

HOME-ARP Allocation Plan



January 2023

Prepared by:



Consultation

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

See Appendix A for all Stakeholder Consultation materials. Stakeholder comments received throughout these various sessions and individual meetings are summarized in the Feedback Chart in the next section and are referenced appropriately throughout the Needs Assessment & Gaps Analysis.

The City of York engaged in an extensive stakeholder consultation process during the month of June 2022. During this time, the City engaged with a variety of shelter and service providers serving each of the qualifying populations; the Continuum of Care and its various subcommittees focused on subpopulations including but not limited to homeless youth, veterans, re-entry populations; victim service providers; rental assistance providers; York Housing Authority; and the County Coalition on Homelessness.

Each of the focus group sessions City and County staff focused on identifying the Qualifying Populations and their unmet housing and service needs. A brief Power Point presentation on the HOME-ARP program was presented followed by questions meant to engage participants in identifying unmet needs among the qualifying populations they served.

The City also conducted a work session with City staff, members of City Council and the Mayor to summarize the unmet needs heard during the consultation sessions. A summary of the agencies consulted and the feedback generated during the consultations sessions is outlined below.

List the organizations consulted:

Focus Group Topic/ Agency	Date of Session	Method of Consultation	Number of Participants	Type of Agency(ies)/Org
2-1-1/Contact Helpline	June 13, 2022 @ 1:00 p.m.	Virtual Interview	2	Providers serving the homeless, victims of domestic violence, veterans' groups Public or private agencies that address the needs of persons with disabilities
Affordable Housing Development Partners	June 24, 2022 @ 1:00	Virtual Interview	10	Providers serving the homeless, victims of domestic violence, veterans' groups Public or private agencies that address the needs of persons with disabilities

Focus Group Topic/ Agency	Date of Session	Method of Consultation	Number of Participants	Type of Agency(ies)/Org
Community Action Agency	June 28, 2022 @ 9:00	Virtual Interview	4	<p>Providers serving the homeless, victims of domestic violence, veterans' groups</p> <p>Public or private agencies that address the needs of persons with disabilities</p>
Fair Housing	June 21, 2022 @ 2:00	Virtual Interview	3	Public or private agencies that address fair housing, civil rights, and the needs of persons with disabilities
Public Housing Authority	June 15, 2022 @ 1:30	Virtual Interview	2	Public Housing Authority
YCCH Emergency Shelter & Street Outreach Committee	June 20, 2022 @ 10:00	Virtual Interview	7	<p>Providers serving the homeless, victims of domestic violence, veterans' groups</p> <p>Public Agencies that address the needs of the qualifying populations</p>
YCCH Rental Assistance Providers Meeting	June 17, 2022 @ 1:30	Virtual Interview	12	<p>Providers serving the homeless, victims of domestic violence, veterans' groups</p> <p>Public Agencies that address the needs of the qualifying populations</p>

Focus Group Topic/ Agency	Date of Session	Method of Consultation	Number of Participants	Type of Agency(ies)/Org
YCCH Veterans Committee	June 1, 2022 @ 11:00	Virtual Interview	11	Providers service the homeless Veterans' groups Public Agencies that address the needs of the qualifying populations
YCCH Youth Committee	June 14, 2022 @ 9:30	Virtual Interview	5	Providers serving the homeless Public Agencies that address the needs of the qualifying populations
York County Coalition on Homelessness	March 24, 2022 @ 1:00	Virtual Interview	48	Continuum of Care Providers serving the homeless, victims of domestic violence, veterans' groups Public Agencies that address the needs of the qualifying populations
York County Reentry Coalition	June 28, 2022 @ 1:30	Virtual Interview	12	Providers serving the homeless, victims of domestic violence, veterans' groups Public Agencies that address the needs of the qualifying populations
Victims Service Providers	June 27, 2022 @ 10:00	Virtual Interview	3	Providers serving the homeless, victims of domestic violence, veterans' groups

Summarize feedback received and results of upfront consultation with these entities:
 General Themes and Trends that emerged from all of the consultation groups include the following:

- There continues to be a large gap in the number of quality affordable and accessible units available for rent in the City.
- Protected classes are generally over-represented among people experiencing homelessness.
- Landlord engagement and risk mitigation funds could be helpful to recruit and encourage more landlords to rent to special needs populations.
- Shelter capacity is limited (both bed and staff capacity); hotel/motel utilization rates are high due lack of shelter bed capacity
- Barriers to accessing housing for special needs populations/ELI households include poor credit, criminal and rental histories; significant requests for security deposit (sometimes 3- and 4-times monthly rent); landlords requiring households have 3x the rent in monthly income
- Private landlords no longer accepting HCV or other rental assistance; porting outside the County takes a lot of time. Many private owners of naturally occurring affordable housing (or owners that had accepted HCV or other assistance) are selling the units to owners who no longer accept assistance or who increase the rent significantly, displacing households who cannot find affordable units elsewhere.
- Supportive services in general are a need-specifically housing locator and housing stabilization services; transportation services; case management
- Sub populations identified as having specific needs include transition age youth (18-24), Veterans, Domestic Violence victims, re-entry individuals exiting the prison system

Continuum of Care/Coordinated Entry

- There is an increase in unsheltered homelessness in the City, especially among youth (18-24) and elderly, most with co-occurring mental health, substance abuse or physical disabilities
- Transportation services are a need to provide access to employment, services from where affordable housing may be located
- Shelters are moving to sleep-only facilities due to lack of staff capacity to operate around the clock
- Supportive services are needed for re-entrants to help them readjust to society; especially vital for those being released from long stays in state prison.
- Services and housing assistance are needed for families at the intersection of imprisonment/child welfare involvement.
- Services are needed for those with severe behavioral health challenges
- There is a cohort of teens who have left a bad home situation, but aren't emancipated, and can't go to shelter because they're not 18. OCYF has difficulty placing this group with providers. They are living in storage units, at camp sites, in abandoned buildings, etc.
- There is a need for week long, whole-family services serving at-risk youth as well as parents experiencing mental health crises.
- Coordinated Entry has seen increase in calls for shelter, hotel stay assistance, housing locator services
- There is a need for ongoing rental assistance after ERAP assistance is expired/maxed out
- There is a need for homeless prevention, especially with elderly households who can't afford rent increases

- Households are struggling to pay both rent and utilities, both of which have increased. Households are forced to choose, but not having utilities is a violation of their lease, putting them at risk of eviction

Shelter Providers

- There has been a significant increase in the number of street homeless/unsheltered population. Street Outreach capacity is limited in order to address the current needs
- It is difficult to move households out of shelter into units due to lack of units in the marketplace (increase in rents, lack of supply and lack of landlords willing to accept special needs populations)
- There are record numbers of families living in hotels who are not able to find permanent housing due to lack of supply, poor credit/rental history, and raising rents. Many of these families could afford some rental payments if they could find a unit.
- There is an increase in people experiencing homelessness who are also disabled
- Shelter capacity is limited-Code Blue shelter unable to open some nights due to lack of staffing capacity
- There is an increase in first-time homeless
- NCS is a need, more COVID-friendly

Service Providers

- Connecting individuals quickly to services, particularly mental health and substance abuse services for those exiting the criminal justice system, is a need
- Case management services in shelters need to be improved
- Families in hotels often owe a lot in past utilities, so they can't move into a new unit and put utilities in their name. Funding support for payment of utility arrears is a need. Even without back owed utilities, affording utilities is a big barrier to housing people.
- Hotel prices are increasing forcing households relying on hotels for shelter out
- Accountability in services is critical-many need services but don't want them
- Implementing a better transition from relying on mainstream benefits to self-sufficiency as income increases would ensure more success
- Civil/legal support is needed for households at-risk of eviction-it is questionable that some of the reasons for terminating a lease are allowed
- Services not tied to rental assistance or other activities are a need to ensure continuity and stability
- Biggest barriers to placing households include rental costs, up-front security deposit costs, first/last month rent costs are skyrocketing
- Access to services outside of traditional business hours/days is a need
- Services are required for re-entry population to maintain housing post-release, including budgeting, legal services, case management
- There is a need for rental assistance for currently housed households to prevent evictions as rents rise; couple this assistance with services to ensure sufficiency
- There is a need to connect youth to well-paying employment opportunities

Rental Assistance Providers

- Additional tenant-based rental assistance, targeted to certain subpopulations participating in self-sufficiency programs, are a need

- General lack of affordable inventory
- Landlord incentives could help encourage landlords to participate in HCV and other rental assistance programs
- Transportation is a barrier for folks accessing services
- Behavioral health services paired with rental assistance/RRH are a need
- Non-Congregate shelter for youth, especially parenting youth, is a need

