

**HOME INVESTMENT PARTNERSHIPS
PROGRAM**

HOME-ARP

ALLOCATION PLAN

FOR THE
SPECIAL APPROPRIATION OF THE AMERICAN RESCUE PLAN ACT

DRAFT for PUBLIC REVIEW

Towns of Amherst, Cheektowaga & Tonawanda, NY
ACT HOME Consortium

September 1, 2022

Table of Contents

INTRODUCTION	2
CONSULTATION	2
Process	2
Consultation Summary Feedback & Findings	7
Survey Results	10
PUBLIC PARTICIPATION	12
Public Participation Process	12
Efforts to Broaden Public Participation	12
Summary of Comments Received	13
Response to Comments or Recommendations Not Accepted	13
NEEDS ASSESSMENT AND GAPS ANALYSIS	14
ACT HOME Consortium Jurisdiction & Existing Role	14
Homeless Alliance of WNY (Continuum of Care Administrator)	16
Size and Composition of Qualifying Populations within ACT HOME Consortium	16
Consideration of Current Resources Available to Assist Qualifying Populations	22
Unmet Housing and Service Needs of Qualifying Populations	25
Gaps & Unmet Needs in the Current Shelter, Housing, and Service Delivery System	29
Priority Needs	31
Determination of Needs and Gaps Methodology	32
HOME-ARP ACTIVITIES	34
Methods for Selecting Developers, Service Providers, Subrecipients and/or Contractors	34
Administrative Role	34
HOME-ARP Program Allocations for ACT HOME Consortium	34
Allocation of HOME-ARP Funding	35
Funding Priorities Rationale	35
HOME-ARP PRODUCTION HOUSING GOALS	36
Affordable Housing Production Goals	36
How Production Goals Address Priority Needs	36
PREFERENCES	37
Priority Qualifying Populations	37
Prioritization Method	37
Referral Methods	37
Limitations in a HOME-ARP Rental Housing or NCS Project	38
Limitation’s Ability to address Unmet Needs and Gaps	38
Ability to Address Other Unmet Needs and Gaps of Other Populations	38
HOME-ARP REFINANCING GUIDELINES	39
Minimum Level of Rehab	39
Review of Management Practices	39
Maintain and/or Create Units	39
Compliance Period	39
Allowable Loan Type	39
Other Requirements	39

Introduction

On March 11, 2021, President Biden signed into law The American Rescue Plan Act of 2021. The Act provides a special \$5 Billion appropriation of U.S. Department of Housing and Urban Development's HOME Investment Partnership Program (HOME) funds to alleviate homelessness and unstable housing situations in the wake of the COVID-19 Pandemic.

The Towns of Amherst, Cheektowaga and Tonawanda regularly receive HOME entitlement funds as part of their HOME Consortium. With the passage of the American Rescue Plan (ARP), the Amherst, Cheektowaga, Tonawanda (ACT) HOME Consortium will receive a special **\$3,413,700** appropriation of HOME-ARP funds for these purposes.

To alleviate homelessness, the special HOME-ARP funding has a narrower beneficiary focus than traditional HOME funding. HOME-ARP funded activities must benefit specific qualifying populations including individuals and families who are homeless; at-risk of homelessness; or in other vulnerable populations or situations. Specific definitions of the HOME-ARP Qualifying Populations as provided in the HUD CPD Notice 21-10 that can be found in Appendix A. Eligible HOME-ARP activities allow for the development and support of affordable housing; tenant-based rental assistance; provisions for supportive services; and acquisition and development of non-congregate shelter units.

HUD's CPD Notice 21-10 requires the ACT HOME Consortium to evaluate homelessness conditions in our communities and outline an Allocation Plan for the expenditure of HOME-ARP funds, which must be approved by HUD. Development of the Allocation Plan must include consultations with community partners, a Needs and Gap Analysis, and a public participation process. This Allocation Plan outlines the steps undertaken by the ACT HOME Consortium to draft this plan, as well as the programming options and special population preferences chosen for the expenditure of HOME-ARP funds.

Consultation

Process

Describe the consultation process:

The ACT HOME Consortium undertook community consultation with three main outreach methods: Stakeholder Introduction Meetings; One-on-One Stakeholder/Service Provider Meetings; and Service/Facility Provider Surveys. Stakeholders consulted consisted of the local Continuum of Care (CoC), Public Housing Authorities; regional service providers, housing/support program facility operators, non-profits, public entities, and other community partners whose primary missions or programming includes assisting homeless populations; assisting populations commonly at-risk for homelessness; and alleviating housing instability conditions.

Beginning in March 2022, three (3) Stakeholder Introductory Meetings were held to kick-off the Allocation Plan planning process by outlining the special funding and qualifying populations and what the Consortium was tasked to do. Following an overview of the main HOME-ARP considerations from the CPD-Notice 21-10, participants also participated in a group discussion of the needs and gaps as they see them within the current homeless assistance system. The Introductory meetings were held in Partnership with Erie County, who also received HOME-ARP funding, and Stakeholders were given the choice of one of the three to attend. A list of participants is provided in Table 1 below and a summary of

the comments and conclusions from these discussions are presented in the Consultation Summary & Findings section beginning on page 7.

TABLE 1. STAKEHOLDER INTRODUCTORY MEETING ATTENDEES

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Service Summary
Belmont Housing Resource of WNY, Inc.	Public Housing Authority Admin; Non-profit Affordable Housing Development	Virtual Meeting 3/17/2022 3/24/2022 3/31/2022	Affordable housing development, housing counseling, and rental voucher administrators
Erie County Department of Mental Health	Local Government Unit, Disability	Virtual Meeting 3/24/2022	Supportive services, counseling, prevention programs, Re-entry services, Single-point-of Access Provider.
Erie County Department of Social Services	Local Government Unit & Homeless Service Provider	Virtual Meeting 3/17/2022 3/24/2022 3/31/2022	Case management and rapid re-housing of homeless individuals and families in Erie County
Family Promise	Non-profit Service Provider, Shelter	Virtual Meeting 3/24/2022	Shelter operator, supportive services, housing search assistance.
Haven House – Department of Child and Family Services	Local Government Unit - Shelter	Virtual Meeting 3/24/2022 3/31/2022	Legal/ social service provider, domestic violence shelter operator
Homeless Alliance of Western New York	CoC Lead/ HMIS	Virtual Meeting 3/25/2022	CoC lead agency and manager of Homeless Management Information System
Legal Aid Bureau of Buffalo	Non-profit Legal Service Organization	Virtual Meeting 3/17/2022	Provides legal service and representation to vulnerable individuals
Housing Opportunities Made Equal	Non-profit Fair Housing Advocacy	Virtual Meeting 3/24/2022	Legal service provider, fair housing counseling
People Inc.	Non-profit service provider	Virtual Meeting 3/31/2022	Intellectual Disability Service Provider, Housing Developer
Rental Assistance Corporation (RAC)	Public Housing Authority	Virtual Meeting 3/24/2022	Housing Choice Vouchers, housing counseling provider

Restoration Society Inc.	Non-profit Recovery-based mental health services	Virtual Meeting 3/24/2022	Substance abuse and mental health supportive services
Tonawanda Housing Authority	Public Housing Authority	Virtual Meeting 3/24/2022	Public housing provider
Salvation Army Adult Rehabilitation Center	Non-profit Housing and Human Service Provider	Virtual Meetings 3/24/2022 & 3/31/2022	Case management, substance abuse counseling, and rapid rehousing provider
Veterans One-stop Center of WNY	Non-profit Veterans Services	Virtual Meeting 3/31/2022	Service and resource provider for veterans
Western New York Veterans Housing Corporation (WNYVHC)	Non-profit Veterans Org	Virtual Meeting 3/31/2022	Veterans-specific housing provider
Developmental Disabilities of WNY	Non-profit disability service provider	Virtual Meeting 3/31/2022	Affordable Housing Developer
WNY Independent Living	Disabilities Services and Advocacy	Virtual Meeting 3/31/2022	Service and resource provider for disabled individuals and families
211 WNY	Informational Hotline, referral service	Virtual Meeting 3/24/2022	Housing and human services hotline

Following the initial Introduction Meetings, ACT HOME Consortium staff held several one-on-one meetings with various stakeholders and service providers. The purposes of the one-on-one meetings were to have a more private conversation about the state/effectiveness of the homeless assistance systems in Western New York and the additional factors to consider that may be contributing to the needs and gaps as brought up previously. Also, the one-on-one meetings provided an opportunity to speak candidly with regional non-profits to understand their long-term goals as an organization to serve the qualifying populations better and what eligible HOME-ARP programming structures would make the most sense from their perspective. These sessions were also used to better gauge capacity-building support needs in order to make programming successful. In this regard, the one-on-one meetings proved helpful to refining the Consortium’s HOME-ARP program allocation categories.

For privacy purposes the conclusions of these meetings are summarized in the Consultation Summary & Findings section. Table 2 lists the organizations and entities that received one-on-one Meetings with ACT HOME Consortium Staff.

TABLE 2. ONE-ON-ONE CONSULTATION MEETINGS

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Services Summary
Amherst Senior Outreach	Local government division	Virtual Meeting 4/20/2022	Provides programing and counseling for Seniors in the Town of Amherst
Buffalo Urban League	Housing and human service coordinator	Virtual Meeting 4/7/2022	Provides individual counseling to people in need of housing, education, and employment
Cheektowaga Senior Services	Local government division	Meeting 5/5/2022	Provides programing and counseling for Seniors in the Town of Cheektowaga
Cheektowaga Youth & Recreation	Local government division	Meeting 5/2/2022	Provides youth programing in the Town of Cheektowaga
Family Justice Center	Non-profit Domestic Violence Service Provider	Virtual Meeting 4/20/2022	Provides counseling, legal services, and housing coordination for individuals of domestic violence
Matt Urban Center	Housing and community service provider	Virtual Meeting 4/22/2022	Coordinates human and housing placement services for individuals and families
People Inc.	Non-profit service provider	Virtual Meeting 4/27/2022	Intellectual Disability Service Provider, Housing Developer
Police Departments: Amherst/Cheektowaga/Tonawanda	Municipal Law Enforcement	In Person interview 6/5/2022 5/3/2022	Community policing
School Districts: Sweet Home Williamsville Amherst Maryvale	NYS education administrators	Virtual Meeting 4/8/2022 4/21/2022 5/17/2022	McKinney Vento Act participants, case work for children of housing insecure families
Town of Amherst Disabilities Committee	Local Government Committee	Virtual Meeting 4/4/2022	Disabilities advocate for the Town of Amherst

University District Community Development Agency	Community development, human services, and affordable housing provider	Virtual Meeting 4/22/2022	Coordinates housing programs and community projects focused on youth and seniors in the University District of Buffalo NY
Village of Depew	Municipality	Meeting 5/6/2022	Government operations
Village of Sloan	Municipality	Meeting 5/4/2022	Government operations
WNY Independent Living	Disabilities advocacy and service provider	Meeting 4/8/2022	Provides counseling and care coordination for individuals with disabilities
Y.W.C.A. WNY	Social and housing service provider	Virtual Meeting 4/22/2022	Coordinates social services and housing placements for women and children

Lastly, the ACT HOME Consortium put out a Survey directed to service and facility providers to further understand needs and gaps in the system as they see them, and to rank the issues raised in terms of preferences for the funding allocations. Table 3. below outlines all the entities that responded to the Survey. A summary of the Survey’s main findings are provided on page 10 and 11. A full copy of the Survey results are included in Appendix B.

TABLE 3. Service and Facility Provider Survey Responses

Agency/Org Consulted	Type of Agency/Org	Survey Date	Services Summary
Center for Elder Law and Justice	Non-profit Legal Services Provider	7/26/2022	Affordable housing development, housing counseling, and rental voucher administrators
Cheektowaga Central School District	School District	7/24/2022	Case management and rapid re-housing of homeless individuals and families in Erie County
NeighborWorks Community Partners	Non-profit	7/14/2022	Legal/ social service provider
Compass House	Domestic violence and youth housing services	7/13/2022	Coordinates human and housing placement services for youth and young adults

Western New York Law Center	Non-profit legal services	7/12/2022	Legal case management and counseling
Legal Aid Bureau of Buffalo, Inc.	Legal Service Provider	7/11/2022	Supportive legal services
Town of Tonawanda Police Department	Veterans Services	7/11/2022	Local law enforcement
Amherst Generations Foundation	Senior Services Nonprofit	7/11/2022	Foundation serving Amherst's aging population
Peaceprints of WNY	Institutional reentry services	7/8/2022	Social justice organization and transitional case work
Harvest House of Buffalo	Human service non-profit	7/8/2022	Religious based housing and human service care
WNY Veterans Housing Coalition	Housing services for Veterans	7/8/2022	Veterans human services and housing coordination
Erie County Bar Association Volunteer Lawyer's Project	Legal services	7/7/2022	Local legal case management

Consultation Summary Feedback & Findings

List the organizations consulted, and summarize the feedback received from these entities:

Discussions from the various in-person meetings (attendees listed in previous tables) yielded several key themes on needs and gaps that exist in the delivery of housing assistance and services for the qualifying populations. It should be noted that due to the housing/service delivery structure of the regional Continuum of Care system many of the themes are based on the region in general and not necessarily specific to needs and gaps within the Towns of Amherst, Cheektowaga or Tonawanda alone; these themes are listed below.

Theme: Lack of Housing Supply

- There's an overall lack of housing supply at all levels: emergency, rapid-rehousing, transitional, and permanent supportive.
- Homeless populations and families are staying in emergency placement and transitional housing much longer than in the past. There's an inability to move people along to the next level of housing, either supportive or permanent due to lack of supply.
- There's a lack of supportive and permanent housing options for larger families, 3+ bedrooms.
- Many of the housing supply issues stem from an overall lack of affordable housing in the market, including the rental market and home purchases.

- Current waiting lists for permanent housing assistance options, such as subsidized affordable housing complexes and Section 8 Voucher Programs are exceptionally long. Most subsidized housing complex waiting lists are 3-4 years long, and the Erie County Section 8 Housing Choice Voucher Program’s waiting list is 10 years and is closed to new sign-ups due to the sheer number of people on the waiting list.
- More people are competing for the limited stock of housing at lower price points, which are driving up rental and home purchase prices, putting more cost-burdened stressors on families overall.
- HUD’s “Housing-First Model” severely restricts service provider’s ability to remove clients from supportive housing that are not following the rules or making progress towards self-sufficiency. This also creates a bottleneck in re-opening a unit to other clients in need.
- House fires are a common event creating homelessness as it’s hard to rebuild from such a heavy loss and can set clients back years with a large financial burden to recover from.
- There’s a lack of landlords willing to take Section 8 vouchers.
- Area motels that host emergency placement are located in isolated suburban communities, without convenient access to transportation and other services. While not ideal, emergency placement in motels is necessary due to the lack of other options in the region.

