

HOME-ARP Allocation Plan Template with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

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

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Template:

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

In compliance with U.S. Department of Housing and Urban Development – Community Planning and Development Notice CPD-21-10, the MHC notified the following entities to identify unmet needs and gaps in housing and service delivery systems prior to establishing the plan for allocating the MHC’s HOME-ARP funds. A listing of each agency contacted is provided below and any feedback is summarized. This list includes at least one of the following agencies: 1) homeless service providers; 2) domestic violence service providers; 3) veteran’s groups; 4) public agencies that address the needs of the qualifying populations; 5) public and private organizations

that address fair housing, civil rights, and the needs of persons with disabilities; as well as the local CoC and all of the public housing agencies (PHAs) that serve the jurisdiction of the MHC.

January 12, 2022 – attended virtual CoC meeting to introduce MHC’s HOME-ARP allocation and to start the consultation process.

November 21, 2022 – sent email invitation to all agencies/organizations listed in the table below to participate in a web-based survey to identify HOME-ARP needs and gaps (19 responses provided as Attachment #1)

November 30, 2022 – sent email invitation to all agencies/organizations listed in the table below to participate in one of two public HOME-ARP information sessions. One session was scheduled to be held in person and the second was scheduled to be held in a virtual format.

December 8, 2022 – held in-person public HOME-ARP information session (10 attendees – meeting summary provided as Attachment #2)

December 9, 2022 – held virtual public HOME-ARP information session (8 attendees – meeting summary provided as Attachment #2)

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Macomb County Continuum of Care (CoC)	CoC / Homeless Services Providers/Address the Needs of all QPs	Email & Survey	Response provided as Attachment #3
Detroit Housing Commission	PHA	Email & Survey	None
Roseville Housing Commission	PHA	Email & Survey	See Attachment #1 for response to survey.
Mount Clemens Housing Commission	PHA	Email & Survey	None
Sterling Heights Housing Commission	PHA	Email & Survey	See Attachment #1 for response to survey.
Eastpointe Housing Commission	PHA	Email & Survey	See Attachment #1 for response to survey.
New Haven Housing Commission	PHA	Email & Survey	None

Clinton Township Housing Commission	PHA	Email & Survey	None
Michigan State Housing Development Authority	Other – public agency that addresses the needs of all QPs	Email & Survey	None
Disability Network of Oakland and Macomb	Persons with Disabilities	Email & Survey	None
Fair Housing Center of Metropolitan Detroit	Civil Rights & Fair Housing	Email & Survey	None
True North to Freedom	Other – private agency that addresses the needs of victims of human trafficking	Email & Survey	See Attachment #1 for response to survey. Attended the public in-person HOME-ARP information session. Participated in workshop exercises meant to identify HOME-ARP needs and gaps.
Macomb County Veteran’s Services	Other – public agency that addresses the needs of veterans	Email & Survey	None
Turning Point	Homeless Service Provider & Domestic Violence Service Provider	Email & Survey	See Attachment #1 for response to survey.
Community Housing Network	Persons with Disabilities, Homeless Service Providers & Affordable Housing Developer	Email & Survey and individual consultation	See Attachment #1 for response to survey.
Macomb County Habitat for Humanity	Other – private agency that assists persons experiencing housing instability	Email & Survey	See Attachment #1 for response to survey.
Michigan Department of Civil Rights	Civil Rights & Fair Housing	Email & Survey	None
Vet’s Returning Home	Homeless Service Provider & Veteran’s Services	Email & Survey	None

Macomb Community College Veteran Services	Veteran’s Services	Email & Survey	None
Abigayle Ministries	Homeless Service Provider	Email & Survey	None
Motor City Mitten Mission	Homeless Service Provider	Email & Survey	None
Salvation Army Harbor Light	Homeless Service Provider	Email & Survey	None
Macomb Intermediate School District – Homeless Services	Homeless Service Provider	Email & Survey	See Attachment #1 for response to survey.
Catholic Services Of Southeast Michigan	Other – public agency that assists persons experiencing housing instability	Email & Survey	None
Legal Aid and Defender Association	Civil Rights & assists persons experiencing housing instability	Email & Survey	None
Michigan Rehabilitation Services	Persons with Disabilities	Email & Survey	None
Salvation Army MATTS	Homeless Services Provider	Email and Survey	See Attachment #1 for response to survey.
Family Youth Interventions	Homeless Service Provider	Email & Survey	See Attachment #1 for response to survey.
Amelia Agnes Transitional Home for Women	Homeless Service Provider	Email & Survey	None
Hearts for Homes	Other – private agency that assists persons experiencing housing instability	Email	Attended the public in-person HOME-ARP information session. Participated in workshop exercises meant to identify HOME-ARP needs and gaps.
Trinity Lutheran of Utica	Other – private agency that assists persons experiencing housing instability	Email	Attended the public in-person HOME-ARP information session. Participated in workshop exercises meant to identify HOME-ARP needs and gaps.
Perfecting Community Development Corp.	Affordable Housing Developer	Email & Survey	See Attachment #1 for response to survey.

Bridge the Gap Ministries	Other – private agency that assists persons experiencing housing instability	Email	Attended the public in-person HOME-ARP information session. Participated in workshop exercises meant to identify HOME-ARP needs and gaps.
City of Sterling Heights	HOME PJ	Email, Survey & Individual Consultation	See Attachment #1 for response to survey.
City of Roseville	HOME PJ	Email, Survey & Individual Consultation	See Attachment #1 for response to survey.
Clinton Township	HOME PJ	Email, Survey & Individual Consultation	See Attachment #1 for response to survey.
Village of Armada	Urban County CDBG Community	Email & Survey	None
Armada Township	Urban County CDBG Community	Email & Survey	None
Bruce Township	Urban County CDBG Community	Email & Survey	None
City of Center Line	Urban County CDBG Community	Email & Survey	See Attachment #1 for response to survey.
Chesterfield Township	Urban County CDBG Community	Email & Survey	None
City of Eastpointe	Urban County CDBG Community	Email & Survey	See Attachment #1 for response to survey.
City of Fraser	Urban County CDBG Community	Email & Survey	None
Harrison Township	Urban County CDBG Community	Email & Survey	None
Lenox Township	Urban County CDBG Community	Email & Survey	None
Macomb Township	Urban County CDBG Community	Email & Survey	None
City of Mount Clemens	Urban County CDBG Community	Email & Survey	See Attachment #1 for response to survey.
City of New Baltimore	Urban County CDBG Community	Email & Survey	None
Village of New Haven	Urban County CDBG Community	Email & Survey	None
Ray Township	Urban County CDBG Community	Email & Survey	None
City of Richmond	Urban County CDBG Community	Email & Survey	None
Richmond Township	Urban County CDBG Community	Email & Survey	None

Village of Romeo	Urban County CDBG Community	Email & Survey	None
Shelby Township	Urban County CDBG Community	Email & Survey	None
City of Utica	Urban County CDBG Community	Email & Survey	None
Washington Township	Urban County CDBG Community	Email & Survey	None

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

The summary of survey responses is provided in Attachment #1. The summary of the input provided by those that attended the HOME-ARP Public Information Sessions is provided in Attachment #2.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Template:

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

- ***Date(s) of public notice: 12/19/2022 (for 1/4/2023 public hearing), 1/16/2023 (for 30 day public comment period) and 1/19/2023 (for 2/6/2023 public hearing)***

- **Public comment period: start date - 1/16/2023 end date - 2/14/2023**
- **Date(s) of public hearing: 1/4/2023 and 2/6/2023**
- **Macomb County Board of Commissioners' – Full Board Meeting 2/16/2023**

Describe the public participation process:

January 4, 2023 public hearing – no attendees

February 6, 2023 public hearing – outcome pending

Describe efforts to broaden public participation:

- Held a second public hearing.
- Extended the public comment period from 15 days to 30 days.
- Directly emailed a copy of the allocation plan to all agencies and organizations that are listed in the consultation table provided above.