Domestic Violence/Victim Service Providers

- Need for civil/legal guidance on housing issues, ranging from whether someone is being illegally evicted, to whether the landlord can increase the rent, through understanding a lease and what you are agreeing to.
- Shelter is a need, but cognizant of the expense and difficulty in identifying ongoing sustainable operating funds.
- There is a need for long-term to permanent subsidy to assist households that will never be able to maintain FMR in the current market, or on disability income alone
- There is a lack of inventory in which to place victims

Veteran Housing and Service Providers

- There is a growing population of senior Veterans with fixed incomes experiencing difficulty finding housing.
- Accessibility continues to be a challenged for disabled Veterans across all housing types-shelter through permanent rentals.
- There is a growing need for support for activities of daily living and representative payee services, particularly among the elderly and elderly Veterans who don't require personal care, assisted or skilled living.
- Continuity of assistance is important so Veteran households don't regress and have to start over identifying services and housing options-particularly among households at 50-80% AMI.
- Prevention services are critical to ensuring stability-forcing a household into homelessness in order to assist the household is costly and inefficient.
- Transportation services for those in rural areas are a need.
- Intensive case management/street outreach/health navigation teams for unsheltered homeless populations are a need.

Agencies that address Fair Housing and Civil Rights

- Housing supply is limited, particularly for those with physical disabilities.
- People fleeing domestic violence don't experience tenant protections for breaking a lease early, making it difficult to flee and/or creating poor rental history.
- Landlord engagement and risk mitigation funds could be helpful to recruit more landlords to rent to special needs populations.

Public Housing Authority

- Landlords unwilling to rent to qualifying and other special needs populations due to poor credit/rental history
- Housing inventory limited

- Availability of robust supportive services may or may not act as assurance for landlords otherwise unsure of renting to QPs/special needs populations
- Offering incentives to households to participate in services helps maintain stability-this is successful in the FSS program
- CONE open to developing units

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:

Date(s) of public notice: 12/2/2022

Public comment period: start date – 12/5/2022 end date – 12/19/2022

Date(s) of public hearing: Click or tap to enter a date.

Describe the public participation process:

Enter narrative response here.

Describe efforts to broaden public participation:

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

Needs Assessment and Gaps Analysis

Like many communities, the city of York, PA has insufficient inventory of affordable housing overall with a lack of adequate transitional housing options as indicated by an average length of stay in 2021 of over ten months. Longer lengths of stay may increase the need for beds, as there is less movement for new clients to be able to use those resources. This could also point to a need for additional housing inventory, as fewer available options lead to less turnover in shelter and transitional housing beds.

Where possible, data specific to the City of York was used. However, the Continuum of Care covers both the City of York and York County.

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	90	29	131	-	-								
Transitional Housing	88	27	10	-	-								
Permanent Supportive Housing	54	14	180	-	43								
Other Permanent Housing	222	82	83	-	21								
Sheltered Homeless						42	105	10	19				
Unsheltered Homeless						10	58	3	0				
Current Gap													

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

The City of York also has a need for affordable housing. The shortage of units both affordable and available for renter households at or below 30% area median income (AMI) increases housing insecurity and rent pressure on extremely low-income households.

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
CITY OF YORK	# of Units	# of Households	# of Households
Total Rental Units	10,860		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,945		
Rental Units Affordable to HH at 50% AMI (Other Populations)	4,364		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,120	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,115	
Current Gaps			4,075

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 number of York residents that meet the definition of homeless under 24 CFR 91.5 was derived from the 2022 PIT Count, conducted by the York County Coalition on Homelessness on January 26, 2022. The PIT Count identified a total of 358 persons experiencing homelessness in 2022, up from 237 persons (+51%) identified in 2021. Of the counted homeless individuals 261 (72.9%) were sheltered and 97 (27.1%) were unsheltered.

Per the Pathways to Home Coordinated Entry (CE) System, 771 unduplicated households accessed the system during 2021. Of those households, 640 (83%) met Literally Homeless criteria. At the end of 2021, 159 households remained on the CE Literally Homeless queue awaiting referral (20.6% of annual total households). Only 275 (36%) of the total annual households were confirmed housed by the end of 2021. This suggests a need for more housing options.

The type of households accessing CE in 2021 were 497 (64%) families with children and 274 (36%) singles/couples. Most households accessing CE, 49.4%, did not fall into a subpopulation.

The households who were considered Literally Homeless per the 2021 CE, 640 total, 270 (42.3%) were White, 149 (23.3%) were multi-Racial, and 139 (21.7%) were Black/African American. There were 192 (30%) Hispanic households identified.

