



# Draft Nassau County HOME-ARP Allocation Plan

PREPARED FOR

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# 1

## Introduction

Nassau County was allocated \$8,835,994 in HOME Investment Partnerships Program (HOME) funds through the American Rescue Plan Act of 2021 (ARP) to assist individuals and families who are homeless, at-risk of homelessness, and other vulnerable populations. ARP, signed into law on March 11, 2021, 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.

Congress appropriated \$5 billion in ARP to be administered through HOME to address the need for homelessness assistance and supportive services. Permitted 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.

The program described in this Plan is the HOME-American Rescue Plan or “HOME-ARP.”

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; or (5) veterans and families that include a veteran family member that meet the criteria in one of (1)-(4) above.

This HOME-ARP Allocation Plan describes how Nassau County will utilize HOME-ARP funds to provide assistance to Qualifying Populations. This document has been prepared based on HUD Notice CPD-21-10 (September 13, 2021) – Requirements for the Use of Funds in the HOME-American Rescue Plan Program. This Plan includes descriptions of the consultation and public participation processes, a needs assessment and gap analysis, and the County’s proposed HOME-ARP projects.

The Nassau County Office of Community Development is the administrative agency for the HUD’s Community Development Block Grant (CDBG) Program, the Home Investment Partnerships (HOME) Program, and the Emergency Solutions Grant (ESG). The Office of Community Development has the staff, procedures, and systems in place to effectively administer HOME-ARP funds.

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## Consultation and Public Participation

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

The County engaged in a thorough consultation process prior to the preparation of the HOME-ARP Allocation Plan. The County met with the Long Island Continuum of Care (CoC), service providers, non-profit organizations, governmental agencies, the public, and other regional Participating Jurisdictions to inform the needs assessment portion of the HOME-ARP Allocation Plan and to assist in determining strategies for using HOME-ARP funding.

During the HOME-ARP Allocation Plan process, organizations and service providers consulted included: the CoC, homeless service providers, domestic violence service providers, veteran's groups, public agencies that address the needs of the qualifying populations, and organizations that address fair housing, civil rights, and the needs of persons with disabilities. Additional County agencies regularly consulted include the Department of Social Services (DSS) and the Veterans Service Agency.

The County consulted with the CoC regarding data necessary to perform the Needs Assessment and Gaps Analysis, as well as strategies for allocating the HOME-ARP resources, implementing the Allocation Plan, and identifying additional resources.

The CoC hosted a meeting with the County, other Participating Jurisdictions in Long Island, and service providers on February 1, 2022. Meeting participants provided feedback on several questions specific to the HOME-ARP Allocation Plan, including, but not limited to, whether there are other populations not specifically included as a qualifying population who should be included; what are the priority needs and unmet housing and service needs of qualifying populations, and what are the gaps within the current shelter and housing inventory.

In addition to the in-person meeting with stakeholders, a survey was created and sent out to the County's nine Public Housing Authorities, and for-profit and non-profit developers. The HOME-ARP program requires Nassau County to consult with Public Housing Agencies and other organizations that work with the qualifying populations. The feedback received assisted the County in determining priorities and how these funds will be spent.

First-hand descriptions of the needs of, and resources available to, the qualifying populations and discussions on how to use the available funding, as provided in feedback by these organizations,

greatly informed the drafting of the Allocation Plan. The organizations who were consulted with stated that the largest unmet need within the current shelter and housing inventory is the lack of affordable units for all Qualifying Populations. Other identified needs of the Qualifying Populations were identified as case management services, studio apartments with supportive services, housing for homeless without restrictions, more long term services, child care, case management services for those who are not eligible but will benefit from it, affordable housing programs for persons with intellectual and developmental disabilities, rental assistance, more Section 8 Vouchers, and a collective resource map for each community.

## Organizations Consulted

List the organizations consulted.

Summarize the feedback received and results of upfront consultation with these entities.

The table below lists the organizations consulted as part of the HOME-ARP Allocation Plan process.

**Table 1 Organizations Consulted**

Agency/Organization Consulted	Type of Agency/Organization	Method of Consultation	Feedback
Long Island Continuum of Care	Continuum of Care	Direct communication regarding data needs and collection, organization of and attendance at consultation meeting on February 1, 2022.	Provided data and feedback during calls, emails, consultation meeting in February 2022.
Long Island Coalition for the Homeless	Homeless	Attendance at consultation meeting on February 1, 2022 and public hearing on January 25, 2023.	Provided feedback during consultation meeting in February 2022 and during public hearing on January 25, 2023.
The Safe Center Long Island	Domestic Violence	Attendance at consultation meeting on February 1, 2022 and public hearing on January 25, 2023.	Provided feedback during consultation meeting in February 2022.
Nassau County Department of Social Services	Social services, homeless, housing, domestic violence, human trafficking	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting in February 2022.