Theme: Limitations and Issues with Supportive Services

- Transitioning clients to the next level of housing is the biggest challenge. With a transition to permanent housing, case-management service capabilities (funding/staffing) drop off dramatically and in many cases clients would be successful long-term in maintaining permanent housing if case-management assistance lasted for another 1-2 years.
- Many cost-of-living expenses compound how qualifying populations succeed in permanent housing, i.e. transportation, food costs, child care, medical costs, etc.
- Traumatic Brain Injury populations struggle to stay in permanent housing and would be successful if long-term case management and other support services were available on an on-going basis. However, many of the current funding resources limit the timeframe by which support services can be provided.
- HUD’s Housing First Model doesn’t require clients to participate in supportive services, which creates no accountability for clients to be working towards transitioning to permanent housing.
- HUD’s Housing First Model is unrealistic for clients that have had a life-time of issues and reoccurring homelessness. The 6-9 months supportive services expectation to have clients self-sufficient again is very unrealistic for these specific clients.
- Having placement housing options in suburban settings is beneficial for children in family situations due to the access to higher-quality schools, however suburban locations present transportation, childcare, mental health counseling and other service gaps from lack of proximity.
- Burn-out and high turnover amongst case management social workers is a real burden to organizations providing housing/services and the clients they serve. Additional resources are needed to reduce caseload burden for staff and competitive wages to maintain staffing.

Theme: Housing Design Matters

- Adaptive Reuse of existing buildings into assistance housing doesn't work well because design is very important to the success of facility operations and resident success. A skillfully designed new-build is better for all forms of assistance housing than conversions of a building.
- The use of motels for emergency placement is not working, they are unsafe, unhealthy options, especially for families with children. There's also a lack of kitchen appliances, convenient and frequent transportation options, and proximity to places of employment, and they can attract criminal activities.
- Placement in a motel requires the loss of 95% of client's belongings, creating an even bigger barrier to rebuilding their lives.
- Erie County Social Services' initial motel placement for families acts as a deterrent for families to seek help and entry into the CoC system.
- Non-congregate settings might not be best for all types of clients as some congregate settings can actually create a sense of community and support system, where helping each other contributes to client success.
- Suburban scattered sites are better reserved for situational homelessness (rather than chronic homelessness), as those clients most often need a one-time boost to land on their feet again.
- The Matt Urban Center Hope House Model should be used more where services are co-located with a one-stop shop: café, job placement services, transportation assistance and van services, childcare, GED classes, etc.

Theme: Specific Populations' Needs are not met with Current Housing System

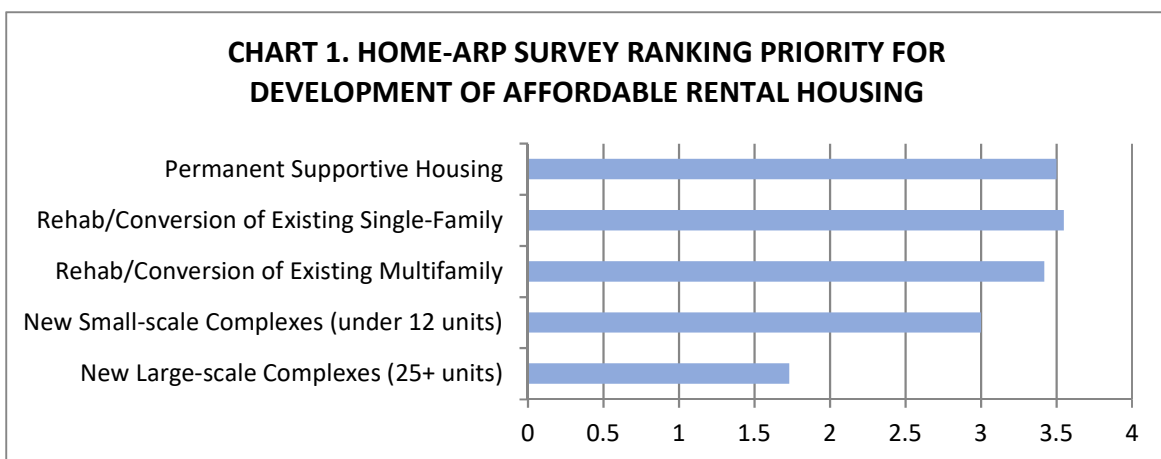
- There is a need for transitional housing for elderly individuals. Nursing homes are currently being used as transitional housing, but are being overwhelmed.
- Transitional housing is needed for individuals with history of substance abuse where they can also seek treatment. Cohousing units with a private room would be ideal for this where there can be a community of support.
- Abusive partners are often the household's primary breadwinner in domestic violence situations. A lack of affordable housing options in the Consortium (where there are strong public schools) makes it difficult for victims to leave dangerous situations.
- Homeless mothers don't always feel safe going to emergency shelters with their infants and need more appropriate transitional housing.
- Cost burdened households with disabilities need affordable housing options with ADA compliance or other special accommodations.

Survey Results

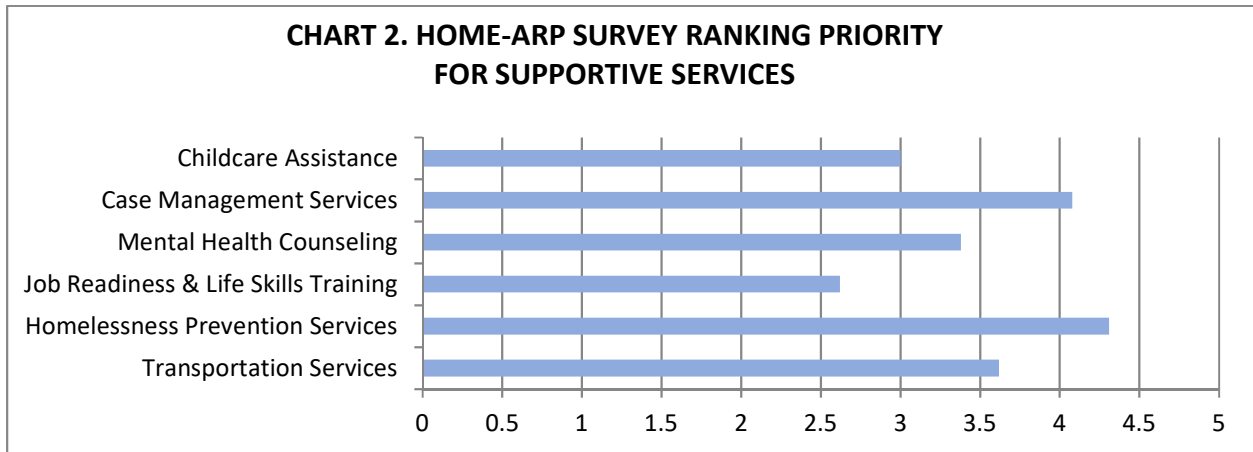
Much like the feedback that was received from the stakeholder and one-on-one meetings, survey responses emphasized the lack of affordable housing options. Respondents were from regional service providers for persons that are homeless or at-risk of becoming homeless, as well as free legal service providers. Respondents from these organizations reported that there is a strong need for more affordable units in general, and also a strong need for an assortment of affordable housing types, such as permanent supportive housing and co-housing. Permanent supportive housing was specifically mentioned by respondents as lacking for young adults, seniors, and persons with disabilities. Co-housing models with private rooms was reported as a conducive model for persons with disabilities, or mental health, or substance abuse issues.

The survey was developed as a means to rank the priority of eligible HOME-ARP activities. The development of affordable housing, tenant-based rental assistance (TBRA), and supportive services were ranked as equally high priorities among all of the eligible activities. Respondents cited specific issues such as rapidly rising rents, long waitlists, and a lack of affordable units with supportive care for persons with disabilities or substance abuse issues. Survey respondents reported that it is extremely difficult to place clients in proper housing that they can afford, but it becomes even more difficult if their client has special needs from a disability or substance abuse issue. New units and rental assistance were identified as the most beneficial activities for these types of clients. It should also be noted that hotel and motel placements ranked the lowest and was not prioritized over any other eligible activity, which was also reflected in the stakeholder meetings and one-on-one interviews.

The survey also asked respondents to prioritize the development of Affordable Rental Housing by the type of units that should be created (see Chart 1). The rankings indicated that permanent supportive housing; rehab/conversion of existing single-family homes; and, rehab/conversion of existing multifamily were the preferred “development styles” to create new affordable housing units for qualifying populations. New small-scaled complexes (under 12 units) also scored high with a ranking of 3 out of a possible 6. New large-scale affordable apartment complexes (25+ Units) were not preferred as many providers simply do not currently have the capacity, although this may be a reflection of the survey respondents themselves as none have experience developing large-scale affordable housing.



Preferred supportive services mentioned in the survey included: legal services, mental health and substance abuse counseling, transportation services, and organizational outreach support (See Chart 2 below). In particular, organizational outreach support was reported as a significant gap in the service delivery of the region’s Consortium of Care (CoC). Often times a significant barrier to delivering services is that most persons who are homeless or at risk of being homeless have little knowledge of the various organizations that can help. Assisting organizations with marketing and outreach is a significant undertaking and something many of the organizations in the CoC could benefit from.



Public Participation

Public Participation Process

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

The ACT HOME Consortium provided opportunities for public participation on the Proposed HOME-ARP Allocation Plan through a 15-day public comment period and two public hearings.

Date(s) of Public Notice:	Amherst Bee – August 31, 2022
	Ken-Ton Bee – August 31, 2022
	Cheektowaga Bee – September 15, 2022
Public Comment Period:	September 1, 2022 – September 27, 2022
Date(s) of Public Hearings:	Amherst – September 19, 2022
	Cheektowaga – September 27, 2022

On September 1, 2022 the Proposed HOME-ARP Allocation Plan was released for public comment and available for the required 15-day public comment period. The comment period was noticed in the Amherst Bee, Cheektowaga Bee, and the Ken-Ton Bee and copies of the Proposed Allocation Plan were made available the Town Clerk's Offices, Town Halls and Libraries of the ACT HOME Consortium communities in accordance with the Consortium's Citizen Participation Plan. Notices for public participation opportunities were also provided in newspapers serving minority populations: Challenger and Panorama Hispano. A copy of the public notice is provided in the Appendix [REDACTED]. Interested citizens could also view the Draft Plan online on the Town of Amherst's Community Development website, which was also provided in the Notice. Citizens had the opportunity to submit written comments via US mail or email, as well as provide comments in-person at either of the two public hearings.

The two public hearings were held in the Towns of Amherst and Cheektowaga and citizens from all three Towns and Villages within their jurisdiction were invited. The first public hearing was held on September 19, 2022 at 7:00 PM in the Town of Amherst at the Amherst Town Board Meeting and the second public hearing was held on September 27, 2022 at 7:00 PM at Cheektowaga's Town Board Meeting.

Efforts to Broaden Public Participation

Describe any efforts to broaden public participation:

To broaden public participation public hearings were held at regularly scheduled Town Board Meetings in order to increase attendance and awareness of the Proposed Allocation Plan. At the beginning of the public hearings, Town staff gave brief presentations on the Proposed Allocation Plan, outlining the amount of funding awarded and the range of activities that the ACT HOME Consortium will undertake, before opening it up for public comment.

At the start of the 15-day public comment period, copies of the Proposed Allocation Plan and notices for public comment were also provided via email directly to the stakeholders, government agencies, homeless service providers, and support organizations involved in the initial Consultation Process in

order for those organizations to distribute the Proposed Plan amongst their constituents and clients for broader feedback.

Lastly, copies of the notices were also provided to managers at shelter locations (rapid rehousing, transitional and permanent units) for posting at the facilities so direct feedback could be received from the qualifying populations the HOME-ARP money is intended to assist.

Summary of Comments Received

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

TBD – Summary from Public Hearing Comments received.

Response to Comments or Recommendations Not Accepted

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

TBD – Only applicable if Public Comments were received.

Needs Assessment and Gaps Analysis

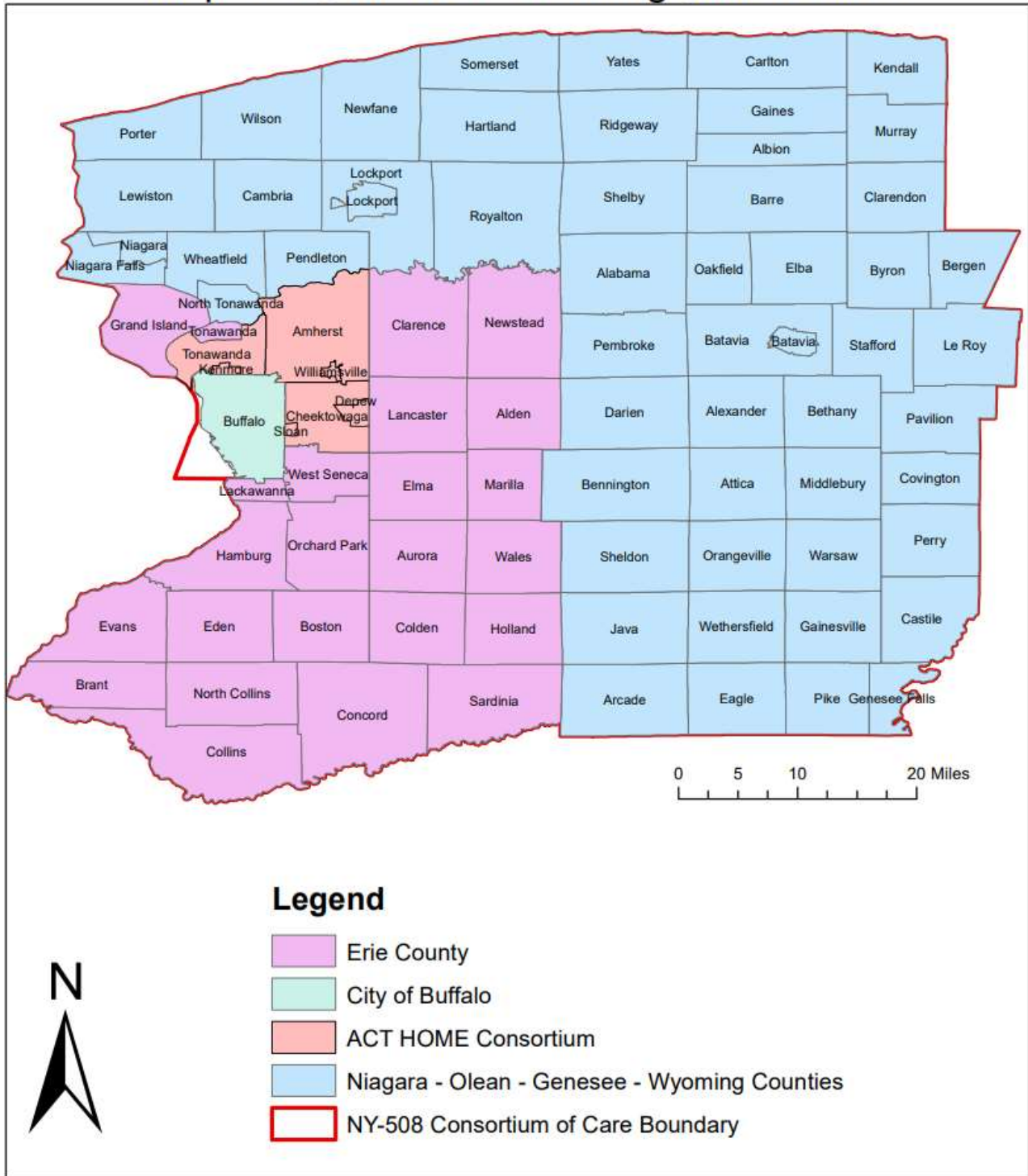
ACT-HOME Consortium Jurisdiction & Existing Role

