

HOME-American Rescue Plan (HOME-ARP) Program Allocation Plan

Participating Jurisdictions: City of Dayton, \$5,091,209
Montgomery County \$3,868,913

INTRODUCTION

The City of Dayton and Montgomery County are both entitlement communities and participating jurisdictions (PJ) for the U.S. Department of Housing and Urban Development (HUD), receiving allocations of Emergency Solutions Grant (ESG), HOME Investment Partnerships (HOME) program, and Community Development Block Grant (CDBG) funds. Historically, the City of Dayton and Montgomery County jointly plan and coordinate the use of these funds to address homelessness and housing.

On March 11, 2021, President Biden signed the American Rescue Plan (ARP) into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses. To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. **These activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.**

ARP defines qualifying individuals or families as those that are **(1) homeless**, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) (“McKinney-Vento”); **(2) at risk of homelessness**, as defined in section 401 of McKinney-Vento; **(3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; (4) part of other populations** where providing supportive services or assistance would prevent a family’s homelessness or would serve those with the greatest risk of housing instability; **and veterans and families** that include a veteran family member that meet the criteria in one of (1)-(4) in the paragraph above.

Montgomery County, Ohio has been allocated a total of \$3,868,913 of HOME-ARP funding. The City of Dayton has been allocated \$5,091,209 of funding. The U.S. Department of Housing and Urban Development issued the Community Planning Division (CPD) Notice 21-010 which outlines the requirements for the use of funds in the HOME-American Rescue Plan Program. Requirements include funding limitations including eligible and ineligible activities, uses and Qualifying Populations.

This HOME-ARP Allocation Plan is currently proposed. It is incomplete because we are currently seeking comments from the public which will be included in the HOME- ARP Allocation Plan submission to HUD.

CONSULTATION

The jurisdictions of the City of Dayton and Montgomery County are both part of the OH-505 Continuum of Care (CoC). Both jurisdictions participate in local joint funding processes, evaluation of community needs, and the development of community strategies to address homelessness, affordable housing, and other key community issues. With the approval of the HUD Field Office, the City of Dayton and Montgomery County worked collaboratively with each other and with the OH-505 CoC on the consultation, needs assessment and gaps analysis, preferences and priorities, and development of HOME-ARP activities for their respective HOME-ARP Allocation Plans.

Consultation for the HOME-ARP Allocation Plan was conducted in three different ways: 1) individual sessions with key stakeholders including the Continuum of Care, the Public Housing Authority, and persons with lived experience of homelessness, 2) virtual consultation sessions with homeless service providers, domestic violence service providers, Veterans’ organizations, 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, 3) surveys emailed to all of the groups listed above as well as other community policy makers/stakeholders.

LIST OF ORGANIZATIONS CONSULTED WITH SUMMARY OF FEEDBACK RECEIVED

Agency Consulted	Type of Agency and Qualified Populations (QPs) Served	Method of Consultation	Feedback
Montgomery County Homeless Solutions	CoC for Dayton, Kettering, and Montgomery County QPs Served: 1-3	Consultations & Data Sharing -January 19, 2023 -January 31, 2023 -February 2, 2023 -February 3, 2023 -February 7, 2023 -February 8, 2023	-Landlord willingness to accept vouchers - Availability of units (general lack of available housing) - Increasing rents & fees - Quality of units - Mitigation fund and incentives for landlords - Expanded street outreach - System-wide Diversion Strategy