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Family Service League Long Island	Emergency shelter and support services for homeless	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting and public hearing in February 2022.
Community Housing Innovations	Homeless emergency and permanent housing, other housing services	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting in February 2022.
Services for the Underserved (SUS)	Veterans, homeless, housing	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting in February 2022.
Family and Children's Association	Addiction, Mental Health (Residence and services), Youth Emergency Shelter	Attendance at consultation meeting on February 1, 2022 and public hearing on January 25, 2023.	Provided feedback during consultation meeting in February 2022.
Federation of Organizations	Housing for individuals with disabilities, community residences	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting in February 2022.
MOMMAS House	Homeless	Attendance at consultation meeting on February 1, 2022 and public hearing on January 25, 2023, and responses to HOME-ARP survey on February 8, 2023.	Provided feedback during consultation meeting in February 2022 and through HOME-ARP survey.
Mercy Haven, Inc.	Supportive housing, community residences	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting in February 2022.
Catholic Charities	Mental health, persons with disabilities, senior housing	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting in February 2022.
Family Residences and Essential Enterprises, Inc (FREE)	Residential programs, disabilities services	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting in February 2022.
Project Safety Net	Mental health, care coordination	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting in February 2022.

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Circulo de la Hispanidad	Domestic Violence	Attendance at consultation meeting on February 1, 2022 and public hearing on January 25, 2023.	Provided feedback during consultation meeting in February 2022.
Concern for Independent Living	Affordable rental housing	Attendance at consultation meeting on February 1, 2022.	Provided feedback during consultation meeting in February 2022.
Nassau County Veterans Service Agency	Social services, veterans benefits, homeless, housing,	Direct communication regarding needs of homeless and at-risk veterans on September 15, 2022.	Provided feedback during meeting and discussed potential housing projects.
The Interfaith Nutrition Network (The INN)	Homeless shelter, homeless services, soup kitchen	Responded to the County's HOME-ARP survey on February 9, 2023.	Provided feedback through the County's HOME-ARP survey.
Great Neck Housing Authority	Public housing	Responded to the County's HOME-ARP survey on February 9, 2023.	Provided feedback through the County's HOME-ARP survey.
Village of Hempstead Housing Authority	Public housing	Responded to the County's HOME-ARP survey on February 15, 2023	Provided feedback through the County's HOME-ARP survey.
Adults and Children with Learning and Developmental Disabilities, Inc (ACLD)	Services for children and adults with learning and development disabilities	Responded to the County's HOME-ARP survey on February 15, 2023	Provided feedback through the County's HOME-ARP survey.
Eager to Serve	Youth education, counseling	Responded to the County's HOME-ARP survey on February 16, 2023 and attended public hearing on January 25, 2023.	Provided feedback through the County's HOME-ARP survey.
Bethany House	Homeless shelter, services for women and children	Responded to the County's HOME-ARP survey on February 16, 2023 and attended public hearing on January 25, 2023.	Provided feedback through the County's HOME-ARP survey.



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Community Development Corporation of Long Island (CDCLI)	Housing services	Responded to the County's HOME-ARP survey on February 17, 2023.	Provided feedback through the County's HOME-ARP survey.
Long Island Housing Services	Fair housing	Attended public hearing on January 25, 2023.	No comments related to HOME-ARP.

## Efforts to Broaden Public Participation

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

Describe efforts to broaden public participation.

The County held two public hearings one on May 18, 2022 and on January 25, 2023. Comments were used to inform the HOME-ARP Allocation Plan needs assessment and to assist in determining usage for HOME-ARP funding. The County provided residents with notice and an opportunity to comment on the proposed Allocation Plan through a 15-day comment period prior to the submission of the Allocation Plan. The draft Allocation Plan was posted on the County's website. The notice was issued on the County's website and in Newsday, as widely distributed publication, on February 27, 2023 and the comment period was open from February 28, 2023 to March 14, 2023.

