

CITY OF FLINT

DRAFT HOME-ARP Allocation Plan

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

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

Consultation

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

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

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

Template:

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

The City of Flint developed a consultation process to meet HUD’s requirements and to ensure that the city considers all priority needs within the community. Throughout the months of February and March 2023, the city held HOME-ARP consultation/needs assessment interviews to consult with the Continuum of Care, local housing and public service providers, grantee departments, and other groups that work to address the needs of qualifying populations. Approximately a dozen one-on-one interviews were conducted. Those interviewed included representatives from agencies that uniquely service the qualifying populations under HOME-ARP. Further information about all consultation is detailed in the table below.

To create a consultation process that would allow for all stakeholders to be involved, a multi-faceted approach was used. First, the City emailed a survey to service providers with which they did not intend to conduct personal interviews. These surveys gave service providers and agencies the opportunity to identify any unmet needs of the qualifying populations, as well as indicate their opinions on project priorities.

The second approach was to reach out to service providers and agencies with a phone call. This provided an opportunity for comment without scheduling a formal interview or filling out a complete survey. During interviews and phone calls, the agencies were asked to speak openly regarding the unmet needs of qualifying populations in the city.

Lastly, the City of Flint attended the local Continuum of Care regular meeting on March 8th. At this meeting, the City explained the purpose of drafting a HOME-ARP Allocation Plan, the activities and populations eligible for HUD funding, and the schedule that Flint will follow to adopt the Allocation Plan in early 2023. Contact information for the process was provided.

Following the brief presentation from the City, meeting attendees were given an opportunity to provide comments during a facilitated discussion. Discussion was facilitated by the city staff.

Once participants identified a number of gaps in housing inventory and service delivery systems, the attendees were asked to identify which gaps should be considered priority needs, and whether any particular subpopulation among the qualifying populations, as defined in the HOME-ARP program, have a more significant need for assistance.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Legal Services of Eastern MI	<ul style="list-style-type: none"> ● DV Services Provider ● Veteran’s Groups ● Civil Rights Org ● Fair Housing Org ● Org Serving People w/Disabilities ● Other org 	Phone Interview	<p>Issues noted:</p> <ul style="list-style-type: none"> ● Lack of affordable and accessible housing ● People being evicted lack representation ● Eligibility requirements for low-income housing are unreasonable ● People in crisis are overwhelmed by the application process <p>#1 Concern: Development of affordable rental housing</p>
Flint Housing Commission	<ul style="list-style-type: none"> ● Homeless Service Provider ● DV Service Provider ● Fair Housing Org ● Org Serving People w/Disabilities ● Other Org 	Phone Interview	<p>Issues noted:</p> <ul style="list-style-type: none"> ● Low-income housing applications are too complex ● Housing applications that are filled out incorrectly are rejected ● Low literacy levels ● Lack of available housing, particularly a need for transitional housing ● Eligibility criteria disqualify many people (over the income limit, having a criminal record, etc.) ● People living in low-income housing are not directly involved in this process ● Income stabilization services including life skills training, affordable child care, employment assistance, job training ● Health services including mental health and substance abuse treatment ● Short-term rental assistance, security deposit, and utility deposit assistance ● TBRA for VAWA or at risk families <p>#1 Concern: Development of affordable rental housing</p>
Genesee Health Plan & Flint Community Schools	<ul style="list-style-type: none"> ● Homeless Service Provider 	Phone Interview	<p>Issues noted:</p>