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

Pending outcome of 30 day public comment period and second public hearing.

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

Pending outcome of 30 day public comment period and second public hearing.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Template:

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	129	62	211	211	9								
Transitional Housing	31	14	6	6	0								
Permanent Supportive Housing	135	0	176	176	191								
Other Permanent Housing	N/A	N/A	N/A	N/A	N/A								
Sheltered Homeless						9 (31 persons)	2	0	4				
Unsheltered Homeless						36 (110 persons)	196	9	0				
Current Gap										154	31	195	195

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	95,537		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	7,106		
Rental Units Affordable to HH at 50% AMI (Other Populations)	37,638		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		14,695	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		14,890	
Current Gaps			8,053

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

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

Homeless as defined in 24 CFR 91.5

The most recent point in time (PIT) count was conducted on February 16, 2022. The total number of sheltered homeless people counted in the Continuum of Care during the survey was 236. The complete PIT count report is provided as Attachment #3.

At Risk of Homelessness as defined in 24 CFR 91.5111

According to Macomb County's 2019-2023 Consolidated Plan, there were 252,774 housing units located within the jurisdiction of the Macomb HOME Consortium. Of those units, 30,516 rental households and 43,082 owner households representing thirty percent (30%) of the total housing inventory reported having one of the following housing problems: 1) substandard housing; 2) severely overcrowded; 3) overcrowded; 4) cost burden over 30%; 5) severely cost burden over 50%; or 6) zero/negative income. Of those, the most common problem for both owners and renters was cost burden both over 30% and 50%. A deeper dive into this data reveals that the largest share of severely cost burdened households are extremely low income (30% AMI) renters followed by extremely low income owners. Of the extremely low income renters, small and other households are most severely impacted. Of the extremely low income owners, elderly and small households are those most severely impacted.

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

As described in Macomb County's 2019-2023 Consolidated Plan, there is no specific data at this time to describe the size and demographic composition of this population. The CoC Representatives from Turning Point (domestic violence shelter) and True North to Freedom (supportive services for survivors of human trafficking) were invited to participate in the development of this plan. They indicated that the demand is extensive and continued support should be a goal and action resulting from this plan.

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

This population includes:

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

- need additional housing assistance or supportive services to avoid a return to homelessness

There is no specific data available for this population, so the MHC reached out to the Macomb County CoC. The CoC reported that 1,004 households (1,344 people) were served by the members of the CoC during the period of 10/1/2021 -9/30/2022. Given the large number of households assisted during that time, it should be expected that some of those households will need additional assistance in order to avoid a return to homelessness.

This population also includes:

Those at Greatest Risk of Housing Instability meaning a household that has:

- Annual income \leq 30% of area median income and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs); OR
- Annual income \leq 50% of area median income and meets one of the conditions in paragraph (iii) of “At risk of homelessness” definition at §91.5

Since this is a broad definition, there is no specific data available. However, the needs assessment provided in Macomb County’s 2019-2023 Consolidated Plan does provide some information related to housing cost burden as reflected in the following table.

Housing Cost Burden	< = 30%	30-50%	>50%	No/Negative Income
Entire Jurisdiction	170,022	44,463	36,908	2,368
White	150,574	37,115	28,395	1,789
Black – African American	10,844	4,924	5,407	384
Asian	3,999	584	705	60
American Indian, Alaskan Native	245	185	63	0
Pacific Islander	125	0	0	0
Hispanic	2,733	863	767	34

Housing cost burden proportionality across race is slightly skewed at varying income levels and race/ethnicity groups. Pacific Islander's housing cost burden was 100% less than, or equal to, 30%. Generally, White, Asian, and Hispanic residents have similar proportions to the jurisdiction as a whole with approximately, 67% at \leq 30%, 18% at 30%-50%, and 14% at $>$ 50%. Black/African American residents however, slightly exceeded the distortion rate of 10% by one percentage point at the $>$ 50% cost burden. American Indian, Alaskan Native residents experienced a higher cost burden than the jurisdiction at the 30%-50% cost burden level.

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

- 1) The CoC reported that there are currently no TBRA and eviction funds available.
- 2) Michigan Homeowner Assistance Fund (MIHAF) is available prevent displacement of homeowners experiencing financial hardship.
- 3) Turning Point (domestic violence shelter) has limited funds and access to DHHS State Emergency Relief Program funds, charitable donations, and some Housing Choice Vouchers.
- 4) MSHDA ESG-CV and ESG provides some funding for rapid rehousing and homelessness prevention activities.
- 5) Macomb CoC HUD funds are being used for rapid rehousing, permanent supportive housing, transitional housing/rapid rehousing and supportive services.
- 6) The Macomb HOME Consortium has funds available for the development of affordable housing. A request for proposal will be issued for these funds by June 2023.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Input provided during the consultation process revealed that members of this population are in need of housing (both temporary and permanent housing) and a variety of supportive services including but not limited to: childcare, transportation, employment training, financial literacy, and access to dependable technology.

At Risk of Homelessness as defined in 24 CFR 91.5

Input provided during the consultation process revealed that members of this population are in need of rental assistance and moving costs. They are also in need of the same services described above under “Homeless”.

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

Input provided during the consultation process revealed that members of this population have difficulty obtaining housing even with vouchers. Many landlords won’t rent to those with credit issues, felonies, etc. Many are also in need of various services such as transportation, childcare, financial literacy, and assistance with getting criminal records expunged. There is currently also very limited services of any type for male survivors of human trafficking.

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

Input provided during the consultation process revealed that members of this population are also in need of rent assistance as well as the supportive services listed above under “Homeless”.

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

Shelters - The CoC reported that the demand for shelter beds outnumber the beds available. Each month Macomb County shelters are at capacity and frequently turn away guests. To further complicate the situation, churches that had traditionally supported the temporary rotating shelter program models, have been reluctant to reopen their doors to housing the homeless. While CARES Act CDBG-CV and ESG-CV funds was used to fill that gap, those funds are quickly running out. This would create a need for at least 60 more shelter beds.

Housing – Many organizations have unused rehousing funds due to the limited available inventory of affordable housing units or the challenge of getting landlords to accept homeless individuals and families.