The public participation process is intended to encourage citizens to become involved in the funding process through identification of the needs of the low to moderate income community and qualifying populations. The qualifying populations, funding amounts, and eligible activities were described so respondents could make suggestions, identify needs, and provide comments.

Written comments were solicited via notices published in the local newspaper and posted on the County's website. In an effort to broaden public participation, the County's public hearings were both held in-person and virtually in a hybrid format, with Spanish interpretation available upon request. The meetings were advertised in the newspaper, posted on-line and e-mailed to an extensive list of service providers and stakeholders. The presentation for the January 25, 2023 meeting was available on-line in English and Spanish.

All comments from the public hearing, comment periods, and consultations were used to help inform and formulate the Allocation Plan.

## Comment Summary

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

The public hearing on May 18, 2022 was a joint hearing for HOME-ARP and Nassau County's 2022 Annual Action Plan for CDBG, HOME, and ESG funding. This meeting was attended primarily by Consortium members and representatives of non-profit organizations. No comments regarding

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HOME-ARP were received. Several members of the public and non-profit organization representatives attended the public hearing on January 25, 2023, which was a joint hearing for HOME-ARP and Nassau County's 2023 Annual Action Plan for CDBG, HOME, and ESG funding. Most comments were related to the County's 2023 Annual Action Plan. Comments related to HOME-ARP included questions about project eligibility and a comment that the County should prioritize programs and low barrier shelter for individuals and families experiencing unsheltered homelessness.

A representative of the Long Island Coalition for the Homeless, which leads the CoC, also submitted a written document identifying the need for low barrier shelter options and more supports to assist households exit homelessness from motel settings, which would decrease the average length of stay for those experiencing homelessness.

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

All comments and recommendations received regarding HOME-ARP were accepted.

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## Needs Assessment and Gap Analysis

The size and demographic composition of qualifying populations within Nassau County and the unmet needs of those populations are examined and assessed by the Needs Assessment and Gap Analysis. The gaps within the current shelter and housing inventory as well as the service delivery system were identified after consulting with the Long Island Continuum of Care, other agencies, and citizens and interested developers of affordable housing. Current census and housing data, including the Point in Time count, Comprehensive Housing Affordability Strategy (CHAS) data, and other data available through the CoC was used to identify the gap of available affordable rental units.

### Size and Demographic Composition of Qualifying Populations

Describe the size and demographic composition of qualifying populations within the PJ's boundaries.

#### Homeless

Counted in the 2021 Point in Time (PIT) counts from the CoC, there were 173 sheltered families with 625 sheltered persons in families, 508 sheltered single adults, and an estimated 60-150 unsheltered individuals in Nassau County. As of 2023, the CoC estimates a total of 462 single adults ages 55+ on Long Island (both Nassau and Suffolk Counties), approximately 55% of whom are currently in Nassau County. This notably includes a large group of aging adults who have resided in Nassau County motels for several years. The CoC notes that the aging population is growing in both Nassau and Suffolk Counties, both in shelter and on the street.

Of homeless individuals in all of Long Island (Nassau and Suffolk Counties), approximately 57% identify as Black or African American, 35% as White, 5% as Multiple Race, 2% as American Indian, and less than 1% for Asian and Native Hawaiian. Approximately 80% of homeless on Long Island identify as Non-Hispanic and 20% as Hispanic/Latino.

Trends in homelessness show that family homelessness continues to decrease while single adult homelessness continues to increase. A leading cause of homelessness amongst single adults continues

to be individuals exiting jail or prison to homelessness. Unsheltered/street homelessness has continued to increase. The population of unsheltered/street homeless is primarily single adults.

## At-Risk of Homelessness

The definition of the at-risk of homelessness qualifying population per Notice CPD-21-10 is as follows:

- An individual or family who:
  - Has an annual income below 30% AMI
  - Does not have sufficient resources or support networks
  - Meets housing instability criteria set forth in Notice CPD-21-10, such as frequent moving because of economic reasons, living in someone else's home, being evicted, self-paying to live in a hotel or motel, living in crowded housing, or exiting a publicly funded institution or system of care.
- A child or youth who does not qualify as "homeless" under Notice CPD-21-10 but qualifies as "homeless" per other federal programs as identified in Notice CPD-21-10

There are 57,385 households earning 30% or less of AMI per 2015-2019 CHAS data. Approximately 17,690 households are earning 30% or less of AMI and living in renter-occupied housing with one or more severe housing problems.