<p>ADAMHS</p>	<p>Public Agency. Plans, funds, and monitors public mental health and addiction treatment services for individuals and families of Montgomery County</p> <p>QPs Served: 1,2,4</p>	<p>Meetings on</p> <ul style="list-style-type: none"> -February 2, 2023 -February 7, 2023 	<ul style="list-style-type: none"> - Availability of units (general lack of available housing) - Lack of assistance with navigating available housing and assistance options - Quality of units (ability to pass HQS or building code inspections) - Lack of resources and incentives for landlords (mitigation funds and landlord incentives needed) - Housing providers/landlords need more education to understand and humanize housing issues people experience
<p>Artemis</p>	<p>Non-Profit Domestic Violence Services Provider</p> <p>QP served: 3</p>	<p>Meetings on</p> <ul style="list-style-type: none"> -February 3, 2023 	<ul style="list-style-type: none"> - Lack of knowledge on tenant rights by tenants - Lack of safe housing options for people experiencing DV - Availability of units (general lack of available housing) - Safe affordable housing for survivors to feel safe that they can actually go in communities
<p>Community Volunteers</p>	<p>Serve on Boards and Committees</p> <p>QPs served: 1-4</p>	<p>Consultations & Data Sharing</p> <ul style="list-style-type: none"> -February 7, 2023 	<ul style="list-style-type: none"> - Availability of units (general lack of available housing) - Lack of resources and incentives for landlords (mitigation funds and landlord incentives needed)
<p>City of Dayton</p>	<p>Participating Jurisdiction.</p>	<p>Meetings on</p> <ul style="list-style-type: none"> -February 2, 2023 -February 3, 2023 	<ul style="list-style-type: none"> - Availability of units (general lack of available housing)

	<p>Operates Dayton Mediation Center</p> <p>QPs Served: 2,4</p>	<p>-February 7, 2023</p>	<ul style="list-style-type: none"> - Shared concern for incentives for landlords who may not reciprocate assistance for QPs - Need additional Permanent Supportive Housing options to assist more folks with mental health - Increasing rents & fees
<p>Community and Economic Development, Montgomery County</p>	<p>Participating Jurisdiction. Serves local businesses and workforce needs in Montgomery County</p> <p>QPs Served: 1-4</p>	<p>Meetings on</p> <ul style="list-style-type: none"> -February 2, 2023 -February 3, 2023 -February 8, 2023 	<ul style="list-style-type: none"> - Need mediation and other additional services for people whose first language is not English - Shared idea of setting aside money to help with utility bills
<p>County Corp</p>	<p>Quasi-public Organization. Provides affordable housing and economic programs for residents and small businesses</p> <p>QPs Served: 2,4</p>	<p>Consultations & Data Sharing</p> <ul style="list-style-type: none"> -February 3, 2023 	<ul style="list-style-type: none"> - Shared concern that there are gaps in our Permanent Supportive Housing programs
<p>Department of Veterans Affairs- Dayton</p>	<p>Veterans' Organization. Provides housing and employment services and connection to mental health services for veterans, including Veterans experiencing homelessness</p> <p>QPs Served: 1-2, 4</p>	<p>Meetings on</p> <ul style="list-style-type: none"> -February 2, 2023 	<ul style="list-style-type: none"> - Availability of units for <u>Sex Offenders</u> (general lack of available housing) - Policy Level Issue: Need mandatory housing inspections/ordinance to get housing in area up to code/standards
<p>Greater Dayton Premier Management</p>	<p>Public Housing Authority</p> <p>QPs Served: 1-4</p>	<p>Consultations & Data Sharing</p> <ul style="list-style-type: none"> -February 8, 2023 	<ul style="list-style-type: none"> - Landlord willingness to accept vouchers - Availability of units (general lack of available housing)

			<ul style="list-style-type: none"> - Quality of units (ability to pass HQS or building code inspections) - Increasing fees - Lack of assistance to help with utility bills and back debt - Lack of assistance with navigating available housing and assistance options - Need for a central document database to assist clients in housing paperwork - Lack of units for people experiencing homelessness - Need to replace units that are condemned or lost - Need for housing service coordinator at affordable housing sites
Homefull	<p>Non-Profit Homeless Service Provider. Provides housing, access to food, and training/employment services to people experiencing homelessness</p> <p>QPs Served: 1-2, 4</p>	<p>Consultations & Data Sharing</p> <p>-February 3, 2023</p>	<ul style="list-style-type: none"> - Lack of systemwide prevention/shelter diversion to keep people housed - Lack of assistance to help with utility bills and back debt - Availability of units (general lack of available housing)
Advocated for Basic Legal Equality	<p>Legal Aid Organization. Provides legal assistance in civil matters to help eligible low-income individuals and groups in Ohio achieve self-reliance, and equal justice and</p>	<p>Meetings on</p> <p>-February 3, 2023</p>	<ul style="list-style-type: none"> - Policy Level Issue: Need to become a Right to Counsel jurisdiction - Lack of funds to support tenants during evictions - Lack of preventative resources to keep people in their homes who are