Service Delivery System: Macomb County has developed an extensive network of housing and service partners which have enabled it to expand the effectiveness of its housing and community development programs. However, many of our service partners have been negatively impacted by the recent labor shortage. This has had some impact on the ability of some partners to expend funds in a timely manner.

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

Not applicable.

Identify priority needs for qualifying populations:

The MHC has prioritized non-congregate shelter, supportive services, and tenant based rental assistance (TBRA). These priorities, when implemented together, will provide a pathway to housing stability for persons included in the HOME-ARP qualifying populations.

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

The MHC determined the level of need by analyzing the data in the Consolidated Plan and input provided by partner organizations during the HOME-ARP consultation process as described previously in this plan.

HOME-ARP Activities

Template:

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

Activities that will not be administered directly by the MHC, subrecipients and/or contractors will be selected by the MHC through requests for proposals (RFP). All RFPs will comply with requirements stated in the Macomb County Purchasing Division’s written policies and procedures.

Describe whether the PJ will administer eligible activities directly:

It is the intention of the MHC to have service providers, subrecipients, and/or contractors administer eligible activities. If the MHC does not receive adequate responses once the RFPs are issued, then the need to administer eligible activities in-house may be re-evaluated.

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

No HOME-ARP funds were provided to a subrecipient prior to HUD’s acceptance of the Macomb HOME Consortium’s HOME-ARP allocation plan.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Template:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,586,553.00		
Acquisition and Development of Non-Congregate Shelters	\$ 2,000,000.00		
Tenant Based Rental Assistance (TBRA)	\$ 1,586,554.00		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%

Administration and Planning	\$ 912,901.00	15 %	15%
Total HOME ARP Allocation	\$ 6,086,008.00		

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

Based on the needs identified in the gap analysis, there is a need to fund all four (4) activities. However, there is also a need to assist as many households as possible in an efficient manner. While development of affordable housing was identified as the highest priority need, based on consultation with affordable housing developers, the MHC’s available HOME-ARP budget would fund approximately fifteen (15) units and would take years to come to fruition. In addition, affordable housing developers are struggling to locate building sites in Macomb County. As a result of these findings, the MHC has decided instead to fund supportive services, acquisition and development of non-congregate shelters, and TBRA.

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:

Macomb County has never had the capacity to shelter all of the individuals and families (most with young children) that find themselves homeless and in need of shelter. Providing HOME-ARP funds to acquire and develop a non-congregate shelter would help address that need. By also providing HOME-ARP funds for supportive services and TBRA, members of the HOME-ARP qualifying populations will be provided with the supports they need to eventually sustain their housing independently.

HOME-ARP Production Housing Goals

Template

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

Not Applicable - The Macomb HOME Consortium has decided not to allocate any of the available HOME ARP funds to the development of affordable rental housing.

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

Not Applicable - The Macomb HOME Consortium has decided not to allocate any of the available HOME ARP funds to the development of affordable rental housing.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

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

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

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

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

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

Template:

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

The MHC does not intend to give preference to a subpopulation of the qualifying populations.

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

Not Applicable

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) 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

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Template:

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. (Optional):

The MHC (including HOME-ARP subrecipients, service providers, and/or contractors) will accept referrals from Macomb County Continuum of Care participating agencies, on a first come, first serve basis, as the application process for the qualifying populations. The MHC will not use a coordinated entry process.

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):

Not applicable.

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):

Not applicable.

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):

Not Applicable

Limitations in a HOME-ARP rental housing or NCS project

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Template

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

Enter narrative response here.

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

Not applicable.

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

Not applicable.

HOME-ARP Refinancing Guidelines

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

- ***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***

The MHC will not use HOME-ARP funds to refinance existing debt.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

Q1 Agency Name

Answered: 17 Skipped: 0

#	RESPONSES	DATE
1	City of Roseville	12/6/2022 3:15 PM
2	Charter Township of Clinton	12/6/2022 12:42 PM
3	Sterling Heights Housing Commission	12/6/2022 9:02 AM
4	The Salvation Army	12/2/2022 11:41 AM
5	Roseville Housing Commission	12/1/2022 2:40 PM
6	Perfecting Community Development Corp.	12/1/2022 12:41 PM
7	City of Eastpointe, Michigan	11/30/2022 5:16 PM
8	City of Center Line	11/30/2022 2:11 PM
9	City of Mount Clemens	11/30/2022 1:39 PM
10	Community Housing Network	11/30/2022 12:46 PM
11	Turning Point	11/29/2022 8:21 PM
12	Family Youth Interventions	11/29/2022 1:09 PM
13	Macomb County Habitat for Humanity	11/29/2022 11:38 AM
14	City of Sterling Heights	11/28/2022 10:36 AM
15	True North to Freedom	11/23/2022 8:26 AM
16	Macomb Intermediate School District	11/22/2022 11:54 AM
17	Eastpointe Housing Commission	11/22/2022 6:32 AM

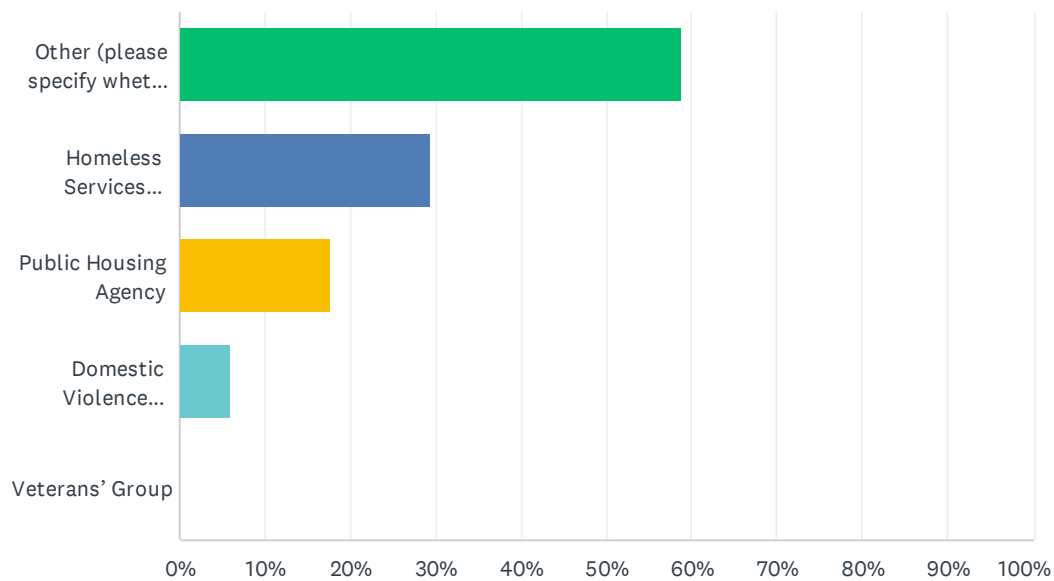
Q2 Email Address

Answered: 16 Skipped: 1

#	RESPONSES	DATE
1	eburman@roseville-mi.gov	12/6/2022 3:15 PM
2	m.wallace@clintontownship-mi.gov	12/6/2022 12:42 PM
3	rm@schoenherttowers.com	12/6/2022 9:02 AM
4	gail.harding@usc.salvationarmy.org	12/2/2022 11:41 AM
5	rhousing@rosevillehc.org	12/1/2022 2:40 PM
6	Ameliagneshome@gmail.com	12/1/2022 12:41 PM
7	imccain@eastpointecity.org	11/30/2022 5:16 PM
8	bjonas@centerline.gov	11/30/2022 2:11 PM
9	btingley@mountclemens.gov	11/30/2022 1:39 PM
10	kelliott@chninc.net	11/30/2022 12:46 PM
11	sdobbyn@turningpointmacomb.org	11/29/2022 8:21 PM
12	jbaarck@familyyouth.com	11/29/2022 1:09 PM
13	hhicks@macombhabitat.org	11/29/2022 11:38 AM
14	tjarzab@sterling-heights.net	11/28/2022 10:36 AM
15	director@truenorthtofreedom.org	11/23/2022 8:26 AM
16	sorris@misd.net	11/22/2022 11:54 AM

