



Draft Annual Action Plan

FY2022-2023

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City of Raleigh

FY 2022-2023

Annual Action Plan

Contingency Statement

This Draft Action Plan is created using the previous year's HUD allocations, given the fact that the City's FY 2022-2023 federal allocations will not be available at the time of its publication. As in previous years, there may be slight differences in the amounts provided in Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG). Below is how the City intends to adjust the budgeting of the federal funds upon receipt of its actual allocations:

	<u>Additional funds to be budgeted to:</u>	<u>Fewer funds to be subtracted from:</u>
<u>CDBG:</u>	Housing Rehab	Housing Rehab
<u>HOME:</u>	Rental Development	Rental Development
<u>ESG:</u>	All non-HMIS grants either reduced or increased by same proportion, except no Subrecipient already fully funded will receive an increase	

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The FY 2022-2023 Annual Action Plan: Year 3 of the 2021-2025 Five-Year Consolidated Plan

The City of Raleigh's 2021-2025 Consolidated Plan (ConPlan) serves as a five-year road map with comprehensive goals and coordinated strategies to address housing and community needs of low-and-moderate-income residents. This unified, coordinated vision is a result of input from citizens, community development partners, and extensive research to determine needs. The City partners with the Continuum of Care (CoC), nonprofit and for-profit organizations, neighborhood groups, and other local governments to undertake specific actions with the strategies developed. The

Community and Economic Development Division of the City of Raleigh Housing and Neighborhoods Department administers and supports the City's ongoing community development programs.

This **2022-2023 Annual Action Plan (AAP)** represents the third year of the City of Raleigh's 2021-2025 ConPlan. The AAP is required by the U.S. Department of Housing and Urban Development (HUD) and serves as the City of Raleigh's application for federal funding. The plan identifies an entitlement community's priorities in terms of housing and community development needs for very low-, low-, and moderate-income city residents. Also, the plan identifies strategies, resources, and networks the community has developed to address those needs.

The AAP is an application for the following grants from HUD:

- Community Development Block Grant (CDBG);
- HOME Investment Partnership (HOME); and
- Emergency Solutions Grant (ESG).

In addition to these federal funding sources, local funding is also used to implement the City of Raleigh's Five-Year ConPlan. For example, over \$6 million is provided by the City's General Fund. The Community and Economic Development Division of the City of Raleigh Housing and Neighborhoods Department (Community and Economic Development) will focus on location-based projects for neighborhood revitalization and affordable housing in the coming year. Community and Economic Development created a Neighborhood Revitalization Strategy Area (NRSA) when the 2016-2020 ConPlan was adopted in 2015, and the NRSA Plan was amended in 2020 and included in the 2021-2025 ConPlan. Community Development activities are being focused within the NRSA, and the NRSA includes several neighborhood areas. College Park is an NRSA neighborhood where single-family homes are being built, and townhome construction is set to begin in East College Park. Within the northern part of the NRSA, the Village at Washington Terrace (162 units) and Booker Park South (72 units for seniors) have been completed. In south Raleigh, the relocation of existing residents and demolition of buildings was completed at the former Brown Birch apartment complex to prepare for future rental development. Nearby on Sawyer Road, city-owned lots were sold for affordable rental apartments.

A key element of the ConPlan and each Annual Action Plan is the collaborative nature of the process. For the recent ConPlan process, the City of Raleigh gathered input from citizens, consulted its community development partners such as the CoC, and conducted extensive research to determine housing and community development needs for 2021-2025.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Unmet Affordable Housing Need

There remains a substantial unmet need for decent, safe, and affordable rental housing, which continues to outpace the

ability of federal, state, and local governments to supply housing assistance and facilitate affordable housing production (Worst Case Housing Needs: 2021 Report to Congress, U.S. Department of Housing and Urban Development).

The primary housing challenge for Raleigh’s low- and moderate-income residents remains housing affordability. Raleigh is one of the fastest growing cities in the nation, and with this rapid growth has come rising land values and increased housing costs. Concurrently, incomes for lower-wage earners have failed to keep pace, with very-low (50% AMI) and extremely-low (30% AMI) income households being most affected.