Between January 1, 2021-December 31, 2021, a total of 2,466 homeless persons were served by the York Continuum of Care.

Program	Persons Served
Emergency Shelter	1,051
Permanent Supportive Housing and Supportive Housing	182
Rapid Re-Housing	1,145
Transitional Housing	88
Total	2,466

According to the FY2021 Performance Measurement Module, 1,302 individuals experienced homelessness for the first time. This is a 22.7% decrease from 2020, which had 1,685 persons experiencing homelessness for the first time. These measures took into account persons entering emergency shelter, transitional housing, safe haven, and permanent housing programs. In total, there were 1,596 individuals who experienced homelessness, and while the number of individuals was down from 2020, the average length of stay rose by 50 days, from 272 to 322.

At Risk of Homelessness as defined in 24 CFR 91.5

According to 2014-2018 CHAS data, in York there are 10,860 rental units of which only 1,945 are affordable to households making 30% area median income (AMI). Households earning between 0-30% area median income total 3,725. Factoring in that only 52% of the affordable units are housing those

with the appropriate income, the gap (the number of housing units needed) for those earning 30% AMI or less is 2,695 units.

Based on HMIS data for the calendar year January 1, 2021-December 31, 2021, 56.7% of leaver households exited to temporary destinations. Exiting to a temporary destination may indicate greater risk of returning to the homeless system.

According to stakeholders, there is a need for on-going rental assistance, particularly once the Emergency Rental Assistance Program is exhausted or expired. Stakeholders also indicated hotel/motel utilization rates are high due to lack of shelter bed capacity, plus hotel prices are increasing further straining households relying on them for shelter.

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

In the 2022 PIT Count, 19 individuals in the system were identified as survivors of domestic violence. According to the 2021 CE, 220 households were fleeing domestic violence which was 35% of the total 771 households who accessed the system. This was the largest subpopulation of all households assessed.

Per the HMIS, 421 (17.1%) individuals had a history of domestic violence and 144 were actively fleeing domestic violence.

In 2021, the YWCA served two victims of human trafficking. Both individuals utilized the transitional housing program. There is an anticipated increase in the needs to assist persons in such situations. YWCA staff is undergoing special training to be prepared.

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

Those at greatest risk of housing instability include 2,560 renter households with an annual income less than or equal to 30% AMI and experiencing severe cost burden. This represents 25.3% of all renter households in York. In addition, 335 renter households earn 30%-50% AMI and pay more than 50% of their income on housing.

Other populations at greater risk of housing instability, as identified in the 2022 PIT Count include 80 persons with serious mental illness, 34 persons with a substance use disorder, 13 veterans, and 19 experiencing domestic violence. The following is a breakdown of these populations sheltered and unsheltered status:

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Adults with a Serious Mental Illness	48	8	24	80
Adults with a Substance Use Disorder	22	1	11	34
Veterans	10	0	3	13
Domestic Violence	17	2	0	19

According to HMIS data, 88 people were living in transitional housing during the period of January 1, 2021-December 31, 2021; of these 45 or over 51% were Black, African American, or African. During the same time period, 1145 people were receiving rapid rehousing assistance; of these, 39.9% were Black, African American, or African, highlighting that this segment of the population is over-represented among people experiencing homelessness. Nearly 25% were Hispanic. Of households that exited Rapid Rehousing programs during this period, 41.1% of adult leavers had no cash income, putting these households at greater risk of returning to homelessness if unable to support ongoing housing payments.

During the period January 1, 2021-December 31, 2021, 1035 households exited to temporary destinations. Households receiving temporary assistance are more likely to return to homeless or face greater risk of housing instability than those exiting to permanent destinations. Furthermore, 562 households, or 30.8% of all exits, exited to places not meant for human habitation which signals immediate returns to homelessness.

Per the 2021 CE, youth households were the second largest subpopulation to access the system. There were 78 households (12% of the total annual households assessed) who were youths. Veterans who accessed the CE system made up 2% with 11 households assessed.

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):

The Housing Authority of the City of York owns and manages 530 public housing units. There are 392 units for the elderly and 365 units for families. Additionally, the Housing Authority administers 1,402 Housing Choice Vouchers, but these support the York County-wide area; however, the Housing Authority indicated that privately owned affordable rentals are limited and very few landlords are accepting Section 8 vouchers. There is a need for a landlord incentive program, to make it more appealing for landlords to accept housing vouchers.