	<ul style="list-style-type: none"> ● Other Org 		<ul style="list-style-type: none"> ● More sliding-scale, low-cost, sustainable multi-unit housing needed (i.e. 5-over-1) ● Non-gendered shelter options for: <ul style="list-style-type: none"> ○ Moms with sons too old to stay in the shelter ○ Single-dads with children ○ Male DV victims ○ Non-binary and intersex people (“There has been no place for them to feel safe their entire lives.”) ● Incorporate climate change into planning for: <ul style="list-style-type: none"> ○ Disaster preparedness for current residents ○ Preparing for climate migration ● There isn’t a way to clearly identify youth living independently due to losing a caregiver due to COVID; self-identifying is too risky for them <p>#1 Concern: Development of affordable rental housing</p>
Center for Civil Justice	Other Org	Phone interview	<p>Issues noted:</p> <ul style="list-style-type: none"> ● More affordable housing is needed ● Landlords can discriminate, based upon source of income (advocating for a local ordinance) ● A housing navigators are needed to: <ul style="list-style-type: none"> ○ Maintain contact with people on the CoC’s quality-by-name list, so that they can be located when housing becomes available ○ Provide long-term support to prevent eviction once someone is housed ○ Increase participation in Housing Court program to clear legal concerns for those in crisis <p>#1 Concern: Non-profit operating funding</p>
Great Lakes Recovery, Inc.	<ul style="list-style-type: none"> ● Homeless Service Provider 	Phone Interview	<p>Issues noted:</p>

	<ul style="list-style-type: none"> ● DV Service Provider ● Org Serving People w/Disabilities ● Other Org 		<ul style="list-style-type: none"> ● Region 10 funding reimburses \$15/night to house an adult, but nothing for children, whose needs are complex and costly due to early traumas and perinatal exposure to substances ● On-site or nearby specialty daycare for children is needed for when parents are complying with their treatment requirements ● They have 76 people on a waiting list, 68 of whom are adults with children 2 and younger because: <ul style="list-style-type: none"> ○ There are only two recovery homes that take adults with children in Flint (Odyssey House is the other) ○ They are the only two orgs in the state that take men with minor children (“Our referral partners beg us to expand, but it isn’t sustainable without ongoing funding ● People making the decisions need to get their boots on the ground and see how important working with people in recovery is <p>#1 Concern: Supportive Services</p>
Office of Public Health, City of Flint	<ul style="list-style-type: none"> ● Civil Rights Org ● Org Serving People w/Disabilities ● Other Org 	Self-completed survey	<p>Issues noted:</p> <ul style="list-style-type: none"> ● More safe and affordable housing is needed for everybody ● The two biggest barriers to obtaining housing are: <ul style="list-style-type: none"> ○ Having a dog(s) ○ Shelters are not ADA compliant and/or lack supportive services for people with disabilities ○ Persistent and severe mental illness and/or substance abuse disorders ○ Some people, especially veterans, don’t want to stay in emergency housing without their guns ● There are too many eligibility requirements for rental assistance,

			<p>people apply too late, or the money has run out</p> <ul style="list-style-type: none"> ● Services need to be trauma-informed ● Staff burnout exacerbates the poor treatment of people in need ● More data is needed that: <ul style="list-style-type: none"> ○ Includes the voices of those who are most marginalized (i.e. LGBTQIA+ folks, people living with HIV/AIDS, IVDUs, sex workers, homeless youth without caregivers, people living in condemned/abandoned properties, etc.) <p>#1 Concern: Development of Affordable Rental Housing</p>
Center for Higher Educational Achievement	Homeless Service Provider	Survey	<p>Issues Noted:</p> <ul style="list-style-type: none"> ● Not enough affordable, well maintained, rental single family homes. ● More financial support and resources are needed for organizations that provide single family homes for rent. Residents in physical homes learn the responsibilities of a house, and this has the potential to encourage homeownership, but it's extremely costly to bring these homes up to code in a short time frame with limited funding.
A Place for Veterans	<ul style="list-style-type: none"> ● Homeless Service Provider ● Veterans Group ● Fair Housing Organization ● Organization Serving People with Disabilities 	Phone Interview	<p>Issues Noted:</p> <ul style="list-style-type: none"> ● Have found transitional housing has been decreasing and shifting to emergency shelters but transitional housing is still a huge need for veterans. ● Need to remove red tape in accessing veterans services. ● More coordination needed between service providers ● Need to have capacity to house people - there are people are on

