Re: possible TBRA program - cautioned us about approach and administrative burden of creating a new program. To be effective, should specifically provide rental assistance to people who are in the eviction process to prevent homelessness, and should be administered by an agency that already administers vouchers, otherwise not as effective a use of these funds as new construction. • A TBRA program will be short-term not permanent due to the timing constraints of the ARPA funds.
Michigan Ability Partners	Supportive Services Shelter for Veterans and Individuals with Disabilities	Zoom meeting	<ul style="list-style-type: none"> • Putting majority of the funds toward brick and mortar (building affordable units) makes sense, but we also know how detrimental it can be if no supportive services are available to go with those units, especially

			<p>for chronic homeless population.</p> <ul style="list-style-type: none"> • Also, we have vouchers and are seeing it becoming harder to find landlords who will accept them, so it should be one of us (affordable housing providers) who develops the new affordable housing.
WHA	Homelessness Advocacy Coalition	Email	<ul style="list-style-type: none"> • The plan makes sense, with the majority of the funding going to support new affordable housing development with some for supportive services. • Would recommend using the funds to create supportive housing targeted to homeless households with deep targeting for some portion of overall developments to households earning 30% AMI or less. • Can the supportive services line item be in support of providing services to tenant-based vouchers (i.e. not tied to affordable housing development)? If so, we may want to consider an increase in that line item to support households pulled through the MSHDA HCV (or other) list to make those vouchers more of a voucher + services model. • I would estimate a provider would be able to have 25-30 cases like that per case manager position (you

			wouldn't likely have deep targeting of acuity so a mix of households that need light- and more frequent touches). Since we don't anticipate any new PSH developments opening up in the next 1.5 to 2-years, an HCV + services model could bridge the gap for a 2-year period or so.
Disability Network Washtenaw Monroe Livingston	Organization addressing needs of persons with disabilities	Email	<ul style="list-style-type: none"> No response received
Fair Housing Center of Southeast and Mid Michigan	Organization addressing Fair Housing & Civil Rights	Email	<ul style="list-style-type: none"> We support the recommendations of Avalon Housing, the WHA, and Ann Arbor Housing Commission.
Washtenaw County Continuum of Care Board ¹	CoC(s) serving the jurisdiction's geographic area; homeless service providers; domestic violence service providers; public agencies that address the needs of the qualifying populations; veterans' groups	Input requested at in-person meeting	<ul style="list-style-type: none"> No comments.

¹The Washtenaw County Continuum of Care Board currently includes representatives from the following entities: Washtenaw Intermediate School District (Formerly homeless individual), Shelter Association of Washtenaw County, Michigan Ability Partners, Legal Services of South Central Michigan, Avalon Housing, Religious Action for Affordable Housing, Ann Arbor Area Community Foundation, Ann Arbor Housing Commission, Ypsilanti Housing Commission, Veterans Administration of Ann Arbor, Washtenaw County Administration, City of Ann Arbor Mayor's office, City of Ann Arbor Policy Department, Washtenaw County Sheriff's Office, Ypsilanti Police Department, Washtenaw Housing Alliance, SOS Community Services, St. Joseph Mercy Health System, Washtenaw County Public Health, Washtenaw County Office of Community and Economic Development, Washtenaw County Community Mental Health,

Michigan Department of Health and Human Services, Community Mental Health Partnership of Southeast Michigan, Salvation Army of Washtenaw County, Ozone House, SAFEHouse, Michigan Works! South East.