The York County 2022 Housing Inventory Chart (HIC) indicated 139 emergency shelter beds and 34 family units were available. In addition, the HIC identified 4 transitional housing beds and 20 family units; 193 Permanent Supportive Housing beds and 18 family units; 51 Rapid Rehousing beds and 74 family units.

Due to expiration of eviction moratoria, which offered protection for many low-income renter households, coupled with escalating rents, lack of affordable housing inventory, and continued economic effects of the COVID-19 pandemic, the homeless system in York experienced significant strains. It lacks capacity across all systems to address the unmet needs of all qualifying populations. This includes staff capacity, inventory capacity and resource capacity to appropriately address growing needs among all of the QPs. Service providers and shelters alike experience ongoing staffing shortages that contribute to these capacity challenges, but also the housing market and inventory is rapidly changing.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Per the CE System in 2021, 771 unduplicated households accessed the system. Of those households, 83% were homeless. At the end of 2021, 20.6% of households remained on the CE Literally Homeless queue awaiting referral. Furthermore, just 36% of the total annual households were confirmed housed by the end of 2021. This suggests a great need for more affordable housing options.

HMIS indicated 2,466 individuals served by the homeless system during the period of January 1, 2021-December 31, 2021. According to the 2022 HIC, York County has 193 Permanent Supportive Housing beds and 18 family units. The County also has 139 emergency shelter beds and 34 family units, 4 transitional housing beds and 20 family units. This available inventory is insufficient to meet the needs of the population experiencing homelessness.

All stakeholders consulted for this process expressed the same overwhelming need: affordable rental housing. They identified a need for additional TBRA, especially if it is tied to a self-sufficiency program. Additionally, there is a need for Rapid re-housing that is connected to supportive services, which should be tied to the County's Risk Mitigation Program to encourage landlords to participate in rental assistance programs for qualifying populations. In addition, stakeholders reported a record number of families living in hotels who are not able to find permanent housing due to lack of supply, poor credit/rental history, and increasing rents. Many of these families could afford some rental payments if they could find a unit, according to shelter providers.

According to stakeholders, intensive case management, street outreach or health navigation teams for unsheltered homeless populations are needed to connect unsheltered individuals and households to shelter and other housing options. However, stakeholders and shelter providers indicated shelters are moving to sleep-only facilities due to lack of staff capacity to operate around the clock, indicating a greater need for staffing and funding capacity, in addition to bed capacity to serve an increase in unsheltered homeless population.

At Risk of Homelessness as defined in 24 CFR 91.5

According to 2014-2018 CHAS data, there is a gap of 4,075 affordable units for York. This indicates that the supply of affordable housing units is insufficient for households earning 0-30% AMI and those earning 30-50% AMI. As a result, these households reside in housing units that are more costly than what would be considered affordable to them. Furthermore, this does not consider additional costs such as transportation, childcare, and accessibility modifications for individuals with disabilities. With 3,120 rental households in York considered at risk of homelessness, these additional costs further exacerbate the limited access to affordable housing in the city. The consultation process also confirmed that the supply of affordable options for housing low-income households is insufficient to meet growing needs among the qualifying populations.

The table below shows a detailed breakdown of the CHAS data for rental households:

	Total		Cost burdened		Severely Cost burdened	
	#	%	#	%	#	%
Total Renters	10,105	-	5,305	52.5%	2,905	28.7%
Very Low-Income Renters (0-50% AMI)	6,430	63.6%	4,955	49%	2,895	28.6%
<i>30-50% AMI</i>	<i>2,390</i>	<i>23.7%</i>	<i>1,760</i>	<i>17.4%</i>	<i>335</i>	<i>3.3%</i>
Extremely Low-Income Renters (0-30% AMI)	4,040	40%	3,195	31.6%	2,560	25.3%

Stakeholders also reported that supportive services such as affordable childcare, transportation, employment training and housing counseling along with tenant-based rental assistance are in great need for all qualifying populations, but especially those at-risk of homelessness.

Poor rental history is often identified as a barrier for households accessing affordable households. Rental assistance and legal services for eviction prevention were identified as needed services to help salvage tenancies and prevent poor rental history from becoming a barrier for future tenancies. Coupling this assistance with services to ensure sufficiency has proven to be a successful model, as forcing a household into homelessness in order to assist the household has proven costly and inefficient for providers in the City.

