

Monmouth County, New Jersey **HOME-ARP Allocation Plan**



October 2022

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Attachments

SF-424

SF-424B

SF-424D

Affirmatively Furthering Fair Housing Certification

Uniform Relocation Assistance and Real Property Acquisition Policies Act and
Anti-displacement and Relocation Assistance Plan Certification

Anti-Lobbying Certification

Authority of Jurisdiction Certification

Section 3 Certification

HOME-ARP Specific Certification

Background

The American Rescue Plan Act of 2021 appropriated \$5 billion to provide housing, services, and shelter to individuals experiencing homelessness and other vulnerable populations. These funds were allocated by formula to jurisdictions that qualified for funding through the HOME Investment Partnership Program (HOME Program) from the U.S. Department of Housing and Urban Development (HUD). This special round of funding is called the “HOME-ARP” program. On September 22, 2021 the U.S. Department of Housing and Urban Development (HUD) awarded the Monmouth County HOME Consortium \$5,523,901.00 in HOME-ARP funds.

Eligible activities that may be funded with HOME-ARP include: (1) development and support of affordable housing; (2) tenant-based rental assistance; (3) provision of supportive services (such as housing counseling, homelessness prevention, child care, job training, legal services, case management, moving costs, rental applications, and rent assistance); and (4) acquisition and development of non-congregate shelter units.

Funds must primarily benefit individuals and households in the following qualifying populations:

- Experiencing homelessness (as defined in 24 CFR 91.5 “Homeless” (1), (2), or (3))
- At risk of homelessness (as defined in 24 CFR 91.5 “At risk of homelessness”)
- Fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking, (as defined in 24 CFR 5.2003)
- Other populations with high risk of housing instability (including highly cost-burdened low-income households, households who have moved two or more times in the last 60 days, and households living in a hotel/motel)

To receive HOME-ARP funding, the Consortium must develop and submit to HUD a HOME-ARP Allocation Plan, which meets the requirements in the HOME-ARP Notice and describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and community engagement, including a 15-day public comment period and at least one public hearing. The following is the draft HOME-ARP Allocation Plan.

The Consortium will submit the HOME-ARP Allocation Plan by uploading a Microsoft Word PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on the AD-25 screen of the FY 2021 Annual Action Plan.

Consultation

Before developing the HOME-ARP Allocation Plan, the Monmouth County Consortium was required to consult with the Continuum of Care (CoC) serving the geographic area, homeless and domestic violence service providers, veterans' groups, public agencies that address the needs of the qualifying populations, as well as, public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities. The Consortium also reached out to all the public housing agencies (PHAs) in the County.

The Consortium partners with many of the public and private entities who provide services and shelter facilities to the qualifying populations mentioned in the previous section. Before developing the HOME-ARP Allocation plan, the County of Monmouth's Department of Community Development consulted many of these entities. The consulted entities have relevant knowledge that can speak to the needs, service gaps, and potential activities that would best benefit the qualified populations. Entities consulted include those who work with those experiencing homelessness, at risk of homelessness, fleeing domestic violence, as well as, other populations with high risk of housing instability.

Throughout the development of the HOME-ARP Allocation Plan, staff from the County of Monmouth's Department of Community Development consulted with these stakeholders to gain their input on how to allocate the HOME-ARP funds to best address the needs of the qualified populations. Stakeholders articulated the critical and ever-present need for additional affordable housing within the County of Monmouth.

A vast majority of feedback throughout developing the HOME-ARP Allocation Plan was received at the Monmouth County Homeless System Collaborative Executive and Full Membership Committee Meetings. The following table summarizes feedback received at the January 19th, 2022 Monmouth County Funding Review Committee Meeting, this meeting served as the initial conversation. Additional comments will be summarized below the table. The Consortium will continue to meet with stakeholders throughout the implementation of the HOME-ARP activities to assess the ongoing needs of stakeholders' clients and to develop and employ strategies that will help end chronic homelessness.