Public Participation for Substantial Amendment

Describe the public participation process for the Substantial Amendment to the Allocation Plan, including information about and the dates of the public comment period and public hearing(s) held to solicit feedback:

- ***Date(s) of public notice:*** June 29, 2023
- ***Public comment period:*** July 5, 2023 – August 4, 2023
- ***Dates of public hearing(s):***
 - July 12, 2023 (at Washtenaw Urban County Executive Committee)
 - July 13, 2023 (at Ann Arbor Housing & Human Services Advisory Board)
 - July 19, 2023 (at Washtenaw County Continuum of Care Board meeting)
 - August 2, 2023 (at Washtenaw County Board of Commissioners meeting)

Describe the Substantial Amendment public participation process:

OCED published a public notice in the Ann Arbor News (print edition) and Mlive.com on Thursday, June 29, 2023, announcing the 30-day comment period and the four (4) public hearings to solicit feedback on the substantial amendment to the HOME-ARP Allocation Plan. The 30-day public comment period was stated as July 5 through August 4, 2023, for providing written or verbal comments on the proposed Substantial Amendment to the Allocation Plan to be made available on the OCED website beginning July 5, 2023. As required, the notice provided the amount of HOME-ARP funds and the proposed budget showing the specific eligible activities that the County plans to undertake per HOME-ARP program rules. In addition, OCED disseminated the public notice to numerous County-administered listservs and posted a notice for the public hearings and comment period on its social media channels (i.e., Facebook, Twitter) and the OCED public-facing website.

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

A total of 57 comments, representing approximately 52 unique entities or individuals, were received during the public participation process. Comments were submitted both verbally and in writing, and they included a number of local agencies, businesses, elected officials, and Washtenaw County residents. Appendix I contains a complete record of the specific public comments received on the previous 6/30/23 Proposed Substantial Amendment during the 30-day comment period from July 5 – August 4, 2023. The majority of comments expressed concern regarding the proposed shift in funding from affordable housing development to supportive services. Many of the comments also recommended returning to either a budget similar to that in the original HOME-ARP Allocation Plan (which placed the majority of funds in affordable housing development), or a budget that better balances the short term and long term housing and service needs as supported by local data.

Public Participation for Original Allocation Plan

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

- ***Date(s) of public notice:*** February 5, 2023 and February 26, 2023
- ***Public comment period:*** March 7, 2023 – March 21, 2023
- ***Date of public hearing:*** March 9, 2023 (rescheduled from February 22, 2023)

Describe the public participation process:

OCED published a public notice in the Ann Arbor News (print edition) and Mlive.com on Sunday, February 5, 2023, announcing the February 22nd public hearing to provide input for the development of the HOME-ARP Allocation Plan. This same Feb. 5th notice also announced the 15-day public comment period of March 7 - March 21, 2023, for providing written or verbal comments on the Draft HOME-ARP Allocation Plan to be made available on the OCED website beginning March 7, 2023. As required, the notice provided the amount of HOME-ARP funds expected to be received and the range of eligible activities that OCED can undertake. In addition, OCED posted a notice for the public hearing and comment period on its social media channels (i.e., Facebook, Twitter) and on the OCED public-facing website. Due to a weather-induced County closure, the February 22nd hearing was canceled and rescheduled for March 9, 2023. An updated public notice was posted on the OCED website, Facebook page, and through listservs on Feb. 22nd, and it was published in the Ann Arbor News and Mlive.com on Sunday, February 26, 2023.

Describe efforts to broaden public participation:

OCED used several strategies to share information about the development of the plan. Primarily, OCED used email to provide important updates to providers in a timely fashion. OCED communicates updates on its website and through a larger CoC listserv, Urban County Executive Committee listserv, Urban County Interested Parties listserv, Community Action Board listserv, and the Barrier Busters network of providers. To further ensure that information was communicated clearly and that there was an opportunity for providers to ask questions, OCED presented information at existing meetings for provider/stakeholder feedback.

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

Enter narrative response here.

Public Comments and Recommendations

All comments and recommendations received through the public participation process were those provided at the public hearing held on March 9, 2023.

OCED received comments/questions from 9 individuals during the virtual public hearing held at the City of Ann Arbor Housing & Human Services Advisory Body on March 9, 2023 at 6:30pm. Some individuals spoke more than once during the public hearing. A summary of comments and discussion is provided below.

Janet Cannon:

- How will the large amount of HOME ARP funding be administered?
- Is the plan to build housing? Who would develop the housing? Would it be a developer with experience building affordable housing?
- Can the funds be used to purchase land?
- Why was tenant-based rental assistance not considered?