Q3 Agency Type. If applicable, you may select more than one type:

Answered: 17 Skipped: 0



ANSWER CHOICES	RESPONSES
Other (please specify whether private or public)	58.82% 10
Homeless Services Provider	29.41% 5
Public Housing Agency	17.65% 3
Domestic Violence Service Provider	5.88% 1
Veterans' Group	0.00% 0
Total Respondents: 17	

#	OTHER (PLEASE SPECIFY WHETHER PRIVATE OR PUBLIC)	DATE
1	Municipality	12/6/2022 3:15 PM
2	Public, municipality	12/6/2022 12:42 PM
3	City Government	11/30/2022 5:16 PM
4	Local Government	11/30/2022 2:11 PM
5	Local government	11/30/2022 1:39 PM
6	Affordable Housing developer	11/30/2022 12:46 PM
7	non-profit with 501 (c)3 status serving low-income families/individuals with affordable housing needs.	11/29/2022 11:38 AM
8	Municipality	11/28/2022 10:36 AM
9	Anti-Human Trafficking service provider	11/23/2022 8:26 AM
10	Education	11/22/2022 11:54 AM

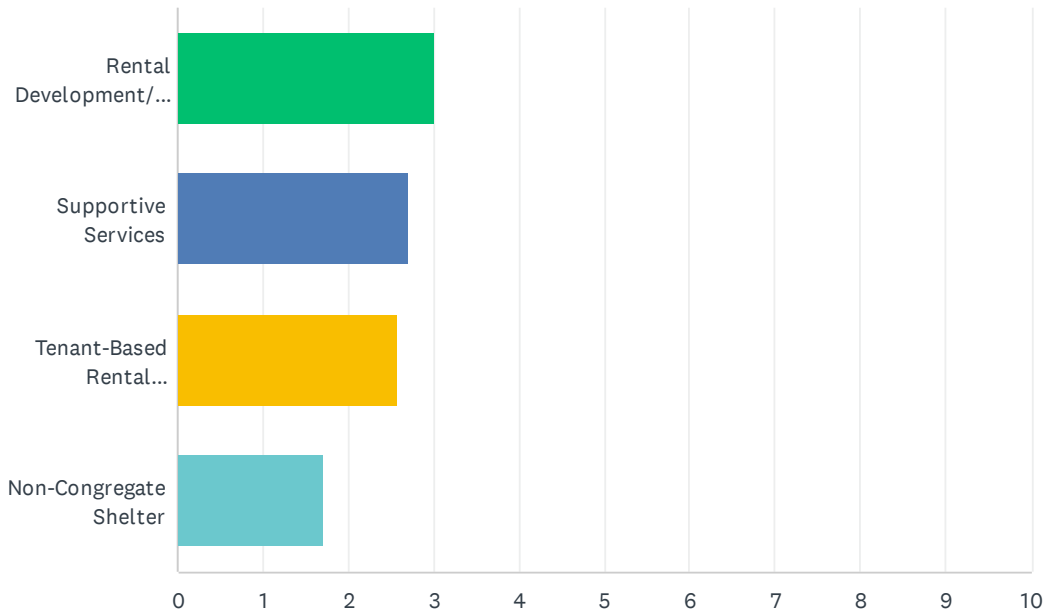
Q4 Does your agency serve the jurisdiction of the Macomb Home Consortium? Yes or No

Answered: 17 Skipped: 0

#	RESPONSES	DATE
1	Yes	12/6/2022 3:15 PM
2	Yes	12/6/2022 12:42 PM
3	Yes	12/6/2022 9:02 AM
4	YES	12/2/2022 11:41 AM
5	Yes	12/1/2022 2:40 PM
6	Yes	12/1/2022 12:41 PM
7	Yes	11/30/2022 5:16 PM
8	Yes	11/30/2022 2:11 PM
9	No	11/30/2022 1:39 PM
10	Yes	11/30/2022 12:46 PM
11	Yes	11/29/2022 8:21 PM
12	Yes	11/29/2022 1:09 PM
13	Yes	11/29/2022 11:38 AM
14	yes	11/28/2022 10:36 AM
15	Yes	11/23/2022 8:26 AM
16	Yes	11/22/2022 11:54 AM
17	Yes	11/22/2022 6:32 AM

Q5 Based on your assessment of need within the jurisdiction of the Macomb HOME Consortium, how would your organization prioritize the following list of HOME-ARP eligible components?

Answered: 17 Skipped: 0



	1	2	3	4	TOTAL	SCORE
Rental Development/Affordable Housing	41.18% 7	29.41% 5	17.65% 3	11.76% 2	17	3.00
Supportive Services	35.29% 6	11.76% 2	41.18% 7	11.76% 2	17	2.71
Tenant-Based Rental Assistance	17.65% 3	47.06% 8	11.76% 2	23.53% 4	17	2.59
Non-Congregate Shelter	5.88% 1	11.76% 2	29.41% 5	52.94% 9	17	1.71

Q6 For the component that you ranked as the highest priority, what specific needs could be addressed by the MHC's HOME-ARP funding?