The Towns of Amherst, Cheektowaga and Tonawanda are first-ring suburbs of the City of Buffalo within Erie County New York and operate as a Participating Jurisdiction (PJ) for the purposes of HOME Entitlement funds. The PJ also includes the Villages of Sloan, Kenmore, Williamsville, and Depew (Western half) which exist within the Town boundaries. Presently all these municipalities play a limited role in delivery of housing and services for Qualifying Populations intended for assistance by the HOME-ARP funds. Other relevant Municipal roles include:

- The Town of Tonawanda and Village of Kenmore receive Homeless Assistance funding in the form of an annual entitlement Emergency Solutions Grant (ESG). The Town currently funds programs through Restoration Society Inc., Compass House, and the YWCA of the Niagara Frontier.
- The Village of Kenmore operates the Kenmore Municipal Housing Authority, a Public Housing Authority (PHA).
- The Town of Amherst is the municipal administrator of the Erie County PHA Section 8 Housing Choice Voucher Program. The Town's contractual administrator is Belmont Housing Resources of WNY.
- Each Town also provides limited support programs for households at-risk of homelessness through Community Development Block Grant entitlement funds.
- Each Town also receives annual HOME Investment Partnerships Program entitlement funds as part of the Consortium, and provides various programming to generate new affordable housing units (single-family and rental).

Aside from the funds and roles mentioned above, the HOME-ARP funding is the first meaningful award of resources the ACT HOME Consortium will have to directly address issues of homelessness jurisdiction-wide. However, it should be noted that the delivery system for housing, support services and care is currently established on a regional-basis, with the Housing Alliance for Western New York (HAWNY) operating the Continuum of Care (CoC) system for Erie, Orleans, Niagara, Genesee, and Wyoming Counties (See Map 1. HOME-ARP Planning Jurisdictions). While the CoC is a regional system, due to financial limitations, housing, services, and providers tend to concentrate in the Cities of Buffalo and Niagara Falls.

Map 1. HOME ARP Planning Jurisdictions



Homeless Alliance of WNY (Continuum of Care Administrator)

The Homeless Alliance of Western New York (HAWNY) is the Lead Agency for both the Continuum of Care (CoC) and the Homeless Management Information System (HMIS) in Buffalo, Niagara Falls, Erie, Niagara, Genesee, Wyoming and Orleans Counties (NY-508). As the lead agency for the region, HAWNY is responsible for coordinating the implementation of housing and service systems within its geographic area. The HMIS is the central database required by HUD under the HEARTH Act as the single point of entry/coordinated entry system for homeless services in the CoC. The HMIS captures client-level information over time on the characteristics and service needs of men, women, and children experiencing homelessness, including a non-duplicative count of homeless persons. Agencies under the CoC employ trained staff to perform client intake using HMIS. This requires the consent of the client and the data represent what the client agrees to disclose upon entry. The procedure has several components that are designed to standardize the intake process and assign placements based on priority. Clients are vetted for their status and prioritized based on their entry assessments and then referred to the proper shelter and or service provider. Often, service-based housing, transitional, and permanent housing is not yet available and therefore the client will be placed on a waiting list within the system. These clients are prioritized in HMIS and are contacted when openings become available and match their respective needs.

Size and Composition of Qualifying Populations within ACT HOME Consortium

Describe the size and demographic composition of qualifying populations within the PJs Boundaries:

Homeless as defined by 24 CFR 91.5

According to HAWNY, approximately 236 homeless individuals were counted within the ACT HOME Consortium geography during their Regional 2021 Point-in-Time (PIT) count. This count aims to provide an estimate on the total number of homeless on any given day, as chronically homeless could be recounted throughout the year. In the entire NY-508 Continuum of Care boundary (Erie, Genesee, Wyoming, Niagara, Olean Counties), there were 663 total housed-homeless, with 70% located in Erie County.

However, it should be noted that while quantifying homeless

populations for the ACT HOME Consortium, HAWNY identified some limitations of the Point-in-Time data (PIT). The HAWNY's explanation is that HMIS and PIT data may not accurately reflect

Jurisdiction	Zip Code of Last Permanent Address	Total
Amherst	14228	5
	14221	11
	14051	1
	14226	11
Cheektowaga	14225	27
	14212	89
	14227	13
	14043	15
Tonawanda	14217	20
	14223	13
	14150	31
Grand Total		236

the geography a homeless person is coming from for townships, and is better used at a larger geography, such as county level. This is due to how the data is collected (self-reporting). The HAWNY indicated that often clients report their current or recent emergency shelter address zip code rather than where they came from when first becoming homeless. Therefore a share of the PIT dataset may actually reflect the populations hosted in the ACT HOME Consortium's motels/hotels that have emergency shelter placement contracts with Erie County Social Services.

Unsheltered persons were not counted in HAWNY's PIT for 2021 due to the pandemic. Unsheltered homeless populations are generally documented by area police departments who periodically check on local homeless and know where they camp. At present Amherst has 2 homeless persons who are considered unsheltered and have repeatedly declined offers of assistance. In these instances, there is often a mental health issue complicating the person's ability to receive housing and services. Cheektowaga Police noted an average of 2-3 unsheltered homeless individuals annually. Cheektowaga Police have been successful in convincing clients to enter the CoC shelter system as they perform welfare checks in partnership with Endeavor Health Services for mental health case management with these individuals. Tonawanda Police report 2 homeless persons who are considered unsheltered and have repeatedly declined offers of assistance. In addition they are aware of a camp with an unknown amount of homeless people (estimate 5 to 6 people); however, patrols have not been able to make contact with them.

Homeless youth that are sheltered are generally counted as part of HAWNY's PIT data set. However, HAWNY's 2017 Unaccompanied Youth Homelessness Summary Brief outlines the hidden populations of unaccompanied minors (aged 11-17), as often times they "couch surf". The findings indicated 305 unaccompanied minors were experiencing homelessness in 2017; of which 30.5% identified as a parent and 41% reported their sexual orientation as "LGBTQ" or "questioning". The Brief identified the average age of unaccompanied minors being 15.5 years and the largest share spending their nights "couch surfing" (37%).

The McKinney Vento statistics tracked by School Districts outlined in Table 5 provide a sense of the number of children considered homeless or housing unstable within the Consortium. School Districts are required to track students whose housing situation is unstable or defined as those living doubled-up, couch-surfing, at-risk of homelessness, or otherwise unstably housed, which is more expansive than the HUD definition of homelessness. Table 5 shows the number of students in each school district per year who receive assistance under the McKinney Vento Act. These numbers include students who are unaccompanied as well as students experiencing homelessness with their families. The Kenmore-Tonawanda School District consistently has the highest student homelessness for any district in Erie County outside the City of Buffalo.

TABLE 5. MCKINNEY-VENTO ACT ASSISTED CHILDREN BY SCHOOL DISTRICT

School District	2014-2015	2015-2016	2016-2017	2018-2019	2019-2020	2020-2021
Amherst CSD	5	16	18	23	26	16
Sweet Home CSD	31	32	55	55	23	36
Williamsville CSD	18	14	13	20	33	14
Cheektowaga CSD	54	60	54	43	37	22
Cheektowaga-Maryvale UFSD	21	20	22	33	22	13
Cleveland Hill UFSD	28	9	19	13	13	10
Depew UFSD	16	13	18	27	14	11
Cheektowaga-Sloan UFSD	17	17	22	5	11	26
Kenmore-Tonawanda UFSD	93	111	135	143	121	127
ACT HOME School Districts Total	283	292	356	362	300	275

Source: NYSTEACHS database on student demographics for NYS.

At-Risk of Homelessness as defined by 24 CFR 91.5

The ACT HOME Consortium quantifies At-risk of Homelessness populations by reviewing the statistics from existing assistance programming and Public Use Micro Data Areas (PUMAs) data¹ reflecting incomes and housing-cost burdened households. The Consortium also has one Emergency Solution Grant (ESG) Program serving the Town of Tonawanda. In the 2021 Program Year, Tonawanda assisted 136 individuals using their ESG funds. Despite the COVID Pandemic, the program stayed consistent from the year before where 133 individuals were assisted in the ESG 2020 Program Year.

Cheektowaga and Amherst also provide Emergency Tenant Based Rental Assistance (ETBRA) to individuals and families at risk of eviction and homelessness funded by HOME Investment Partnerships Program funds and a special appropriation of CDBG-COVID. To-date, the ACT Consortium assisted 109 at-risk households with ETBRA.

According to the *Engaging the Future of Housing*² Report, income inequality is also rising in the region. The ACT consortium is no exception. The percentage of residents who are considered very low and extremely low income is significant in the Consortium, at levels of 21.1%, 22.7%, and 28.3% in Amherst, Tonawanda, and Cheektowaga respectively (see Table 6). Low and Very

¹ It should be noted that PUMA data, while more detailed on elements such as household financial information than US Census Bureau’s American Community Survey, the PUMA Areas may be delineated geographically across municipal boundaries in some cases. For example, while Amherst Town has its own standalone PUMA Area (#1202) the Town of Tonawanda and Cheektowaga are combined with other neighboring municipalities. This may skew the data set as Tonawanda is presented with a more affluent township (Grand Island) and Cheektowaga, is presented with poorer communities (West Seneca and Lackawanna). Regardless, the PUMA data does present a general characteristic of the state of incomes and housing cost burden to a more refined level than county-wide for the purposes of this Plan.

² Source: *Engaging the Future of Housing in the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead* (2021 for Local Support Initiatives Corp.)

Low incomes are thresholds that qualify for housing and rental assistance and represent a significant demand for services in the Consortium.

TABLE 6. HOUSEHOLD INCOME BY PUMA GEOGRAPHY

PUMA #	Municipality	Extremely Low Income (<30 AMI)	Very Low Income (30% AMI)	Low Income (50% AMI)	Total % of All Households (<50% AMI)
1201	City of Tonawanda, Towns of Tonawanda and Grand Island	12.1%	10.6%	17.9%	40.6%
1202	Town of Amherst	12.8%	8.3%	14.1%	35.2%
1204	City of Lackawanna, Towns of Cheektowaga and West Seneca	14.5%	13.8%	21.1%	49.4%

Source: *Engaging the Future of Housing in the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead (2021)*

At the same time, the number of cost burdened households (households which spend 30% or more of their income on housing) is notable (Table 7 & 8). Renters, however, are significantly more vulnerable. Not only are renters more likely to be cost burdened, but are likely to be considered severely cost burdened, defined as households that spend 50% or more of their income on housing. The percentage of cost burdened and severely cost burdened renters in Tonawanda, Amherst, and Cheektowaga PUMAs is 46.8%, 56.6%, and 49.9%, respectively. In other words, around half of all renters in the entire ACT HOME Consortium-PUMA Areas are considered cost burdened. In total, the number of cost burdened renters amounts to 44,861 individuals across the three (expanded) PUMA territories. While the total number of renters is ultimately less than total homeowners, the percentage of renters with cost burden poses a significant risk to overburdening the current homelessness prevention system in Western New York.

TABLE 7. COST BURDEN OF OWNER-OCCUPIED HOUSING

PUMA #	Municipality	Total Owner-Occupied spending 30% or more on housing	% Cost Burden (30%-50% of Income)	% Severe Cost Burden (50%+ of Income)	Total % of Owner-Occupied with Cost Burden (30%+)
1201	City of Tonawanda, Towns of Tonawanda and Grand Island	35,760	11.1%	7.2%	18.3%
1202	Town of Amherst	34,962	10.1%	5.9%	16.0%
1204	City of Lackawanna, Towns of Cheektowaga and West Seneca	45,301	12.6%	8.0%	20.6%

Source: *Engaging the Future of Housing in the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead (2021)*

TABLE 8. COST BURDEN OF RENTER OCCUPIED HOUSING

PUMA #	Municipality	Total Renters spending 30% or more on housing	% Cost Burden (30%-50% of Income)	% Severe Cost Burden (50%+ of Income)	Total % of Renters with Cost Burden (30%+)
1201	City of Tonawanda, Towns of Tonawanda and Grand Island	11,618	19.6%	27.2%	46.8%
1202	Town of Amherst	13,949	24.9%	31.7%	56.6%
1204	City of Lackawanna, Towns of Cheektowaga and West Seneca	19,294	23.4%	26.0%	49.9%

Source: *Engaging the Future of Housing | the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead (2021)*

Amherst, Cheektowaga and Tonawanda also fund HUD-certified housing counseling for at-risk populations, foreclosure prevention counseling, and housing discrimination counseling in order to prevent homelessness. These programs have operated for many years and are currently provided by Belmont Housing Resources for WNY, Buffalo Urban League, and Housing Opportunities Made Equal. In the last year the total number of households counseled in the Consortium for a housing instability issue was 370.

Most recently, due to processing of Post-COVID eviction proceedings the Town of Amherst has begun funding homeless households with assistance to move to a new rental unit. For these cases, CDBG-COVID funding is used to pay first month, security deposit and up to four months rent for a new apartment. Apartments chosen are screened for affordability and assisted clients are typically in one-time event-driven situations. Prior to COVID the Town hadn't funded these types of cash assistance awards, so there is no ability to comment on trends pre and post COVID. At present however, the Town is receiving about 1 application a month for these situations.