Those considered most at-risk of homeless in Nassau County, are households that have previously been homeless and the re-entry population according to the CoC. The formerly homeless households with the greatest risk of housing instability include single adults previously unsheltered with undiagnosed mental illness and/or with alcohol/substance use disorders, single adults placed in temporary housing situations without ongoing case management, and households that fled domestic violence but returned to their abusers. Families that identify as Black/African American or Latino (especially mother and child/children with mother in the generational range mostly born in 1980s-1990s), single adults that identify as White (generational range generally born in 1950s-1970s), and single adults that identify as Black/African American and are becoming homeless directly from jails or prisons (generational range is mostly born 1970s-1990s) are the demographics most at risk.

## Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Comprehensive data for the number of individuals or families who are fleeing, or attempting to flee, domestic violence, sexual assault, stalking, or human trafficking is not available. The New York State Division of Criminal Justice Services reports on domestic violence statistics on a County-wide basis and in Nassau County there were 3,323 domestic violence victims reported in 2021, including 2,645 victims of simple assault, 438 victims of aggravate assault, 139 victims of violated protection order, and 101 victims of sex offense.

According to the 2021 Point in Time Count, there were five individuals in emergency shelter, 53 in rapid re-housing, and six in permanent supportive housing.

## Other Populations

Other Populations refers to additional populations, not included in the Qualifying Populations described above, where providing supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability. This population must meet one of the following criteria:

- 1) Other individuals or families requiring services or housing assistance to prevent homelessness, such as individuals or families who have previously been qualified as homeless, are currently housed due to temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness.
- 2) Individuals or families at greatest risk of housing instability, defined as having an annual income less than or equal to 30% AMI and is experiencing severe cost burden, or has annual income less than or equal to 50% AMI and meets one of the conditions defined for the At-Risk of Homelessness qualifying population.

As of the 2021 Point in Time count, there are 113 people residing in temporary housing in the County. Approximately 3,855 households are currently using Section 8 Housing Choice Vouchers in the County. These populations may qualify under this Qualifying Population.

There are 40,305 households with an annual income less than or equal to 30% AMI who are experiencing severe housing cost burden, which represents approximately 70% of all households in this income bracket per CHAS data, and is comprised of 57% homeowners and 43% renters. There are 63,710 households earning 50% AMI or less living with one or more severe housing problems, of which 62% are homeowners and 38% are renters. Many of these households may qualify under this Qualifying Population. For an expanded description of this population, see the At-Risk of Homelessness description above.

## Current Resources Available to Assist Qualifying Populations

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.

### Homeless

Resources available to assist homeless individuals and households includes:

- Emergency shelter – 42 projects with 777 family beds, 502 single adult beds, 7 domestic violence beds, 12 youth beds, and 10 parenting youth beds.
- Temporary housing – 2 projects with 4 domestic violence beds and 10 youth beds.
- Rapid re-housing – 3 projects with 35 family beds, 13 single adult beds, and 20 domestic violence beds.

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- Permanent supportive housing – 24 projects with 233 family beds, 87 single adult beds, 29 veterans beds, 2 domestic violence beds, 2 parenting youth beds, 22 HIV beds, 28 SPMI beds, and 7 HIV/DD/PD beds.

The Nassau County Department of Social Services is the agency tasked with providing shelter placements and emergency housing to homeless persons. Public service programs are carried out by numerous non-profit organizations throughout the County. These public service programs provide services such as employment training; food pantries and soup kitchens; substance abuse prevention; mental health counseling; crime awareness; fair housing counseling, testing and enforcement; English as a Second Language (ESL) training; veteran's organizations; and public health programs. The following is a list of homeless facilities in the County:

- Peace Valley Haven
- Mommas House
- The Safe Center
- Bethany House of Nassau County Corp.
- The INN (The Interfaith Nutrition Network)
- Family & Children's Association
- A&R Multi-Service, Inc.
- ADDD/ADHD Housing Group
- B&B House LLC
- Bridges of NY
- Broken but not Destroyed
- Clear the Way Support Services
- Community Housing Innovation
- Dignity Enterprise
- Glory Recovery House
- Gospel of Peace International
- HDDIC, Inc.
- Horizon Hearts
- Leah's Home
- Allen Shelter
- New Beginning
- Regina Residence
- Smilie Hearts

## At-Risk of Homelessness

There are approximately 446,975 housing units in Nassau County, of which 360,580 (81%) are owner occupied and 86,400 (19%) are renter occupied per CHAS 2015-2019 data. Of the renter occupied housing units, 15,500 (18%) are affordable to households earning 30% of AMI, or the at-risk population. Another 14,835 (17%) rental units are affordable to households earning between 30% and 50% AMI.