Answered: 17 Skipped: 0

#	RESPONSES	DATE
1	Financial Assistance Costs, such as: Rental application fees, security deposits, utility deposits and payment of rental arrears.	12/6/2022 3:15 PM
2	Homelessness prevention and housing counsel	12/6/2022 12:42 PM
3	Affordable housing is the greatest need, voucher holders are finding it difficult to get affordable housing.	12/6/2022 9:02 AM
4	Drop in center for the homeless	12/2/2022 11:41 AM
5	Security deposit and utility assistance	12/1/2022 2:40 PM
6	We have provided rapid rehousing funding rental assistance through HUD as well as E.S.G. emergency shelter grant CV. We have found it necessary to assist in stabilize homeless families in permanent housing. As a result of these phones and program the homeless families we served have maintained their stable housing after the assistance ended.	12/1/2022 12:41 PM
7	I believe we could utilize MHC's HOME-ARP funding to develop missing middle affordable housing in Eastpointe. This would support low-income Eastpointer's housing needs, increase neighborhood density, while fitting in with the residential character of the city.	11/30/2022 5:16 PM
8	The more services offered by the county that assists with housing counseling and homelessness prevention will help our residents with the tools necessary to better prevent foreclosures.	11/30/2022 2:11 PM
9	Redevelopment of underutilized commercial buildings into a affordable, multi-tenant buildings.	11/30/2022 1:39 PM
10	Due to the years of the Pandemic we are seeing the many of our residents are experiencing an increase need for housing case management and wrap around services. Our current budgets are at pre covid levels and yet the demand and need has doubled or tripled in some cases. These services are crucial to helping families who where homeless stay housed and build lives of sustainability.	11/30/2022 12:46 PM
11	The specific need that could be addressed with the HOME-ARP funding would be to create and offer affordable rental units to those in need, with accompanying supportive services including financial literacy courses, job coaching, etc to prevent future homelessness.	11/29/2022 8:21 PM
12	Client centered case management, advocacy, life skills, and referral to provide supportive services to clients to increase the likelihood of maintaining housing.	11/29/2022 1:09 PM
13	Less restrictions such as SAM-certification.	11/29/2022 11:38 AM
14	TBRA	11/28/2022 10:36 AM
15	Survivors of HT have difficulting obtaining housing even with vouchers, many landlords won't rent to those with felonies; credit issues etc.	11/23/2022 8:26 AM
16	Lack of affordable housing the in the community often leads our low-income families to cycle in and out of homelessness. We also need to be able to serve homeless families that do not fit the HUD definition (i.e. doubled up and motel).	11/22/2022 11:54 AM
17	Macomb County needs more affordable housing for families. The voucher program participants are currently priced out of the rental market even with assistance. A rental development would be beneficial or security deposit assistance to families.	11/22/2022 6:32 AM

Q7 For the component you ranked as highest priority, if possible, please provide an estimate of the need (e.g. number of units).

Answered: 17 Skipped: 0

#	RESPONSES	DATE
1	estimated 10 to 15 residents	12/6/2022 3:15 PM
2	I believe there are 200 homeless individuals in the county at any given time.	12/6/2022 12:42 PM
3	40	12/6/2022 9:02 AM
4	100 beds	12/2/2022 11:41 AM
5	N/A	12/1/2022 2:40 PM
6	It is uncertain at this time how many families will need rental assistance using these funds. The amount of funds and cost of each rental unit along with the number of months that rental assistance is provided.	12/1/2022 12:41 PM
7	I believe 50+ units could be developed, and would be quickly filled by local and regional residents.	11/30/2022 5:16 PM
8	N/A	11/30/2022 2:11 PM
9	Unknown.	11/30/2022 1:39 PM
10	Funding for one or two additional housing case managers would make a huge difference. So about \$60k to \$120k annually (that is salary and benefits)	11/30/2022 12:46 PM
11	10-12 units would be beneficial	11/29/2022 8:21 PM
12	An approximate caseload would be 50.	11/29/2022 1:09 PM
13	1000	11/29/2022 11:38 AM
14	Shelter supportive services	11/28/2022 10:36 AM
15	I am sure the need is much greater than we are aware! In our organization, we currently have five survivors in need of safe housing,	11/23/2022 8:26 AM
16	I couldn't even venture a guess. The need is great -- especially for doubled up and motel families.	11/22/2022 11:54 AM
17	100 plus	11/22/2022 6:32 AM

Q8 For the component that you ranked as the second highest priority, what specific needs could be addressed by the MHC's HOME-ARP funding?

Answered: 17 Skipped: 0

#	RESPONSES	DATE
1	Funds to put towards an affordable housing development NOT specifically for senior housing. No contractor wants to be involved with an affordable housing development because they do not make a profit, but if HOME-ARP funds could be used to create an affordable housing development it would take off of the cost of the development.	12/6/2022 3:15 PM
2	Provision of housing affordable to LMI families	12/6/2022 12:42 PM
3	na	12/6/2022 9:02 AM
4	Services for the homeless	12/2/2022 11:41 AM
5	More affordable housing. Market rental rates have skyrocketed making it difficult for families to find housing	12/1/2022 2:40 PM
6	Providing support services has proven to be the missing link to assure families once they are housed remain housed and not return to the homeless system. These case managers work with clients on self-sufficiency, obtaining employment, And the life skills needed to become productive citizens.	12/1/2022 12:41 PM
7	MHC's Home-ARP funding could support existing tenants with rental assistance based on hardship from the COVID-19 pandemic and economic fluctuations. This would prevent evictions and displacement of individuals and families, and ensure landlords continue to receive rent to maintain their property and pay their tax bills.	11/30/2022 5:16 PM
8	N/A	11/30/2022 2:11 PM
9	Unknown.	11/30/2022 1:39 PM
10	There is a crucial shortage of safe shelter in Macomb. While the rotating shelter system had served Macomb well for many year's it is clear that we need something more sustainable and something that will provide greater safety and health for our citizens who experience homelessness.	11/30/2022 12:46 PM
11	Tenant-based rental assistance could support homelessness, increasing affordable and safe housing options for those in need. Being able to offer tenant-based rental assistance, without such a long waiting period or lengthy process would support those in need.	11/29/2022 8:21 PM
12	Serving youth ages 18-24, pregnant/parenting, at-risk of HT.	11/29/2022 1:09 PM
13	First and last month's rent	11/29/2022 11:38 AM
14	transitional housing	11/28/2022 10:36 AM
15	Increase in rental development/affordable housing would give more safe options available. Our organization is searching for a n affordable building for us to offer apartments and space for our Center to offer direct survivor assistance.	11/23/2022 8:26 AM
16	Assistance for doubled-up and motel families.	11/22/2022 11:54 AM
17	The need for affordable housing would be further addressed by tenant-based housing.	11/22/2022 6:32 AM

Q9 For the component you ranked as second highest priority, if possible, please provide an estimate of the need (e.g. number of units).

Answered: 17 Skipped: 0

#	RESPONSES	DATE
1	35 to 40 people depending on affordable housing development and how many units are in housing development.	12/6/2022 3:15 PM
2	My understanding is the county is likely 1000s of homes short for this population	12/6/2022 12:42 PM
3	na	12/6/2022 9:02 AM
4	Access to affordable housing	12/2/2022 11:41 AM
5	N/A	12/1/2022 2:40 PM
6	It is estimated that support services one case manager will be needed per 15 clients .	12/1/2022 12:41 PM
7	I believe 50+ individuals and families would be eager to utilize rental assistance support.	11/30/2022 5:16 PM
8	N/A	11/30/2022 2:11 PM
9	Unknown.	11/30/2022 1:39 PM
10	As a guess I would 40 units of non-congrate shelter but I would check with McCrest and Turning Point. They are the experts.	11/30/2022 12:46 PM
11	NA	11/29/2022 8:21 PM
12	Number of units for TBRA in a funding year would be 20-25	11/29/2022 1:09 PM
13	2000	11/29/2022 11:38 AM
14	shelter	11/28/2022 10:36 AM
15	For our organization, we are looking for a four to six unit building. The need is so great across the county, it would be beneficial to have 100 units available.	11/23/2022 8:26 AM
16	I couldn't even venture a guess. The need is great -- especially for doubled up and motel families.	11/22/2022 11:54 AM
17	100 plus	11/22/2022 6:32 AM