Raleigh’s continued rapid growth throughout the city has resulted in increased land prices, especially near downtown. The majority of the new private market residential developments are “luxury” rentals. These trends have increased the cost of housing for all households with incomes <80% of AMI, particularly renters. Developers also continue to acquire older, modest private sector rental communities throughout the city to redevelop as upscale apartments. This both removes affordable units and contributes to the upward pressure on rents.

Rising Housing Costs Outpacing Income Increases

According to the 2020 Wake County Analysis of Impediments to Fair Housing Choice, “Housing costs have continued to increase at a faster rate than household incomes. Many Wake County residents are financially burdened by the cost of housing, especially in Raleigh.” The AI highlights when the cost of quality housing is high, low-income, and marginalized populations have more of a chance of becoming cost burdened.

The primary housing challenge for Raleigh’s low- and moderate-income residents is housing cost (see NA-05 in the 2021-2025 ConPlan). Cost burden remains the most common housing problem. A household is “cost burdened” when it expends more than 30% of its gross monthly income on housing costs: for homeowners that includes principle, interest, taxes, and insurance; for renters that includes rent plus utilities. A household is “severely cost burdened” when it expends more than 50% of its gross monthly income on housing costs. Of Raleigh’s 180,045 households, 29.5% or 53,125 households are either cost or severely cost burdened. Racial and ethnic minorities, most notably African Americans, are disproportionately affected compared to Whites.

Five-Year Priorities

The Consolidated Plan for the five years covered through June 30, 2025, will focus on three priorities:

- (1) Increasing the supply of affordable housing;
- (2) Enhancing the homeless to housing continuum; and
- (3) Increase Services to Build Self-Sufficiency & Sustainability.

While most programs will be available to residents based on need and income citywide, there will be a geographic focus to the priorities listed above: (1) College Park NRSA; (2) Citywide; and (3) Downtown Neighborhoods.

Strategies & Outcomes

Performance measurement is a process for determining how effectively programs are being implemented and meeting community needs. Each year, the City establishes measurable objectives for each program by which to measure end benefit and determine program effectiveness. Data is gathered to make this assessment to determine if programmatic activities could be improved and limited resources directed more effectively.

Strategies

- **Connecting transit to housing**

The City of Raleigh is making the connection between affordable housing and transit a priority in the current five-year ConPlan period. A cross-departmental group continues to work on identifying potential sites for housing along transit corridors and creating funding strategies and incentives to develop affordable housing at those locations. Additionally, affordable housing and transit is being prioritized by setting affordable housing goals along transit corridors and developing transit overlay districts for compatible development along transit lines. The City places a priority for tax credit funded affordable housing developments to be within walking distance of a transit stop. Starting in FY 2021-2022, the City began using the new \$80 million housing bond in part to acquire land near transit for affordable housing development.

- **Focusing on producing more affordable housing**

As the need for affordable housing continues to grow and housing costs continue to outpace income increases, the City of Raleigh is prioritizing creating additional affordable housing and preserving existing affordable housing with almost \$14 million budgeted for rental development in FY 2022-2023. The focus of affordable housing creation will be on rental to allow more units to be created and ensure long-term affordability.

- **Zoning & regulatory changes to improve housing choice and affordability**

In 2020 and 2021, City Council passed regulatory changes to help improve housing choice and affordability. One area of emphasis is on "missing middle" housing types such as duplexes, triplexes, townhouses, cottage courts, and similar housing that are common in older neighborhoods but were often prohibited or made impractical by previous zoning. In 2020, City Council allowed the expansion of the Accessory Dwelling Unit (ADU, or second dwelling units on a property with a single primary dwelling) concept to use-by-right in residential districts and permitting tiny homes (typically 400 square ft or less). Both alternative housing types could contribute to providing additional housing affordability in the City. In FY 2021-2022, the City also implemented a Transit

Oriented Development zoning overlay which provides the option for additional building height if affordable housing units are provided as part of the development. The City continues to explore ways to provide additional “Missing Middle” development types and zoning alternatives that will broaden affordable housing production in Raleigh.

- **Addressing Homelessness through Partnerships**

The City will continue its partnerships with the Continuum of Care, Wake County’s Department of Housing Affordability and Community Revitalization, and local nonprofits in addressing both the on-going needs of the City’s homeless population, as well as those exacerbated by the COVID-19 pandemic. The City and County both have received additional federal funding to provide assistance to those impacted by the pandemic and struggling to maintain or find affordable housing.