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

According to Erie County, its Child and Family Services division serves domestic violence victims in WNY for emergency housing. The County manages the region's only 36-Bed Emergency Shelter Program for domestic violence victims and the facility is located within the City of Buffalo. County provided statistics indicate the division serves approximately 1500 unique individuals annually, most are women and children.

The ACT HOME Consortium also reached out to the non-profit Family Justice Center of Western New York, which is a primary provider of assistance to domestic violence victims and serve clients at earlier stages of intervention, often before cases escalate to Child and Family Services.

Currently the Family Justice Center maintains a satellite office in Amherst and estimated their current client base within the Consortium at 288 clients, with 165 clients experiencing housing instability. The total number of persons affected by domestic violence in the Consortium increases to 521 persons if clients’ children are included in the counts.

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.

Disabled Populations

Also indicated in the *Engaging the Future of Housing* Report, households with persons with disabilities are significantly more likely to be cost burdened compared to other households. As shown in Table 9, households occupied by a person with a disability are between 33% and 40% housing-cost burdened within ACT HOME Consortium-PUMA areas consulted. More notably, households occupied by a person with a disability are between 10% and 20% more likely to meet the definition of cost burdened. Therefore, disabled populations should be considered “at greater risk of housing instability”.

In consultation with disability advocacy and service organizations this sentiment was reinforced. Concerns focused on a general lack of appropriately designed affordable housing options regionally (ADA, visual or deaf impairment, Visit-ability) and the inability for low-and-moderate income disabled persons to renovate housing units to meet their needs. Another main theme presented was the limited amount of disabled-supportive housing in the region that constrains developmentally-disabled adults from living independently. According to People Inc., there are currently 516 developmentally disabled adults on New York State’s Office of Temporary and Disability Assistance emergency waiting list for housing.

TABLE 9. COST BURDEN FOR HOUSEHOLDS OCCUPIED BY PERSONS WITH DISABILITIES

PUMA #	Municipality	With Disability		No Disability	
		Cost Burden	No Cost Burden	Cost Burden	No Cost Burden
1201	City of Tonawanda, Towns of Tonawanda and Grand Island	35.9%	64.1%	21.9%	78.1%
1202	Town of Amherst	40.2%	59.8%	24.4%	75.6%
1204	City of Lackawanna, Towns of Cheektowaga and West Seneca	33.7%	66.3%	27.8%	72.2%

Source: *Engaging the Future of Housing | the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead (2021)*

Veterans

Another special population that is vulnerable to housing instability within the Consortium are veterans. According to the 2021 PIT count, 32 of the sheltered clients were veterans. Local supportive service and rapid rehousing providers for Veterans report having 25 clients within the ACT consortium area citing a lack of affordable housing units and rising housing costs as the biggest obstacle for their clients.

Elderly

Other special populations such as seniors or those who generally have fixed incomes are also particularly vulnerable to homelessness in the ACT consortium. According to the PIT counts from HAWNY, seniors or those over 65 years old make up a small number of those within the HMIS database. However, this number has doubled for the ACT consortium from 2019 to 2021. This is not surprising given the rising costs of rental housing.

Consideration of Current Resources Available to Assist Qualifying Populations

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

Current Congregate and Non-Congregate Shelter Units

The ACT HOME Consortium does not host any emergency shelters that would be considered congregate. Area motels and hotels located in the Consortium do serve as non-congregate shelters for emergency placement by the Erie County Department of Child and Family Services. Non-congregate shelter is the term used for emergency shelters that provide accommodations in a way that provides private space for guests. Most of these motels/hotels are located on Niagara Falls Boulevard and Transit Road and are less than ideal for placements due to lack of proximity to services, lack of transportation options, and overall distance from city service providers. Motel placements have also been mentioned periodically by school district social workers as objectionable due to “incidences of crime”, “isolation created due to lack of a car”, “lack of safety”, “overcrowding of motel rooms”, “and reduction of belongings to enter”, and “lack of kitchen facilities”.

Current Tenant Based Rental Assistance (TBRA) Programs

There are two main TBRA programs in Western New York serving Erie County. One is the Erie County Public Housing Authority (PHA) Section 8 Rental Voucher Program, administered by Belmont Housing Resources for WNY on behalf of the Town of Amherst (Lead Jurisdiction). The Erie County PHA currently provides approximately 5,365 tenant-based vouchers annually and has a closed 10-year waiting list. An additional 73 Emergency Housing Vouchers were also received by the Erie County PHA from COVID relief funding specifically for homeless individuals and at this time are all allocated. The other main Section 8 Rental Voucher Program operating regionally is administered by Rental Assistance Corporation (RAC) and typically serves 5,200 households annually. The RAC waitlist is approximately 4-5 years long, but opens periodically to accept new applicants.

Within the ACT HOME Consortium, approximately 527 households receive TBRA from the Erie County PHA Section 8 Vouchers. However, it's difficult to quantify the number of ACT HOME Consortium residents that are on the Section 8 Voucher waiting list as many residents move around and neglect to update their contact information with Belmont.

The Town of Tonawanda's Emergency Solution Grant (ESG) funding also provides direct rental assistance and rapid-rehousing assistance via Restoration Society Inc., Compass House, and the YWCA of the Niagara Frontier. In 2020 and 2021, ESG funding assisted a total of 25 and 9 households respectively. An additional special COVID appropriation of ESG funds also assisted approximately 73 households with various types of rental assistance.

Amherst and Cheektowaga are not eligible for ESG funding. However, both Towns provided rental assistance via special CDBG-COVID funding received in 2020. Amherst and Cheektowaga's Emergency Rental Assistance (ERA) Programs assisted renters for up to 6 months of arrears or current rent. The programs assisted low-to-moderate income households facing eviction due to a COVID-related financial impact. As mentioned previously, approximately 111 households were assisted with the Consortium's ERA programs. These COVID era programs are anticipated to end by March 2023.

The CoC also administers a variety of Rapid Rehousing and Scattered-site Permanent Supportive Housing for those with disabling conditions. Consultations with area non-profit service providers indicated that a majority of the Rapid Rehousing and Scattered Sites serving the CoC geography are located within the City of Buffalo, while a few small complexes (4-8 units each) exist in Cheektowaga and Tonawanda. A majority of scattered site Supportive Housing is contracted through the Erie County Department of Mental Health (DMH) and is eligible to County residents with severe mental illness. However, in consultation with non-profit providers, scattered sites located in suburbia were not considered ideal for mentally ill clients, as they can be isolating for clients and difficult to case manage.

Current Affordable and Permanent Supportive Rental Housing

The Kenmore Housing Authority (KHA) has two developments within the boundaries of the ACT HOME Consortium. Kenmore Village Apartments and Theater Apartments each offer 97 one-bedroom units for the elderly. There are 10 accessible units in each building. KHA's buildings are normally at full occupancy and the length of stay is predominantly 5-10 years (29%) and 10-20 Years (27%). Though 29 households were classified as "disabled," 194 requested accessibility features in their units. Residents of the complexes have an average annual income of \$17,078 (*2020-2024 Consolidated Plan for the ACT HOME Consortium*). As of mid-2019, the Kenmore Housing Authority had 530 applicants on its waiting list. There are no other public housing authority developments in the Towns of Amherst, Cheektowaga, and Tonawanda.

Amherst hosts 16 affordable multifamily rental complexes financed as either Low-Income Housing Tax Credits (LIHTC) deals or HUD Project-based Section 8. The 16 complexes provide a total of 2,028 units, 48% of which are 55+ Senior housing. Many of the existing affordable complexes include sizable wait-lists. The rental market overall is tight in Amherst with a considerable college student population from the University at Buffalo and Daemen University

driving up competition for lower-cost market rate rental units. While college students generally are ineligible for subsidized rental housing units, the overall market demand for off-campus housing created by students, plus the growing loss of single-family home rentals to investor Airbnbs, are driving up rent prices locally as a whole.

Approximately 10,602 units or 32%, of Cheektowaga's occupied housing units have renters residing in them. To serve the rental market in Town, there are 8 affordable multifamily rental complexes that have either been financed as Low-Income Housing Tax Credits (LIHTC) deals or HUD Project-based Section 8. The 8 complexes provide a total of 755 units, 76% of which are 55+ Senior housing. Of the existing complexes, 3 provide supportive services to their residents, whether they are seniors, physically disabled, or visually impaired. In addition to the existing complexes, there is currently 1 additional complex under construction in the Town of Cheektowaga, that will provide an additional 67 units to those age 55+. Construction is expected to be complete by the end of 2022.

Tonawanda hosts 8 large affordable rental housing complexes whose tenants typically also receive Section 8 Housing Choice Vouchers. Soon, Tonawanda will have another new large multi-family affordable housing complex, Victoria Place, which has an expected construction-rehab start in 2023.

People Inc. is a major provider of supportive services for the developmentally disabled in WNY and owns and operates many group homes and permanent supportive rental housing in Western New York. Their new project, Blocher Homes Apartments, is in pre-development stages to create 93 units of affordable and supportive housing in Williamsville, NY. Twenty of the units will include a rental subsidy from the NYS Office of Persons with Developmental Disabilities (OPWDD). People Inc. currently owns and operates approximately 288 units of affordable apartments and supportive rental housing throughout 11 complexes within the ACT HOME Consortium.

Other permanent supportive rental housing complexes include only a handful of 2-8 unit scattered sites provided by regional non-profit service providers in Amherst, Cheektowaga and Tonawanda. When asked if there was demand for these types of units during consultation, providers indicated that suburban scattered sites require the right clientele for placement and are harder to case manage and can be isolating for their clients due to lack of transportation, walkable amenities and support programs. However, for households with children, placement in good school districts with adequate social services was desired.

Current Supportive Services

The following supportive services are currently provided for residents by the ACT HOME Consortium's CDBG and HOME funded subrecipient providers: housing counseling; fair housing counseling; foreclosure prevention counseling; case management for victims of domestic violence; senior van transportation services; senior outreach; community policing; and at-risk youth/childcare programs. In addition, Tonawanda's ESG funding provides: homeless street-outreach; rapid-rehousing and homelessness prevention services (case management, security

deposits, rent assistance); moving-costs/initial rent; emergency shelter operations and essential shelter services.

Aside from CDBG, HOME, and ESG funded programming, residents of Erie County can access various non-profit providers via WNY's 211 network, who assist in screening callers for need against program criteria and referring callers to appropriate programming and service providers.

Unmet Housing and Service Needs of Qualifying Populations

Describe the unmet housing and service needs of qualifying populations, including but not limited to sheltered and unsheltered homeless populations; those currently housed populations at risk of homelessness; other families requiring services or housing assistance or to prevent homelessness; and those at greatest risk of housing instability or in unstable housing situations:

Homeless as defined by 24 CFR 91.5

Homeless populations considered “sheltered” within the ACT HOME Consortium are currently housed in area motels/hotels that have contracts with Erie County Social Services for emergency sheltering. The 2021 Inventory of Housing Facilities PIT count conducted by HAWNY indicated a utilization rate of 100% of the 21 beds under contract by the County³. Aside from the motels/hotels under contract with Erie County there are no other non-congregate emergency homeless shelters located within the Consortium and citizens coming from Amherst, Cheektowaga, or Tonawanda rely heavily on City of Buffalo, Erie County, and Niagara County's emergency shelter facilities for placement.

A regional trend outlined in the consultation process for sheltered homeless was the inability to move people into more appropriate longer-term housing (transitional, permanent supportive, affordable housing) in a timely manner. Emergency Shelters are meant to be short term 1-2 days, but rapid-rehousing options and other next-level facilities have remained full or near capacity for longer and longer periods, creating a bottleneck. This trend is reflected in the 2021 Inventory of Housing Facilities PIT Count as all the Rapid Rehousing facilities within Erie County had a 100% Utilization rate (total 398 Beds). In fact, of the total Emergency Shelter beds available in Erie County in 2021 (523 beds), 340 beds or 65% were occupied at the time of the Count. The 2021 PIT facility count also showed between 84%-100% utilization rate for permanent supportive housing in Erie County (1158 beds out of a total of 1244 were occupied).

In addition, consultation discussions yielded a regional lack of housing for larger families. This was mentioned in regards to the inappropriate nature of placing families with multiple children into emergency shelters or motels/hotels. It was also brought up from veteran's organizations, where a family's best option for placement sometimes meant splitting up a family between men-only or women and children only facilities, which again is not ideal.

For unsheltered homeless, typically the chronically homeless with mental health or addiction issues, the needs are more service based. For example, seasonal based support for those that

³ This is a regional bed count figure and doesn't reflect the total number of ACT HOME Consortium facility beds.

choose not to enter to the shelter system, case management, or easy access to transportation as a means to stay in support programs. In the ACT Home Consortium, support for the chronically homeless who are unsheltered is provided informally by the Police Departments, who offer rides to facilities and check-ins periodically. However, this population can fall through the gaps and local first responders should share knowledge of unsheltered homeless populations with other regional support service providers in order to ensure on-going check-ins and consistent offers for assistance are made.

For Youth shelters, such as Compass House, HAWNY PIT Inventory datasets indicated an adequate amount of capacity in the County as a whole. However the 2017 Unaccompanied Youth Homelessness Brief outlines an additional need for shelters catering to unaccompanied youth. Other needs outlined in the Brief and Compass House consultation include needing a 24 hour drop-in center for safe places for teens to congregate, connect to other resources, and learn life-skills; programs that expand rental assistance to teens falling through HUD definition cracks via the “couch-surfing” homelessness classifications; assistance with application fees for apartments and appliances; and mental health services with transportation included.

At-Risk of Homelessness as defined by 24 CFR 91.5

At-risk populations currently have a wealth of service resources available to them to avoid homelessness in the ACT HOME Consortium. What isn't available however are affordable housing options, plus temporary short-term assistance for families and individuals that lose their homes and need to move into new units, especially for households at lower income brackets (30-60% AMI) or single-parent households.

The populations at risk of homelessness are even more vulnerable when you consider the regional and national trend of stagnant income growth, inflation and rising housing costs. Unfortunately, this is not a new trend or simply because of the COVID-19 Pandemic. Lack of income growth especially in the Western New York region has been a decades long trend. New York State wages had annual growth rate of 1.52% between 2012 and 2018, whereas the Buffalo-Niagara region experienced 1.15%. While incomes have remained stagnant in the region, rents and mortgage rates have been increasing at faster rates than incomes⁴. According to the *Engaging the Future of Housing Report*, Median Inflation-Adjusted Sales Prices in the Buffalo-Niagara region increased by 83% from 2012 to 2020 for single family units. Likewise, PUMA areas 1201, 1202, and 1204 increased between 73% and 76%⁵. These trends are adding pressure onto already vulnerable populations.