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

Victims of domestic violence are identified by the 2021 CE System as the top subpopulation who accessed services, indicating a need for dedicated resources, including shelter. Per the HMIS, 17.1% of individuals served during 2021 had a history of domestic violence and 5.6% were actively fleeing domestic violence. There is a strong need for housing and services dedicated for survivors of domestic violence. Transitional housing has been identified as a successful model for individuals fleeing domestic violence and human trafficking, particularly when finding permanent affordable housing is difficult.

According to stakeholders, there is an overall lack of inventory in which to place victims. Shelter is a need, but there are challenges with the expense and identifying on-going, sustainable operating funds. There is also a need for long-term to permanent subsidies to assist households that will never be able to maintain fair market rent or are reliant on disability income with no other sources. Additionally, individuals fleeing domestic violence do not have experience with tenant protections and are breaking lease agreements early which makes it difficult to flee and/or is creating a poor rental history.

[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](#)

According to HMIS, during the period of January 1, 2021-December 31, 2021, 1,825 individuals exited the homeless system. Of these, 56.7% exited to temporary destinations, including transitional housing and temporarily staying with friends or family. Households without permanent housing may be more likely to experience returns to homelessness. Even among households exiting to permanent

destinations, 16.5% exited to rentals without ongoing subsidy. Together, these suggest a need for both affordable housing units, as well as tenant based-rental assistance to support extremely low-, and low-income households.

Supportive services for re-entrants to help them readjust to society were identified as especially vital for those being released from long stays in state prison. Housing placement and stabilization services would assist this at-risk population obtain and maintain housing, including budgeting, legal services, case management. In addition, stakeholders noted the importance of quickly connecting re-entry populations with community-based mental health and substance use services.

Veterans: Per HMIS data during the period from January 1, 2021-December 31, 2021, 52 veterans were homeless. Of those, 37 exited from homelessness 20 (54%) to temporary destinations. Continuity of assistance is important, so veteran households don't regress and have to start over identifying services and housing options. Providing permanent affordable options for veterans could help address this need. During the 2022 PIT, three veterans were determined to be unsheltered indicating a barrier in accessing these resources or difficulties by service providers in engaging veterans. These barriers may include co-occurring mental health and/or substance abuse disorders, lack of income or rental history, or criminal history.

Stakeholders identified a growing population of senior veterans with fixed incomes having trouble finding housing. Prevention services and continuity of all services are needed to ensure stability to keep veterans housed.

Persons with Disabilities: According to HMIS, 188 individuals with physical disabilities were homeless. For people with disabilities, accessible housing is a continuing and critical need, ranging from individuals in wheelchairs to medical beds and in-home healthcare services in order to maintain housing stability. Overall, there is a severe need for permanent housing that can accommodate persons with disabilities. This typically includes bathroom equipped with grab bars, installation of handrails, walk-in showers and tubs, along with handicapped accessible doors and cabinets. Medical respite care was identified as a need for individuals discharging from hospital settings. Other needs of this population to maintain housing stability are the same as everyone else: access to employment and accessible public transportation.

According to stakeholders, there is an increase in persons with disabilities who are homeless. Increase in mental health issues as it relates to homelessness. Non-congregate shelter for youth (18-24), especially youth with children of their own. Protected classes are generally over-represented among people experiencing homelessness. Stakeholders also identified veterans, victims of domestic violence, and individuals who have recently exited the prison system as other populations experiencing difficulties finding housing. There is an increase in unsheltered homelessness in the City, especially among youth (18-24) and elderly, most with co-occurring mental health, substance abuse or physical disabilities.

There is a need for whole-family services serving at-risk youth as well as parents experiencing mental health crises. Stakeholders also suggested needs for behavioral health services paired with rental assistance and/or rapid rehousing. Transportation was also identified as a barrier for qualifying populations, especially for youth aged 18-24 who have children. Additionally, there is a need to connect youth to well-paying employment opportunities, which potentially requires transportation.

Landlord engagement and incentives were identified by stakeholders as needs due to the growing number of landlords unwilling to rent to qualifying and special needs populations due to poor credit/rental history. Risk mitigation funds and other incentives could be helpful to recruit more landlords to rent to special needs populations. Additionally, incentives could help encourage landlords to participate in HCV and other rental assistance programs.

