

CITY OF NEW ROCHELLE

HOME-ARP ALLOCATION PLAN



June 2, 2022

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Introduction

Participating Jurisdiction: The City of New Rochelle, New York

Date: 6/1/2022

As part of the American Rescue Plan (ARP), the City of New Rochelle was allocated \$1,490,848 in HOME Investment Partnership (HOME) funds to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations. The purpose of HOME-ARP funds is to reduce homelessness and increase housing stability. The funds may be purposed for housing development, rental assistance, supportive services as well as non-congregated shelters. In order to receive its HOME-ARP allocation, the City of New Rochelle must develop and submit a HOME-ARP Allocation Plan to the U.S. Department of Housing and Urban Development (HUD) and are subject to a 15-day public review period.

Background

HUD mandates that each HOME-ARP Participating Jurisdiction (PJ) consults with agencies and service providers whose clientele include the HOME-ARP qualifying population. Agencies that must, at a minimum, be consulted include the Continuum of Care serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities. PJ's are not required to consult with all Continuums of Care affiliates or PHAs in their jurisdiction. HUD also requires that each Participating Jurisdiction provide opportunities for the public to comment on the proposed Allocation Plan, including the amount of HOME-ARP funds that will be received and the range of activities that the PJ may undertake.

Consultation

The City of New Rochelle consulted with various stakeholders in the participating jurisdiction (PJ) for the purposes of gaining their perspective on the current state of housing in the area. The PJ conferred with the local Continuum of Care (CoC), Municipal Housing Authority (NRMHA), agencies that are vested in the protection of the residents in the qualifying populations and their civil rights as well as religious institutions.

Summarize The Consultation Process

The City of New Rochelle conducted three main consultation activities. The first was a virtual forum made up of representatives from the cities of New Rochelle, Yonkers, Mount Vernon and Westchester County. Strategic Collaborative (ASC) meeting, which functions as the New Rochelle CoC membership joined together to have discussions on all manner of topics revolving around housing and the need of affordable housing in the county. The Westchester County Continuum of Care Partnership to End Homelessness is a collaborative group of administrators from various local municipalities whose mission is to improve the system of care that exists in New Rochelle and their surrounding communities for people experiencing homelessness. Representatives from such agencies were present as part of the HOME-ARP discussion. The meeting was held on January 11, 2022.

The other two consultation activities were conducted virtually and hosted by the City of New Rochelle. These meeting consisted of a collaborative body made up of members from the City of New Rochelle, Public Housing Agencies, Homeless Provider Agencies, Veteran Organizations, Healthcare Providers, Social Service Agencies, Government Entities, and Housing Development Agencies whose purpose is to implement strategies that increase the supply of safe, decent affordable rental housing for very low-income people.

These meetings were held on March 23, 2022. Overall, 10 agencies and 12 of their respective members were consulted. Both meetings were conducted via remote virtual platforms. For the consultation process, the City of New Rochelle developed a presentation to inform meeting participants of the HOME-ARP funding, including HOME-ARP requirements, Eligible Activities, and the Qualifying Population.

In the development of the allocation plan, the City consulted with stakeholders and asked for their input concerning the HOME-ARP grant and the proposed budget. Stakeholders voiced their concerns about gaps in services and housing needs by providing written as well as verbal input. The City of New Rochelle has synthesized feedback from participants and the following table will provide summaries of the feedback received. The City of New Rochelle will continue to meet with stakeholders throughout the implementation of the HOME-ARP activities in an effort to assess the ongoing needs of the qualifying population. The City of New Rochelle will also strive to collaborate with stakeholders to develop and effectuate strategies that will help end chronic homelessness.

Ensuring HOME-ARP allocation was the top priority in the committees' agenda for discussion, email reminders were sent to inform committee members of the importance of not only attending but engaging in such discussion. The City's Department of Community Development also received feedback from external stakeholders about the need to support occupational-based housing vouchers using HOME-ARP funds to assist this population with the financial hardships these occupations faced during the pandemic and/or due to the high cost of living in New Rochelle.