Within the Nassau Urban County Consortium, there are nine public housing authorities which collectively operate and manage 3,750 public housing units and maintain approximately 1,280 Section 8 Housing Choice Vouchers. In late 2022, New York State selected the Community Development Corporation of Long Island (CDC LI) to administer the approximate 2,575 Housing Choice Vouchers previously managed by the Nassau County Office of Housing. The County will coordinate with each of these entities to ensure the HOME-ARP funding is able to take advantage of any available vouchers.

## Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Nassau County facilities for domestic violence households includes seven emergency shelter beds, four temporary housing units, 20 rapid re-housing units, and two permanent supportive housing units. Domestic violence shelter and services are provided through Circulo de la Hispanidad and The Safe Center Long Island.

## Other Populations

Services available to other populations currently include permanent supportive housing, rapid re-housing, supportive housing, and resources available to the At-Risk of Homelessness Qualifying Population. This population is also served by some of the County's Community Development Block Grant (CDBG) and HOME programs such as public services, homebuyer down payment and closing cost assistance, housing rehabilitation, and production of new affordable housing units. Per the Regional Plan Association Long Island Housing Data Profiles, Nassau County also has approximately 6,671 subsidized housing units administered by New York State, which may be a resource for this population.

## Unmet Housing and Service Needs of Qualifying Populations

Describe the unmet housing and service needs of qualifying populations.

### Homeless

The table below shows the current inventory of homeless housing and homeless population in Nassau County along with a gap analysis of permanent beds for families and adults (not including veteran, domestic violence, or other specialized housing inventory or population). The gap analysis is based on the CoC's ideal ratio for system flow of 200% total permanent housing beds to total shelter beds, with

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permanent housing consisting of rapid re-housing and permanent supportive housing and shelter defined as emergency shelter, transitional housing, and Safe Haven (Low Demand Homeless Program) housing. The County has a total of 368 permanent housing beds and 1,279 shelter beds for a total ratio of 29% permanent housing beds to shelter beds, which is well under the ideal ratio of 200%. This translates into a gap of 2,190 permanent housing beds.

**Table 2 Homeless Housing Gap Analysis**

	Current Inventory		Homeless Population		Gap Analysis	
	Family	Adults Only	In Family Household (at least 1 child)	In Adult Household (without child)	Family Beds	Adults Only Beds
	# Beds	# Beds				
Emergency Shelter	777	502				
Rapid Re-Housing	35	13				
Permanent Supportive Housing	233	87				
Ratio Permanent to Shelter	34%	20%				
Sheltered Homeless			625	508		
Unsheltered Homeless			60-150*			
Ratio of Permanent to Shelter Beds					34%	20%
Gap in Permanent Beds per Ideal Ratio of Permanent to Shelter Beds					1,286	904

\* This data combines both and adult households.

The table above breaks down the gap in ratio for family and adult household permanent housing to shelter. The County needs another 1,286 permanent housing beds for families and 904 permanent housing beds for single adults per this analysis. It is noted that emergency shelter occupancy is 84%,



therefore, the system may need fewer shelter beds. However, even with an 84% shelter occupancy, a substantial number of permanent housing beds are needed. Service providers have stated that the need for additional permanent housing for single adults and families exiting homelessness is one of the most significant needs of this population. The CoC also noted a specific need for permanent housing for homeless seniors (ages 55 and over), who often have their own specific housing and service needs, such as accessible living accommodations, transportation, health services, and access to food.

Although the current shelter occupancy rate is 84%, showing that there are more beds than needed, it has been noted by the CoC that most homeless shelters have some type of restrictive eligibility and there is a need for specialized shelters that have low barrier/broad eligibility requirements to serve the unsheltered population that is currently not able to access shelter. In Nassau County there is a large population that is ineligible for shelter due to citizenship status, while others avoid the shelters because the shelters are overly restrictive or difficult to navigate. To serve these populations, there is a need for low barrier shelters that have low barrier admission policies, such as not needing to present to DSS to access shelter, no shelter payment requirements, no sobriety requirements, and no required asset spenddown. These shelters must also have voluntary supportive service programs that assist households in accessing and sustaining permanent housing. There is also a need to upgrade some of the existing shelters in the County.