Rosanita Ratcliff: How long will the organizations have to provide feedback (for example the agencies serving people with disabilities referenced under consultation)?

Steve Gutterman: What is the likelihood of the HOME ARP funds being combined with other funding sources?

Someone on the HHSAB committee asked whether housing developments would be limited to the Urban County rather than the entire Washtenaw County. Staff then showed everyone the Urban County map to note that nearly all local units of government (21 of 29 total) are members of the Urban County at this point.

Anna Erickson (HHSAB committee member): Why hasn't Milan joined the Urban County?

Anna Foster (HHSAB committee member): Could the shelters that are scheduled to close be converted to permanent housing?

Jean Leverich (HHSAB committee member): How much funding would be devoted to shelters?

Jennifer Hall (Ann Arbor Housing Commission):

- Shelters are a short-term solution. People need and want to be in permanent housing. Housing is always the long-term solution if owned by a mission-based organization, whether private or non-profit with a mission, which is different than private developers who do affordable housing as a part of their larger portfolio. It depends what they're trying to accomplish.
- With TBRA, it's one and done. It's extremely difficult to administer. We have an 800-page manual just on how to administer TBRA. A lot of work for a little bit of benefit, even if quicker than building new housing.
- Pairing supportive services with permanent housing is best practice.

Anna Foster (HHSAB committee member): I would support keeping the funds largely distributed as they are in the Plan.

Some discussion about homeless shelters and recent closures occurred during the public hearing.

Jennifer Hall (Ann Arbor Housing Commission): Staples Center was administered by Salvation Army – (there was) lower demand for family shelter during the pandemic due to CERA. But now we need those spaces. The other shelter was lost in Wayne County.

Steve Gutterman: If Wayne County is losing shelters, Delonis Center already takes in people from outside Washtenaw County. Delonis is already over-burdened. It seems like the shelters closing in Detroit will impact Washtenaw County shelters.

Wendy Carty-Saxon (Avalon Housing): Avalon sees affordable housing as most impactful (for HOME-ARP funds). We know of a number of affordable housing projects (in the pipeline). Supportive Services are needed too; there is a gap especially outside of Ann Arbor. Something to consider...I like the way the funding is split in the current MSHDA HOME-ARP application, where they require at least 35% of households being served (by the affordable housing being developed) would need to be supportive housing populations.

Some discussion followed to clarify the definition of non-congregate shelter.

James Downing (HHSAB committee member): Setting aside money specifically for shelters is a need...were a project to present itself it would be a reason to amend the plan, but with pipeline of affordable rental units coming online, that is more likely. Shelters have to be specifically staffed and need a specific type of organization backing them, (these are) fewer in numbers than for affordable housing.

Jennifer Hall (Ann Arbor Housing Commission): (We use) braided funding to build housing, but then revenue all comes from rent to cover operating costs. Whereas shelters have braided operating costs too. Would need predictable funding to keep a shelter operational beyond 2030.

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

All participants that had a comment were given time to state their comment, suggestion, or question. Several people spoke more than once throughout the public hearing process. There were no comments or recommendations that were not accepted.

Needs Assessment and Gaps Analysis

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

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 Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	95	22	95	95	5								
Transitional Housing	5	1	10	10	21								
Permanent Supportive Housing	130	40	301	301	157								
Other Permanent Housing	160	52	79	79	0								
Sheltered Homeless						260	134	21	87				
Unsheltered Homeless						18	14	1	0				
Current Gap -- Shelter										178	44	43	43
Current Gap - Permanent Housing										266	70	150	150

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	61,600		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,607		
Rental Units Affordable to HH at 50% AMI (Other Populations)	16,680		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		14,695	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		6,790	
Current Gaps			4,805

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

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

Homeless as defined in 24 CFR 91.5

There are two main ways of measuring the number of people experiencing literal homelessness in Washtenaw County: The annual Point-in-Time Count and the By-Name-List of everyone experiencing homelessness in Washtenaw County.