List Of Organizations Consulted

Summary of feedback received

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Section 8 for the City of New Rochelle	Homeless Provider/Healthcare Provider/People with Disabilities	Meeting: 1-hour virtual meeting	<ul style="list-style-type: none"> Proposed the additional funds are used to expand the section 8 voucher program. Provide additional funds that can be used to bridge the gap between the participants of the program and an income threshold that can compensate for the gaps in living standards.
HOPE Community Services	Public Housing Agency	Meeting: 1-hour virtual meeting	<ul style="list-style-type: none"> Suggested using HOME-ARP funds added to TBRA (Tenant-Based Rent Assistance) funds to have a larger pool to assist more people in the qualifying population.
New Rochelle Housing Authority	Public Housing Agency	Meeting: 2 separate 3-hours virtual meetings	<ul style="list-style-type: none"> Suggested finding ways to use additional funding to assist the citizens that participate in rent subsidies to move beyond needing assistance. Develop ways to simplify the process of getting assistance.
United Community Center of Westchester, Inc	Supportive Services & Programs Advocacy	Meeting: 1-hour virtual meeting	<ul style="list-style-type: none"> Recommends more funding going to housing and economic empowerment for the low-to-moderate income earners.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Veterans Advisory Committee	Veterans Affairs & Service Provider Homeless Provider	Meeting: 1-hour phone interview	<ul style="list-style-type: none"> • Immediate placements for veterans facing homelessness. • Place housing priority for older veterans facing homelessness. • Provide case management opportunities for veterans that are struggling with adjustment.
Westchester Community of Mental Health	Homeless Provider Healthcare Provider People with Disabilities	Meeting: 1-hour virtual meeting	<ul style="list-style-type: none"> • Requested funds should be allocated to a program that teaches participants about financial competency. • Ongoing participation in housing subsidies should be tied to education for financial literacy.
Westchester County Continuum of Care	Continuum Care	Meeting: 1-hour virtual meeting	<ul style="list-style-type: none"> • CoC satisfied with how funds are being used for long-term housing, but thought that some funds should be used to help some of the participants acquire educations and skills to maintain self-sufficiency.
My Sister's Place	Homeless & SafePlace Provider Therapy Provider People who are the victims of Domestic violence	Meeting: 1-hour phone meeting	<ul style="list-style-type: none"> • Housing is a critical issue because the cost of housing is rising. This has led to victims feeling trapped and staying in non-ideal situations because of lack of options. Proposed funding could assist victims to be placed in a more affordable housing situation.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Senior Citizens Center	Supportive Services & Programs Advocacy	Meeting: 1-hour phone meeting	<ul style="list-style-type: none"> • Stated that the senior population is being priced out of their homes. Recommended more housing vouchers are issued to seniors instead of having seniors live in a retirement home. • Increase security. There are a number of individuals who are not seniors are placed with the senior population.
LGBTQ Community Liaison	Supportive Services & Programs Advocacy	Meeting: 1 hour phone meeting	<ul style="list-style-type: none"> • Stated the organization wasn't aware of any housing discrimination or any factors that would stop the LGBTQ community from receiving housing. • Funding for a safe space for youths in their community could congregate would be useful.
Westchester Disabled on The Move (WDOMI)	Supportive Services & Programs Advocacy	Meeting: 1-hour phone meeting	<ul style="list-style-type: none"> • Need for accessible housing is of primary importance to those wishing to avoid institutionalization or homelessness. WDOMI can assist with getting the support needed to live in the community, housing has been a formidable barrier. WDOMI is requesting that that the HOME-ARP set aside funding to prevent institutionalization and homelessness.

Summary Of Feedback Received

Of the four eligible activities, the need to expand the City's existing Tenant Based Rental Assistance (TBRA) program was indicated as the most urgent need in New Rochelle to help the current homeless population and to prevent homelessness in the City. Even though some stakeholders expressed concern about creating additional housing vouchers through the TBRA program because many tenants with housing vouchers are struggling to find landlords willing to accept vouchers in the current rental market, the City is currently working with the U.S. Department of Housing and Urban Development (HUD) to permanently increase the City's payment standards to landlords to keep landlords and to entice new landlords house eligible New Rochelle residents.