Organizations consulted and summary of feedback

Agency/Organization Consulted	Type of Agency/Organization	Method of Consultation	Feedback
Monarch Housing Associates, Ending Homelessness Team	Affordable Housing Developer Consultant, Service Provider	Virtual Meeting – Monmouth County Funding Review Committee (1/19/22)	a representative discussed the need to expand the supply and accessibility of affordable, permanent supportive housing through development.
Monmouth County Continuum of Care	Service Provider	Virtual Meeting – Monmouth County Funding Review Committee (1/19/22)	a representative conferred the desperate need for low-income housing development in Monmouth County, noting the competitive housing market and high rents within the County as two of the main contributing factors to the lack of affordable housing.
Monmouth ACTS	Service Provider	Virtual Meeting – Monmouth County Funding Review Committee (1/19/22)	No specific feedback received.
Monmouth County Department of Human Services	Service Provider	Virtual Meeting – Monmouth County Funding Review Committee (1/19/22)	a representative proposed the full allocation be geared toward the development and production of affordable housing and suggests funding projects which already received HOME funds for additional homeless set asides.
Interfaith Neighbors, Inc.	Affordable Housing Developer, Service Provider	Virtual Meeting – Monmouth County Funding Review Committee (1/19/22)	a representative proposed money should be allocated to shovel ready affordable housing development projects so we can quickly assist the

			qualified populations.
Monmouth County Homeless System Collaborative	Service Provider	Virtual Meeting – Monmouth County Funding Review Committee (1/19/22)	No specific feedback received.
Monmouth County Fair Housing Officer		In-Person Meeting (6/2/22)	a representative noted the numerous complaints she has received from renting tenants in the County, citing rent increases as high as 40%, landlords taking tenants month to month instead of full year leases, lack of HUD regulated affordable housing, mostly effecting the 0-30% percentile
Long Branch Housing Authority	Public Housing Agency	Contacted via E-mail	No comments received.
Middletown Housing Authority	Public Housing Agency	Contacted via E-mail	No comments received.
Red Bank Housing Authority	Public Housing Agency	Contacted via E-mail	No comments received.
Freehold Borough Housing Authority	Public Housing Agency	Contacted via E-mail	No comments received.
Keansburg Housing Authority	Public Housing Agency	Contacted via E-mail	No comments received.
Belmar Housing Authority	Public Housing Agency	Contacted via E-mail	No comments received.
Neptune City Housing Authority	Public Housing Agency	Contacted via E-mail	No comments received.
Asbury Park Housing Authority	Public Housing Agency	Contacted via E-mail	No comments received.
Highlands Housing Authority	Public Housing Agency	Contacted via E-mail	No comments received.

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Summary of Comments Received During the Consultation Process

- During the consultation process, The Monmouth County Homeless System Collaborative’s **Permanent Housing Committee** has frequently stressed their focus on exploring possibilities for development of affordable housing. The committee also seeks to develop relationships with the Public Housing Agencies in Monmouth County to work with the Mental Health Association (MHA) of Monmouth County’s, Housing Navigator to implement homeless preference. The Housing Navigation program prioritizes and assists homeless individuals and families in obtaining permanent housing, serving as a point of exit from homelessness. **A representative** of MHA reported seeing a continuous increase in referrals since the start of the COVID-19 pandemic. This trend correlates with the need for additional affordable housing within the County.
- **A representative** of The Monmouth County CoC and **a representative** of Monarch Housing Associates, noted that they held meetings with the local PHAs in the Spring of 2021, to try and discuss establishing homeless set asides, however they report there have been some barriers as the housing authorities do not necessarily see the benefit to their agencies to partnering with the CoC despite HUD guidance encouraging CoC’s to try for this type of collaboration.
- Several of the Counties Homeless Shelters and Emergency Housing accommodations, including **180 Turning Lives Around and Linkages**, continuously reported being near or at full capacity, utilizing motels for overflow and referring clients to the Emergency Housing Voucher Program (EHV). While **Interfaith Neighbors** and **Lunchbreak**, both recipients of the Emergency Solutions Grant (ESG), reported they continue to see a high number of calls for at risk residents in need of assistance. ESG funds are used to provide mortgage assistance, rental subsidy assistance/arrears, utility payments, and security deposit assistance to low-income families in Monmouth County who are either homeless or who would become homeless without assistance. ESG also provides funding for the continuance of a Rapid-Rehousing/Homeless Prevention Program. This program assists low-income families in obtaining and/or maintaining affordable housing within Monmouth County.
- In response to the COVID-19 pandemic, the County of Monmouth received \$38,410,914.20 from the United States Department of Treasury. With this funding the County launched an Emergency Rental Assistance Program (ERAP) in May 2021. The purpose of the program was to provide rental assistance for eligible households in Monmouth County making less than 80% of the area median income in accordance with

the federal program guidelines. The County worked closely with the Department of Human Services to administer the program. Through the ERAP the County realized the vast number of renters in Monmouth County that are in crisis and at risk of losing their rental housing.