Cost burden, particularly among renters, has also created a significant and growing at-risk population in the ACT consortium. The 2020 American Community Survey's 5-year Estimates detail Median Gross Rents of \$1,124, \$864, and \$862 in Amherst, Cheektowaga and Tonawanda respectively, which reflect a 12-17% increase for the Consortium from 2015 Median Gross Rents. An extremely low-income 2-person household paying these rents would constitute a housing cost burden of 64%⁶. For individuals entering the CoC system as homeless, self-

⁴ Source: *Engaging the Future of Housing* (page 60; Table 21)

⁵ Source: *Engaging the Future of Housing* (page 80; Table 27)

⁶ Based on HUD Buffalo Metropolitan Statistical Area's 30% Area Median Income figures.

reporting indicates that evictions (whether by the landlord or through housing court) is one of the most likely reason for an individual or family to become homeless. Therefore, the risk of becoming homeless due to rising rents and housing costs is a major factor.

Aside from the need to increase affordable housing options, it seems that populations that suffer from mental health issues; household disputes; domestic violence; substance abuse; and overall loss of income events are the other primary reasons for homelessness of at-risk populations in the Consortium (See Table 10). Because of these contributing factors, HOME-ARP supportive service programming funding should focus on providing these services for at-risk qualifying populations.

TABLE 10. HAWNY 2021 PIT DATA: SELF-REPORTED REASON FOR HOMELESSNESS				
Primary Reason Homeless	Amherst	Cheektowaga	Tonawanda	Grand Total
Ask to leave by landlord		10	5	15
Court eviction by landlord	2	11	3	16
Criminal Activity		1		1
Data Not Collected	1	9	3	13
Domestic Violence	5	8	6	19
Doubled-Up/Over Crowded	1	7	1	9
Eviction by primary tenant	1	9	6	16
Fire Disaster		1		1
Fire or Natural Disaster		3		3
Health/Safety Violation	1	6	1	8
Household Disputes (not DV)	4	19	10	33
Loss of Job/Income (includes public benefits)	3	19	4	26
Medical Condition	1	4	1	6
Mental Health	4	17	10	31
Mortgage Foreclosure of own home			1	1
Problem with landlord		1	2	3
Problems with building		4	2	6
Release From Institution	2	2	4	8
Relocation from out of the NY-508 CoC Area			2	2
Substance Abuse	3	12	3	18
Substandard Housing		1		1
Grand Total	28	144	64	236

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

As mentioned previously, the County maintains a shelter for Domestic Violence victims, Haven House. Other housing facilities serving these special qualifying populations within Erie County include the Pathstone Corporation and the YWCA of Western New York. Haven House provided shelter to 211 adults and 121 children; counseling or advocacy to 1,848 individuals; and took over 1,200 hotline calls for assistance, throughout Erie County last year. Amherst also hosts four permanent supportive housing units owned by the YWCA for their clientele.

The Family Justice Center of WNY (FJC), a major non-profit service provider for victims of domestic violence, has begun to operate a few safe transitional housing facilities for victims in association with church owner-developers in WNY. In consultation, the Family Justice Center indicated there were not enough options for housing in suburban and rural locations within the county. At this time, the Center indicated a preference to utilize HOME-ARP funding for creation of new supportive housing with high security features in suburban settings (where a majority of their clients are coming from and their children are enrolled in school), as well as short-term TBRA for families to re-establish their lives in a new unit, and services to enhance victim safety while housing situations are sorted-out. In general the Center indicated if the latter two programs mentioned were established many clients would completely avoid entry into the homeless CoC system and limit disruption to their children.

Service needs mentioned for this qualifying population includes assistance for the purchase of safety technology, such as Ring door-bells, home security systems, tracking-device detectors, virtual tools for family court attendance, and burner phones. Many of the funding sources for domestic violence service agencies don't cover these costs, which can add up and are essential for helping victims maintain safe housing.

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.

Disabled

As mentioned previously, a general lack of appropriately designed affordable housing options regionally (ADA, visual or deaf impairment, Visit-ability) and the inability for low-and-moderate income disabled persons to renovate housing units to meet their needs is a major unmet need. Another main theme presented was the limited amount of disabled-supportive housing in the region that restrict developmentally-disabled adults from living independently.

People Inc, a major non-profit service provider for developmentally-disabled individuals has been managing 220 units in the ACT consortium and 1,227 within Erie County. While People Inc. manages their own units, they do have a desire to take on more units which could benefit their clients. Their clients especially have trouble finding affordable housing on top of having close proximity or transportation to the services they need. When disabled individuals do find housing, they often times need accommodations to be made within the units such as ADA

ramps and bathrooms. These come with a cost and landlords are often hesitant to make the investment. Even though the accommodation is required by law, legal services and representation is a need for the disabled population in the ACT consortium for this reason.

Veterans

WNY Veterans Housing Coalition is the major non-profit supportive service provider for WNY veterans. WNY Veterans Housing Coalition provides case management and housing services for regional veterans in need. They serve 25 clients within the ACT consortium as of 2022 and have 120 housing units within the Consortium of Care boundary. Lack of affordable units and mental health support was reported as the biggest unmet need and gap in services. Many of their clients need supportive mental health counseling in addition to affordable housing options to maintain housing.

Elderly

The PIT counts from HAWNY for seniors (those over 65 years old) only make up a small number of those within the HMIS database. However, this number has doubled for the ACT consortium from 2019 to 2021. This is not surprising given what we know about rising costs of rental housing within this report. Senior Services social workers indicate the lack of 2-bedroom affordable rental units as an issue in convincing seniors to enter affordable apartment complexes when they can no longer maintain their single-family homes and most cannot afford market-rate apartment rentals on limited Social Security Incomes. Service providers with elderly clients reported legal needs as a significant service gap. Many clients need legal representation for their housing needs. Elder Law and Justice serves 1,360 clients within the ACT consortium. Many of which needed assistance with evictions, mortgage foreclosures, wills, deeds, health care proxies, and powers of attorney.

Gaps & Unmet Needs in the Current Shelter, Housing and Service Delivery System

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

Table 11. below is HUD’s preferred table format to showcase gaps in the shelter, housing and delivery system in the ACT HOME Consortium. The Table identifies gaps by comparing homeless populations living in or coming from the ACT HOME Consortium to the facilities/beds of various shelter/housing options available in the jurisdiction to serve these populations. Unfortunately, due to the structure of the Coordinated Entry system and the CoC’s regional delivery system, it’s difficult to populate the table for the ACT HOME Consortium jurisdiction alone. This table would reflect a more accurate representation of gaps if completed on a County-level and include City of Buffalo jurisdictions, where a majority of qualifying populations ultimately receive housing/services currently (See Table 12).

TABLE 11. HOMELESS NEEDS INVENTORY AND GAP ANALYSIS for ACT HOME CONSORTIUM

Homeless													
	Current Facility 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	21	21	21	21	0								
Transitional Housing	0	0	0	0	0								
Permanent Supportive Housing	12	4	0	0	0								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						NA	236	32	16				
Unsheltered Homeless						NA	7	NA	NA				
Current Gap										NA	NA	-210	-218

Suggested Data Sources: 1. 2021 Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. ACT 2021 CAPER; 4. ACT Police Departments. **NA= Not Available**

For the Table reflecting the ACT HOME Consortium jurisdiction, it should be noted that some data sets were not available (NA) or HAWNY was unable to breakout the data into separate categories of populations for Consortium Zip codes (i.e. Adults vs. Families). Therefore Table 11 is populated based on the 236 individuals identified as “sheltered” homeless coming from ACT HOME Consortium zip codes in the 2021 HAWNY Point-in-Time counts, the 7 individuals estimated from area police departments, and the 16 victims of domestic violence housed in the YWCA’s Amherst Permanent Supportive Housing units (4 units). It should be noted that McKinney Vento stats for 2021 were not included in Table 11 either due to the likelihood of double-counting persons/families already tracked by the School Districts (275 school children in Consortium’s districts were assisted in 2021).

The only other known emergency shelters in the Consortium are those contracted motel/hotel units with Erie County Social Services (21 Beds) and this figure may also include motels/hotels outside of the ACT HOME Consortium jurisdiction. Table 11’s Gaps for the Consortium identified -208 beds and -216 units, which are a reflection of the 33 beds/25 housing units available minus the estimated 241 total homeless persons counted. However when evaluated on a regional delivery system basis, Erie County’s gap analysis table reflects a positive capacity of approximately 2,000 beds in the overall supply of shelter/bed options.

TABLE 12. HOMELESS NEEDS INVENTORY AND GAP ANALYSIS for ERIE COUNTY

Homeless													
	Current Facility 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	451	NA	523	NA	NA								
Transitional Housing	585	NA	585	NA	38								
Permanent Supportive Housing	1244	NA	1244	NA	367								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						44	324	47	54				
Unsheltered Homeless						NA	NA	NA	NA				
Current Gap										+2,236	NA	+2,028	NA

Suggested Data Sources: 1. 2021 Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); **NA= Not Available by unit & unsheltered Homeless not counted in 2021**

Documented Increased Risk of Instability

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:

While, the ACT HOME Consortium does not intend to utilize and define preferences for “other populations” for the allocation of HOME-ARP funding, it should be noted that Veteran and Disabled Populations have a documented “increased risk of homelessness” regionally. For information pertaining to this conclusion, see the Unmet Housing and Service Needs discussion on pages 25-29.

Priority Needs

Identify priority needs for qualifying populations:

Development of Affordable Rental Housing

Priority needs for the homeless populations located within the Consortium should focus on the creation of additional affordable rental units, and supportive services to better assist those facilities. The 100% utilization rates reflected in HAWNY’s facilities inventories from 2017-2019 show the preference for placement of homeless households into rapid-rehousing programs and facilities over emergency shelters. The rapid-rehousing model is a more stable model to provide support services and case management in order to successfully graduate clients out. However,

the lack of affordable rental housing units was mentioned repeatedly as the main bottleneck issue keeping rapid-rehousing capacity full and creating extended stays in emergency shelters, even as regional homelessness has been trending downward. More specifically, the lack of affordable housing regionally is creating situations hindering success in maintaining housing stability and self-sufficiency. Even in rapid-rehousing programs that provide rental vouchers clients are experiencing increased difficulty trying to find a rentable unit to utilize their voucher. This same trend is occurring with Section 8 Housing Choice Vouchers, where administrators have been extending deadlines simply because there isn't enough affordable housing rental stock.

It should also be noted, that the suburban nature and limited NFTA bus routes of the ACT HOME Consortium make it inappropriate for the creation of additional non-congregate shelter units in the Consortium. Common themes from non-profit service providers indicate few clients succeed in such isolating environments.

Supportive Services

Supportive services in general are considered a major factor in determining long-term client success and the ACT HOME Consortium intends to fund a broad range of supportive services as separate activities or in combination with other HOME-ARP activities. Consultations indicated the need to do everything possible to make it easier for persons struggling with underlying issues contributing to homelessness to get the care and support they need and for a longer period than the 2-year rapid-rehousing and transitional housing models will allow. Many personal issues were found to compound a client's unstable housing situation, so the more options for service assistance the better. For example, transportation and childcare are essential to helping adults access and keep mental health appointments, attend job interviews, stay employed, finalize divorce settlement agreements to receive child support, and maintain sobriety.

While the Consortium will entertain proposals for all eligible supportive services outlined in HUD Notice 2021-10 (as long as they meet Consortium requirements) the following supportive services are considered priorities:

- **Extended case management** provided for qualifying populations that require additional support after graduation out of a 2 year limited rapid-rehousing or transitional care facility.
- **Childcare Assistance (intermittent and regular)**
- **Mental Health Services**
- **Transportation Services**
- **Legal Services** including subject matters that affect income (child support), personal safety, and citizenship, etc.
- **Translation Services/English Language Learning**
- **Technology Assistance for Domestic Violence Victims**

Determination of Needs and Gaps Methodology

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 quantify the qualifying populations within the ACT HOME Consortium and effectively outline unmet needs and gaps of these populations within the current housing and service delivery system, the Towns analyzed existing datasets, existing resources and programs, current reports and plans, in addition to the qualitative data provided by the consultation process. The following data sets and reports/plans were reviewed as part of the Needs and Gaps Analysis:

Data Sets:

- Homeless Management Information System (HMIS) – HAWNY (2017-2021)
- HAWNY Point-in-Time Data for Erie County (2017-2021)
- HAWNY Point-in-Time Data Summarized for Amherst, Cheektowaga and Tonawanda Zip Codes (2017-2021)
- HAWNY Point-in-Time Data for Veterans (2018-2021)
- HAWNY Point-in-Time Data for Youth (2018-2021)
- 2018-2020 Facility Inventory List for Erie, Niagara, Orleans, Genesee & Wyoming Counties (HAWNY)
- U.S. Census Bureau American Community Survey 2019 5 Year – Public Use Microdata Areas (PUMAs)
- McKinney Vento Statistics by ACT HOME Consortium’s School Districts (NYSTEACHS)
- Regional Domestic Violence Case Management Statistics by Family Justice Center- Erie County
- Erie County Public Housing Authority Section 8 Housing Choice Voucher Waiting List
- Amherst, Cheektowaga and Tonawanda Police Department Reporting

Reports & Plans:

- ***Analysis of Impediments to Fair Housing Choice*** (2020, Erie County with Town of Hamburg, ACT HOME Consortium and City of Buffalo)
- ***2020-2024 Amherst-Cheektowaga-Tonawanda Consortium HUD Consolidated Plan***
- ***Engaging the Future of Housing in the Buffalo-Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead*** (Jason Knight/Russell Weaver for LISC WNY, September 2021)
- ***Market Demand for Senior Rental Housing*** (UBRI for Amherst IDA, Sept 2012)
- ***2020 Erie County Homelessness Brief*** (HAWNY)
- ***2019 Veterans Homelessness Brief*** (HAWNY)
- ***2017 Unaccompanied Youth Homelessness Brief*** (HAWNY)
- ***Homelessness among Youth Adults in Buffalo: A Research Report Highlighting Youth Voices*** (UB School of Social Work & HAWNY)

HOME-ARP Activities

Methods for Selecting Developers, Service Providers, Subrecipients and/or Contractors
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:

The ACT HOME Consortium will not directly provide services or develop new HOME-assisted units for the qualifying populations as part of HOME-ARP programming. The Consortium’s activities will fund subrecipients for eligible project/service types through request for proposals processes that follow Federal and local procurement policies. Proposals will be competitively scored and reviewed by a committee made up of municipal staff involved in community development, affordable housing, social and senior services, disabilities and youth services.