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

According to York County PA 2-1-1 Counts from January 1, 2022, through July 31, 2022, the service received over 2,000 contacts every month. These contacts outpaced the corresponding months for 2021 by hundreds, and in some months by double. 2,108 requests for the seven months were made for housing and shelter assistance. Over 46% of these requests were made regarding rental assistance. While most requests were adequately met, unmet request rates were high for those seeking rental assistance (6% unmet), temporary housing solutions through shelter (5% unmet) and home repair or maintenance needs for low-income homeowners (5% unmet). Home repair/ maintenance includes adaptations for safety and disability access, general upkeep, and weatherization. This suggests an unmet need for supportive services and reinforces stakeholder comments indicating a lack of affordable and accessible housing options.

Since PIT and HIC data only provide a snapshot of persons experiencing homelessness on a single night, a broader picture can be provided through data currently presented in City of York’s Annual Performance Report (APR) for January 1, 2021-December 31, 2021, 2,466 households stayed at least one night in emergency shelter (ES), permanent supportive housing (PSH), permanent housing (PH), rapid re-housing (RRH), or transitional housing (TH).

Exits from the Homelessness System			
	% Exits to Positive Destinations	# of Households Exited to Positive Destinations	Total # of Households Exited
<i>By Household type</i>			
Adult-only Households	21.4%	186	869
Households with Children	35.6%	324	909
Child-only Households	0.0%	0	3
<i>By Pathway</i>			
ES	19.6%	179	912
PSH + PH	41.1%	23	56
RRH	36%	292	811
TH	43.5%	20	46
All Households	28.2%	514	1825

Only 28.2% of households exiting the homeless system exited to positive housing destinations. This suggests that there is an overall lack of permanent housing resources for all household types that

entered the homelessness system, especially for those who were only able to access emergency shelter or rapid re-housing resources.

According to stakeholders, there is a need for legal guidance ranging from whether someone is being legally evicted to whether the landlord can increase the rent, through understanding the lease and to what the individual is agreeing.

2014-2018 CHAS Data identified 3,120 renter households in York with income below 30% AMI. There are 2,115 renter households between 31-50% AMI, and there is a total 4,075 unit-gap in housing in units both affordable and available for households below 50% AMI. This suggests that households are experiencing cost burden and severe cost burden by occupying units that are not affordable to them, putting them at greater risk of housing stability and homelessness.

Supportive Services are needed including employment training. Supportive service providers expressed interest in opportunities to partner behavioral health work with rapid rehousing programs to stabilize individuals' mental health and housing at the same time. Shelter capacity is limited (both bed and staff capacity); hotel/motel utilization rates are high due lack of shelter bed capacity. An overwhelming issue identified by stakeholders was the lack of affordable housing increasing due to landlord selling once affordable properties rendering them no longer affordable. Additionally, there are fewer and fewer landlords accepting housing choice vouchers and other rental assistance.

A specific subpopulation identified by stakeholders was families, particularly those housed in hotels, often owe money in past utilities. This prohibits them from moving into a new unit as they are unable to put utilities in their name. For any household struggling to pay rent and/or utilities, not having utilities is a violation of their lease and puts them at risk of eviction. Funding support for utilities, even for those who do not owe arrears, is needed as it is a significant barrier to obtaining and maintaining housing stability.

The York County Coalition on Homelessness identified the need for preventative services for those at risk of homelessness, as well as an increased need for permanent supportive housing and rapid rehousing for those who are literally homeless and/or fleeing domestic violence.

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:

Enter narrative response here.

Identify priority needs for qualifying populations:

Based on stakeholder consultations and data analysis, rental housing that is affordable and accessible to individuals and households at 0-30% AMI is the priority need. An adequate inventory of deeply subsidized housing for Qualifying Populations is a priority due to landlord barriers and escalating rental costs. Coupled with this is a priority for rental assistance and supportive services (including case management, legal services and homeless prevention services) to assist the homeless identify and access housing and become stably housed, as well as to prevent homelessness among households who

are at greatest risk. Additionally, individuals need to be connected to services quickly, particularly mental health and substance abuse services, especially for those exiting the criminal justice system.