			the street and there is no place for them to go.
Habitat for Humanity	Other Organization (housing)	Phone interview	Homeownership opportunities for low and moderate income families in the city of Flint.
Shelter of Flint	<ul style="list-style-type: none"> ● Homeless Survey Provider ● DV Service Provider ● Org Serving People with Disabilities ● Other org 	Phone interview	<ul style="list-style-type: none"> ● The biggest challenge for the average person experiencing homelessness – just not enough affordable housing. The largest numbers of people seen in emergency shelters have issues that prevent them from being able to find suitable housing even when typical housing stock is available. <ul style="list-style-type: none"> ○ There are three major challenges: The first is untreated mental health issues (also includes SUD). This population does not respond well with a conventional delivery of mental health services. Need much more intensive mental health treatment options. ○ The next challenge is providing permanent housing for large families (greater than 5) that don't fit in a traditional 2-3 bedroom apt or house. ○ Those with criminal justice histories or who have multiple evictions. ● All three categories require longer stays to get housing that has a chance at being permanent. So actual numbers are decreasing, but bed numbers are much higher. ● Permanent housing with internal support services built in are needed to take care of the most vulnerable.

Communities First, Inc.	<ul style="list-style-type: none"> • Homeless service provider • Org serving people with disabilities 	Survey	<ul style="list-style-type: none"> • There is a housing shortage in Genesee County, and we lack a diversity in housing • There has been a drastic increase in the cost of housing since Covid-19 and many landlords have sold rental properties, leaving a huge gap in the market. • Individuals facing homelessness need additional supportive services to be successfully housed and there needs to be a substantial increase in the production of affordable housing.
Court Street Village	Other organization	Survey	<ul style="list-style-type: none"> • Lack of decent affordable housing • Lack of aggressive code enforcement which leads to substandard housing • Non profit capacity building and operating extremely important; without them there is no program. • If new multi-unit housing is a continued priority, make sure that housing is scattered throughout the city and not concentrated in one geographical area. • Interested in Major Karen Bass's new approach in LA to see if it decreases homelessness and for how long.
Carriage Town Ministries	<ul style="list-style-type: none"> • Homeless • At risk of homelessness • Fleeing DV 		<ul style="list-style-type: none"> • Clean, safe affordable housing and community based single room occupancy • Clean and safe assisted living/ extended care/ supervised facilities for those with chronic physical and mental health needs. • Supportive services to help those maintain wellness and newly acquired housing. • Invest in strategies that last (sustainability)

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

The consultation process resulted in the identification of the following priority needs. Needs in bold font were identified several times:

- Safe, **affordable housing**
- Rapid Re-Housing in emergency
- Transitional Housing (alongside supportive services)
- Wrap-around supportive services (like skills, childcare, employment assistance, job training, health services, **mental health and substance abuse**, financial assistance)
 - **Housing/financial counseling**
 - **Trauma education/support**
 - Support for children in shelters
- Housing for those with Disabilities (**Accessible Housing**)
- Emergency Rental Assistance – too many rules
- Support for staff and agencies providing care (ensure that help is provided with respect)
- Case management/**Housing Navigation** support (Support for filling out applications correctly)
- Non-gendered shelter options
- Training around DV, trafficking, etc. (for schools, police, hospitals)

Additionally, the agencies and service providers ranked the eligible activities and identified the following top funding priorities (in order of importance):

1. Supportive Services
2. Affordable Rental Housing
3. Tenant-Based Rental Assistance
4. Acquisition and Development of Non-Congregate Shelter
5. Non-Profit Operating Assistance (limited to 5% of allocation)
6. Non-Profit Capacity Building (limited to 5% of allocation)

Public Participation

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

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

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

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

Template:

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

- *Date(s) of public notice: 3/2/2023*
- *Public comment period: start date – 3/3/2023 end date – 3/18/2023*
- *Date(s) of public hearing: 3/15/2023*

Describe the public participation process:

In accordance with HUD guidelines, Flint held a 15-day public comment period to obtain comments from city residents, agencies, and anyone else who wished to review and comment on the HOME-ARP Allocation Plan. The city held a public hearing on March 15, 2023 to get feedback on the proposed funding activities. The final authorization of the substantial amendment to approve the HOME-ARP Allocation Plan was also held after the public comment period, which concluded on March 18, 2023.