Administrative Role

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 or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:

No HOME-ARP funds, administrative or otherwise, were released to subrecipients prior to HUD’s acceptance of this HOME-ARP Allocation Plan. The Consortium also does not intend to contract-out administrative or programmatic oversight duties as part of the HOME-ARP funding.

HOME-ARP Program Allocations for ACT HOME Consortium

Use of HOME-ARP Funding

Eligible Program Areas	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$120,000		
Acquisition and Development of Non-Congregate Shelters			
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$3,000,000		
Non-Profit Operating	\$85,000	2.5%	5%
Non-Profit Capacity Building	\$90,700	2.7%	5%
Administration and Planning	\$118,000	3.5%	15%
Total HOME-ARP Allocation	\$3,413,700		

Allocation of HOME-ARP Funding

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

The majority of HOME-ARP funding for the ACT HOME Consortium will be allocated to the development of affordable rental housing. HOME-ARP units will be generated via a subsidy for construction applied to units within larger multifamily affordable housing projects and/or as part of small stand alone in-fill projects that provide 2-12 units for qualifying populations who typically can succeed in suburban environments.

Supportive Services are the second largest funding category and will entertain proposals for all of the eligible services outlined in the HUD Notice 2021-10, with a priority placed on those services mentioned under the priority needs summary above.

The remaining funding categories of the Allocation Plan Budget include non-profit capacity building and operating expenses. Through consultation it was clear that some smaller non-profit service providers would develop outside the City of Buffalo, if they received assistance for capacity building, operating expenses and supportive services to make their smaller suburban-outlier facilities successful.

Funding Priorities Rationale

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:

Since regional homelessness totals have been declining it's clear the gaps and needs simply outline an overarching need for additional affordable rental units, as stock is limited at multiple levels of the housing market and squeezing out those most vulnerable. This sentiment is also reflected in HAWNY's 2020 Erie County Homelessness Brief, where it states that "Even with the additional Section 8 vouchers provided by the federal government, homelessness will still be an issue because there are not enough available affordable housing units. Some people are losing their allocated vouchers because they can't find housing." The report goes on to state that one of the main ways to provide housing to those most in need is to "further subsidize the developers with HOME funds and project-based Section 8 vouchers". This is precisely what the ACT HOME Consortium intends to do with HOME-ARP funding and has allocated \$3 million to do so.

HOME-ARP Production Housing Goals

Affordable Housing Production Goals

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

With \$3 Million allocated to the development of new affordable rental housing units and an award per unit of roughly \$280,000, the ACT HOME Consortium estimates a creation of approximately 10 new affordable rental units. While the per-unit construction subsidy could be lowered to incentivize additional units, the Consortium planning staff feels that this figure is realistic of the financial requirements new-construction complexes must meet in order to cash-flow the HOME-ARP unit for the life of the 15-year affordability period.

How Production Goals Address Priority Needs

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

Construction subsidies on the creation of new affordable rental housing are anticipated to generate 10 HOME-ARP units, plus be of a sizable nature as to assist in the financial viability of the larger rental complex as a whole. This model is anticipated to generate HOME-ARP unit set-asides, plus other non-HOME-ARP affordable units. The Construction Subsidy program will operate in a similar manner to the HOME Rental Subsidy programs the three Towns operate now, only with more flexibility provided by HOME-ARP regulatory waivers.

Through this same program, the Consortium will also entertain proposals for small in-fill development projects with non-profits that aim to expand programming and services to suburban areas that may better fit their existing clientele. The small projects program area will focus on small 2-4 unit rental complexes provided that they are coupled with the necessary supportive services to operate successfully in a suburban setting (i.e. transportation, childcare, counseling, extended case management).

Preferences

Priority Qualifying Populations

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:

The ACT HOME Consortium will not apply preferences for subpopulations of the HOME-ARP qualifying populations.

Prioritization Method

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

Not Applicable - The ACT HOME Consortium will not apply preferences for subpopulations of the HOME-ARP qualifying populations.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program.

The ACT Home Consortium intends to utilize HOME-ARP funds for the development of rental housing units to serve Qualifying Populations (QPs) as defined in HUD Notice CPD-21-10, including "other populations" as defined in this Allocation Plan. These units will be made available to all QPs and accept referrals through various sources, including the local Coordinated Entry system to identify eligible homeless residents and direct referrals from local non-profits, municipalities and private sources throughout Erie County.

- **If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):**

The Consortium intends to utilize referrals from the local CE process to identify eligible homeless populations. Additional referrals will be accepted to identify other qualifying populations from various public/private sources. The HOME-ARP project grantees will maintain a referral list open to the community and all qualification and eligible applicants will be accepted in chronological order.

- **If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):**

Referrals accepted from the accepted CE process established by the CoC will prioritize eligibility according to the utilized vulnerability index survey referred to as the VI-SPDAT. This survey measures vulnerability and prioritizes those with greatest risk from living on the street. Those determined to have the highest vulnerability, and need for permanent housing, and interested in applying will be identified as eligible and offered the opportunity to apply for housing through the HOME-ARP project.

- ***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

Referrals will be coming from multiple sources throughout the community. Since no preferences are identified, HOME-ARP project grantees will maintain a referral list, screen for eligibility, and accept qualifying populations based on chronological order.

Limitations in a HOME-ARP Rental Housing or NCS project

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 the Notice:

The ACT HOME Consortium does not intend to utilize any project limitation or preference.

Limitation's Ability to Address Unmet Needs and Gaps

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.

Ability to Address Other Unmet Needs and Gaps of Other Populations

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

According to HUD, 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 the following:

The ACT HOME Consortium will not allow the use of HOME-ARP Funds for the refinancing of existing debt secured by multifamily rental housing.

Minimum Level of Rehab

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.

Not Applicable.

Review of Management Practices

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 service qualified populations for the minimum compliance period can be demonstrated.

Not Applicable.

Maintain and/or Create Units

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

Not Applicable.

Compliance Period

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

Not Applicable.

Allowable Loan Type

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

State other requirements in the PJ's guidelines, if applicable.

Not Applicable.

Appendix A

IV. QUALIFYING POPULATIONS, TARGETING AND PREFERENCES

ARP requires that funds be used to primarily benefit individuals and families in the following specified "qualifying populations." Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria (e.g., additional income criteria). All income calculations to meet income criteria of a qualifying population or required for income determinations in HOME-ARP eligible activities must use the annual income definition in [24 CFR 5.609](#) in accordance with the requirements of [24 CFR 92.203\(a\)\(1\)](#).

A. Qualifying Populations

1. **Homeless**, as defined in [24 CFR 91.5](#) *Homeless* (1), (2), or (3):

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

2. At risk of Homelessness, as defined in [24 CFR 91.5](#) *At risk of*

homelessness: (1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "Homeless" definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(1) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(1)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as "homeless" under this section but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42

U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Domestic violence, which is defined in [24 CFR 5.2003](#) includes felony or misdemeanor crimes of violence committed by:

- 1) A current or former spouse or intimate partner of the victim (the term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- 2) A person with whom the victim shares a child in common;
- 3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- 4) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- 5) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating violence which is defined in [24 CFR 5.2003](#) means violence committed by a person:

- 1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- 2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship;
 - b. The type of relationship; and
 - c. The frequency of interaction between the persons involved in the relationship.

Sexual assault which is defined in [24 CFR 5.2003](#) means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking which is defined in [24 CFR 5.2003](#) means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- 1) Fear for the person's individual safety or the safety of others; or
- 2) Suffer substantial emotional distress.

Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

- 1) *Sex trafficking* means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- 2) *Labor trafficking means* the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

4. **Other Populations** where providing supportive services or assistance under section 212(a) of NAHA ([42 U.S.C. 12742\(a\)](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

(1) Other Families Requiring Services or Housing Assistance to Prevent

Homelessness is defined as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in [24 CFR 91.5](#), are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

(2) At Greatest Risk of Housing Instability is defined as household who meets either paragraph (i) or (ii) below:

- (i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

- (ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, **AND** meets one of the following conditions from paragraph (iii) of the "At risk of homelessness" definition established at [24 CFR 91.5](#):
- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan

Veterans and Families that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

B. Use of Funds to Benefit Qualifying Populations

ARP states that funds must be used to primarily benefit the qualifying populations through the four eligible activities: (1) TBRA, (2) development and support of affordable housing, (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter (NCS) units. Recognizing the urgent needs of individuals and families in qualifying populations, HUD is requiring that:

- 100% of HOME-ARP funds used by a PJ for TBRA, supportive services, and acquisition and development of non-congregate shelter units must benefit individuals and families in qualifying populations. Individuals and families in qualifying populations may be assisted by one or more of the HOME-ARP eligible activities, consistent with the requirements in this Notice.
- Not less than 70 percent of affordable rental housing units acquired, rehabilitated, or constructed with HOME-ARP funds by a PJ must be occupied by households in the qualifying populations. Units that are not restricted to occupancy by qualifying populations are subject to income targeting and rent requirements established under the

HOME-ARP Rental Program rules and are only permitted in projects with rental units restricted for occupancy by qualifying populations.

HUD recognizes that, because many households in the qualifying populations are unable to pay rents sufficient to cover unit operating costs, PJs and project owners should attempt to obtain Federal or state project-based rental subsidies, if available. Since project-based rental subsidies can be difficult to secure, additional flexibility may be necessary to structure and underwrite projects so that they remain both affordable and financially viable. HUD is providing PJs with additional flexibilities in [Section VI.B.](#) to structure and underwrite HOME-ARP rental projects so they remain financially viable during the minimum compliance period. One of these flexibilities is permitting up to 30 percent of HOME-ARP rental housing units funded by a PJ to be occupied by low-income households. PJs are encouraged to use this flexibility only when it is required to facilitate development of a HOME-ARP rental project.

PJs must determine and document that households meet the definition of a qualifying population or, for the portion of HOME-ARP rental units not restricted to these populations, that households are low-income.

C. Preferences Among Qualifying Populations, Referral Methods, and Subpopulations

1. Preferences

ARP establishes the qualifying populations that are eligible for assistance with HOME-ARP funds. A PJ may establish reasonable preferences among the qualifying populations to prioritize applicants for HOME-ARP projects or activities based on the PJ's needs and priorities, as described in its HOME-ARP allocation plan. For example, a PJ may set a preference among qualifying individuals and families for a HOME-ARP non-congregate shelter for individuals and families who are homeless; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and veterans and families with a veteran family member that meet the criteria of one of these prior qualifying populations, consistent with its HOME-ARP allocation plan.

The PJ must comply with all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in [24 CFR 5.105\(a\)](#) when applying preferences through its referral methods. Persons who are eligible for a preference must have the opportunity to participate in all HOME-ARP activities of the PJ in which they are eligible under this Notice, including activities that are not separate or different, and cannot be excluded because of any protected characteristics or preferential status.

Targeted assistance: If HOME-ARP funds are used for TBRA, the PJ may establish a preference for individuals with special needs or persons with disabilities among the HOME-ARP qualifying populations. Within the qualifying populations, participation 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\(b\)\(1\)\(iv\)](#). The PJ may also provide a preference for a specific category of individuals with disabilities (e.g., persons with HIV/AIDS or chronic mental illness) within the qualifying

populations only if the specific category is identified in the PJ's HOME-ARP allocation plan as having unmet need and the preference is needed to narrow the gap in benefits and services received by such persons.

2. Referral Methods for Projects or Activities

A PJ may use the referral methods described below to administer HOME-ARP assistance to qualifying individuals and families. Regardless of the referral method used by the PJ, HUD holds the PJ responsible for determining and documenting that beneficiaries meet the definition of a qualifying population or, for the portion of HOME-ARP rental units not restricted to qualifying populations, that beneficiaries are low-income.

A PJ may use the coordinated entry or coordinated entry process (CE) of a continuum of care (CoC) for referrals for projects and activities as described below. Under 24 CFR 578.3, a CE is a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals within a defined area. HUD requires each CoC to establish and operate a CE with the goal of increasing the efficiency of local crisis response systems and improving fairness and ease of access to resources, including mainstream resources. A PJ may permit a CoC CE to collect information and documentation required to determine whether an individual or family meets the criteria of a HOME-ARP qualifying population at any point in the coordinated entry process, (i.e., after or concurrently with the assessment and intake processes) as long as that information is not used to rank a person for HOME-ARP assistance other than as specified by the preferences or method of prioritization established by the PJ, in accordance with HOME-ARP requirements. If the PJ uses CE, the PJ cannot require HOME-ARP victim service providers to use the CE but may permit them to do so.

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 using the following referral methods:

i. Use of Expanded CE in HOME-ARP

Under this referral method, a PJ may use a CE established by a CoC operating within its boundaries for one or more projects or activities if the CE accepts all HOME-ARP qualifying populations eligible for those activities or projects, in accordance with the preferences and prioritization, if any, established or approved by the PJ in its HOME-ARP allocation plan and imposed through the PJ's written agreements.

Before using a CoC's CE, PJs should consider whether the CE covers the same service area as the HOME-ARP project or activity that would use that CE. At a minimum, the PJ must establish policies and procedures that describe the relationship of the geographic area(s) served by the project or activity to the geographic area(s) covered by the CoC CE and address how the CE will provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE.

The PJ must require a project or activity to use CE along with other referral methods (as provided in section ii below) or to use only a project/activity waiting list (as provided in section iii below) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE.

ii. Use of CE with Other Referral Methods

The PJ may use a CoC CE with additional referrals from outside organizations or project-specific waiting lists consistent with HOME-ARP requirements. If using this referral method, the PJ must establish or approve any preferences or prioritization criteria applied by a CoC CE or other referral sources. The PJ may also use a waiting list to receive referrals from a CoC CE and other referral agencies for a project or activity, where a CoC CE or referral agency refers an applicant that is placed on the waiting list for that project or activity in chronological order.

If applicable, a PJ must establish policies and procedures for applying a PJ's established preferences and method of prioritization, if any, when accepting direct referrals from a CoC CE and other referral agencies and must document that such the policies and procedures were followed for each applicant served.

iii. Use of a Project/Activity Waiting List

The PJ may establish a waiting list for each HOME-ARP project or activity. All qualifying individuals or families must have access to apply for placement on the waiting list for an activity or project. Qualifying individuals or families on a waiting list must be accepted in accordance with the PJ's preferences, if any, consistent with this Notice or, if the PJ did not establish preferences, in chronological order, insofar as practicable.

3. Limiting Eligibility to Subpopulations

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.