The County's service needs include supportive services, health care, job training and placement, substance abuse programs, child care and other services. Transportation to these services and to jobs is also needed. Service providers identified more long-term services, on-going rental assistance, transportation, and case management as particular needs for this population. Supportive services, including comprehensive housing focused case management, are needed for the homeless population residing in motels to help them exit homelessness and sustain permanent housing. Some motel residents are staying in their current placement for years because they do not have these necessary services.

### At-Risk of Homelessness

The most common housing problems, according to the County's 2020-2024 Consolidated Plan, are housing cost burden, which disproportionately impacts households with the lowest incomes, and a lack of affordable housing units. As previously noted, the County has 40,305 households with an annual income less than or equal to 30% AMI who are experiencing severe housing cost burden, which represents approximately 70% of all households in this income bracket per CHAS data. There is a shortage of rental units in Nassau County, and in particular, a shortage of affordable rental housing. According to the Regional Planning Association's Long Island Housing Profile 2020, "Finding affordable housing on Long Island is a challenge, especially for renters. The National Low-Income Housing Coalition calculates that a household has to make nearly \$62,000 per year to afford a modest one-bedroom apartment at fair market rent without being cost-burdened." The service providers consulted with for this HOME-ARP Allocation Plan all stated an unmet need for more affordable housing units. Affordable units are needed for all incomes below 100% AMI, but especially for the at-risk population which generally makes 30% or less AMI. The County needs additional affordable housing to serve its at-risk of homelessness population.

Unmet service needs for the at-risk of homelessness population includes rental assistance, child care, transportation, housing counseling, mental health care, substance abuse services, job training, and other services that contribute to financial stability. Formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance, in particular, often need social services aimed at gaining employment or reducing their costs so they can continue to afford housing payments.

## **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**

This Qualifying Population's needs include access to safe, sanitary, and affordable housing and services such as counseling, access to food, health services, rental assistance, legal advocacy, employment training and opportunities, and other services. Housing supply for this qualifying population is adequate to serve regional needs, per conversations with the CoC and consultation with domestic violence organizations that serve the region. Although there was an increase in domestic violence during the COVID-19 pandemic, the capacity increase in domestic violence housing was generally matched by set-aside funding through the CoC.

## **Other Populations**

Other Populations are also experiencing high rates of housing cost burden. As previous noted, there are 63,710 households earning 50% AMI or less living with one or more severe housing problems, of which 62% are homeowners and 38% are renters. To remain permanently housed, Other Populations need access to services, including rental assistance, employment benefits, daycare for children, mental health care, transportation, job training and placement, medical care, substance abuse programs and other services. This population also needs access to additional permanent affordable housing. Deeply affordable housing is scarce in the County.

## **Gaps within the Current Shelter and Housing Inventory and Service Delivery System**

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

The Nassau County Department of Social Services (DSS), CoC, and non-profit organizations work within a coordinated system in providing services for homeless individuals and families. The existing shelter inventory is adequate to meet the current needs. However, there are not enough permanent affordable housing units to permanently house the homeless population or to satisfy the needs of the other Qualifying Populations. The County is facing a substantial gap in resources to construct new permanent affordable housing for those exiting homelessness. Affordable housing is constructed in the region by both private developers and non-profit developers but there are not enough resources to sustain rents for those with the lowest incomes, such as households exiting homelessness or those otherwise at-risk of homelessness. High housing and construction costs also create barriers to the construction of affordable housing. Per consultation with the CoC and service providers, gaps in the service delivery system include not enough care coordination and case management for homeless populations and a lack of tenant based rental assistance for homeless and at-risk populations.

## Additional Characteristics if Further Refining Definition of “Other Populations”

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.

The County does not plan to refine its definition of the Other Populations Qualifying Population. All program beneficiaries assisted as Other Populations will meet one of the two required definitions in CPD Notice 21-10, Section IV(A)(4).

## Priority Needs for Qualifying Populations

Identify priority needs for qualifying populations.

Priority needs for all of the Qualifying Populations center around the need for more permanent affordable housing units and the County will seek out opportunities to assist with the production of housing focused on the needs of all Qualifying Populations. The provision of related supportive services and strengthening the capacity of contributing non-profit providers are also a priority for the County.

## Methodology

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.