Q10 Additional comments:

Answered: 8 Skipped: 9

#	RESPONSES	DATE
1	A program that would be benifitcal to my residence sense they can't get into the rehab program because there are too many people to be able to provide service to is if there was a new program created to be able to allow the homeowner to find a contract and get a quote/invoice for the cost of services and pay out the contractor in increments that will go along with worked completed verses work need to be done. That way we are only held responsible for payment not finding the contractors and only liable for payment of work completed.	12/6/2022 3:15 PM
2	na	12/6/2022 9:02 AM
3	N/A	12/1/2022 2:40 PM
4	It will be our pleasure to Assist the community in Assuring safe and affordable housing is provided to homeless citizens to eradicate their homeless situation as they prepare to become productive citizens. As our case managers work with homeless families and individuals to break the cycle of homelessness as well as assist them in obtaining and maintaining main stream resources along with any other needed services. We have taken a full wraparound strength base case management approach with working with each client that we serve since 1992, which has been a proven method to reduce recidivism.	12/1/2022 12:41 PM
5	I ranked rental development 3rd because at this time I see the other as more pressing and well it is harder to find funding for Supportive services and shelter creation. This is not to say that rental development is not also, if not equally important. Rental Development is also a long term endeavor. We really need to figure out how to do it all.	11/30/2022 12:46 PM
6	We like working with the Macomb County HOME providers. They are very familiar with all regulatory rules, and they are a huge asset to our understanding of the program. They are very supportive, experienced, and knowlegable.	11/29/2022 11:38 AM
7	TNTF is grateful to be asked to weigh in on this subject. We are seeking the best options for the clients we serve. Seeing the needs daily, we desire to be a part of the solution. We are looking for funding oppotunities to help us achieve the goal of safe housing options for those we serve, Thank you for addressing this need!	11/23/2022 8:26 AM
8	The demand for affordable housing is high for families, disabled families and seniors. We receive up over 200 phone calls weekly from individuals/families looking for safe affordable housing.	11/22/2022 6:32 AM

HOME ARP Consultation

December 8, 2022

NAME	ORGANIZATION	EMAIL
Kelly Wilson	True North to Freedom	kellywilson@Oakland.edu Christa@Hearts4Homes.org
Christa Carpenter	Hearts for Homes	
Alex Bates-Gesler	Hearts 4 Homes	Karamby@hearts4homes.org
Rev. Lewis Stier	Trinity Lutheran	lster@trinitylutheran.com
Kristin DeFranco	MCHA	Kristin.defranco@mchabg.org
Elizabetha Sargent	Moravian Community Action	Elizabetha.Sargent@macombga.org
Anita Scott-Meisel	Cookshire Legal Aid	anita.scott@meisel@gmail.com
Heidi Wilt	True North to Freedom	director@truenorthtofreedom.org
Annex Allen	BRIDGE THE GAP MINISTRIES	Bisshop@bridgethegap.org

HOME ARP CONSULTATION Sign in

NAME	ORGANIZATION	EMAIL
Dave Rose	Community Flooding Network	drose@chvinc.net

HOME ARP Public Consultation: 12/9/2022-Virtual

Plan due: 3/31/2023

Deadline 12/22/2022-Data Request

Attendance:

Name: Organization:

- 1.) Gail Harding-The Salvation Army MATTS Shelter
- 2.) Sydnie Allor - City of Sterling Heights
- 3.) Brandon Jonas- City of Center Line
- 4.) Kim Meltzer Clinton Township k.meltzer@clintontownship-mi.gov
- 5.) Erica Burman - City of Roseville
- 6.) C.J. Felton - Community Housing Network
- 7.) Ian McCain-Economic Development, Manager, City of Eastpointe imccain@eastpointecity.org
- 8.) Jennifer McNeely MSHDA Specialist HOME –ARP mcneelyj2@michigan.gov

Summary of input from December 8, 2022 and December 9, 2022

HOME-ARP Public Information Sessions

Characteristics of the housing market and barriers to affordable housing:

- Felony criminal record
- Credit issues
- Uncontrolled rent increases
- Security deposit & first month's rent
- Lack of job skills
- Move in costs
- Stigma – re: population
- Being able to take a pet to a shelter/housing
- Tenant rights & landlord duty education
- Hedge funds acquiring housing and raising rent (huge problem with mobile home parks)

Unmet need that can't be addressed with current funding:

- Relocation cost assistance
- Clearinghouse for services
- Housing search & counseling services
- Credit repair

Current shelter and housing inventory and service delivery system:

- **Needs:**
 - Not enough shelter space
 - Need more subsidized units
 - Safety & cleanliness as need for recovery of trauma survivors
 - Rental assistance
 - Not enough affordable rentals
 - More permanent supportive housing
 - More rental housing targeting household with income below 40% area median income
 - Eviction diversion funds
- **Gaps:**
 - Transitional recovery home for survivors of human trafficking
 - No/limited services for male survivors of human trafficking

Priority needs of qualifying populations

- Childcare
- Access to technology and a reliable phone
- Employment training
- Transportation including: emergency car repairs, car maintenance, help with car payments, bus tickets and Uber/Lyft vouchers

Macomb COC HOME-ARP Committee Report

Committee:

- Tim Joy - MCREST
- Candice Morgan - Community Representative (COTS)
- C.J. Felton - CHN
- DeAra Johnson - Turning Point
- Jessica Keenan - CHN
- Kara Black - PCDC
- Katie Carroll - Macomb County Veterans
- Lindsey Keesling - FYI
- Lisa Chapman - MCAH
- Melissa Coleman - Turning Point
- Natalie Wojcickij - CHN
- Richard Cannon - Hearts for Homes

Macomb Community Action the participating jurisdiction (PJ) for the Macomb County HOME-ARP funds requested that the committee answer the following questions:

1. Describe the unmet housing and service needs of qualifying populations.

- The county has 129 emergency shelter beds. Dozens of individuals and families are turned away from shelters each month due to no vacancy. This does not include over 1000 children and their parent or parents who live doubled up or in small single room motels.
- The annual PIT count every January is a snapshot of the number of individuals who are homeless that are sheltered and unsheltered in Macomb County. Unfortunately there was no unsheltered count in 2021 and the 2022 count is yet to be reported. But we know that there are dozens of unsheltered folks in our county from past counts.
- There are thousands of renters in Macomb County that are at risk of becoming homeless. Over 14,695 renters are at 0% - 30% area median income (AMI) with one or more severe housing problems and are paying more than 50% of their income on housing expenses. As much as 35,940 renters fall below 50% AMI.
- The average monthly rent for a one bedroom apartment in Macomb County is \$1147. Those 14,695 renters at 0% - 30% AMI if paying 30% of their income for rent, can afford only \$600 per month. The average renter in Macomb County earns \$16.64 per hour. This means their affordable rent should be \$865 per month. Therefore, we need more affordable housing in Macomb County.
- Currently there are 70 households on the Coordinated Entry Registry awaiting assistance for housing. In addition, Turning Point has 52 households in their shelter and 27 households in their transitional program awaiting housing. Family

Youth Interventions have over fifteen (15) 18 - 24 years old individuals awaiting housing. The temporary winter shelter averages well over 100 individuals not on the coordinated entry registry.