HOME-ARP rental housing or NCS may be limited to a specific subpopulation of a qualifying population identified in [Section N.A.](#) of this Notice, so long as admission does not discriminate against any protected class under federal nondiscrimination laws in [24 CFR 5.105](#) (e.g., the housing may be limited to homeless households and at risk of homelessness households,

veterans and their families, victims of domestic violence, dating violence, sexual assault, stalking or human trafficking and their families).

Recipients may limit admission to or provide a preference for HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided (e.g., domestic violence services). 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.

Consistent with the statutory authority under ARP, HOME-ARP NCS may be converted to permanent housing under the CoC program or used as shelters under the ESG program, when all program and fair housing and nondiscrimination requirements are met. As such, HOME-ARP NCS may need to limit eligibility to households that are homeless and/or at risk of homelessness if the shelter will be converted to permanent housing under the CoC program or used as an emergency shelter in the ESG program.

APPENDIX B

Amherst Cheektowaga Tonawanda HOME Consortium

HOME-ARP Funding Survey

The U.S. Department of Housing and Urban Development (HUD) awarded the Towns of Amherst, Cheektowaga, and Tonawanda a \$3.4 Million special appropriation of the HOME Investments Partnerships Program (HOME) Grant through the American Rescue Plan Act of 2021 (ARP). The Amherst, Cheektowaga, Tonawanda HOME Consortium is seeking your organizations input on how best to utilize these additional resources in our communities.

**For purposes of this Survey, where the "Towns of Amherst, Cheektowaga and Tonawanda" are mentioned, that geography also includes the Villages within their boundaries (Williamsville, Depew, Sloan and Kenmore)*

Contact Info

Name of Person Completing Survey:

Name of Organization

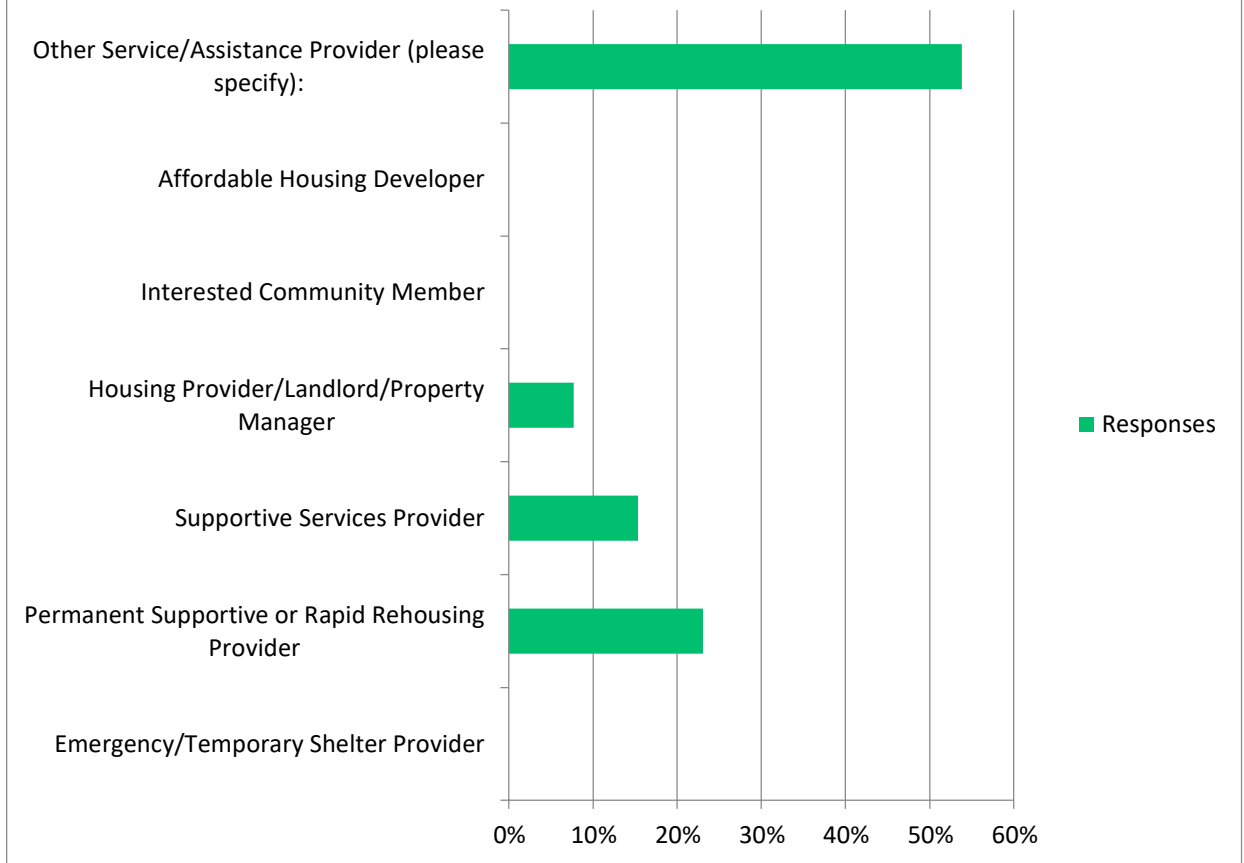
Email Address

Phone Number

Type of Provider

What is your involvement with the following HOME-ARP Qualifying Populations: Homeless; At-Risk or Homelessness; Fleeing Domestic Violence, sexual assault, stalking or human trafficking; veterans; families; other populations at risk of housing instability? (check all that apply)

Type of Provider:



Geography & Number of Clients Served

Describe your organizations geographic service area? (i.e. City of Buffalo, Erie County, Town/Village, Neighborhood)

Responses:
11 counties in WNY (including Erie County) including all cities, towns and villages.
Cheektowaga
All of Erie County
City of Buffalo, Erie County
We can represent people in any of the 8 Counties of WNY but focus on Erie, Niagara, Wyoming, and Genesee.
8th Judicial District (Erie, Niagara, Chautauqua, Wyoming, Orleans, Allegany, Cattaraugus)

TOWN OF TONAWANDA
Town of Amherst
Erie County
East Side of Buffalo. We are located at 175 Jefferson Avenue, 14210. We are serving many low income families and working families. We are serving people who are homeless or at risk of becoming homeless. Many older people with fixed incomes are becoming homeless due to the rent increases by the landlords.
WNY
Mostly Erie County, some Niagara, Genesee, Orleans and Wyoming
Western NY ERIE, Niagara, Genesee, Orleans, Wyoming

Describe the size of the Qualifying Populations your organization serves in total and note approximately what % are from the Towns of Amherst, Cheektowaga and Tonawanda?

Responses:
Last year we closed 4,607 and 11,000 benefit from our outreach, mobile legal unit and presentations. 1,360 clients lived in Amherst, Cheektowaga and Tonawanda and we did 24 presentations in those towns.
From Cheektowaga area we serve in the district around 2,000 students not including individual families.
NCP primarily works with low-moderate income individuals and families making less than 80 percent of area median income. A very small percentage are currently from these towns but our residential rehabilitation program and our down payment assistance loan products are going to be available in all of Erie County in the very near future.
We are currently serving 45 RRH youth ages 18-24
The Law Center serves hundreds of homeowners facing foreclosure every year. Of those cases, close to 1/3 are from the first ring suburbs of Amherst, Cheektowaga, and Tonawanda
During the Quarter 4/1/2022 to 6/30/2022 we intake 328 applicants in the Qualifying Populations, and 115 of these applicants resided in the Towns of Amherst, Cheektowaga and Tonawanda

75,000 TOWN OF TONAWANDA
126,000 population all in Town of Amherst
Approximately 200 clients/year. About 20% are in the towns of Amherst, Cheektowaga & Tonawanda.
1-20% from Cheektowaga (estimating)
25
Approximately 1200 tenants served per year. Roughly 50 tenants from Amherst, Cheektowaga and Tonawanda.
2000 plus clients per year

Housing Inventory (if applicable)

Describe the number and type of housing units serving the Qualifying Populations your organization maintains/operates:

Responses:
n/a
0
We do maintain 70 rental units but most of our programs and services are focused on creating new homeowners or working with existing homeowners.
We rent from people. We do not have apartments.
NA
n/a
0
None
24 bed transitional housing 10 bed supported housing 4 unit supported family units

We work with landlords in the community to find the best and most affordable places for our clients.
120
I don't know
N/A

Housing and Services - Needs & Gaps

Unmet Housing

In your opinion what are the primary unmet housing needs for the Qualifying Populations within the Towns of Amherst, Cheektowaga and Tonawanda?

Responses:
Cost of upkeep for older adults. Non-medical transportation. There should be a subsidized Uber-type service for older adults that is easy to use. Nobody likes to rely on van service- which can take all day long and is not available for all types of transportation needs.
Income coming in, support to help with unforeseen emergencies.
Available inventory that is safe, decent, and affordable.
Getting jobs that will pay enough to meet the minimum requirements for landlords. Many want the rent to be 30% of their income. So if you pay 1,000 rent a month, they want your monthly income to be \$3,333. Many of the jobs our clients get, especially starting out do not pay this much.
Very similar to what I stated in the previous question. Taxes in a lump sum for a senior on a fixed income can be very difficult. Estate cases are a huge problem. Even if someone can get an attorney (which is often cost prohibitive) just to file a probate case in court often costs \$425. To file a deed at the Clerk's office it costs \$285 because of all the state forms that are required. These small amounts can be a major barrier to someone qualifying for assistance to remain in their home long term.
Financial Stability, transportation to employment, availability of loans and subsidies for home buyers.
LACK OF MONEY, LACK OF CHILDCARE, LIFE COACHING
Cost

stigma associated with criminal history
Rent increases. Fixed incomes (SSI or SSD) only give you \$800 - \$900 a month but your apartment cost you \$1,000 nothing included many times.
Affordable housing, rising utilities costs
Lack of affordable housing, rising rent amounts, tenants still facing financial struggles from the pandemic.
Cost of rent

What are the biggest factors Qualifying Populations face in maintaining permanent housing in Amherst, Cheektowaga or Tonawanda?

Supportive Services (if applicable)

Describe the supportive services your organization provides to assist Qualifying Populations?

Responses:
Free legal representation for older adults in housing (eviction, housing code violations, mortgage foreclosure), Family Law (Kinship families) consumer debt and scams, elder abuse, health law (denials of Medicaid, Medicare and private insurance and nursing home complaints), free legal clinics for wills, health care proxies, and powers of attorney, presentations on all areas of law impacting seniors. Also, we have a pooled supplemental needs trust which enables disabled persons to stay at home and retain public benefits. We also run a free statewide legal helpline for anyone age 55 and older with a brief legal question about any issue.
N/A
not applicable.
We provide case management, independent living skills training, referral, advocacy, individual, group and family counseling and we provide things needed for apartment (furniture, pots and pans, towels, etc) and well as their basic needs (soap, shampoo, clothing, etc)
We do foreclosure prevention, assist with consumer debt issues, file chapter 7 bankruptcies for people, run a small business clinic, do eviction prevention / defense, we have a free wills clinic (for people to plan for the future of their property) and help families that own vacant properties.

Legal Services in eviction defense, and related services. We also provide a range of Civil Legal Services directed at assisting our clients achieve stability in family, education, employment and finances.
LEGAL/LAW ENFORCEMENT - ADVICE AND LEGAL ACTIONS, CONNECT WITH ADVOCACY AND PROTECTION
Monetary assistance.
Wrap around intensive case management -Housing -Mentoring -Prerelease programming and coordination with courts -Food Pantry
Case management. We help people apply to programs that can help you with rental arrears. We guide people to other agencies that can help more for example legal/housing needs. We know resources in the community that can benefit the clients individually. We provide clothing for children. We have a free dental clinic for people who do not have health insurance. We have a free primary care clinic for people without health insurance and we help people get health insurance. We collaborate with other agencies in the community to help the people.
We provide Case Management services for all our clients meeting with them at least monthly, creating service plans with short term and long term goals, and connecting them to needed services
Legal representation to tenants facing eviction.
N/A

In your opinion, what are the supportive service gaps or hurdles that exist for Qualifying Populations within the Towns of Amherst, Cheektowaga and Tonawanda?

Responses:
Transportation and mental health support for older adults
Lack of aide or assistance due to shortages of employees in agencies and government organizations to provide that to families. Information and updates being shared regularly with community members in need.
Estate assistance. We can do some advice and council but there is no organization that takes on full cases consistently in WNY right now.

The Qualifying Populations would benefit for services that help find affordable housing after eviction
ACCESS TO SERVICES AND A LACK OF SERVICES LOCALLY
n/a
Awareness. People don't know of the available programs in those areas. People need case management to bring them to those communities. People need navigation in the system. Navigation, Awareness, Case Management are needed.
Inventory of available units
There are not many organizations helping tenants find affordable housing, and helping tenants navigate that process.
Assistance in applying for services.