The Point-in-Time, or PIT Count is held each year at the end of January. People currently in shelter and transitional housing are counted through the Homeless Management Information System used by all providers, while unsheltered persons are counted by teams of volunteers that canvas the county one night in January from 10pm to 2am. This method provides a clear snapshot of the number of people homeless in one night. The data is limited for unsheltered persons, however, as not everyone may be found and surveyed on the night of the count, and some people meeting the definition, such as those staying inside abandoned buildings, may not be able to be counted. Therefore, the PIT Count is best understood as a measure of the minimum amount of homelessness. The last 3 PIT Counts showed an average of **245 persons** experiencing homelessness in Washtenaw County on a night in January.

The By-Name-List, or BNL, is maintained by the Washtenaw Office of Community and Economic Development and is a comprehensive list of everyone experiencing homelessness who has engaged with our system within the past 60 days. Every client receiving services from a Washtenaw County homelessness agency will be placed on the BNL, which is then used to prioritize and refer clients to our limited permanent housing resources. At the same time, the BNL provides a monthly count of the number of people experiencing literal homelessness. This count is limited to people who seek services, so people experiencing homelessness that are unknown to our system are not counted, which may make the number too low. Clients also remain on the list for 60 days, so some clients may still be on the list after resolving their homelessness, leading to an overcount. Despite these limitations, the BNL is the most accurate source of data for the number of people homeless in a given month. The average number of people experiencing homelessness across all months in 2022 was **373 persons, with a high of 448 in December of 2022.**

Based on these two sources, the literal homeless population is estimated to be around **375 persons, with a minimum of 250 and a maximum of 450.**

At Risk of Homelessness as defined in 24 CFR 91.5

The number of people meeting the At Risk of Homelessness grew expansively during the COVID-19 pandemic, as evidenced by the more than \$25.5 million dollars of rental assistance distributed through the Covid Emergency Rental Assistance program in Washtenaw County since March of 2021. This program served around 3,100 Washtenaw County households over 15 months. In comparison, 749 households were served in 2019, the

last full year before the pandemic. It is not fully clear what the need for prevention funding for At-Risk households will look like as we continue to move out of the pandemic. Early data suggests that between 750 and 1250 households will meet the At-Risk definition and qualify for prevention assistance.

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

In 2022, 10% of all households served identified as actively fleeing domestic violence. Based on that number, there are between 35-40 survivors experiencing homelessness due to actively fleeing at any given time in Washtenaw County. This only reflects those actively fleeing—if the number includes all people with a history of DV, the estimate increases to 75-100 persons at any given time.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Data provided from McKinney Vento programs in Washtenaw County show that 930 students were served in the 2021 to 2022 school year, compared to 730 in the last year before the COVID-19 pandemic. While the data does not show household size for these students, or how many total families were served, it is reasonable to assume at an average family size of 3, this represents over 2,700 people meeting the Department of Education definition of homelessness. As not all households meeting this definition will identify themselves to the school district, the actual number is certainly much higher, although difficult to estimate.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

Resources available to serve the above qualifying populations include:

Affordable Housing: The Washtenaw County Office of Community and Economic Development maintains data on affordable housing developments within Washtenaw County. Currently, there are only 2,607 units considered affordable to households below 30% AMI (at risk of homelessness), while the at-risk population in the county is over 14,000. The lack of affordability exists as well for those making up to 50% AMI, where there is a 4,805-unit shortfall. Altogether, the county has limited affordable housing, which is typically already occupied.

Homelessness Prevention: Financial assistance available to households imminently at-risk of homelessness. Funds can be used to cover rental and utility arrears or to assist with moving into a new unit. Due to the availability of additional COVID relief funds for prevention, Washtenaw County has distributed over 28 million dollars in prevention funding since the start of 2021. Given the end of the CERA program, increase in cost of living, and limited affordable housing stock in the rental market, those in need of prevention resources and services exceed that which currently exists.