Other suggestions included developing affordable housing long-term solutions and supportive services such as case management, rental housing counseling and financial literacy. The discussion around these suggestions acknowledged that these activities are a short-term solution to the bigger issue of a lack of affordable housing for the population the HOME-ARP funds are intended to support. However, these programs will have a long-term impact on the population's ability to afford to live in New Rochelle through improving their ability to access housing resources, improve and manage their finances.

Public Participation

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.

Public participation is an essential element in assessing the needs and gathering input from the citizens of New Rochelle.

The 15-day HOME-ARP Allocation Plan public comment period will begin on June 29 to July 13, 2022. A public hearing will be held at 5:30 pm on July 12th with the City Council. A notice of public comment period and public hearing were published in both English and Spanish on June 24, 2022. In addition, the notice was displayed on the City's website and emailed to the City's list of stakeholders.

1	Mode of Outreach: PUBIC ONLINE SURVEY 6/1/2022	
	Target of Outreach	Online Survey in English and Spanish available on the City's Website
	Summary of response/attendance	<p>The City of New Rochelle made available to the public an online survey where the public's inputs could be accounted for without bias. The goal was to have a virtual safe space where their perspectives about the housing market would be heard in English as well as Spanish. The online public participation yielded a variety of answers, but there were a few points and comments that were reoccurring:</p> <p>The job market is always a familiar theme and is indirectly related to the housing market. There seems to be a lack of well-paying positions for the unskilled labor force.</p> <p>The common concern was about the lack of affordable housing. The survey is meant to encapsulate the age, gender, sex, etc. of the participants so that the city can get a perspective from the various demographically defined populations of New Rochelle.</p>
	Summary of comments received	The comments were a summary of the results of the survey.
	Summary of comments not accepted and reasons	All comments were considered.
2	Mode of Outreach: PUBLIC HEARING AND 15-DAY PUBLIC COMMENT PERIOD	
	Target of Outreach	Public Hearing
	Summary of response/attendance	To be determined upon completion of the 15-Day comment period and Public Hearing.
	Summary of comments received	To be determined upon completion of the 15-Day comment period and Public Hearing.

Summary of comments not accepted and reasons	To be determined upon completion of the 15-Day comment period and Public Hearing.
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Describe any efforts to broaden public participation

- The City of New Rochelle made available an online survey that allows citizens of New Rochelle to give their input on the state of the housing market **anonymously**. It allowed New Rochelle residents to share their opinions without being concerned of personal scrutiny. The City of New Rochelle solicited various social media outlets to broadcast to their citizens that the surveys were available bilingually in an effort to boost participation.
- Draft of the HOME-ARP Allocation Plan will be sent to multiple local housing advocates serving diverse populations and neighborhoods.

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

To be determined upon completion of Public Hearing and Public Comment Period.

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

To be determined upon completion of Public Hearing and Public Comment Period.

Needs Assessment and Gaps Analysis

To assess the unmet needs of HOME-ARP qualifying populations, the City of New Rochelle's Community Development Department evaluated the size and demographic composition of those qualified populations. They have also identified gaps within its current shelter and housing inventory, as well as the service delivery system. In the needs assessment and GAP analysis, current data was used including Comprehensive Housing Affordability Data (CHAS), New Rochelle's Municipal Housing Authority Data, as well information submitted by various vested parties.

The following information includes the basis for the needs assessment and gap analysis for HOME-ARP qualified populations.

HOMELESS											
	Current Inventory						Homeless Population				
	Family		Adults Only	Vets	DV		Family HH With One Child	Family HH Without Only Children	Adults Only	Vets	DV
	# Of beds	# Of Units	#	#	# Units	# Beds					
Emergency Shelter	497	173	518	17	10	20	96	430	434	24	42
Transitional Housing	627	211	58	12			163	41	47	5	12
Permanent Housing	454	178	1,009	343							
Other Permanent Housing	2,121	576	39	0							
Sheltered Homeless							734	481	29		
Unsheltered Homeless							0	96	1		

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

The City of New Rochelle evaluated the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, the City identified gaps within its current shelter and housing inventory as well as the service delivery system. The City used current data (including point in time and housing inventory counts) available through CoC, the City of New Rochelle and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