Describe efforts to broaden public participation:

The City of Flint published a public notice for the public hearing and the 15-day comment period to broaden public awareness and participation in the development of the HOME-ARP Allocation Plan. A 15-day public comment period is required, which the city held before the public hearing to allow more time for citizens to review the plan and provide comment. Additionally, the city

followed its citizen participation plan, which guides all public participation efforts in a manner that promotes transparency and encourages active participation from residents, especially those qualifying populations. The 15-day public comment period and public hearings were held after the city's consultation/needs assessment forum campaign, which included several one-on-one phone interviews and the completion of a survey by service providers. The city also attended the local Continuum of Care regular meeting to gain additional consultation/needs assessment feedback from stakeholders that work with qualifying populations.

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

[to be inserted]

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

All comments and recommendation were accepted and considered in the development of the city's HOME-ARP Allocation Plan.

Needs Assessment and Gaps Analysis

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

Template:

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	134	32	107	N/A	0								
Transitional Housing	16	4	76	N/A	22								
Permanent Supportive Housing	199	69	88	N/A	10								
Other Permanent Housing	62	23	41	N/A	9								
Sheltered Homeless						27	257	17	25				
Unsheltered Homeless						0	14	1	1				
Current Gap										No Gap (+325 beds)	No Gap (+101 units)	No Gap (+41 beds)	N/A

Suggested Data Sources: 1. 2022 Point in Time Count (PIT) for Flint/Genesee County Continuum of Care 2. 2022 Flint/Genesee County Continuum of Care Housing Inventory Count (HIC); 3. Consultation

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	15,163		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,015		
Rental Units Affordable to HH at 50% AMI (Other Populations)	6,790		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,685	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,410	
Current Gaps			No Gap (+2,710 affordable units)

Suggested Data Sources: 1. 2017-2021 American Community Survey (ACS) 5-Year Estimates; 2. 2013-2017 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

Homelessness affects all races and ethnicities; however, within Flint/Genesee County Continuum of Care, white and black individuals are most impacted by homelessness. Of the 360 homeless individuals counted in the 2022 Point-In-Time counts for the continuum of care, 201 (over 55%) individuals were black, and 133 (nearly 37%) of individuals were white. The remaining 8.0% of homeless individuals identified as other minority races. Only about 5.0% of the total counted homeless population identified as Hispanic or Latino. Due to the transient and ever-changing nature of homelessness, it should be assumed that the Point-in-Time count is an undercount of the homeless population in Flint and Genesee County. Based on feedback from service providers and agencies, there is a significant need for shelter, transitional housing, affordable housing, and other income-based and supportive housing options for those experiencing homelessness. This is contrary to what the data in the Housing Inventory Count suggests; however, the HIC and the PIT are only snapshots of the conditions and availability on one given night. They should not be treated as concrete numbers or final interpretations of the current homelessness challenge.

Nearly 76% (273) of all homeless individuals counted were adults in households without children. There were 86 (nearly 24%) homeless individuals counted in households with children, and only 1 homeless individual counted in households that contained only children (under the age of 18).

At Risk of Homelessness as defined in 24 CFR 91.5

According to HUD's FY 2022 Low- and Moderate-Income Summary Data (LMISD), there are approximately 63,865 low- and moderate-income individuals within the City of Flint. This represents nearly 66% of the city's population according to HUD, and over 76% of the city's total population based on the 2021 American Community Survey 5-Year estimates. Of the city's 133 Block Groups, 107 Block Groups are characterized as having more than 51.00% of the population designated as low- and moderate-income. This suggests that a significant percentage of city's population has an income of less than 80% AMI and may be at increased risk of homelessness or in need of additional supportive services and assistance to prevent homelessness and housing instability.

According to 2013-2017 CHAS, there are 385 low- and moderate-income households (<80% AMI) that experience crowding of more than 1 person per room. Additionally, there are 5,125 renter households in the 0-30% AMI income group that are experiencing cost burden greater than 30%, and 4,630 renter households in the 0-30% AMI group that are experiencing cost burden greater than 50%. Due to crowding, income levels, and cost burdens, the households within these groups are at risk of homelessness.

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

In total, 26 (about 7%) homeless individuals counted identified themselves as victims of domestic violence. According to the Michigan State Police Michigan Incident Crime Reporting database, there were 2,720 reported domestic violence offenses in Genesee County alone in 2021. Flint represents approximately 20.5% of the population in Genesee County. Therefore, it can be assumed that there were nearly 558 reported domestic violence incidents in the City of Flint in 2021. There were also 74 reports of rape in Flint for the same year.