Permanent Supportive Housing (PSH) combines non-time-limited rental assistance w/ wraparound supportive services. Services are voluntary, individually tailored, and flexible, and are not a condition of ongoing tenancy. Most PSH providers also provide mental health (MH) services or have a MOU in place w/a mental health provider, such as Community MH. PSH providers work to assist clients w/accessing benefits, while connecting them w/other necessary services (e.g. health care) w/the end goal of maintaining stable housing. PSH programs also partner w/agencies to provide such services onsite. A total of 589 HUD-funded beds are available in the community, with additional beds provided through additional funding streams. Currently, there are more than 135 units currently under development.

Rapid Re-Housing (RRH) assists w/choosing and obtaining affordable housing, using client strengths to help create plans for short-term/crisis resolution. Providers link clients to any needed and desired ongoing service e.g. legal services, child care, w/focus on housing retention. Staff also monitor housing stability, which may include communication w/landlords, linking to ongoing supports and more. Approximately 180 beds are available at any one time. An increase in RRH would provide the resources necessary to stabilize those currently experiencing homelessness and in need of time limited case management.

Transitional Housing (TH) provides outreach/case management/assistance in obtaining mainstream benefits. Case management may include connections to health care/daily living/financial planning/legal services. The County's Grant Per Diem (GPD) providers use a Bridge Housing model, which emphasizes short stays (usu. up to 90 days) and rapid connections to permanent housing. GPD providers work closely w/the VA Ann Arbor Healthcare System & coordinated entry partners to ensure veterans are connected to permanent housing and to services that can remove any barriers to staying housed. Washtenaw County has 41 year-round transitional beds.

Emergency Shelter provides safe, temporary housing & supportive services to those experiencing homelessness. Shelter staff work w/households to identify affordable permanent housing, identify +/- or increase sources of income, and connect w/other necessary services. Some shelters, such as the Delonis Center, offer nonresidential case management and have other service providers onsite, such as Michigan Works! & Packard Health Clinic. 195 year-round beds are available.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

People experiencing homelessness in Washtenaw County have unmet needs in virtually every arena. Insufficient shelter space and permanent housing resources mean that long wait times exist for every resource, up to more than a year for Permanent Supportive Housing, the highest level of care offered. Because of these waits, people experiencing homelessness face longer periods of homelessness with increased vulnerability. Overall, the average length of time to housing for CoC resources was 165 days in 2022—nearly half a year. Increasing CoC

resources would help to reduce this length of time, as would additional affordable housing, as many CoC project participants are housed in the private market.

Homeless providers also regularly report a need for more supportive services than are available in the community. Frequently cited needs include employment assistance, mental health, disability support, substance use, and physical health needs. Just over 50% of people served by Washtenaw County CoC report a disability that will impact their ability to stay housed.

At Risk of Homelessness as defined in 24 CFR 91.5

A lack of sufficient and timely prevention resources mean that many At-Risk households are not assisted within the critical two-week timeframe before they lose their housing. When a preventable housing crisis isn't averted, the households most often end up doubled-up or literally homeless, placing further strain on the system's limited resources, and untold trauma on households experiencing preventable homelessness. As of early 2023 this is being acutely seen among families, with a backlog of more than 50 families waiting for prevention appointments and full caseloads at the courts. This in turn is leading to an increase in families experiencing literal homelessness. In addition to more prevention services, there is a lack of available affordable housing in the county, forcing many low-income households to spend unsustainable amounts on rent. Less than 10% of the 55,102 rental units in Washtenaw County are designated affordable.

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

Because SAFEHouse, Washtenaw County's Domestic Violence provider, has limited staffing and bedspace and focuses on intimate partner violence, not everyone fleeing domestic violence is able to access shelter, as the limited space is prioritized for people in immediate danger. Additional shelter space and permanent housing resources would allow for faster rehousing of people fleeing from domestic violence, helping to reduce the trauma they are experiencing. While care is approached with a trauma-informed lens throughout the system, the current scope of DV specific services is insufficient to meet the needs of the 20% of people experiencing homelessness who are also survivors of domestic violence, dating violence, sexual assault or human trafficking. In addition, a lack of available and affordable housing means there are fewer safe alternatives to house survivors.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

While it is difficult to estimate the true size of this population, it is clear that there is a great need for prevention services in Washtenaw County, which would be one of the most direct means of impacting other populations at the greatest risk of housing instability. Additional supportive services would also benefit all of the other populations considered under the HOME-ARP plan.