- **Affordable Housing Bond**

An affordable housing bond was approved by the voters in November 2020. The \$80 million bond will fund existing programs such as rental development, homebuyer assistance, and will also be a funding mechanism for developing affordable housing along transit lines and other public-private partnerships.

3. Evaluation of past performance.

The most recent summary of the City’s past performance in its housing and community development programs is included in the FY 2020-2021 Consolidated Annual Performance and Evaluation Report (CAPER).

FY 2020-2021 Results-At-A-Glance	
Activity	Quantity Served
Infill Houses Built and Sold	28
Substantial Housing Rehab	9
Limited Repair	20
New or Preserved Affordable Rental Units	209
Home-buying Counseling	190
Homebuyer Assistance	76
Benefit from Community Enhancement Grants	1,507
Job Training	19
Emergency Shelter	611
Rapid Rehousing	11

The chart above represents significant impact on the needs identified in the ConPlan. With additional federal and local resources available in the upcoming years, the City expects a significant increase in quantifiable impacts.

4. Summary of Citizen Participation Process and consultation process

The Planning Process

The number of public hearing attendees and comments gathered during the public input process (including public hearing comment transcripts, and comments submitted to Community Development) is included in the attachments.

Public Hearings

Participation of the general public, public organizations, and private organizations is important to the development of this Annual Action Plan (AAP). Citizen participation events included two virtual public hearings (December 7, 2021 and April 5, 2022). All citizen participation events were advertised in local newspapers at least 12-16 days in advance. As part of the 2021-2025 Consolidated Plan process, the City also gathered input from partner agencies in the community development field. The input from partner agencies helps identify and prioritize community needs, develop strategies to address the needs, identify available community resources, and promote the coordination of resources. Public participation events are advertised through flyers posted in low-income neighborhoods at public gathering spaces (i.e. libraries, community centers, and churches). In addition, these events were also advertised to non-profit organizations, on the City of Raleigh website, the Raleigh Affordable Housing website, postings on City of Raleigh Twitter page which has over 110,000 followers, postings on City of Raleigh Facebook page which has over 27,000 followers, and through the City of Raleigh Community Development email distribution list which has over 6,000 recipients.

Lead Agency: The Community and Economic Development Division within Raleigh's Housing and Neighborhoods Department acts as the primary liaison with local public agencies, nonprofit agencies, and for-profit agencies such as lenders, realtors, developers, builders, and city residents. Other agencies engaged in implementing this plan include the federal Department of Housing and Urban Development (HUD), the North Carolina Housing Finance Agency, Wake County Human Services, the Continuum of Care, and the Raleigh Housing Authority.

5. Summary of public comments:

All comments will be added to the final AAP as an attachment. The final day to submit written public comments was April 1, 2022. On April 5, 2022, the City held a Public Hearing to receive public comments on the Draft AAP. The Public Hearing was the final opportunity for citizens to submit public comments on the Draft AAP.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments were accepted.

7. Summary

There were four Annual Action Plan public meetings in March 2022, two in-person and two virtual. The City held two virtual public Annual Action Plan Hearings on December 7, 2021, and April 5, 2022. Both public hearings were advertised in newspaper announcements. A digital copy of the AAP as well as AAP summaries are available on the City website and

paper copies are available upon request.

AP-10 Consultation – 91.100, 91.200(b), 91.215 (I)

1. Introduction

Several consultation meetings were held with local organizations, as part of the development of the Consolidated Plan, to enhance agency coordination and establish consensus on the needs of special populations, including individuals that are homeless, have special needs, and/or have low incomes. These ongoing conversations occur at Continuum of Care (CoC) meetings which are held monthly. There were three Annual Action Plan public meetings in March 2022, two in-person and one virtual. The City held two virtual public Annual Action Plan Hearings on December 7, 2021, and April 5, 2022.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies (91.215(I)).