NON-HOMELESS			
	Current inventory	Level of Need	Gap Analysis
	# of units		
Total Rental Units	13,570		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	6,250		
Rental Units Affordable to HH at 50% AMI (Other Populations)	3,810		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,245	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,080	
GAP ANALYSIS			3,005

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

Size and Demographic Composition of Qualified Population

The 2021 New Rochelle Point in Time (PIT) count reports that out of the 1,381 people who are experiencing homelessness in New Rochelle, 44 are under 18 years old and 437 are aged 18 to 24. The data shows that 639 are females, 642 are males, 3 people describe themselves as transgender, and 3 people indicate that they are gender non-conforming. The data indicates that 927 people identified themselves as non-Hispanic or non-Latino, and 360 people identified themselves as Hispanic or Latino. Regarding race, most of the people from the PIT count indicated that they are Black (903), White (346), and multiple races (25).

The New Rochelle 2021 PIT count identifies that the 118 people experiencing homelessness are chronically homeless. The PIT count also shows that there are 29 Veterans experiencing homelessness. The PIT count also identifies 39 unaccompanied youth in which 6 are considered chronically homeless. The data shows that 21 of the unaccompanied youth reports that they are residing at emergency shelters and 18 are in transitional housing.

The New Rochelle 2021 PIT count also identifies other homeless subpopulations. 221 adults report that they have severe mental illness, 144 adults report that they have substance abuse issues, 2 adults report that they have HIV/AIDS, and 36 adults report that they are survivors of domestic violence.

In New Rochelle, the greatest risk of homelessness is among renters. According to the City of New Rochelle 2018-2022 Consolidated Plan “the most common housing problem in the City is cost-burdened, which affects 68 percent of low and moderate-income households earning less than 80 percent of AMI, including 36,384 renter households and 9,999 owner households who pay more than 30 percent of their monthly gross income for housing costs.

The 2018-2022 Consolidated Plan also provides other information about low-income renters. There are 36,383 low-and moderate-income households that are experiencing some levels of cost-burdened and a severely cost-burdened. The two most affected groups include 12,814 small, related renter households with four or fewer household members and 15,895 other/single person renter households.

Elderly renters and owners within these income ranges together comprise 12,204 households that experience cost-burdened or severe cost-burdened, representing 53 percent of all elderly households with similar income. Cost-burdened also impacts 3,805 large, related households of renters and owners with five or more people, representing 65 percent of similar income level large family households. Of those severely cost-burdened renter households, 18,550 households earn less than 50 percent of AMI and are considered the most at risk of becoming homeless.

Summary of the unmet housing and service needs of qualifying populations

- **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**

Homelessness

Many obstacles that the qualifying populations are confronted with overlap with each other and are not directly linked to that particular segment of the population. There is a need for rapid rehousing, wrap around services, and programs that can prevent homelessness which could increase housing stability. There is also a need for more sheltering options for the chronically unsheltered population.

Because of COVID-19, there has been a widening gap between service providers who cater to the homeless or displaced population and certain sectors of the qualifying population. Some of the staff shortages, and lack of direct interaction with sectors of the population has caused a divide between services that are needed and services that are available. It is important to connect people to permanent housing with the right level of services to ensure their success.

There are universal needs for the qualifying population that should be examined. In terms of supportive services, general needs for all types of qualifying populations include transportation to meet basic needs, such as food, and health care. The Continuum of Care also noted a need for more resources to treat mental health issues and substance abuse.

In addition to households that will require on-going assistance to achieve housing affordability, there are other families who suffer a temporary loss or reduction of income that places them at-risk of homelessness. Especially during the massive caseloads of unemployment due to COVID, a household filing for unemployment may need to wait a significant period of time, up to eight weeks, to receive assistance close to half of what they were making through employment. The rent and lease addendums have been rescinded which places a significant number of people in positions where they can be evicted.

Currently housed and at risk of homelessness, other families requiring services or housing assistance to prevent homelessness and those at greatest risk of housing instability or in unstable housing situations

Corresponding with the 2014-2018 CHAS data displayed above, there is a significant gap of affordable housing units for households earning less than sixty percent of area median income (AMI). It is assumed that the true gap is higher based on increased demand for housing in the last few years. The lack of affordable housing is consistently the number one unmet need in recent planning studies. This includes shortages of emergency shelter and transitional housing beds, long term affordable housing, and housing for seniors and persons with disabilities.