Priorities for Funding Assistance

Please rank the following activities/needs of the Qualifying Populations in the Towns of Amherst, Cheektowaga and Tonawanda in order from highest priority to lowest priority: (1=highest; 6=lowest)

Overall HOME-ARP Eligible Activities

Supportive Services

Development of Affordable Rental Housing (including the rehab of units)

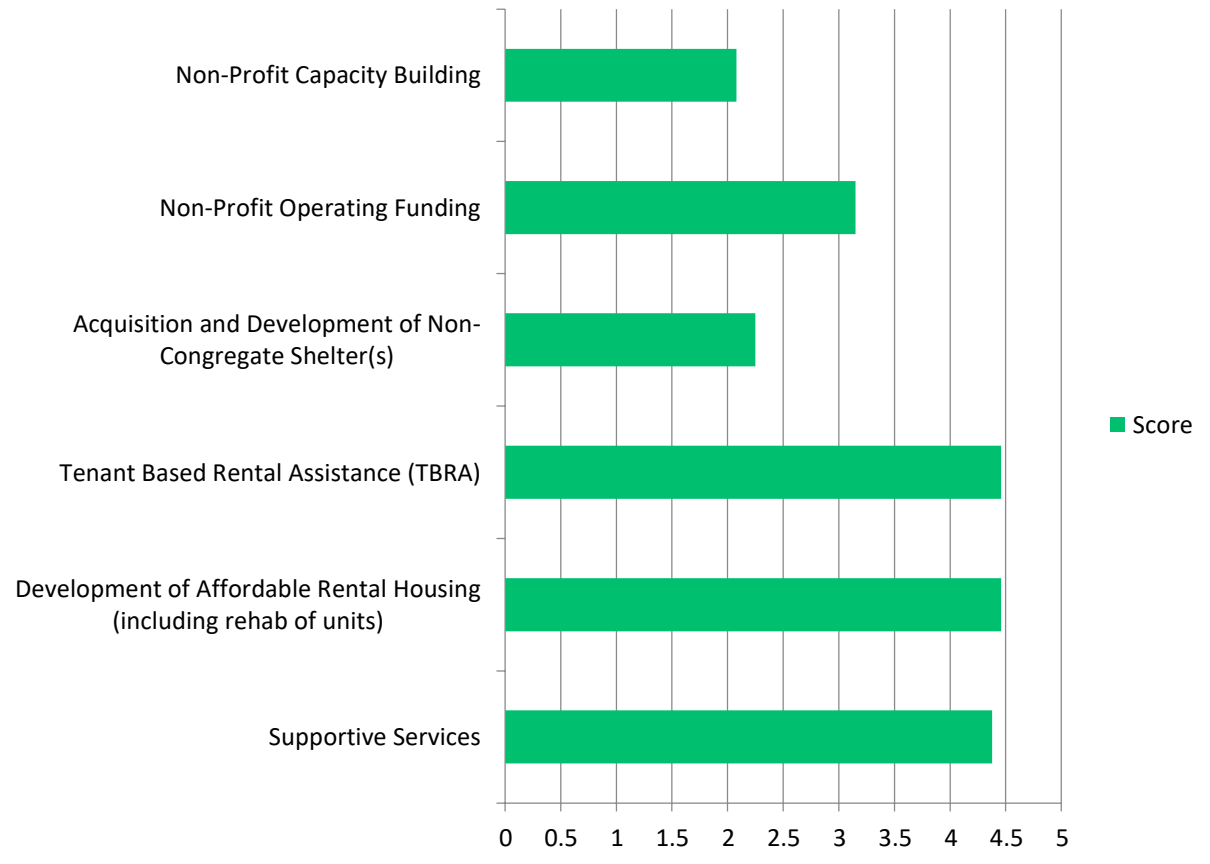
Tenant Based Rental Assistance (TBRA)

Acquisition and Development of Non-Congregate Shelter(s)

Non-Profit Operating Funding

Non-Profit Capacity Building

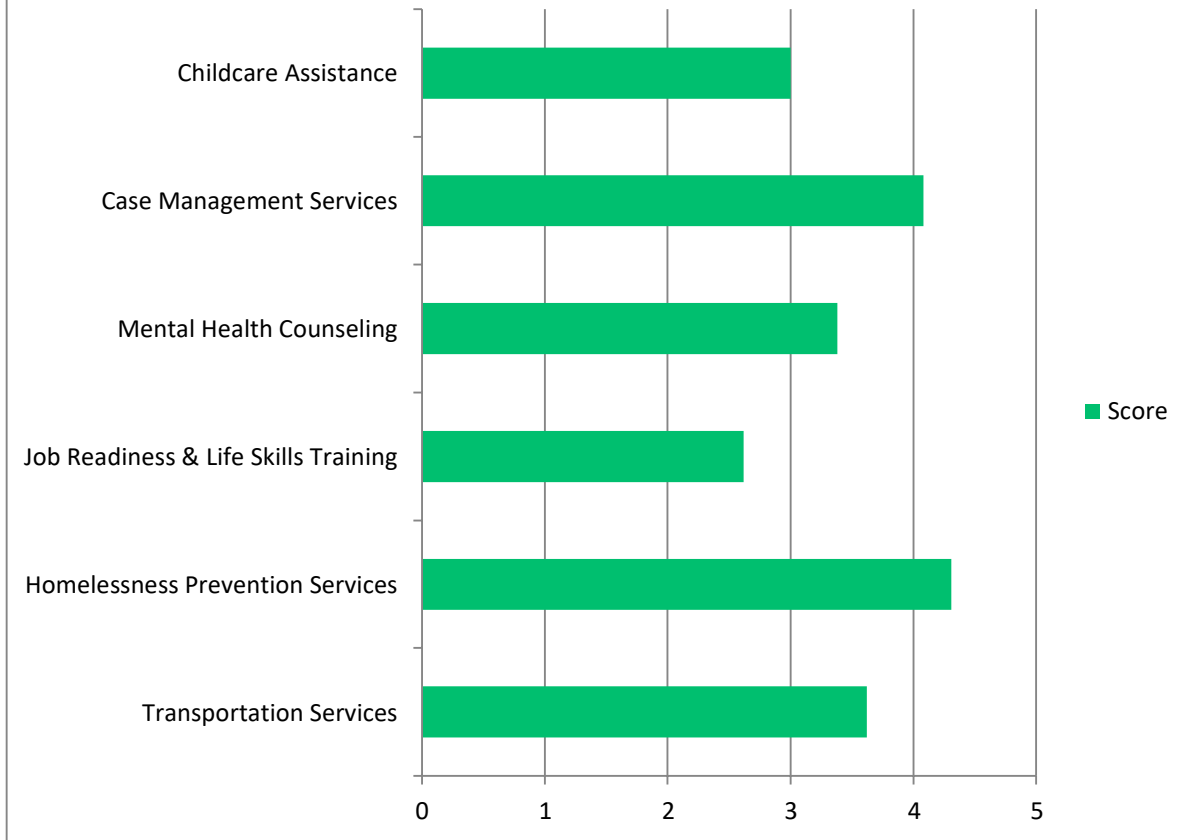
Priorities for Funding Assistance -



Supportive Services

- Transportation Services
- Homelessness Prevention Services
- Job Readiness & Life Skills Training
- Mental Health Counseling
- Case Management Services
- Childcare Assistance

Priorities for Funding Assistance - Supportive Services



Development of Affordable Rental Housing

New Large-scale Complexes (25+ units)

New Small-scale Complexes (under 12 units)

Rehab/Conversion of Existing Multifamily

Rehab/Conversion of Existing Single family

Permanent Supportive Housing

Other Preference: _____

Priorities for Funding Assistance - Development of Affordable Rental Housing



Acquisition and Development of Non-Congregate Shelter

Scattered Sites

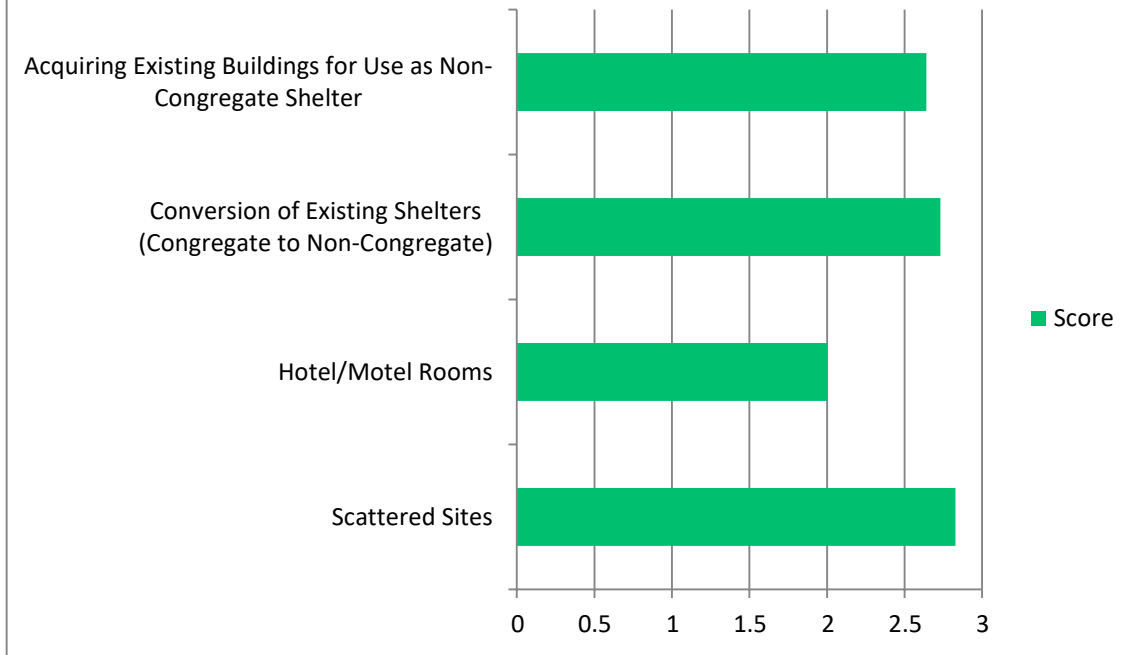
Hotel/Motel Rooms

Conversion of Existing Shelters (Congregate to Non-Congregate)

Acquiring Existing Buildings for Use as Non-Congregate Shelter

Other Preference: _____

Priorities for Funding Assistance - Acquisition and Development of Non- Congregate Shelter



Preferences

HOME-ARP funds used for some eligible activities are allowed to establish preferences for targeted assistance to individuals with special needs or persons with disabilities among the Qualifying Populations.

Please describe if there is a need to establish such preferences for certain target populations in the Towns of Amherst, Cheektowaga and Tonawanda and why?

Responses:
Yes
In Cheektowaga I believe that we need to have more housing for people with special needs and also disabilities. We also have a large population of immigrants and non-English speaking families.
I feel all homeless people need this. Adults adapt easier than young adults. Young adults take longer to get stable. permanent supportive housing is needed for young adults.

We've spoken with many people who are homebound in these areas because of their high populations of senior. insuring that people who may not be able to physically go anywhere have access to these programs can prevent them from having to move which can be very difficult.
This is an important goal if there is an established gap in service.
YES THERE IS A NEED
There is a need in Amherst
yes, to include justice involved individuals
It is important to have a scale to help the people who need it the most. In my opinion YES
Families
Those with very low incomes (under 125% FPIG), elderly, those receiving fixed incomes like SSI
Don't know

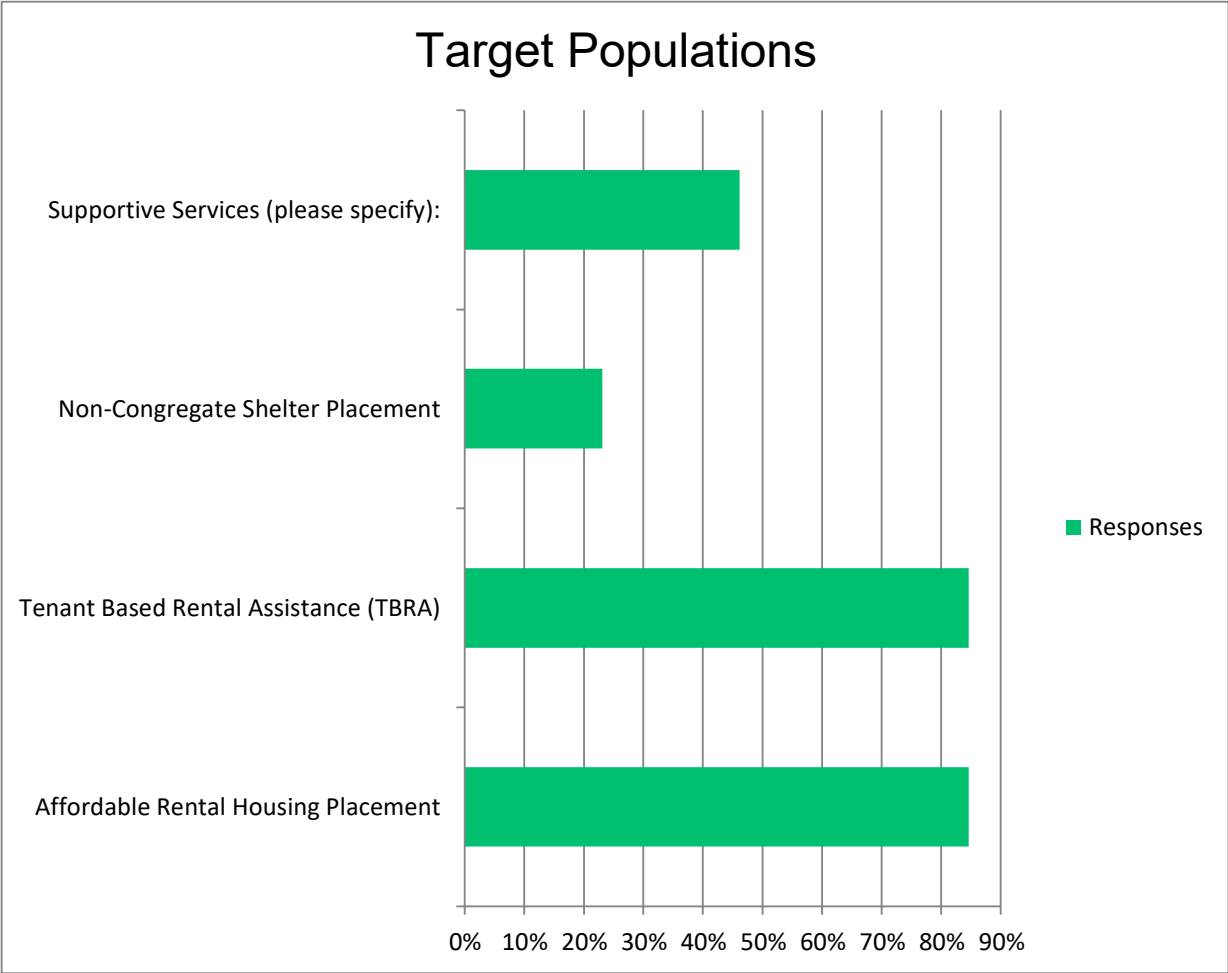
If so, indicate what eligible activities would be most beneficial for preferred populations:

Affordable Rental Housing Placement

Tenant Based Rental Assistance (TBRA)

Non-Congregate Shelter Placement

Supportive Services, explain _____



Other Input

HOME-ARP funding is a one-time opportunity to create programs/services that would have a significant impact on reducing homelessness in WNY. Are there other eligible uses of funding that were not specifically asked about that should be considered for funding or funding preferences?

Responses:
Immigrants and non-English speaking families.
Consider utilizing some of the area vacant homes to create safe and affordable housing options. There are many vacant properties that could be prioritized in the tax auction to address blight and simultaneously create affordable housing.

TRANSPORTATION ASSISTANCE - RELOCATION ASSISTANCE TO LIVE CLOSE TO JOBS AND SERVICES

n/a

After the pandemic many people are having mental health concerns, so providing services in that area will help people. Job trainings and workforce development are also important in WNY especially in the East Side of Buffalo. We need funding to provide services, so people become self-sufficient as much as possible.

Substance Abuse support

Legal services funding is always needed to help represent tenants facing eviction and notify them of their rights. Many people move out when they do not have to, as they don't know their rights. They then are homeless but it could have been prevented.

Repair/renovation of existing affordable housing, rental assistance.