Staff members in the Community and Economic Development Division have had regular communication with affordable housing stakeholder groups in developing the Consolidated Plan to discuss developing new housing programs, maintaining existing programs, and coordinating effectively. For example, staff has met with the Raleigh Housing Authority to discuss the status and goals of their Public Housing units and Housing Choice Vouchers. In addition, the Community Development Division has hosted meetings with the Raleigh Housing Authority and other housing advocacy groups to develop the city's Affordable Housing Location Policy. At all stakeholder group meetings, the city makes sure to include housing nonprofits who serve individuals with physical and mental disabilities.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City is a member of the Raleigh-Wake Continuum of Care (CoC), and a Community and Economic Development staff member sits on the Board of Directors of the CoC's lead agency, the Raleigh Wake Partnership to End and Prevent Homelessness (Raleigh Wake Partnership). Full membership meetings of the CoC are held every month, with attendance ranging from 40-70 persons, including representatives from nonprofit agencies, government agencies, and members of the general public. Agencies receiving ESG or HUD CoC funds must participate in HMIS and Coordinated Entry and use Vi-SPDAT as the intake tool to prioritize need. Members of the CoC have worked to transform the local homeless service delivery system into a Housing First, low-barrier model. The Access Hub, which is managed by the Raleigh Wake Partnership, serves as a referral helpline for Wake County residents experiencing or at-risk of homelessness. This is the first step to connect individuals and families experiencing housing crisis to appropriate service providers. The

Coordinated Entry system uses information from HMIS to create a “By-Name” list of homeless individuals. The by-name list contains information about the background and urgent service needs of each client. The CoC uses the by-name list to match clients with homeless service providers that can accommodate their needs. The CoC also worked with the Raleigh Housing Authority on how to distribute 138 Emergency Housing Vouchers to those experiencing homelessness, prioritizing on the chronically homeless and unsheltered individuals.

The City helps fund efforts to address the needs of homeless individuals. City-funded efforts include:

- The City’s Emergency Solutions Grant (ESG) entitlement funds are awarded through a combined two-year RFP process done in partnership with Wake County. ESG subrecipients for FY2022-2023 include: Healing Transitions, who receive funds to provide emergency shelter to single women; Passage Home, who receive funds to provide rapid re-housing; and The Raleigh Wake Partnership, who receive funds to operate HMIS for the CoC.
- The City provides local funds to: Oak City Cares, who receive funds to support their weekend and holiday meal distribution program; Catholic Charities, who receive funds to provide rapid re-housing and homelessness prevention services to homeless families with children; and the Raleigh Wake Partnership, who receive funds to cover operational expenses as the lead collaborative applicant for the Wake County CoC.
- The City provides CDBG funds to the South Wilmington Street Center, which provides emergency shelter for homeless men, which also has a focus on Veterans. In addition, the City provides CDBG funding for a white flag shelter, given the need for additional space given reduced capacity at area shelters due to COVID-19.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS.

The City of Raleigh is a governance committee member of the Wake County Continuum of Care (CoC), and staff participate in monthly governance committee, membership, and committee meetings. The City and Wake County release a Combined Request for Proposals (RFP) to fund activities eligible for the Emergency Solutions Grant (ESG). The City contributes Emergency Solutions Grant (ESG) entitlement funds, and the County contributes local tax dollars to the RFP. Agencies receiving funds from the Combined RFP, whether ESG or local funds, are required to use the Homeless Management Information System (HMIS), participate in Coordinated Entry, and adhere to the CoC’s Written Standards. The City, the County, and the CoC use information from HMIS to determine if agency outcomes are meeting the standards established by the community to make homelessness rare, brief, and nonrecurring.

2. Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?

RHA: Raleigh Housing Authority provided a portion of the narrative in this Annual Action Plan (AP-60) addressing the on-going challenges administering vouchers and managing several large public housing communities.

Identify any Agency Types not consulted and provide rationale for not consulting:

None.

Describe other local/regional/state/federal planning efforts considered when preparing the Plan.

Name of Planning Effort: Wake County Continuum of Care

Lead Organization: Raleigh Wake Partnership to End and Prevent Homelessness

AP-12 Participation – 91.105, 91.200(c)

Summary of citizen participation process/Efforts made to broaden citizen participation

The citizen participation process included the following:

- Two public hearings (December 7 and April 5)
- Community Consultations with the Continuum of Care
- Draft Annual Action Plan being made available to the public for comment (30 days)
- There were four Annual Action Plan public meetings in March 2022; two in-person and two virtual.