In consultations with local service providers working on homeless prevention efforts for both this allocation and the City's update to the Consolidated Plan, agencies noted a marked increase in the number of families and single person households needing lower cost housing.

Individuals and families at risk of homelessness may need housing assistance that could vary from eviction assistance, diversion assistance, or rent and utility assistance in addition to other

types of supportive services. Households who need assistance with maintaining or regaining housing to prevent homelessness will benefit from targeted services, like diversion services. However, diversion services, for instance require specialized outreach and engagement services targeted to high-risk populations and geographies to ensure people and communities at highest risk for homelessness are engaged with housing supports before experiencing literal homelessness. Services that may be needed to assist individual and families at risk of homelessness include:

- An increase in the number and availability of housing vouchers.
- More rent subsidies and Tenant Based Rental Assistance (TBRA) Programs.
- Financial literacy programs that can assist individuals or families on how to financially maintain their affairs which could assist in housing stability.
- Case Management, including initial evaluation; verifying and documenting eligibility; assistance applying for needed services and benefits; trauma-informed care including ongoing risk assessment and safety planning with victims of domestic violence.
- Housing Research and Counseling Assistance, including creating an action plan for locating housing, housing search assistance, tenant counseling, assistance securing utilities, making moving arrangements, outreach, and negotiation with landlords/property owners

Residents who have been previously homeless or are currently using some type of rental assistance may need the assistance to continue for a short or long period of time. Funding existing services and housing assistance programs is important to the housing stability of these individuals and families. In addition, the City of New Rochelle and the surrounding region have a lack of quality affordable housing available for residents in need causing families to become cost-burdened leading to housing instability. There is also a need to assist residents living in unstable housing situations increase their income, build savings, and acquire assets through additional supportive services in the community.

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

The City of New Rochelle actively participates in the regional Continuum of Care CoC serving Westchester County, New York. The CoC provides funding support to address service needs and coordinates care with local service providers addressing homeless needs. There are many service providers and below is a list of a several of the New Rochelle community services that caters to the qualifying population:

Locations:

Organizations	Activity	Population Served
Providence House	Non-Congregate Housing	Homeless
Oasis	Non-Congregate Housing	Homeless
Hope Services	Non-Congregate Housing	Homeless, Risk of being Homeless
My Sister’s Place	Non-Congregate Housing	Homeless, Escaping Domestic Violence

Services:

Organizations	Services	Population Served
New Rochelle Housing Authority	Rent Vouchers	Tenant Based Rental Assistance
Veterans Advisory Committee	Case Management	Supportive Services
CDBG Funding	Not for profit grant assistance	Supportive Services
HOME Funding	First Time Homebuyer Down Payment Assistance Program	Supportive Services Affordable Housing
First Source Referral Center	Employment Services	Supportive Services

The City of New Rochelle has made strides to accommodate those who are facing housing instability. The City was granted the ability to increase the value of the vouchers to cover the differences in rental cost and AMI for some occupants. HUD has temporarily increased the City of New Rochelle’s payment standards from 110% to 120% of the FMR. The City is working to make the increase permanent to retain current landlords and acquire new ones to support residents in need.

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

The City of New Rochelle works with the Continuum of Care to ensure that the qualifying population is accounted for and are receiving the essentials for living. However, due to the increasing property value and overall increase in living cost in the area there will be some oversights that may go unaccounted. As seen in the GAP analysis, there are some areas that need more resource allocation and supervision.

Some of the discrepancies are not due to a lack of resources, but due to mishaps in the delivery system. Because of COVID-19, some of the shelters and service providers have not yet regained the number of associates and helpers to be effective as they were previously. Sometimes with limited staff and remote access to the qualifying population, opportunities to be of better assistance are missed. When one or both of these mishaps occur the qualifying population's overall decline in utility is either reoccurring or prolonged. A prolonged occurrence can take the form of being chronically homeless, endangerment of being homeless, mental illness, and even a lack of proper nutrition.