	<p>economic opportunity</p> <p>QPs Served: 1-4</p>		<p>at imminent risk of homelessness</p> <ul style="list-style-type: none"> - Need a tenant rights group - Need mediation and other additional services for people whose first language is not English - Lack of assistance to help with utility bills and back debt - Availability of units (general lack of available housing) - Lack of systemwide prevention/shelter diversion to keep people housed
<p>Persons with Lived Experience</p>	<p>Individuals with lived experience of homelessness in our community.</p>	<p>Interviews -September 2022</p>	<ul style="list-style-type: none"> - Need for additional rental assistance - Need for available units in more locations - Need for additional outreach teams - Need for more available rooming houses with rules and structure -Need transportation services - Availability of units - Need for additional supplies for people sleeping unsheltered - Lack of assistance to help with utility bills and back debt
<p>Miami Valley Community Action Partnership</p>	<p>Nonprofit Community Action Agency.</p> <p>QPs Served: 1-4</p>	<p>Consultations & Data Sharing -February 3, 2023</p>	<ul style="list-style-type: none"> - Lack of flexible funds to help keep people in their homes who are at imminent risk of homelessness - Shared concern that once resources are at

			<p>capacity, there are still many people that are in need of those services/resources</p> <ul style="list-style-type: none"> - Lack of assistance with navigating available housing and assistance options - Need additional staff to process rental assistance resources - Lack of systemwide prevention/shelter diversion to keep people housed
<p>Miami Valley Fair Housing</p>	<p>Fair Housing Organization</p> <p>QPs Served: 1-4</p>	<p>Consultations & Data Sharing</p> <p>-February 2, 2023</p>	<ul style="list-style-type: none"> - Landlord willingness to accept vouchers - Policy Level Issue: Need to become a Right to Counsel jurisdiction - Policy Level Issue: Need source of income protection laws for voucher holders - Policy Level Issue: Need mandatory housing inspections/ordinance to get housing in area up to code/standards - Availability of units (general lack of available housing) - Quality of units (ability to pass HQS or building code inspections) - Lack of resources and incentives for landlords (mitigation funds and landlord incentives needed) - Housing providers/landlords need more education to

			<p>understand and humanize housing issues</p> <p>people experience</p> <ul style="list-style-type: none"> - Lack of safe housing options for people experiencing DV - Need additional resources for transportation services
<p>Miami Valley Housing Opportunities</p>	<p>Non-Profit Homeless Service Provider.</p> <p>Street outreach services, permanent supportive housing provider</p> <p>QP Served: 1</p>	<p>Consultations & Data Sharing</p> <ul style="list-style-type: none"> -September 2022 -February 3, 2023 	<ul style="list-style-type: none"> - Need for temporary housing for high level of care clients for mental health intervention/stabilization with targeted case management - Need for a severe mental health focused outreach team - More Permanent Supportive Housing
<p>PLACES Inc.</p>	<p>Non-profit homeless service provider.</p> <p>Provides Permanent Supportive Housing</p> <p>QP Served: 1</p>	<p>Consultations & Data Sharing</p> <ul style="list-style-type: none"> -February 3, 2023 	<ul style="list-style-type: none"> - Lack of systemwide prevention/shelter diversion to keep people housed - Lack of affordable housing units
<p>St Vincent de Paul</p>	<p>Non-Profit Homeless Service Provider.</p> <p>Prevention, Emergency Shelter, Rapid Rehousing, Permanent Supportive Housing</p> <p>QPs Served: 1-4, Veterans</p>	<p>Meetings on</p> <ul style="list-style-type: none"> -February 3, 2023 	<ul style="list-style-type: none"> - Lack of accessible resources and services in shelter (like health care and employment services) - Lack of systemwide prevention/shelter diversion to keep people housed - Availability of units (general lack of available housing) - Landlord willingness to accept vouchers - Shared concern that there are missing