The City of Raleigh's multi-faceted citizen participation process aided city staff in determining which populations and neighborhoods to focus on in the Annual Action Plan, ultimately impacting goal setting. Citizen participation also helps city staff determine which types of programs best serve low-income and homeless populations.

Citizen Participation Outreach

1. Public Hearing: Non-targeted/broad community
 - Summary of response/attendance
 - City Council Chambers and Online; December 7, 2021; Two Comments.
 - Summary of Comments Received

- See attachment for transcript.
- 2. Public Hearing: Non-targeted/broad community
 - Summary of response/attendance
 - City Council Chambers and Online; April 5, 2022; TBD
 - Summary of Comments Received
 - TBD
- 3. Internet Outreach: Non-targeted/broad community
 - Summary of response/attendance
 - Draft was posted on the City website. TBD commented, in the form of e-mails sent to CD.info@raleighnc.gov.
 - Summary of Comments Received
 - Email comments are included as attachments - TBD

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Raleigh plans to commit over \$35 million in federal and local funding to address housing and community development needs during the fiscal year beginning July 1, 2022 and ending June 30, 2023. This increase in funding is primarily due to the \$80 million housing bond approved by voters in the November 2020 election. Programs that will continue to receive funding include rental development, homeowner rehabilitation, and homebuyer assistance. The City remains focused on increasing and preserving the supply of affordable housing through future site development and infrastructure improvements. Site development for single-family and townhomes will continue through the City's sponsorship of the construction of affordable houses. Public service grants funded by the Community Development Block Grant (CDBG) will include Community Enhancement Grants, the South Wilmington Street Center, Homebuyer Counseling, support for the Fair Housing Hearing Board, and workforce development. ESG funds will continue to fund rapid rehousing, emergency shelter, and HMIS administration. CDBG funding will also go toward funding economic development programs.

In addition to federal funding sources, local funding is also used to implement the City's Annual Action Plan, including over \$6 million provided annually through the City's General Fund. The General Fund funds are used for Community Development priorities and play a role in the City of Raleigh's strategic plan, which includes the key focus areas of "Safe, Healthy and Vibrant Communities." The Safe, Healthy, and Vibrant Communities focus area includes initiatives that establish partnerships to provide services to homeless individuals and implement affordable housing strategies. Another bond for Affordable Housing was approved by voters in November 2020 to fund existing programs such as rental development, homebuyer assistance, and will act as a funding mechanism for developing affordable housing along

transit lines. City leaders continue to demonstrate strong support for housing and community development by providing increased local funding for programs and establishing strategic plan initiatives focused on affordable housing and addressing homelessness.

Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources : \$	Total: \$		
CDBG	public - federal	Acquisition, Admin and Planning, Economic Development, Housing, Public Improvements, Public Services, Overnight shelter	\$3,118,483	\$280,000	\$0	\$3,398,483	\$7,961,105	Homeowner rehab assistance; public services (grants to subrecipients, homebuyer training, grant to South Wilmington Street Men's Shelter, white flag shelter); site improvements ; homebuyer assistance
HOME	public - federal	Admin and Planning, Homeowner rehab, CHDO	\$1,448,216	\$100,000	\$0	\$1,548,216	\$3,196,432	homeowner rehab assistance; assistance to Community Housing Development Organization (CHDO); homebuyer assistance
ESG	public - federal	Emergency shelter, Rapid re-housing (rental assistance), HMIS	\$272,266	\$0	\$0	\$272,266	\$544,532	Grants to Subrecipients for provision of homeless assistance

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources : \$	Total: \$		
Other-Bond	public - local	Rental development, transit-oriented site acquisition, public-private partnerships. Maintenance of city owned units, bond administration	\$20,800,000	\$0	\$0	\$20,800,000	\$38,400,000	City issued \$80 million general obligation bond to pay for affordable housing activities.
Other-General Fund for Housing	Public-local	Rental development loans, tenant relocation	\$7,800,000	\$0	\$0	\$7,800,000	\$21,990,000	Multifamily rental new construction, Multifamily rental rehab, relocation

TABLE 1 - EXPECTED RESOURCES – PRIORITY TABLE

Explain how federal funds will leverage those additional resources (private, state, and local funds), including a description of how matching requirements will be satisfied