According to the Flint Police Department, there were 144 reports of Sexual Assault in 2022 and 97 reports of Sexual Assault for 2023 through February 19, 2023. Victims of these crimes are susceptible to homelessness and housing insecurity.

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

The 2022 homeless Point-In-Time count identifies 18 homeless veterans on the date of survey, representing about 5.0% of the homeless population. Of this population, only 1 individual was considered unsheltered and literally homeless. The majority of this population currently resides in an emergency shelter or transitional housing. The agency A Place for Veterans identifies 570,662 veterans within the state of Michigan. According to the 2020 Decennial Census, Flint represents <1% of the total statewide population. Under this knowledge, it can be assumed that there are about 4,600 veterans within the City of Flint, who may be eligible for benefit under the HOME-ARP program.

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):

There is a wide array of existing homelessness prevention services available in Flint and the greater Genesee County region, including counseling, legal assistance, mortgage assistance, rental assistance, utilities assistance, law enforcement, mobile clinics, street outreach services, drug and alcohol abuse services, childcare, education services, employment and employment training services, healthcare services, life skills training, mental health counselling, transportation services, and food banks.

Metro Community Development (MCD) the lead agency for the CoC, provides a number of services to homeless populations and those at risk of homelessness, including the creation, preservation, and financing of affordable housing. MCD also assists first-time home buyers through education, counseling, and financial assistance. MCD leads a number of economic and community development services, and other neighborhood stabilization services, to prevent and end homelessness. In conjunction with MCD, several other non-profit and religious organizations serve the homeless population within the city. These include, but are not limited to Carriage Town Ministries, Catholic Charities, City of Flint Public Health, Communities First, Crossover Outreach, Genesee County Youth Corp (REACH & Traverse Place), Great Lakes

Recovery, My Brothers' Keeper, Salvation Army, Shelter of Flint, and United Way, among others.

To better address the needs of the area's homeless population, the MCD maintains an online website for the Continuum of Care, which includes resources related to CoC procedures, frequently-asked-questions, coordinated entry procedures, and other related information.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

In Flint, members of the Continuum of Care, such as churches and nonprofit organizations, led by Metro Community Development (MCD), provide homeless services such as emergency shelter and transitional housing. As noted above, some providers include Carriage Town Ministries, Catholic Charities, City of Flint Public Health, Communities First, Crossover Outreach, Genesee County Youth Corp (REACH & Traverse Place), Great Lakes Recovery, My Brothers' Keeper, Salvation Army, Shelter of Flint, and United Way, among others.

These organizations work independently and collectively to identify any unmet housing and service needs of qualifying populations. Based on the consultation process, the unmet housing and service needs are additional affordable rental units, rental/financial assistance, wrap-around supportive services, mental health and substance abuse counseling, and housing navigation, and non-congregate shelter for individuals and families.

Additionally, the 5-Year Consolidated Plan identifies priority needs of the homeless population in Flint, which primarily include prevention activities and supportive services, as well as shelter and affordable housing rehabilitation opportunities. Those individuals that are getting priced out of housing, and those struggling with mental health and substance abuse (and therefore at increased risk of homelessness) were also noted as an underserved population needing case management, employment opportunities, and access to affordable housing to bridge the gap between short-term care and long-term independence. The existing shelters and supportive service providers need additional funding as they work collaboratively to ensure satisfactory provision of services and future expansion of these services for those experiencing homelessness.

At Risk of Homelessness as defined in 24 CFR 91.5

The most recent 5-Year Consolidated Plan (2017/2018-2021/2022) identifies priorities related to persons experiencing homelessness and those at risk of homelessness. Among those needs are youth programs and services, youth facilities, job training/workforce development, utility assistance, financial literacy/credit repair, homeless prevention and services, and transitional and emergency shelters. While there are existing shelters and supportive services for those experiencing homelessness, there may be a need for additional supportive services to prevent homelessness, emergency assistance and other moving assistance (rental deposit assistance, security deposit), and other rental assistance and utility assistance efforts. These efforts also contribute to the maintenance and availability of affordable housing for all income groups, especially qualifying populations.