- **A representative** for the Monmouth County Department of Human Services and Monmouth ACTS (Assisting Community Through Services) made notes that although the ERAP may help the County's renter population get out of COVID-19 related arrears, the New Jersey eviction moratorium would come to an end and there would be an influx of evicted renters in need of affordable housing. In July 2021 it was reported that there were 1800 pending evictions in Monmouth County. Similarly, **a representative** of the Monmouth County Department of Social Services noted that during the COVID-19 pandemic many Monmouth County residents received unemployment benefits, the benefits served as a temporary crutch which once ceased would cause a flood of additional at-risk residents and a need for additional affordable housing.
- A representative from Soldier On, a private nonprofit organization committed to ending veteran homelessness, noted that from her experience with assisting the homeless and at risk Veteran community there is not enough quick access to permanent housing in the County, which is a necessary benchmark toward ending homelessness.

All comments received thus far have been taken into consideration and serve as the foundation for the use of Monmouth County HOME-ARP funds.

Public Participation

The Monmouth County HOME Consortium must solicit and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, the Consortium 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 Consortium must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, the Consortium must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

Public Comment Period

The draft Monmouth County HOME-ARP Allocation Plan was made available for public display and comment on the Monmouth County Office of Community Development website at <https://www.visitmonmouth.com/page.aspx?ID=2966> and available in hard copy upon request at the Monmouth County Division of Planning Office of Community Development Department. The public comment period ran October 17, 2022 through November 21, 2022. Public notice of the public comment period was published in English and in Spanish in the Star Ledger on October 11, 2022.

Public Hearing

A Public Hearing on the draft HOME-ARP Allocation Plan was held on October 27, 2022. Public notice of the hearing was published in English and in Spanish in the Star Ledger on October 11, 2022. The public comment period ran October 17, 2022 through November 21, 2022.

Description of Efforts to Broaden Public Participation

Information about Monmouth County’s HOME-ARP funding was widely distributed, through traditional avenues such as public notices, as well as, posted on the Monmouth County Office of Community Development website.

The Consortium must consider any comments or view of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summary of comments and recommendations received through the public participation process

- At a Monmouth County Homeless System Collaborative meeting, public participant, April Hurley, commended the group for brainstorming and working to prepare for the “tsunami of need” for those that will be homeless once the moratorium ceased.
- This section is pending the completion of the comment period.

Summary of comments or recommendations not accepted and reasons why

All comments or recommendations will be accepted and a response to each comment will be provided.

Inclusion of ERAP survey to participants and corresponding data

Needs Assessment Overview

The Monmouth County HOME Consortium must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, the Consortium must identify any gaps within its current shelter and housing inventory as well as the service delivery system. The Consortium should use current data, including Point in Time Count, Housing Inventory Count, or other data available through the Continuum of Care (CoC), and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Describe the size and demographic composition of qualifying populations within Monmouth County boundaries

HUD requires HOME-ARP funds be used to primarily benefit individuals and families in specified HOME-ARP qualifying populations. Qualifying populations include, but are not limited to the following:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

The Continuum of Care (CoC) is a collaborative effort to prevent and end homelessness in the Monmouth County region. The CoC for Monmouth County is led by the Monmouth County Homeless System Collaborative. The mission of the Monmouth CoC is to ensure that every resident of Monmouth County who experience homelessness or are at imminent risk of homelessness will have access to community and system resources to resolve their immediate housing crisis and facilitate their transition from homelessness to stability in permanent, affordable, and safe housing. The CoC is charged with overseeing the annual application process to the U.S. Department of Housing and Urban Development (HUD). The CoC provides a forum for analysis and discussion of emerging needs, development of program standards, and assessment of progress toward ending homelessness and identification and coordination of other sources of funding. The CoC shall implement the Monmouth County Strategic Plan to End Homelessness and monitor progress towards the plan goals.