Federal funds will be used to leverage additional resources in the following ways:

- Community Enhancement Grant (CEG) funds are awarded to nonprofit programs and can be used to cover up to 50% of the program costs. Nonprofit awardees must match 50% or more of the program funding with funding from other sources.
- Affordable housing development activities include loans to private developers that build or preserve affordable rental units. The City provides funding to developers that receive federal Low-Income Housing Tax Credits (LIHTC) for rental development projects. The city loans serve as gap financing and cover any financing gaps that developers could not borrow from commercial lenders or obtain through other financing options. In this way, the loans provided by the City leverage both private dollars from developers in the form of equity, market rate loans, and public dollars from the LIHTC program. Some rental development projects may receive funding other government entities, such as the North Carolina Housing Finance Agency (NCHFA) and Wake County.
- ESG funds leverage funding for programs that assist homeless individuals and families. ESG requires dollar-for-dollar match – either from the City or from local Subrecipients. Every two years, the City partners with Wake County to

issue a joint RFP for homeless and affordable housing services. The contribution from Wake County is projected to be more than \$825,000.

- CDBG and HOME funds can be used to provide homebuyer assistance and leverage private financing obtained by homebuyers. CDBG funds are also used to fund activities associated with the construction of new housing units that provide homeownership opportunities. These CDBG and HOME funds leverage investments from private developers. Local funds will provide a match for HOME funds.
- Buyers of infill housing sponsored by the City use private lenders for first mortgage loans and often supplement the first mortgage with homebuyer assistance funding provided by the City. The homebuyer assistance funding can be used to cover down-payment costs associated with purchasing a home.
- An affordable housing bond was approved by voters in the November 2020 election. The bond is providing additional funding to existing programs such as rehab, rental development, homebuyer assistance, and will also be a funding mechanism for developing affordable housing along transit lines. This local investment represents a significant local leveraging of the federal grants the City receives.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

East College Park: Single-Family construction, the first component of the East College Park development, is underway.

The second component is the construction and sale of townhomes. The developer Evergreen Construction Company has been selected through an RFP process to build townhomes in East College Park. Overall, there will be at least 12 townhomes, with plans for the remaining sites under review due to rising cost constraints. In collaboration with the Parks, Recreation, and Cultural Resources Department, a new park broke ground during the 2021-2022 fiscal year and is expected to be completed within the 2022-2023 fiscal year.

South Park/Garner Road Area: Over the past decade, the City has invested both federal and local dollars in the South Park/Garner Road area. The City is partnering with a multi-family developer to build affordable rental units on 5.7 acres of city-owned land along Sawyer Road and in the Brown Birch Apartment site. The developer was awarded funding for two 4% tax credit from the federal Low-Income Housing Tax Credit (LIHTC) program and will receive additional gap financing from the City. The development will provide approximately 354 affordable units in an area that is witnessing heavy private investment.

West Idlewild: The West Idlewild area has been a focus area for many years. The City is in the process of selling its final 1.1-acre site in this area through a public land disposition process to the Raleigh Area Land Trust (RALT). RALT is currently in the site plan process and will likely close on the property in FY 2022-2023.

Downtown East: The Downtown East area has also been a focus area for City redevelopment for years. The City will enter into land leases for several properties in the area through a Request for Proposal (RFP) process. It is projected that these properties will produce affordable multifamily housing in FY 2023-2024.

Martin-Haywood: The City selected a builder to complete construction of affordable (LMI homebuyers) single-family homes on the remaining 10 lots. All houses will be built and sold by December 31, 2023.

Strategic acquisition to prioritize affordable housing adjacent to transit: The new \$80 million bond has provided funding, in part, to allow the City to secure ownership interest in parcels near future bus rapid transit stations and routes to guarantee housing opportunities for low- and moderate-income households, providing access to jobs, medical facilities, schools, and public amenities throughout the City.

Discussion

Funds will be used for activities that support the priorities of the Consolidated Plan:

1. Increase & Preserve the Supply of Affordable Housing;
2. Enhance the Homeless to Housing Continuum; and
3. Increase Services to Build Self-Sufficiency & Sustainability.