			<p>services in Rapid Rehousing programs</p> <ul style="list-style-type: none"> - Lack of resources that provide furniture and other housing supplies for people moving into housing - Policy Level: Need for Eviction Sealing - Lack of resources for homeless seniors - Lack of resources for alternative housing for folks coming out of medical facilities with nowhere else to go - Increasing rents & fees -Lack of flexible funds to help keep people in their homes who are at imminent risk of homelessness
The Dayton-Montgomery County Ombudsman's Office	<p>Ombudsman.</p> <p>QPs Served: 1-4</p>	<p>Consultations & Data Sharing</p> <p>-February 7, 2023</p>	<ul style="list-style-type: none"> - Lack of assistance to help with utility bills and back debt - Landlord willingness to accept vouchers - Shared concern for incentives for landlords who may not reciprocate assistance for QPs - Lack of systemwide prevention/shelter diversion to keep people housed - Lack of flexible funds to help keep people in their homes who are at imminent risk of homelessness
United Way of the Greater Dayton Area	<p>Community Funder.</p> <p>HelpLink Referral Hotline</p>	<p>Consultations & Data Sharing</p> <p>-February 7, 2023</p>	<ul style="list-style-type: none"> - Landlord willingness to accept vouchers

	QPs Served: 1-4		<ul style="list-style-type: none"> - Availability of units (general lack of available housing) - Lack of resources and incentives for landlords (mitigation funds and landlord incentives needed) - Lack of preventative resources to keep people in their homes who are at imminent risk of homelessness - Availability of units (general lack of available housing) - Lack of beds in shelters for DV and youth - Lack of housing options and resources for veterans and seniors
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Across groups and types of consultation, including surveys, several themes emerged as key needs or concerns. Top among them is the lack of available affordable housing in the community, impacting all 4 QPs. The lack of units is compounded by landlord unwillingness to accept vouchers or rental subsidies and too many housing units that do not meet housing quality standards. Other concerns highlighted the need for a more intentional, systemic approach to prevention and shelter diversion, primarily for QPs 1-2. Consulted groups also identified a need for mitigation funds and for staff to conduct housing-focused problem solving to help keep people in housing rather than entering shelter (QPs 1-2) and navigation staff to assist those with vouchers or rental subsidies find suitable housing and complete all necessary paperwork and documentation.

PUBLIC PARTICIPATION

PUBLIC PARTICIPATION PROCESS

Montgomery County’s advertisement for the public meeting was published in the *Dayton Daily News* on February 22, 2023. Citizens had the opportunity to review and comment on Montgomery County’s HOME Investment Partnerships-American Rescue Plan Allocation Plan for a 15-day period beginning February 22, 2023, at www.mcoho.org or by requesting a copy from the Montgomery County Human Services Planning & Development Department. Public comments regarding the County’s HOME Investment Partnerships-American Rescue Plan Allocation Plan were able to be submitted via email or mail. The participating jurisdictions

followed applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodations for persons with disabilities and providing meaningful access to participation by limited English proficient residents.

Date of Public Notice: February 22, 2023
 Public Comment Period: February 22-March 9, 2023
 Date of Public Hearing: March 6, 2023 (Montgomery County)
 March 13, 2023 (City of Dayton)

EFFORTS TO BROADEN PUBLIC PARTICIPATION

In an effort to broaden public participation, the date and location of the public meeting and the dates of the 15-day comment period were announced at the public Board of County Commissioners meeting on February 21, 2023. The meeting was recorded and broadcasted.

SUMMARY OF PUBLIC COMMENTS RECEIVED

This section will be completed following the end of the public comment period, prior to submission to HUD.

SUMMARY OF PUBLIC COMMENTS NOT ACCEPTED

This section will be completed following the end of the public comment period, prior to submission to HUD.

NEEDS ASSESSMENT AND GAPS ANALYSIS

The City of Dayton and Montgomery County consulted with the OH-505 CoC to evaluate the size and demographic composition of qualifying populations within the City of Dayton and Montgomery County Cincinnati and assessed the unmet needs of those populations. Any gaps in the current shelter, service, and housing inventory were analyzed. The City of Dayton and Montgomery County also used current data, including Point-in-Time (PIT) count, Housing Inventory Count (HIC), and other data available through the CoC, along with consultations with service providers, to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, and/or services.