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

Populations with unstable living environments may require additional financial assistance, such as rental assistance, down payment assistance, security deposit assistance, or utility assistance. These groups may also rely on transitional shelters and safe homes for temporary housing. Additional funding for the non-profit operating assistance and capacity building for organizations that could provide these services would ensure that sufficient and decent housing is available for those that depend on it.

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

For non-homeless populations of greatest risk of housing instability, more affordable rental housing units, rental and financial assistance, housing counseling/navigation and legal services for eviction prevention, and other related supportive services are also needed to prevent future homelessness. One identified priority need, which would support those at greatest risk of housing instability, is additional health services, mental health, and substance abuse treatment counseling. This is a need for populations of all ages and backgrounds.

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

The City of Flint, and the broader Genesee County region, has a robust shelter, housing, and service delivery system for individuals experiencing homelessness and who are at risk of becoming homeless. Some identified gaps may exist, including sufficient funding to support the volume and reach of homeless supportive services (including non-profit service providers that offer substance abuse and mental health services, services for homeless youth, case management, and housing navigation). The City will continue to financially support these programs, when possible, and aid in the identification of additional funding sources, and provide technical assistance to aid in the completion of grant applications.

The City maintains strong relationships with service providers, many of which participated in the consultation/needs assessment forums that informed the HOME-ARP Allocation Plan. The input received from service providers during the consultation process was critical to the identification of priority needs. Service provider involvement ensures successful programming to lessen the existing gaps in housing and services for qualifying populations.

The city is very engaged with the Metro Community Development (the lead agency for the Flint/Genesee County Continuum of Care) and supports the organization in the implementation of the 10-Year Plan to End Homelessness. Additional improved and maintained coordination between these service providers and the City would benefit those populations at risk of homelessness and those experiencing homelessness by promoting a transparent and accessible communication strategy. Improved coordination would increase the dissemination of information about critical resources and supportive services, as well as improve the quality of those services.

An identified gap is the need for additional affordable rental housing. In addition to financially supporting the closure of this gap through the HOME-ARP program, one way to reduce this need is for the city to continue to coordinate with the Continuum of Care, non-profit service providers, and other organizations to encourage the development of these types of housing.

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:

Housing with one (1) or more housing problems is associated with instability. As shown in the table above, there are 6,095 households earning less than 50% AMI with at least one severe housing problem. Additionally, households experiencing cost burden and crowding may be experiencing housing instability and be at a greater risk of homelessness. According to the 2013-2017 CHAS data, there are 385 low- and moderate-income renter households (<80% AMI) that experience crowding of more than 1 person per room. Additionally, there are 5,125 renter households in the 0-30% AMI income group that are experiencing cost burden greater than 30%, and 4,630 renter households in the 0-30% AMI group that are experiencing cost burden greater than 50%.

Identify priority needs for qualifying populations:

While there are many important priority needs listed in the city’s 2017/2018 – 2021/2022 5-Year Consolidated Plan, the HOME-ARP Allocation Plan considers only the priority needs listed below, which reflect the eligibility of the program as well as comments received during the consultation/needs assessment forums and public participation process. These priority needs align with goals previously identified in the Consolidated Plan:

1. Youth programs and services
2. Youth Facilities
3. Job Training/Workforce Development
4. Affordable Housing (Renter-occupied)
5. ADA-Accessible Home Improvements
6. Utility Assistance
7. Financial Literacy/Credit Repair
8. Special Needs Services
9. Veterans Services
10. Senior Services
11. Homeless Prevention and Services
12. Transitional and Emergency Shelters