The City has significantly increased the local contribution to increasing or improving affordable housing opportunities within its borders, and land acquired by the City is being made available to support infill affordable housing in neighborhoods near downtown. The first year, out of five, of the \$80 million affordable housing bond was applied in FY 2021-22 and will continue to be applied to the City's affordable housing programs in FY 2022-2023.

AP-20 Annual Goals and Objectives

1 Year Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	1-Year Funding	1-Year Goal Outcome Indicator
1	Increase and preserve the supply of affordable housing	2022	2023	Affordable Housing	CITYWIDE COLLEGE PARK DOWNTOWN NEIGHBORHOODS	Supply of Affordable Housing Co-locate Affordable Housing & Transit	HOME: \$1,429,991 CDBG: \$2,063,654 Local: \$2,555,000 City of Raleigh Affordable Housing Bond: \$19,800,000 City of Raleigh GF Affordable Housing: \$7,800,000	Loans for construction of rental units: 550 Household Housing Units Homeowner Housing Rehabilitated: 40 Household Housing Units Direct Financial Assistance to Homebuyers: 25 Households Assisted Buildings Demolished: 1-2 Buildings Acquisition of Existing Units: 1 Unit
2	Enhance the homeless to housing continuum	2022	2023	Homelessness	CITYWIDE	Enhance the Homelessness & Low-Income population to Housing Continuum Increase Services to Vulnerable Populations	ESG: \$ 272,266 CDBG: \$ 200,000 Local: \$68,000	Rapid Rehousing: 8 Households Assisted Emergency Overnight Shelter (including white flag support): 1585 individuals assisted HMIS Administration Support Circles: 15 households assisted with Rapid Rehousing and 5 households assisted with Homelessness Prevention
3	Increase Services to Build Self-Sufficiency & Sustainability	2022	2023	Non-Housing Community Development Non-Homeless Special Needs	CITYWIDE	Increase Services to Vulnerable Populations	CDBG: \$711,132	Public service activities other than Low/Moderate Income Housing Benefit: 5,260 Persons Assisted (Community Enhancement Grant, Homebuyer Counseling, Fair Housing Hearing, Workforce Training) Site improvements

TABLE 2 – GOALS SUMMARY

Goal Descriptions

1	Goal Name	Increase and preserve the supply of affordable housing
	Goal Description	As the area experiences unmet affordable housing need and housing costs continue to outpace income increases, the City of Raleigh is prioritizing creating additional affordable housing and preserving existing affordable housing with local funds that include an annual General Fund contribution of ~\$7.8 million and the \$80 million affordable housing bond. The focus of affordable housing creation will be on rental to allow more units to be created and ensure long-term affordability. Preserving affordable housing will focus on homeowner rehabilitation, homebuyer assistance, and possibly the acquisition and rehabilitation of existing affordable units. The sources of funds that will be used are federal HOME Investment Partnership, the Community Development Block Grant, local General Fund dollars, and local bond money. The City will use the following programs to increase the number of affordable housing units: new construction and rehabilitation of rental units, rehabilitation of homeownership units, homebuyer assistance for down payments and second mortgages, and activities that support the development of affordable housing (public works/site improvements, acquisition, demolition, and relocation). Equitable development near transit will be one of several goals prioritized in the next five years.
2	Goal Name	Enhance the homeless to housing continuum
	Goal Description	This goal addresses enhancing the continuum from shelter to permanent housing for persons who are homeless. The source of funds will be the federal Emergency Solutions Grant. The City also provides \$100,000 CDBG each year to support the men's shelter that Wake County owns and operates in the city, as well as \$100,000 to support an additional white flag emergency shelter.
3	Goal Name	Increase Services to Build Self-Sufficiency & Sustainability
	Goal Description	Through meeting needs of those in the community through services and resources, the City of Raleigh seeks to help build self-sufficiency and sustainability in people's lives through funding non-profit programs, housing counseling, workforce development training, the Fair Housing Hearing Board, and economic development. The source of funds will be the Community Development Block Grant.

AP-35 Projects – 91.220(d)

Introduction

An Annual Action Plan (AAP) is required for each year of the Five-Year Consolidated Plan (ConPlan). This AAP covers July 1, 2022, through June 30, 2023 and is the third year of the City's 2021-2025 ConPlan. The AAP implements strategies outlined in the ConPlan by addressing the housing needs of very low-, low-, and moderate-income citizens of Raleigh. The AAP enables investors, nonprofit organizations, program administrators, elected officials, and concerned citizens to work with the City to develop affordable housing and community development programs.