HOMELESS NEEDS INVENTORY AND GAPS ANALYSIS TABLE

	2022 HIC Current Inventory						2022 PIT Count				
	Family		Adult Only	Youth	Vet	DV	Family HH	Adult Only HH	Youth HH	Vet HH	DV HH
	# beds	# units	# beds	# beds	# beds	# beds					
Emergency Shelter	155	55	316	24	14	45	38	400	17	34	19

Transitional Housing	23	10	94	62	30	12	3	79	48	18	3
Rapid Rehousing	152	41	115	47	15	54	35	103	35	14	23
Permanent Supportive Housing	492	161	978	0	219	65	158	896	NA	179	62
Unsheltered Homeless PIT Count							0	34	0	1	0

Data Sources: Dayton-Montgomery County HMIS; YWCA Comparable Database

HOUSING NEEDS INVENTORY AND GAP ANALYSIS

Non-Homeless		
	Current Inventory	Level of Need
	# of Units	# of Households
Total Rental Units	83,356 (1)	
Rental Units Affordable to HH at 30% AMI (at-risk of homelessness)	10,708 (2)	
Rental Units Affordable to HH at 50% AMI (other populations)	62,533 (3)	
0%-30% AMI Renter HH w/ 1 or more severe housing problems (at-risk of homelessness)		18,715 (4)
30%-50% AMI Renter HH w/ 1 or more severe housing problems (other populations)		2,745 (5)

Data Sources: 1. American Community Survey (ACS) 2. Comprehensive Housing Affordability Strategy (CHAS) data 2015-2019 ACS

(1) American Community Survey (ACS) - 2019 numbers and pre-pandemic:

- <https://data.census.gov/table?q=total+rental+units&t=Housing+Units&g=0500000U S39113&y=2019&tid=ACSDP1Y2019.DP04> (Total Rental Units = “Occupied units paying rent” from census data) “Occupied units paying rent” = 83,356

(2) American Community Survey (ACS) - 2019 numbers and pre-pandemic:

- <https://countycorp.com/resources/area-median-income-guidelines/> (AMI for Montgomery County, as of 4/18/22)
- **1-person household** size with 30% AMI is \$17,670 using County Corp 100% AMI data. 30% of \$17,670 is \$5,301. ($30/100 = .3$; $.3 \times \$17,670 = \$5,301$) $\$5,301/12 = \441.75 per month
- <https://data.census.gov/table?q=total+rental+units&t=Housing+Units&g=0500000U S39113&y=2019&tid=ACSDP1Y2019.DP04> (Rental Units Affordable to HH at 30% AMI= “Occupied units paying rent” column, specifically using the estimate number from “Less than \$500” from census data)

- “Less than \$500” = 10,708 units

(3) American Community Survey (ACS) - 2019 numbers and pre-pandemic:

- <https://countycorp.com/resources/area-median-income-guidelines/> (AMI for Montgomery County, as of 4/18/22)
- **1-person household** size with 50% AMI is \$29,450 according to County Corp. 30% of \$29,450 is 8,835. ($30/100 = .3$; $.3 \times \$29,450 = \$8,835$) $\$8,835/12 = \736.25 per month
- <https://data.census.gov/table?q=total+rental+units&t=Housing+Units&g=0500000U S39113&y=2019&tid=ACSDP1Y2019.DP04> (Rental Units Affordable to HH at 50% AMI= *Occupied units paying rent* column, specifically using estimate number from “Less than \$500” and “\$500 to \$999” from census data)
- “Less than \$500” = 10,708 and “\$500 to \$999” = 51,825; $10,708 + 51,825 = \underline{62, 533}$ units

(4) & (5) Comprehensive Housing Affordability Strategy ("CHAS") data:

- <https://www.huduser.gov/portal/datasets/cp.html> (Data Year: 2015-2019; Summary Level: County; State: Ohio; County: Montgomery County, Ohio)
- (4) “Income by Cost Burden (Renters Only)” “Household Income less-than or= 30% HAMFI” “Cost Burden >30%” = 18,715
- (5) “Income by Cost Burden (Renters Only)” “Household Income >30% to less-than or= 50% HAMFI” “Cost Burden >50%” = 2,745

Description of the size and demographic composition of qualifying populations (QPs) within the participating jurisdictions of Dayton and Montgomery County.

HOMELESS

AT-RISK OF HOMELESS as defined in 24 CFR 91.5

FLEEING, OR ATTEMPTING TO FLEE DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING, OR HUMAN TRAFFICKING, as defined by HUD for the HOME-ARP Program.

OTHER POPULATIONS REQUIRING SERVICES OR HOUSING ASSISTANCE TO PREVENT HOMELESSNESS AND OTHER POPULATIONS AT GREATEST RISK OF HOUSING INSTABILITY, as defined by HUD for the HOME-ARP Program.