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

The most recent Housing Inventory Counts (January 2022) and Point-In-Time counts (January 2022) were used to develop the data presented in the tables and narrative above. The 2013-2017 CHAS and 2021 American Community Survey 5-Year Estimates were used to supplement the housing inventory and point-in-time counts. Based on reported numbers, there are currently sufficient shelter beds for those populations experiencing homelessness; however, it should also be assumed that the reported count for homeless populations is an undercount. Based on feedback from consultations, there is likely a gap in affordable housing for low- and moderate-income populations (especially those earning less than <50% AMI), as well as individuals in transitional housing situations, and those populations at risk of homelessness. There are only 2,015 rental units considered affordable to extremely low-income populations earning less than 30% AMI and only 6,790 rental units affordable to populations earning less than 50% AMI (total of 8,805 units affordable to those earning >30% and >30-50% AMI). According to 2013-2017 CHAS data, there are 18,320 households earning >30% AMI or >30-50% AMI. This suggests that there are 9,515 households that are unable to access affordable rental housing, though it should be noted that some of these households may be able to access affordable owner housing. Additionally, over 6,095 renter households with an income less than 50% AMI live in a house with one or more severe housing problems. This represents over 33% of the total low-income households earning less than 50% AMI, suggesting there is a need for additional decent, affordable rental units.

Gaps related to coordination and supportive services were identified using previous performance of similar programs and previously identified community needs, as identified in the 2017/2018-2021/2022 5-Year Consolidated Plan. Additionally, through the consultation process the city identified gaps and needs based on outreach to housing and service providers.

HOME-ARP Activities

Template:

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

After city approves the submission of the Substantial Amendment to the FY 2021 Annual Action Plan to include the HOME-ARP Allocation Plan, the city will then issue RFPs via email and publish on the City's website for the four categories of eligible allocation priorities that the City will fund. The City will notify the public when the RFPs are available.

All proposed project applications will submit a description of the proposed project, identification of the organization, and specify the requested funding amount. The City of Flint will evaluate all project proposals against the allocated budget and identified priority needs. The City will review internally and underwrite rental development projects, perform a risk analysis of all submissions, and make preliminary recommendations to the City-Wide Advisory Committee. These recommendations will also be presented to Administration and City Council. The applications will be reviewed for their compliance with the HOME-ARP program and benefits to qualifying populations prior to determining which projects to award. Upon approval by City Council, the City will execute contracts with selected subrecipients and developers.

Describe whether the PJ will administer eligible activities directly:

The city does not intend to administer eligible activities directly. Flint plans to administer the program through a number of subrecipients. Funding for eligible activities will be allocated directly to these subrecipients, with program compliance oversight and general administration/planning conducted by the City of Flint.

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

Not applicable. No HOME-ARP administrative funds will be provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan.

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

Template:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 495,000.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 300,000.00		
Development of Affordable Rental Housing	\$ 1,800,657.00		
Non-Profit Operating	\$ 162,228	5 %	5%
Non-Profit Capacity Building	\$0.00	0 %	5%
Administration and Planning	\$ 486,685.00	15 %	15%
Total HOME ARP Allocation	\$ 3,244,570		

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

The City of Flint will allocate most of its HOME-ARP funding allocation to supportive services and the development of affordable rental housing. Throughout the consultation process, several priority needs came to the city’s attention, including the need for affordable rental housing, wrap-around services, and nonprofit operating and capacity building to provide such services. Although other specific needs were identified, most fell under the larger umbrella of supportive services (e.g., housing navigation, rental/financial assistance, mental health services, etc.). Tenant-based rental assistance was also ranked as a high priority need; however, through conversations with stakeholders and service providers, it became clear that the need for rental/financial assistance (as a supportive service) was a broader need, which is why both activities are funded at different levels.

Although non-congregate shelter was identified as a need, stakeholders were concerned about the ongoing operational expenses associated with such facilities not being an eligible activity under the HOME-ARP funding. A few needs identified were not eligible given the parameters of the HOME-ARP program.

Given the emphasis on supportive services heard at all the consultation/needs assessment forums and public hearing, and the dire need for affordable rental units in the City of Flint, the city has decided to focus most of its HOME-ARP funding allocation on those two eligible activities. The city will also reserve a small portion of the funds for non-profit operating assistance (5%), specifically seeking to support providers in their provision of supportive service efforts and to meet the needs of qualifying populations. An additional small portion of funding is reserved for tenant-based rental assistance. The city is also reserving about 13% of the funding allocation for administration and planning efforts.

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:

As previously identified in the above sections, the qualitative and quantitative data presented indicates a need for projects that support the identified priority needs (affordable housing and supportive services), and those that close the gaps in service delivery (coordination for supportive services and resource sharing).