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

Washtenaw County Continuum of Care conducts regular reviews of system data to understand how our resources are meeting or failing to meet the needs of people experiencing homelessness in Washtenaw County. Every analysis consistently shows that the system does not have enough resources to adequately serve the number of people experiencing homelessness in Washtenaw County.

Homeless as defined in 24 CFR 91.5

A 2022 System Model Report prepared by the Corporation for Supportive Housing indicated that the Continuum of Care needed an additional 58 year-round shelter beds for individuals and 123 year-round beds for families with children. In addition, the model showed that a further need for 644 Rapid Re-Housing services for individuals and 242 for families each year, as well as an additional 717 Permanent Supportive Housing units for individuals and 154 units for families.

At Risk of Homelessness as defined in 24 CFR 91.5

While the population of households at risk of homelessness is lower than during the pandemic, it still appears higher than before the pandemic based on current waitlists for prevention appointment, full eviction court case loads, and increasing levels of literal homelessness. In addition, the average level of funds needed to prevent a household from eviction in January and February 2023 was \$963, compared to \$558 for the same period in 2019.

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

DV services in Washtenaw County do not cover the full range of populations identified in this notice, so a gap exists in specific services for those not served, such as victims of human trafficking. This leads to persons feeling or attempting to flee to seek shelter in the general homeless system. An additional 20-30 beds would likely be needed, with room for overflow. In addition, the lack of affordable housing and low vacancy rates in the county lead to a lack of alternatives outside the safety net system for those attempting to flee.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

2022 Census estimates suggest that there are 45,804 persons living below the poverty line in Washtenaw County, yet there are only 4,460 designated affordable units. The need is even greater if the households under 30% of the AMI are considered. This data suggests that the county needs several thousand more affordable units to keep this population from becoming at-risk. In addition to more affordable housing, additional community services available to a broad range of the public would benefit this group, including food assistance, health care, mental health, behavioral health, housing navigation, employment assistance and more.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Characteristics identified include:

- A history of homelessness

Identify priority needs for qualifying populations:

Homeless as defined in 24 CFR 91.5

Priority needs for people experiencing literal homelessness include additional affordable housing, increased permanent housing resources (RRH & PSH), increased shelter space for individuals and families, and supportive services for persons experiencing homelessness.

At Risk of Homelessness as defined in 24 CFR 91.5

For households at risk, identified priorities include additional affordable housing; increased prevention funding for rental and utility arrears or move-in costs; and supportive services or employment, or disability support.

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

Identified priorities include additional affordable housing, additional staffing and beds for DV specific shelters, and supportive services for people fleeing or attempting to flee.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Priorities for other populations include additional affordable housing, and supportive services focused on housing and increasing income.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The PJ used data from the following sources:

- Point-In—Time Counts from 2019-2022
- Housing Inventory Charts from 2019-2022
- Washtenaw County Homeless Management Information System (HMIS)
- Washtenaw County By-Name-List Data, 2018-2022
- 2022 Washtenaw County Gaps Analysis (CSH System Modeling Report)
- Washtenaw County McKinney Vento Data
- Stella P Data (System modelling provided by HUD)

HOME-ARP Activities

Template:

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

OCED, as staff for both the Washtenaw Urban County and the Continuum of Care, will issue competitive Requests for Proposals (RFPs) to solicit funding applications for supportive services and development of affordable rental housing. In addition to applicants' financial stability, the County will consider the applicants' level of experience and programmatic outcomes from similar programs they have carried out.

Supportive Services

The County intends to award and spend down the supportive services funding over a 3 - 4 year timeframe, through annual RFPs and ongoing evaluation of local data to inform the investment of funds. Supportive Services eligible for HOME-ARP include: Rapid Rehousing; Eviction Prevention/Rental Assistance; Move-in Costs; Income Stabilization Services; Transitional Housing.