Description of the unmet housing and service needs of qualifying populations (QPs) within the participating jurisdictions of Dayton and Montgomery County.

HOMELESS

AT-RISK OF HOMELESS as defined in 24 CFR 91.5

FLEEING, OR ATTEMPTING TO FLEE DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING, OR HUMAN TRAFFICKING, as defined by HUD for the HOME-ARP Program.

OTHER POPULATIONS REQUIRING SERVICES OR HOUSING ASSISTANCE TO PREVENT HOMELESSNESS AND OTHER POPULATIONS AT GREATEST RISK OF HOUSING INSTABILITY, as defined by HUD for the HOME-ARP Program.

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

Neither the OH-505 CoC nor any of the organizations that participated in the consultation process indicate a need for additional emergency shelter. The gap related to shelter that does exist is the lack of a system-wide shelter diversion program to provide housing-focused problem solving and financial assistance when needed to keep people housed and prevent entry into shelter and homelessness. Other service gaps identified include navigation services to help qualifying populations effectively utilize housing vouchers or rental assistance and legal assistance to help prevent evictions.

The greatest gaps that exist are in the affordable housing inventory. The lack of affordable housing is greater today than it was 15 years ago. This gap is exhibited in several ways including the total number of available units, the quality of the units, and an unwillingness by some landlords to rent to people with vouchers or rental assistance. The community is still facing the consequences of the 2019 Memorial Day tornadoes that impacted 2,633 apartment units. 944 units were destroyed; another 567 suffered major damage. The loss of those units is exacerbated by rising housing costs, inflation, higher food costs, and comparatively stagnant wages. Rising rents make it more likely that households will lose their housing and the lack of available units lengthens the time that people stay in shelter. In Ohio in 2021, there were 44 available and affordable units for every 100 very low-income renters. The loss of those affordable housing units has resulted in an extremely high occupancy rate of 95%-97%, with too many households competing for the small percentage of available units at any point in time.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the participating jurisdictions will include such conditions in their definition of “other populations” as established in the HOME-ARP Notice.

Neither the City of Dayton nor Montgomery County will include such conditions in their definitions of “other populations” as established in the HOME-ARP Notice.

Identify priority needs for qualifying populations.

Priority needs across all qualifying populations include the development and preservation of affordable housing, rental assistance, navigation assistance to identify landlords and complete all documentation requirements for housing vouchers and rental assistance, and a system-wide diversion strategy to stabilize people in housing and prevent entry into emergency shelters. An additional priority need for QP 1, those experiencing homelessness, is expanded outreach to

engage persons who are sleeping unsheltered and connect them to shelter, services, and housing.

The need for additional housing, improved quality of the housing, landlord willingness to accept vouchers, and the challenges faced by all QPs in using vouchers is evident in a review of data from Greater Dayton Premier Management, the Public Housing Authority in Dayton and Montgomery County. As of January 2023, there are 488 households who have been issued a voucher who are searching for housing. The success rate is 20%. For those who are successful in using the voucher, the average time from voucher issuance to leasing is 2.5 months.

Explain how the participating jurisdictions determined the level of need and gaps in the shelter and housing inventory and service delivery systems based on the data presented in the plan.

Montgomery County Homeless Solutions, the CoC Lead in Dayton and Montgomery County, operates the CoC's homeless management information system (HMIS), which has 100% coverage of street outreach, emergency shelter (with the exception of the domestic violence shelter), and temporary and permanent supportive housing projects for people experiencing homelessness. The domestic violence shelter enters data into a comparable database. In addition to the point-in-time data presented in an earlier table, the CoC analyzes HMIS data over time, reviewing annual totals of households experiencing homelessness, demographics, and key system performance measures such as the length of time homeless and exits to permanent housing. The jurisdictions used HMIS data, census data, and the results of the consultation sessions and surveys to compare the level of need to the shelter, temporary housing and permanent supportive housing inventory listed on the CoC's Housing Inventory Chart to determine the level of need and gaps in the shelter and housing inventory and service delivery systems in the community.

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 and whether the participating jurisdiction will administer eligible activities directly.