Consultation with stakeholders revealed numerous service delivery system gaps, including limited navigation and case management capacity to effectively stabilize households or help households maintain housing stability; employment opportunities that provide sufficient income to support housing stability; and specialty vouchers with move-in assistance.

Some of the additional gaps that have been uncovered:

- o Lack of financial literacy
- o Lack of services that represent the housing status of the HIV/AIDS population
- o Lack of transportation and job services
- o Increase of community based mental health and substance abuse services
- o Lack of rental assistance
- o Lack of alcohol drug treatment facilities
- o No tracking of data for chronically homeless men and women who reside under the bridges and in the woods.

- o Limited number of shelters and little to no resources for elderly

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:

The number one indicator of households falling into homelessness from a place of housing instability is a previous history of homelessness. Homeless assistance is generally the last resort for households in extreme poverty with few resources of their own and limited connections to others who could offer temporary, emergency support. Additionally, when other systems of care, like hospitals, behavioral health settings, child welfare, and criminal justice systems, are unable to address the reasons why people cannot stay housed, people have no alternative than turning to the homeless response system.

To prevent people from falling into homelessness, public systems for justice, anti-poverty, prevention, health (including behavioral health), child welfare and affordable housing must use data to identify how people are falling into homelessness and target prevention strategies and policies to address these areas.

Additionally, families with children, or unaccompanied youth who are unstably housed and likely to continue in that state, including those people who are doubled up in other people’s homes because they lack a home of their own, are not considered to be experiencing homelessness by the U.S. Department of Housing and Urban Development (HUD) and are not eligible for its homeless assistance. These same families are, however, considered to be experiencing homelessness by the U.S. Department of Education and are eligible for additional educational services and supports. People are considered to be “at risk of homelessness” if they are losing their primary nighttime residence, which may include a motel or hotel or a doubled-up situation.

Identify priority needs for qualifying populations:

For homeless populations, priority needs include rapid re-housing and supportive services to achieve housing stability. For extremely low-income households, priority needs include the creation of additional rental units affordable to families with less than 35% of area median income and permanent supportive housing. For low-income households and households at risk of homelessness, priority needs include increased homeless prevention, tenant-based rental assistance coupled with supportive services to help achieve housing stability. In terms of supportive services, general needs for all types of qualifying populations include transportation to meet basic needs, such as food, and health care. The Continuum of Care also noted a need for more resources to treat mental health issues and substance abuse.

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:

Based on the various metrics we explored and stakeholders that we consulted with in order to do our due diligence in completing the allocation plan it is clear to see that there are various gaps in housing that need to be addressed. There are various social services groups and even though there doesn't seem to be an immediate need for additional non-congregated housing there is a growing need for other resources. There are a number of rental units that have fallen into dilapidation. The individuals who occupy these rental units may not be able to reside in those locations for too long, and at 30%AMI or less they cannot afford to find a place in the general vicinity.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The City of New Rochelle expects to administer programs directly. Applications for activities directly administered by New Rochelle, will be solicited from developers, service providers, subrecipients and/or contractors through requests for proposals and/or calls for projects following Consortium (PJ) procurement policies.

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:

The City of New Rochelle has not allocated any funds to a subrecipient or subcontractor.

HOME-ARP Allocation Plan

Activity	Funding Amount	Percent of Allocation	Statutory Limit
Supportive Services	\$149,084.80	10%	Not Applicable
Tenant-based Rental Assistance	\$969,051.20	65%	Not Applicable
Affordable Housing	\$149,084.80	10%	Not Applicable
Non-Congregate Shelter	\$0.00	0%	Not Applicable
Non-Profit Operating	\$0.00	0%	Not Applicable
Non-Profit Capacity Building	\$0.00	0%	Not Applicable
Administration and Planning	\$223,627.20	15%	15%
Total HOME-ARP Allocation	\$1,490,848.00	100%	

RATIONALE FOR FUNDS DISTRIBUTION AMONG ELIGIBLE ACTIVITIES

SUPPORTIVE SERVICES

Below is a list of activities that the city of New Rochelle will either expand on or adopt with the funds allocated for Supportive Services. During the stakeholder engagement the following services were prioritized as the most needed for the qualifying population now. All supportive

services provided must help program participants obtain and maintain housing. Services not specified in the Continuum of Care Interim Rule are not eligible § 578.53(d).