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:

In addition to feedback from stakeholders and consultation sessions, the following plans and data sources were consulted to determine needs and system gaps for HOME-ARP qualifying populations:

- American Community Survey (ACS), 2016-2020
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018
- York County Coalition on Homelessness 2022 Point-In-Time Count
- York County Coalition on Homelessness Housing Inventory County (HIC)
- York County Coalition on Homelessness Coordinated Entry System (CES)
- York County CoC Annual Performance Report (APR)
- 2021 System Performance Measures
- United Way of Pennsylvania's 2-1-1 Counts

HOME-ARP Activities

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

The City of York Bureau of Housing Services will invite any Developer/Owner that is looking to apply for funding and/or other resources from the City for the new construction, substantial rehabilitation, and/or preservation of affordable housing to submit a proposal for funding. The proposed activity, including the proposed qualifying population(s) to be served, will be evaluated in accordance with the City's HOME-ARP allocation priorities, preferences and prioritization (if any), and projects that address qualifying populations will be considered. The City is not currently establishing preference or priority as part of its scoring criteria for HOME ARP proposals for funding. Should the City establish preference or priorities, a substantial amendment may be duly publicized and submitted to HUD for review.

Applicants for HOME-ARP must meet the minimum program eligibility and threshold requirements. Depending on the nature of the proposed activity, site inspections may be conducted by City staff. An evaluation of the site's feasibility, financial underwriting and developer capacity assessment will be completed and considered as part of the review process.

Describe whether the PJ will administer eligible activities directly:

The City of York will not administer and oversee its eligible activities directly. Rather, it will enter into HOME Agreements with developers of affordable rental housing projects, and execute subrecipient agreements with service providers. The City will provide oversight and management of its developer and subrecipient agreements.

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:

The City of York will not be distributing any portion of its HOME – ARP administrative funds to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 1,683,533		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 297,093	15 %	15%
Total HOME ARP Allocation	\$ 1,980,626		

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

The HOME-ARP budget was driven by the priority needs identified as a result of stakeholder consultation and data analysis. The City of York will distribute 85% of its HOME-ARP allocation for the development of affordable rental housing. An overall lack of affordable rental units was one of the most frequently identified unmet needs among stakeholders. Tight rental markets and high rents make it extremely difficult for housing and service providers to find units that are affordable and in decent condition for their clients. The Bureau of Housing Services is prioritizing the creation of affordable housing units for qualified populations. HOME – ARP funds will be used for individuals or families from all of the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability.

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:

The affordable rental housing inventory in the City of York is severely limited, a challenge that existed long before and has been exacerbated by the pandemic. There is increased competition for fewer affordable units throughout the City. Privately owned units are no longer available for affordable housing in many places as landlords are no longer willing to accept rental assistance or have tenant selection policies that act as barriers for special needs populations. Shelters lack bed capacity for

households experiencing homelessness, primarily because it is increasingly challenging to move folks out of shelter into permanent housing due to lack of affordable inventory. Therefore, the City's emphasis with HOME ARP funds will be to create new units to add to the affordable housing inventory in the City.

DRAFT

HOME-ARP Production Housing Goals

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

It is anticipated that the City's HOME ARP funds will be used to create 8 new units affordable to households at or below 30% AMI.

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:

It is anticipated that the City's HOME ARP funds will be used to create 8 new units affordable to households at or below 30% AMI. The City's priority goal established by this Allocation Plan is to increase the number of affordable housing units in the City. Providing funds for rental housing production directly supports the advancement of that goal.

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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:

The City of York will not establish a preference; all qualifying populations will be eligible to apply for assistance under the City's HOME-ARP assisted program(s). Any preferences established in the future will be described in an amendment to this Allocation Plan and will not violate any fair housing, civil rights, or nondiscrimination requirements at the federal, state, or local level, which includes but is not limited to requirements found in 24 CFR 5.105(a).

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:

No preferences are established.

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Referral Methods

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

The City of York will use the Coordinated Entry system as an indirect referral source, in addition to other referral sources such as local nonprofits, municipalities and private sources to identify other qualifying populations. The CE will be used for intake in order to add eligible applicants to a HOME-ARP project waiting list, which will be selected from in accordance with the preference and prioritization described above. Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project.

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):

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be placed on the project(s) waiting list and admitted in chronological order.

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

Referrals accepted from the CE process established by the CoC will prioritize eligibility according to the CoC's assessment and prioritization. This survey measures vulnerability and prioritizes those with the greatest risk. Those determined to have the highest vulnerability, and need for permanent housing, and interested in applying will be identified as an eligible and offered the opportunity to apply for housing through the HOME-ARP project. However, as indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project.

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

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be placed on the project(s) referral list and admitted in chronological order. Source of referral will not give one applicant preference or prioritization over another.

Limitations in a HOME-ARP rental housing or NCS project

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

The City of York is not establishing limitations on eligibility.

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:

The City of York is not establishing limitations on eligibility.

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

The City of York does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing in order to rehabilitate the units with HOME-ARP funds.

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