This Allocation Plan follows the HOME-ARP Allocation Plan template provided by HUD and uses data from the CoC (collected through HMIS), CHAS 2015-2019 data, and the Regional Plan Association Long Island Housing Profiles. Qualitative information and assistance in providing a full assessment of the needs of the qualifying populations were obtained through consultation with the County, CoC, service providers, and the public.

# 4

## HOME-ARP Activities

### Method for Soliciting Applications

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

Describe whether the PJ will administer eligible activities directly.

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

The County plans to issue a Notice of Funding Availability (NOFA) and work with interested and experienced non-profit and for-profit developers and service providers acting as subrecipients. The County's Office of Community Development utilizes an on-line funding application that will be modified to address the particular HOME-ARP requirements. The link to the portal will be available on the County website and included in a public notice. Outreach will also include e-mails and calls to stakeholders, service providers, and developers. The selected subrecipients will manage the completed projects in accordance with HOME-ARP guidelines.

No subrecipient or contractor will be provided with HOME-ARP funds prior to HUD acceptance of Nassau County's HOME-ARP Allocation Plan.

## Use of HOME-ARP Funding

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

The County plans to allocate 80% (\$7,068,994) of its HOME-ARP allocation to the development of affordable rental housing. Another 5% (\$442,000) will be allocated each towards supportive services and non-profit operating costs. The remaining 10% (\$883,000) will be allocated for administration and planning activities.

**Table 3 Use of HOME-ARP Funding**

Activity	Funding Amount	Percent of Grant	Statutory Limit
Supportive Services	\$442,000	5%	-
Acquisition and Development of Non-Congregate Shelters	-	-	-
Tenant Based Rental Assistance (TBRA)	-	-	-
Development of Affordable Rental Housing	\$7,068,994	80%	-
Non-Profit Operating	\$442,000	5%	5%
Non-Profit Capacity Building	-	-	5%
Administration and Planning	\$883,000	10%	15%
Total HOME-ARP Allocation	\$8,835,994	100%	-

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.

It was determined during the County’s HOME-ARP consultation and public participation efforts that the most significant priority need is the development of affordable rental housing. There is a gap in funding for the construction of housing at the deepest affordability levels that would serve the Qualifying Populations, therefore, the County is allocating its largest share of HOME-ARP funding towards meeting this need. There is also a substantial need for supportive services, such as case management, to serve these populations. The County recognizes that non-profit organizations will be administering much of this funding, whether through the provision of supportive services or the development of affordable rental housing, and therefore, is allocating funds towards non-profit operating to assist these organizations in their work.

## HOME-ARP Production Housing Goals

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

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

Nassau County intends to use its allocated HOME-ARP funding to produce approximately twenty units of affordable rental housing through property acquisition and rehabilitation, conversion or new construction. The County plans to issue a Notice of Funding Availability (NOFA) and work with interested non-profit and for-profit developers and service providers acting as subrecipients. The selected subrecipients will manage the completed projects in accordance with HOME-ARP guidelines.

## Preferences and Limitations

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

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.

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.

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)

In administering its HOME-ARP Program, Nassau County plans to give preference to households that meet the HOME-ARP Notice definitions of the homeless Qualifying Population and to the homeless subpopulation of homeless seniors. This preference will be designed so as to not 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 County will not limit eligibility to a particular Qualifying Population or subpopulation.

If the County decides to fund more than one project for development of affordable rental housing, the other project or projects will either give preference to homeless seniors or will be designed with no preference.

There is currently an unmet need of permanent affordable housing for homeless seniors and a gap in resources for the construction of affordable housing specifically for homeless populations. The production of new units through conversion, rehabilitation or new construction that prioritizes this population will help lessen a portion of this unmet need and gap in funding.

There is also an unmet need and gap in funding for affordable housing for the other non-prioritized Qualifying Populations. The gap in funding, however, is greatest for households with

the lowest income who tend to fall within the homeless Qualifying Population. Nassau County will utilize other funding sources, including its annual Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grants (ESG) Program funds to address the gap in funding and unmet need. These funds may be combined with HOME-ARP funding where appropriate.

The County will utilize either the CoC's Coordinated Entry system and other referral methods, or a waitlist, to select residents for the newly produced affordable rental units. The method to be employed will be determined on a case-by-case basis as projects are selected. The current Coordinated Entry system does not include all of the HOME-ARP Qualifying Populations, therefore, if this method is chosen, other referral methods will also be used to ensure access to all Qualifying Populations.

## HOME-ARP Refinancing Guidelines

The County does not anticipate using HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

# Attachments

DRAFT