Development of Affordable Rental Housing

The County anticipates a single RFP process within a year of obtaining final approval from HUD on the 8/30/23 Proposed Substantial Amendment. This RFP will solicit proposals for future development projects (i.e. not yet in the pipeline) to provide housing that can accommodate families or larger households. Proposals will be evaluated on criteria that includes, but is not limited to, mix of unit types and prioritization for units that meet the needs of homeless families.

Describe whether the PJ will administer eligible activities directly:

The PJ (OCED as lead agency for Washtenaw Urban County) will carry out planning and administration activities related to HOME-ARP contracts and regulatory compliance. Other eligible activities will be administered by external partners with expertise in the specific types of supportive services or affordable housing projects for which they are awarded.

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

Not applicable

In accordance with Section V.C.2. of the Notice (page 4), 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.

Template:

Use of HOME-ARP Funding

Note: Items in blue reflect changes to the budget in the August 30, 2023 Proposed Substantial Amendment.

	Funding Amount	% of Grant	Statutory Limit
Supportive Services	\$1,824,892.00 \$1,459,914	40% 32%	--
Non-Profit Operating	\$ 228,112	5%	5%
Administration and Planning	\$ 684,334	15%	15%
Development of Affordable Rental Housing	\$1,824,892.00 \$2,189,870	40% 48%	--
Acquisition and Development of Non-Congregate Shelters			--
Tenant Based Rental Assistance (TBRA)			--
Non-Profit Capacity Building			5%
Total HOME ARP Allocation	\$ 4,562,230	100%	

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

Washtenaw Urban County will distribute 40% of its HOME-ARP funds to affordable housing development, 40% to supportive services, 5% to Non-Profit Operating, and 15% to Administration and Planning for County staff to support and ensure compliance for HOME-ARP programs over the life of the grant.

As discussed above, under Priority Needs for Qualifying Populations, the common priorities identified across all four of the qualifying populations are affordable housing and supportive services. This aligns with the distribution of the County's HOME-ARP funds by concentrating on key resources to potentially increase stability for individuals from across all of the qualifying HOME-ARP populations. Provision of Non-Profit Operating funds will help to ensure that non-profits providing supportive services and/or affordable housing have adequate resources to serve additional client caseloads.

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:

2022 Census estimates suggest that there are 45,804 persons living below the poverty line in Washtenaw County. The need is even greater when considering the households under 30% AMI. Currently, there are only 2,607 units considered affordable to households below 30% AMI (at risk of homelessness), while the at-risk population in the county is over 14,000. The lack of affordability exists as well for those making up to 50% AMI, where there is a 4,805-unit shortfall. Altogether, the county has limited affordable housing, which is typically already occupied.

Looking specifically at the County's current homeless population as compared to existing housing inventory, the County has a permanent housing gap of 266 housing units for families and 150 housing units for individuals.

A 2022 System Model Report prepared by the Corporation for Supportive Housing indicated, among other needs, that the Continuum of Care needed an additional 717 Permanent Supportive Housing units for individuals and 154 units for families. These gaps underscore the need for funding of supportive services to serve all HOME-ARP qualifying populations, within the context of supportive housing as well as in the community.

HOME-ARP Production Housing Goals

Template

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

If used to leverage other funding sources, the County estimates that HOME-ARP funds could support the development of up to 50 affordable rental units.

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

Through the production of up to 50 new affordable rental units, the County would look to prioritize larger units that can meet the needs of families experiencing homelessness.

Preferences

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. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

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

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a 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).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Template:

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:

Washtenaw County does not intend to give preferences to particular qualifying populations or subpopulations for any of the HOME-ARP activities described in this Plan.

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

Not applicable

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or

activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.

- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Template

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Washtenaw County does not intend to limit eligibility for HOME-ARP rental housing projects to particular qualifying populations.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable

HOME-ARP Refinancing Guidelines

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:

None of the following is applicable as Washtenaw Urban County does not intend to use HOME-ARP funds to refinance existing debt.

- *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*

N/A

- *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.*

N/A

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

N/A

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

N/A

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

N/A

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

N/A