The 2021 Point-in-Time Homeless Count & Survey was coordinated by Monarch Housing Associates and found a total of 322 people (in 244 households) experiencing homelessness on the night of January 26, 2021. On this night in 2021, 198 homeless persons stayed in emergency shelters, 98 stayed in transitional housing, and 26 were living unsheltered across Monmouth

County. Of the 244 homeless households counted on this night in Monmouth County, 44 (18%) were families with at least one child under the age of 18 and one adult. These families include 119 persons, including 72 children under the age of 18 and 47 adults. Agencies and volunteers were able to identify a total of 27 identified homeless adults between 18 and 24 years old, 219 adults over the age of 24, and 72 children under 18 experiencing homelessness on the night of the count. 56.4% of homeless persons were male, 43.6% were female.

People experiencing homelessness are disproportionately people of color; 42.2% of people experiencing homelessness in the 2021 Point in Time County were Black or African-American, whereas just 6.7% of people in Monmouth County overall are Black or African American. The next largest group at 29.2% self-identified as white, followed by those identifying as Multiracial at 3.7%. Regarding ethnicity, 13.4% of counted persons identified themselves as Hispanic/Latino.

Describe the unmet housing and service needs of qualifying populations, including but not limited to: sheltered and unsheltered homeless populations; those currently housed populations at risk of homelessness; other families requiring services or housing assistance to prevent homelessness; and those at greatest risk of housing instability or in unstable housing situations

Many of the needs of the qualifying populations are similar and include the increased flexibility in the response and referral system, an increase supply of affordable housing options, and the expansion of existing, or creation of new wrap-around, supportive services or assistance that could prevent homelessness or greater housing instability.

Similar to many other Counties in New Jersey and other states, Monmouth County is experiencing an extremely low vacancy rate in its rental market. The result is increased competition for rental units, higher prices and a market that disadvantages individuals perceived as being risky tenants. This low-vacancy rate and rising housing costs, coupled with the COVID-related regulations at emergency shelters, has left many more individuals and families without shelter.

Development of new affordable housing for the qualifying populations is needed to address the need for availability. Households who need assistance regaining housing will benefit from development.

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

The Monmouth County Consortium receives an annual allocation from HUD including funds for the Community Development Block Grant (CDBG), the Home Investment Partnership Program (HOME), and the Emergency Solutions Grant (ESG). The Consortium utilizes this funding to increase access to; safe, decent, and affordable housing, supportive services, public facilities, emergency shelter facilities, and many other services. Additionally, the Consortium received an allocation in CARES Act funding, between CDBG-CV and ESG-CV funding, to be used for activities specifically related to response to the COVID-19 pandemic.

Since March of 2021 the Monmouth County Office of Community Development has partnered with a network of other service providers that work with qualifying populations to administer the Emergency Rental Assistance Program (ERAP). This program provides rent and utility assistance to households who are at risk of losing their housing or face utility shutoffs and were impacted by the ongoing COVID-19 pandemic.

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

Monmouth County has two dedicated emergency shelters for individuals. Family shelter is available at the Linkages facility and scattered site motels. Additional emergency shelter is available for victims/survivors of domestic abuse through 180 Turning Lives Around. The County also has a network of nonprofits that provide essential stabilization services to individuals and households experiencing homelessness. A priority of the HSC is to move families and individuals out of emergency shelter to appropriate permanent housing—either relying on rapid rehousing or moving directly into permanent housing—with services, if needed, as quickly as possible.

Projects selected for funding under the Emergency Solutions Grant program provide operating costs for homeless and transitional housing facilities, health assessments, services for those leaving the prison system, prevention funds for those threatened or at risk of homelessness, and permanent housing. The Mental Health Association serves as the coordinated system for housing assistance for nonprofit rapid rehousing providers. The annual Homeless Count completed through in person outreach at shelters, churches, and soup kitchens works to gather an accurate count of the homeless population within the county and necessary services. Social service organizations distribute food, coats, clothing, blankets, and toiletries to homeless and near-homeless men, women, and children at designated locations throughout Monmouth County. In return, participants are asked to take a 12- question survey that assists social service agencies, shelters, soup kitchens and other nonprofits better serve the needy within their communities. This count provides a snapshot of homelessness in Monmouth County and is the sole source of information about the unsheltered homeless population. The strength of the unsheltered count varies from community to community. In addition, it is generally accepted

that while communities work to identify and engage all persons living unsheltered within their geographic region, the count of persons unsheltered in the community may not reflect the full population experiencing homelessness. The 2022 Homeless count reported participation by 336 individuals in emergency Shelters, 94 in transitional housing, and 23 on the street.