Case Management: Case management services are already being implemented by the City of New Rochelle and New Rochelle Municipal Housing Authority (NHMRA). The responsibilities include interacting with both individuals and families who have housing issues and connecting them with emergency shelters. The case manager must also assist homeless adults and at-risk youths in finding safe and affordable accommodations. They may also need to coordinate and manage the needs of housing units. They must provide emotional support to clients, while helping them structure their finances and plan their life goals along a structured program.

Education Services: One of the needs consistently mentioned by the stakeholders was a need for education or financial literacy. Funds can be rendered to service providers for education, but only when the distribution involves housing. There is a need to educate members of the qualifying population on how to budget, maintain their financial affairs and overall economic self-reliance. Most stakeholders feel that an investment in education can only have positive effects on housing stability in the City by increasing the percentage of the population transitioning into a better housing and financial position.

Housing Search and Counseling Services: The City of New Rochelle social outreach administration currently offers this service and their goal is the continuation and expansion of these services. This service provides one-to-one counseling to delve into the details of affordable housing, ranging from exploring the rights of tenants and landlords to understanding the barriers that can automatically disqualify you from subsidized or market rate housing.

Legal Services: Funds should be allocated to this service because of the need of information or representation for the legal rights of the tenant or occupant. The funds set aside would assist the qualifying population as well as all New Rochelle residents. The benefit to the most cost-burdened populace who may be able to prevent homelessness by addressing rent or leasing challenges. These households or individuals make up a sizable group of the qualifying population.

TENANT-BASED RENTAL ASSISTANCE

After completing our needs assessment and GAP analysis we have determined that to maximize the effects of the HOME-ARP federal funds, the City of New Rochelle should place a significant interest on the non-homeless population that is a cost-burdened as a measure to prevent homelessness. This group is defined by the individuals and households that fall into the 50 to 30% AMI or at 30% or less AMI. These individuals are part of the qualified population as they are experiencing economic hardship due to the increase in the cost of living in New Rochelle that is affecting their living arrangements.

This is the largest group of the qualifying population and after conferring with various stakeholders, it looks as if this group seems to be in the most danger of becoming displaced. The sector of the qualified population cost-burdened or rent challenged, but the reason is largely due to the fact that these working families who become homeless due to the high cost of living in City of New Rochelle. This subsection of the population primarily works and provides services to parts of the metropolitan area.

Under further examination, all of the aforementioned qualified populations find their positioning worsening because of a lack of affordable housing. Because of a lack of housing options most of the qualified population can't find viable solutions especially if that population needs alternative living arrangements. A good example would be victims of domestic violence or persons suffering from a disability. In both situations various stakeholders have informed the City that they would be better off if those qualifying populations had better housing stability. The disabled populations are generally living on a fixed income and have limited options in earnings and pricing themselves in the market.

The same can be said about the victims of domestic violence and abuse. During COVID, some of these individuals were forced to cohabitate in less-than-ideal situations. The consequences for these living arrangements were dire, there was a spike in the severity of domestic violence situations. This is primarily because the shelters were closed but also because the victims could not find alternative housing. A recent study stated that a significant number of the homeless families in the City of New Rochelle were because of internal conflicts domestically which led to some of the family members becoming displaced.

For these various reasons the City of New Rochelle knows that more affordable housing options and greater housing stability in the form of vouchers or rental assistance are the best options. These options are not without their complications, but at this point the City of New Rochelle feels that the greater share of the allocated funds should be purposed for these activities because this disbursement can have the maximum effect in achieving housing parity.