2. What current resources are available to assist qualifying populations?

- Housing Choice Vouchers and Emergency Housing Vouchers are available. There are approximately 100 vouchers available.
- The CERA program continues to accept new applications. Applicants must have arrears from March 13, 2020 - December 20, 2021. Macomb County could receive additional funds through reallocation.
- The MSHDA-ESG CV program has over \$200,000 available for rental assistance through September 30, 2022. MSHDA ESG and HUD ESG has approximately \$80,000 available each year for housing rental assistance.
- Turning Point has limited funds, and access to DHHS State of Emergency Relief program, and charitable foundations and of course Housing Choice Vouchers.
- Family Youth Interventions have limited rental assistance funds through the HUD COC funded rapid rehousing grant. These funds serve only half of our folks in need.
- Veterans have many resources available for housing. They include HUD VASH, SSVF, Trust Relief Fund, and VA/VCRRC. Although many homeless veterans find themselves not qualifying for any of these programs.
- At this time there are no TBRA funds or Eviction Diversion Funds available.
- Michigan Homeowner Assistance Fund assists for eligible participants with delinquent mortgage expenses, property taxes, homeowners insurance, utilities and more.

3. What gaps currently exist within the existing shelter and housing inventory as well as the service delivery system?

- As reported above, the demand for shelter beds outnumber the beds available. Each month all shelters are at capacity and turn away dozens of households in need of shelter. Added to that, churches who participate in the MCREST rotating shelter that includes 60 guests, have not reopened their doors as of March/22 and the infection rate for Macomb County is at a low of below 4%. We strongly anticipate that most if not many of these devoted churches will not return to the program. This would create a need for 60 more shelter beds.

- Even though resources are available to house more households, individuals and families cannot find affordable housing and/or landlords that will accept them as tenants. It is believed that 1 in 4 households with vouchers are able to find housing. The number of HCVs available are irrelevant if the existing households with vouchers cannot find housing.
- Many of organizations have unused rehousing funds all due to the fact of limited affordable housing or challenges getting landlords to accept homeless individuals and families.
- The current lack of rental units is complicated by the fact that rent has increased nationally by 14% this year. Nearly 50% of American workers no longer earns enough to rent a one bedroom apartment. As of January/21 the inventory of necessary new homes was nearly 7 million in the hole, thus pushing up rental rates.

Conclusions:

HOME-ARP funds could be used for all four (4) eligible activities. The need exists in all areas. So the question is, what is the highest, most important unmet need? Where can the funds make the most impact?

Currently, we have more funds in prevention services and rapid re-housing then ever before due to covid resources. This is only a short term bandaid. Although, even with the normal amount of accessible funds we cannot find enough affordable housing to utilize what we have.

Macomb County has never had the capacity to shelter all the individuals and families with children that request a warm place to sleep. That has increased dramatically due to covid and the closing of our rotating shelter churches. Money that has enabled the shelter of over 100 folks in the winter months will be gone this next coming winter.

The committee agrees that the largest unmet needs are affordable housing and shelter beds. Which is the bigger need? How do you honestly decide that? Both are so important.

The committee agreed that for a small portion of the funds we can meet the rapid rehousing needs of the survivors of domestic and sexual violence as well as homeless youth and families.

Homelessness is the challenge. **So we feel the funds should be used in the most efficient way to house and/or shelter the most households.** An analysis by the best minds available can determine such things as should we build a new shelter or convert an old motel to non-congregate beds? Can we find other funds to add to the HOME-ARP funds to build new apartment units or convert old motels to small affordable apartments? All of this will take time, we know, but we must keep moving forward. All is possible.

Macomb COC subcommittee recommendation for ARP HOME funding

Our committee is ready to submit its final report.

In conversations with MCA, Stephanie, she requested that the COC submit answers to three (3) questions.

How do you describe the unmet housing and service needs of qualifying populations?

What current resources are available to assist qualifying populations?

What gaps currently exist within the existing shelter and housing inventory as well as the service delivery system?

To the best of our ability, I feel we have fully answered these questions.

We have also stated the committee's recommendations for the usage of the HOME-ARP funds.

As we stated in the report, we feel there is a need for all eligible activities, but the largest need

is for shelter beds and affordable housing. We hope the board agrees.

It was too difficult with the data at hand to decide which is more important.

We feel the money should be used for both.

I have also included a table of information that will be very useful for Stephanie to complete the allocation plan for HUD.

Please copy me on the email to Stephanie that includes your recommendations.

I will share it with the committee.

If you need to discuss further please call or we can schedule a zoom.

Thank you for allowing the COC membership to have a voice in the COC recommendations to MCA.

Tim

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	95,537		
Rental Units Affordable to HH at 0-30% AMI (At-Risk of Homelessness)	7,106		
Rental Units Affordable to HH at 31-50% AMI (Other Populations)	37,638		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		14,695	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		14,890	
Current Gaps			(+)8053

NARRATIVE FOR SUBMISSION WITH THIS DATA TABLE:

While it appears that Macomb County may have sufficient affordable housing, that is unfortunately not the case. It is estimated that there are only 4,664 units available to rent currently, and those are not specified to be affordable or sufficient for habitation, simply available.

Additionally, 35,940 renting households in Macomb County fall below 50% Area Median Income or AMI, 18,620 of those falling between 0-30% AMI. 29,585 renting households that have 0-50% AMI also have 1 or more housing problem (incomplete kitchen facility, incomplete plumbing facility, more than 1 person per room, or a cost burden greater than 30%).

Given these additional barriers, along with lack of vacant units available for rent, there is a housing crisis within the community.

WHAT THE TABLE DOES NOT SHOW US; additional data breakdown:

- There are 95,537 total rental units, but only 17,770 vacant units and estimated only 4,664 units are available to rent currently.
 - https://www.huduser.gov/portal/datasets/cp.html#2006-2017_query

- There are 37,638 units that technically meet affordability for Renting Households with 0-50% AMI Renter, *please note that does not mean they are available or meet housing standards*
 - Household size used is 2; most common overall household size is 2 in Macomb County
 - <https://data.census.gov/cedsci/table?t=Household%20Size%20and%20Type&g=0500000US26099&tid=ACSST1Y2019.S2501>
 - Affordable housing by HUDs definition is housing that is 30% or less of total monthly income
 - 30% AMI for 2 person HH is \$19,200; 30% = \$480/month
 - 7,106 units were \$500 or less
 - 50% AMI for 2 person HH is 32,000; 30% = \$800/month
 - 30,532 units were between \$500-\$800/month
 - Including rental units up to \$500; 37,638 units were \$800 or less
 - <https://data.census.gov/cedsci/table?t=Renter%20Costs&g=0500000US26099&tid=ACSST1Y2019.B25056>
 - This averages only about 39% of all rental units in Macomb are affordable
 - Only 4,664 rental units are available, and we know from our agencies and community partners that those that are available do not typically meet Fair Market Rent (FMR)/Affordability, or pass housing inspections for habitability.
- 29,585 identified households:
 - Have 50% or below the AMI
 - Have 1 or more housing problems
 - Incomplete kitchen facilities
 - Incomplete plumbing facilities
 - More than 1 person per room
 - Cost burden greater than 30%
 - https://www.huduser.gov/portal/datasets/cp.html#2006-2017_query
- 29,240 households have an AMI of 50% or less, but a cost burden of 30% or more
 - https://www.huduser.gov/portal/datasets/cp.html#2006-2017_query