The Mental Health Association (Housing Navigator Agency), operates a centralized coordinated intake and assessment system. The system is designed to provide an initial comprehensive assessment of the needs of individuals at a centralized point of entry. In January 2022 the Housing Navigator Agency reported for FY2021 559 referrals were received, 520 were admitted to the system, 277 were outreached, 46 were chronically homeless at admission, and 165 were housed. In addition to coordinated entry, unsheltered persons are met by an ESG-funded Street Outreach Teams. This organization works collaboratively with multiple service and municipal agencies to ensure appropriate movement into shelter or other housing settings.

Identify the characteristics of housing associated with instability and an increased risk of homelessness (if the Consortium will include such conditions in its definition of “other populations”)

The County does not plan to formally adopt a definition of “other populations”.

Identify priority needs for qualifying populations

The priority needs for homeless populations include rapid re-housing and supportive services to achieve housing stability. For extremely low income households, priority needs include the creation of additional affordable rental units for families with less than 30% of area median income and permanent supportive housing. For low income households, as well as, households at risk of homelessness, priority needs include but are not limited to, increased homeless prevention, tenant-based rental assistance paired with supportive services to help achieve housing stability. All types of qualifying populations have a general need for supportive services, including transportation to meet basic needs, such as food, and health care.

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

The Continuum of Care meets monthly to discuss the level of need and gaps in shelter and housing inventory and service delivery systems. Also, as previously discussed the data collected from the annual Point-in-Time Homeless Count supplemented the required consultations and indicate the current needs of the area.

HOME-ARP Activities

Description of the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the Consortium will administer eligible activities directly

Funding will be allocated through a competitive application process open to all eligible entities, including municipalities, nonprofit housing organizations, and for-profit developers. To be considered eligible for Program funds, Monmouth County Office of Community Development will require that recipients, at a minimum meet the following criteria:

1. Make acceptable assurances to the County that it will comply with the requirements of the HOME-ARP Program during the entire period that begins upon selection of the recipient to receive HOME-ARP funds and ending upon the conclusion of all HOME-ARP Program funded activities.
2. Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity.
3. Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HOME-ARP Program funds to ensure compliance with all applicable requirements and regulations of such programs
4. Have demonstrated experience and capacity to conduct HOME-ARP Program eligible activities as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development.

The Monmouth County HOME Consortium 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.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$0.00		
Acquisition and Development of Non-Congregate Shelters	\$0.00		
Tenant-Based Rental Assistance	\$0.00		
Development of Affordable Rental Housing	\$4,695,315.85		
Nonprofit Operating	\$0.00	0%	5%
Nonprofit Capacity Building	\$0.00	0%	5%
Administration and Planning	\$828,585.15	15%	15%
Total HOME-ARP Allocation	\$5,523,901.00		

Monmouth County will allocate the largest amount of HOME-ARP funds \$4,695,315.85, to the development of affordable housing. Eligible costs may include, but are not limited to, property acquisition, hard and soft development costs and operating subsidies required to serve extremely low-income households. The remaining \$828,585.15 will be allocated to administration and planning.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gaps analysis provided a rationale for the plan to fund eligible activities

The current amount of unmet need is greater than the amount of resources available to meet those needs. After careful consideration and deliberation, the County proposes to use HOME-ARP funds for the development of affordable rental housing, using an estimated \$500,000 per

project. The County expects to fund approximately 10 affordable housing development projects, adding up to 40 affordable rental units to the Counties affordable housing stock.

HOME-ARP Production Housing Goals

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

Monmouth County estimates 32-40 new affordable housing units will be created from the recommended allocation.

Describe the specific affordable housing rental production goal that the Consortium hopes to achieve and how it will address the Consortium's priority needs

The estimated number of affordable housing units is expected to double the County's housing stock of available affordable rental units.

Preferences

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

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

In an effort to provide maximum program flexibility and opportunities to all County residents experiencing or at-risk of homelessness, Monmouth County has elected to not apply preferences among the qualifying populations.

(If a preference was identified) How the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the Consortium's needs assessment and gaps analysis

N/A

(If a preference was identified) How the Consortium will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference

N/A