HOME-ARP Production Housing Goals

Template

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

Based on the funding available, the City of Flint anticipates being able to support the construction of 40 new affordable units for qualifying populations by layering with other funding sources.

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:

The city's most recent consolidated plan identified the goal to have desirable, stable, and inclusive neighborhoods with a range of affordable and attractive housing options available to a diverse population, and to diversify the city's housing stock, including the development of rental housing, to allow anyone to make Flint their home. Using the HOME-ARP funding allocation, the city estimates that it will support the development of 40 additional affordable housing units for qualifying populations. These efforts will be supported by layering with other funding sources (including tax credits). The proposed budget for development of affordable housing will fund projects that work towards addressing the city's high priority need for affordable rental housing.

Preferences

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

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

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

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

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

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

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

Template:

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

The City of Flint does not intend to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Subrecipients of HOME-ARP funds administered by the City of Flint, such as but not limited to CoCs, may have coordinated entry processes that establish priority based on need and according to established written standards. In such cases, the city will allow for need-based prioritization so long as such prioritization does not give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Subrecipients will be required to demonstrate that the funded activity or project will be made available to all qualifying populations under the HOME-ARP program, consistent with civil rights and nondiscrimination laws and requirements, including fair housing and equal opportunity.

If a funded activity or project is later determined to necessitate preference for any reason, the HOME-ARP Plan will be substantially amended accordingly to reflect such limitation.

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

Not applicable. The City of Flint does not intend to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Referral Methods

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

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

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

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

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

Template:

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

Since the City of Flint will not administer HOME-ARP projects directly (except for administration and planning), the city defers to the Continuum of Care's referral methods and coordinated entry procedures. Metro Community Development (MCD) is the lead agency for the Flint/Genesee County Continuum of Care for the region, including the City of Flint.

The city defers to the Continuum of Care’s referral methods and coordinated entry procedures, which will prioritize the chronically homeless from all qualifying populations in order of longest length of time homeless. Additionally, Flint will ensure that the CoC’s coordinated entry process is utilized by any organization/subrecipient that receives the HOME-ARP funding.

The Continuum of Care outlines their Coordinated Entry and referral procedures here:

<https://flintgenesee-county-coc.org/coordinated-entry/>.

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

The city will work with the CoC and MCD for coordinated entry procedures. Referrals for projects are made through a number of agencies, including the City of Flint Public Health department and Metro Community Development. Several projects may include referral activities and will be completed by the corresponding HOME-ARP subrecipients; however, all qualifying populations are eligible for a project or activity and will be included in the coordinated entry process as necessary. Flint will ensure that the CoC’s coordinated entry process is utilized by any organization/subrecipient that received the HOME-ARP funding.

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):

Since the city will not administer HOME-ARP projects directly (except for administration/planning), subrecipients are responsible for maintaining the prioritization requirements established in this plan. Since the city is not establishing preferences, Flint will require that individuals and households from all qualifying populations are admitted to projects or activities chronologically in order of their application.

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):

Since the city will not administer HOME-ARP projects directly (except for administration/planning), subrecipients are responsible for maintaining the prioritization requirements established in this plan. Since the city is not establishing preferences, Flint will require that individuals and households from all qualifying populations are admitted to projects or activities chronologically in order of their application.

Limitations in a HOME-ARP rental housing or NCS project

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

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

Template

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

Non-congregate shelter projects will not be funded using the city’s HOME-ARP allocation funding. The city has budgeted a portion of its allocation for the development of affordable rental housing; however, the City of Flint does not intend to limit eligibility for a HOME-ARP rental housing or non-congregate shelter project to a particular qualifying population or subpopulation of a qualifying population.

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 Flint does not intend to limit eligibility for a HOME-ARP rental housing or non-congregate shelter project to a particular qualifying population or subpopulation of a qualifying population.

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):

The City of Flint does not intend to limit eligibility for a HOME-ARP rental housing or non-congregate shelter project to a particular qualifying population or subpopulation of a qualifying population.

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***
Not applicable. The City of Flint does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
Not applicable. The City of Flint does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
Not applicable. The City of Flint does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
Not applicable. The City of Flint does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
Not applicable. The City of Flint does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***Other requirements in the PJ's guidelines, if applicable:***
Not applicable. The City of Flint does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.