- 35,940 households have an AMI of 50% or less
 - 18,620 households 0-30% AMI
 - 17,320 households 31-50% AMI
 - https://www.huduser.gov/portal/datasets/cp.html#2006-2017_query

Homeless													
	Current Inventory (HIC)					Homeless Population (PIT)				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	129	62	211	211	9	62	205						
Transitional Housing	31	14	6	6	0	14	3						
Permanent Supportive Housing	135		176	176	191								
Other Permanent Housing (CHN SHU)						9 (31 persons)	2	0	4				
Sheltered Homeless						36 (110 persons)	196	9					
Unsheltered Homeless													
Current Gap										(+)154	(+)31	(+)195	(+)195

Total Inventory - 2021			
Emergency	Transitional Housing		Total

Total Households:	231	8	239
Total Persons:	306	24	330
Total Adults:	230	7	237
Total Children:	76	17	93

NARRATIVE FOR SUBMISSION WITH THIS DATA TABLE:

Contrary to what this table shows, Macomb County does not have sufficient shelter and other housing supports for those who are literally homeless. This data only presents sheltered, and does not take into consideration unsheltered persons who are homeless. Additionally, due to the COVID-19 Pandemic, persons who otherwise would not meet criteria for homeless diversion programs are eligible at this time. Although this programming is great for our community, it does not address the unmet need during times where this additional support is not available.

It should also be addressed that there are limited spots in each of the programs: Permanent Supportive Housing (PSH), Supportive Housing Units (SHU), Transitional Housing, and Emergency Shelter. While the current Inventory shows the Housing Inventory Count which is an annual allocation count, the Homeless Population data only shows a Point in Time. While an Emergency shelter may support hundreds of people throughout the year, they unfortunately cannot shelter hundreds of people at a time, the same to be said with Transitional Housing programs. For continued housing supports such as PSH and SHU, most participants are static in the program, and vacancies do not happen often. While there may be several spots available at a given time, this does not address the hundreds of persons facing homelessness who need intensive supportive housing following a homeless episode.

Now viewing data for: MI-503 - St. Clair Shores, Warren/Macomb

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[Point-in-Time \(PIT\)](#) [PIT Counts](#) [All Homeless Populations](#) [Additional Homeless Populations](#) [Youth Populations](#) [Veteran Populations](#) [Methodology](#) [Notes](#)
[Reporting Status](#)

PIT Counts

Note: Youth Populations and Veteran Populations data is a subset of the All Homeless Populations data. Veterans and Youth Populations and Veteran Populations data should be included in the All Homeless Populations data section.

Date of PIT Count

Type of Count Conducted This Year

- Sheltered and Unsheltered Count
- Sheltered-Only Count

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Received HUD Waiver?

- Yes
- No
- Not applicable

	Households with at least one Adult & one Child	Households with only Children	Households without Children	Totals			
Total Households and Persons				Sheltered		Unsheltered	Total
				Emergency	Transitional	Safe Haven ^a	
	Total Number Of Households			158	4	0	29
	Total Number of Persons			236	4	0	32
	Number of Children (under age 18)			78	0	0	2
Number of Persons (18 to 24)			10	4	0	0	
Number of Persons (over age 24)			148	0	0	30	
						178	
Gender				Sheltered		Unsheltered	Total
				Emergency	Transitional	Safe Haven ^a	
	Female			119	2	0	7
	Male			117	2	0	25
	Gender that is not singularly 'Female' or 'Male' (e.g., non-binary, genderfluid, agender, culturally specific gender)			0	0	0	0
	Questioning			0	0	0	0
Transgender			0	0	0	0	
Ethnicity				Sheltered		Unsheltered	Total
				Emergency	Transitional	Safe Haven ^a	
	Non-Hispanic/Latin(a)(o)(x)			221	4	0	31
Hispanic/Latin(a)(o)(x)			15	0	0	1	
						16	
Race				Sheltered		Unsheltered	Total
				Emergency	Transitional	Safe Haven	
	American Indian, Alaska Native, or Indigenous			1	0	0	0
	Asian or Asian American			0	0	0	0
	Black, African American, or African			120	2	0	10
	Native Hawaiian or Pacific Islander			0	0	0	0
	White			100	2	0	22
Multiple Races			15	0	0	0	
						15	
Chronically Homeless				Sheltered		Unsheltered	Total
				Emergency	Transitional	Safe Haven ^a	
Total number of persons			35		0	5	
						40	

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The PIT count should be completed using unduplicated counts or statistically reliable estimates of homeless persons in sheltered and unsheltered locations on a single night during the last ten days of January 2019. **HUD requires that PIT counts be conducted in compliance with HUD counting standards and related methodology guidance.** [PIT Guides and Tools](#) are available on the HUD Exchange. CoCs that are considering performing their required PIT count outside of the last 10 days of January must request a PIT count date exception from HUD. No HUD permission or exception is required for CoCs to conduct supplemental PIT counts.

- Persons counted in permanent housing, permanent supportive housing and rapid re-housing should not be included in the PIT count of homeless persons reported to HUD.
- Persons counted in any location not listed on the Housing Inventory Count (HIC) should not be included in the PIT count of homeless persons reported to HUD (e.g. institutional settings, residential treatment facilities, doubled-up with family or friends).

The gender category "Gender Non-Conforming" is intended to represent people whose gender identity is not "male, female, or transgender," and should not be used in the event that gender of a person is unknown. In the event gender is unknown, CoCs should use approved extrapolation techniques to ensure that the total number of persons listed under each category equal the total number of persons counted.

It is important for CoCs to closely coordinate their HIC and PIT counts of sheltered homeless persons and report only those persons who are staying in emergency shelter, Safe Haven, or transitional housing beds/units identified on the HIC. The total number of persons reported in all emergency shelter, Safe Haven, and transitional housing projects on the HIC must match the total number of sheltered persons reported in the PIT Population tab in the HDX. Please refer to the [2019 HIC and PIT Data Collection Notice](#) for additional information and instructions concerning HIC and PIT data collection.

Youth Populations and Veteran Populations data is a subset of the All Homeless Populations data. Veterans and Youth Populations and Veteran Populations data should be included in the All Homeless Populations data section.

^aIndividuals housed in Safe Havens on the night of the count should only be recorded in the "Safe Haven" column, NOT in the emergency shelter column.

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U.S. Department of Housing and Urban Development
451 7th Street S.W., Washington, DC 20410
Telephone: (202) 708-1112 TTY: (202) 708-1455
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