AFFORDABLE HOUSING – CONSTRUCTION AND PRESERVATION

According to the given data, a singular one-bedroom unit in New Rochelle cost nearly \$300,000 to build. Under most housing maintenance laws, a 1-bedroom unit can house 2 full adults and an underage child. Below is a projected cost model for affordable housing in New Rochelle:

	Total Cost / Unit	Construction Cost / Unit	Average Sq Ft / Unit
Studio	\$221,165	\$145,950	542
1-bed	\$299,986	\$197,965	736
2-bed	\$374,149	\$246,906	917
3-bed	\$464,152	\$306,300	1,138
Average Cost			
Total Cost / sq ft	\$408		
Construction cost / sq ft	\$269		

The cost for building affordable housing in the City of New Rochelle is extremely high. To this end, making a large capital investment in purchasing or rehabbing already established structures is not economically viable considering the amount of the City’s HOME-ARP allocation.

NON-CONGREGATED HOUSING (NCS)

Non-Congregated Shelters funds can be used to serve institutions that provide units or rooms for temporary shelters. Serve individuals and families that meet one or more of the qualifying populations and occupants that are not required to sign a lease or occupancy agreement.

HUD allows for funds usage for activities such as acquisition of structures to be used as NCS, rehabilitation not required because structure is in standard condition. The activities include new construction of structures to be used as NCS with or without land acquisition and rehabilitation of existing spaces (such as motels, nursing homes, or other facilities) to be used as NCS with or without acquisition.

The City of New Rochelle has done a competent job of addressing issues of sheltering individuals and families who are in need of emergency housing and transitional housing. Based on stakeholder engagement as well as the GAP analysis, the acquisition of structures to be used as Non-Congregate Housing (NCS) is not feasible given the budget and the resources available. Through the City's outreach efforts, it was determined that funding improvements to existing space in New Rochelle would better serve the qualifying population.

NON-PROFIT OPERATING

Non-Profit Operations (NGO) are private nonprofit, community-based service organizations that have obtained or intend to obtain staff with the capacity to develop affordable housing for the communities it serves. The City of New Rochelle currently has several organizations whose goals are to reduce housing instability for the low to moderate income earners. With that being said, the City does realize that it is important to fund NGOs because of the expansive needs for such institutions. In response, the City is providing substantial funding through its American Rescue Plan Act (ARPA) to support the efforts of local nonprofits to provide these services to the community. Therefore, the City has decided not provide HOME-ARP funding to Non-Profit Operating activities.

NON-PROFIT CAPACITY BUILDING

The GAP analysis and the stakeholder engagement didn't yield the need for additional building spaces or resources that were not already addressed through alternative funding. The City of New Rochelle decided against funding this expense because there wasn't a need for this activity.

ADMINISTRATIVE

There are costs that are accrued from the investment equity and resources that are required to resolve such a large-scale effort. HUD does allow a portion of the funds for allocation for these compensations.

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:

New Rochelle believes to compensate for any shortages in services or resources the city needed to participate in a weighted funding allocation. All analysis of New Rochelle housing inventory and stakeholders' participation indicates the strong need for direct rent subsidies or increase in affordable housing. More than \$969,051.20 (65%) of the allocation's funds are suggested for this usage. There isn't a more dire need for the City of New Rochelle, but there must be some safeguards put in place to ensure that the citizens will not be completely

dependent on these funds which is why we are suggesting a more cooperative funding strategy.

Suggested allocation to the supportive services and rent assistance with the goal being housing counseling and eviction preventive programs being the highest prioritized needs. Assisting families that are now just recovering from economic ruin because of COVID-19 with a few more months a rent deferral could increase housing stability in the area. Allowing for more funding for counselors to assist in locating and helping to maintain housing for the qualifying population would have a positive effect on the housing and economic stability of the New Rochelle.

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

Because of the cost of production for affordable housing, the city of New Rochelle has decided on limited allocation. However, the PT will be seeking alternative forms of obtaining affordable housing unit such as acquisitions of already established units, reconstruction. or even partnering with another institution to assist the Qualifying Population.

Preferences

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

In an effort to provide maximum program flexibility and opportunities to all New Rochelle residence experiencing or at-risk of homelessness, the City of New Rochelle has elected to not apply preferences among 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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not Applicable

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

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**
- **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.**
- **State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.**
- **Specify the required compliance period, whether it is the minimum 15 years or longer.**
- **State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.**
- **Other requirements in the PJ's guidelines, if applicable.**

This is not applicable to the City of New Rochelle.