The method for soliciting applications for funding for the development or preservation of affordable housing, administration of rental assistance, and/or implementing services will be through a Request for Proposals or Request for Qualifications process. The CoC's Affordable Housing Options Committee will play a role in the review of applications requesting funding for the development or preservation of affordable housing. The CoC's Program Performance & Evaluation Committee will play a role in the review of applications requesting funding for the administration of rental assistance or implementation of services. Before selecting a provider and committing funds to a project, the participating jurisdiction will evaluate the project in accordance with the criteria it has adopted to ensure the provider has the necessary capacity and experience and that the proposed budgeted costs are reasonable and allowable.

If any portion of the 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 participating jurisdiction’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the jurisdiction’s HOME-ARP program.

Montgomery County will not be utilizing a subrecipient or contractor to administer the HOME-ARP funding.

USE OF HOME-ARP FUNDING

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$1,768,913	46%	
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$500,000	13%	
Development of Affordable Rental Housing	\$1,500,000	39%	
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$100,000	3%	15%
Total HOME-ARP Allocation	\$3,868,913		

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

The needs assessment and gaps analysis indicated that there is a significant need for additional affordable housing units and the supportive services that will help people access affordable housing and remain stably housed. Affordable housing and services were identified as priority needs for all four HOME-ARP qualifying populations. Montgomery County expects to receive an additional allocation of U.S. Treasury Emergency Rental Assistance funding and will prioritize the smaller amount of Tenant Based Rental Assistance (TBRA) to qualifying populations who do not qualify for Treasury Emergency Rental Assistance. TBRA funds will be used for rent, security deposits, utility deposits, and utility costs.

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.

Neither the review of the shelter and housing inventory nor the consultation process identified a need for additional shelter beds. However, both the consultation process and the gaps analysis identified a need for more affordable housing in the community and key services including housing navigation, a system-wide diversion strategy, and expanded outreach.

GLOSSARY

AMI – Area Median Income

Cost burden – Monthly housing costs (including utilities) exceeding 30% of monthly income.

HAMFI – HUD Area Median Family Income. This is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents (FMRs) and income limits for HUD programs. HAMFI will not necessarily be the same as other calculations of median incomes (such as a simple Census number), due to a series of adjustments that are made (For full documentation of these adjustments, consult the **HUD Income Limit Briefing Materials**). If you see the terms "area median income" (AMI) or "median family income" (MFI) used in the CHAS, assume it refers to HAMFI.

Household (HH) – All people living in a housing unit. Members of a household can be related (see family) or unrelated.

Household Income – Adjusted household income, which includes the income of all members of the household at the time of the survey, adjusted for inflation to reflect the most recent year of the data release (e.g. 2013 dollars in the 2009-2013 CHAS data).

Severe cost burden – Monthly housing costs (including utilities) exceeding 50% of monthly income

Participating Jurisdictions (PJ):

U.S. Department of Housing and Urban Development (HUD)

Emergency Solutions Grant (ESG):

HOME Investment Partnerships program (HOME):

Community Development Block Grant (CDBG):

Continuum of Care (CoC):

QUALIFYING POPULATIONS

Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3):

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence
- (2) An individual or family who will imminently lose their primary nighttime residence
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless

At risk of Homelessness, as defined in 24 CFR 91.5 At risk of homelessness:

- (1) An individual or family
- (2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under additional sections listed
- (3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with her or him.

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

- (1) **Domestic violence**, which is defined in 24 CFR 5.2003 includes felony or misdemeanor crimes of violence committed by:
 - a. A current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
 - b. A person with whom the victim shares a child in common;
 - c. A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
 - d. A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
 - e. Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

- (2) **Dating violence** which is defined in 24 CFR 5.2003 means violence committed by a person:
 - a. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
 - b. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - I. The length of the relationship;
 - II. The type of relationship; and
 - III. The frequency of interaction between the persons involved in the
 - IV. Relationship

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

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

- a. Fear for the person’s individual safety or the safety of others; or
- b. Suffer substantial emotional distress.

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

These are defined as:

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

Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability:

- (1) **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.
- (2) **At Greatest Risk of Housing Instability** is defined as household who meets either paragraph (i) or (ii) below:
 - a. has annual income that is less than or equal to 30% of the area median income, a determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs)
 - b. has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition

For more information on qualifying populations visit:

<https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-10cpdn.pdf>

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