In FY 2022-23, the City anticipates a budget for housing and community development of over \$35 million from federal and local resources. This money will be used to increase and preserve the supply of affordable housing through the homeowner rehabilitation program, homebuyer assistance (for down payment assistance and second mortgages), and the development of affordable rental units. Supporting the production of affordable housing are site improvements which help with activities such as updating infrastructure, the acquisition of land and housing, the demolition of buildings, and relocation.

From shelter operations to finding stable housing, the federal Emergency Solutions Grant helps fund non-profits serving people experiencing or at risk-of homelessness. In the coming year, the City of Raleigh will fund rapid rehousing, emergency shelter, and the administration of the Homeless Management Information System (HMIS). HMIS is a central database used to collect data on homeless service clients and data on housing and other services provided to each client.

The following organizations were selected for funding from the City's Emergency Solutions Grant (ESG) allocation [see table 1].

Agency	Approximate Award (year 1)	Use of the Funds
Healing Transitions	\$132,715	Emergency Shelter
Passage Home	\$63,051	Rapid Re-Housing
Raleigh Wake Partnership to End & Prevent Homelessness	\$76,500	HMIS
Total City ESG Funding	\$272,266	

Table 1 - Combined ESG Funding for FY 2022-2023, Second Year (of Two): City of Raleigh ESG

With the goal of increasing services to build self-sufficiency and sustainability, the City will fund homebuying counseling, workforce development training, operating costs of the South Wilmington Street Center, economic development (through the Façade Improvement Grant and the Building Upfit Grant), and the Community Enhancement Grant (CEG). The CEG funds are awarded to local agencies that support neighborhood improvements or innovative services for low-income persons or “special populations” such as disabled, elderly, homeless, etc.

2022

The following are the proposed nonprofits recommended for funding for CDBG public service funding through the CEG program for FY2022-2023 pending Council approval in April [See table 2].

Agency	Recommended Award	Use of the Funds
Raleigh Wake Partnership to End Homelessness	\$58,000	Access Hub Expansion
The Green Chair Project	\$51,000	Family Furnishings Program
StepUp Ministry	\$56,000	Advancing Opportunities for Low Income Raleigh Residents
YMCA of The Triangle	\$43,000	Workforce Development
Loaves and Fishes	\$22,000	Out-of-School Tutoring and Youth Engagement

Table 2 - Community Enhancement Grant, FY 2022-2023: Selections for Funding, \$230,000 Total

The projects listed below are funded with only federal funds or a combination of federal and local funds in the Annual Action Plan year.

Projects

#	Project Name
1	Housing Rehab- 22/23
2	Homebuyer Assistance- 22/23
3	Rental Dev- 22/23
4	Pub Works/Site Imprv- 22/23
5	Acquisition- 22/23
6	Relocation- 22/23
7	Demolition- 22/23
8	Admin- 22/23
9	HESG- 22/23
10	Public Service- 22/23
11	Economic Development- 22/23

TABLE 3 – PROJECT INFORMATION

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

All allocation priorities support the overall priorities of the Consolidated Plan and address underserved needs of lack of affordable housing, homeless services and housing, supportive housing, and services to build self-sufficiency. The main obstacle in addressing underserved needs is that the needs of the community outweigh the funding available to address the needs.

1	Project Name	Housing Rehab-22/23
	Target Area	CITYWIDE
	Goals Supported	Increase & Preserve the Supply of Affordable Housing
	Needs Addressed	Supply of Affordable Housing
	Funding	CDBG: \$1,299,555 Local: \$1,500,000 (Bond) HOME: \$90,000
	Description	Rehabilitation of substandard housing. The City has two types of owner-occupied home rehabilitation programs – substantial and limited repair. \$97,055 CDBG will also be spent on rehab-related Activity Delivery Costs.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 15 low and moderate-income homeowners will benefit from substantial rehabilitation and 25 low-income homeowners will benefit from limited repair.
	Location Description	Citywide

	Planned Activities	Approximately 40 housing units to be rehabilitated.
2	Project Name	Homebuyer Assistance- 22/23
	Target Area	CITYWIDE
	Goals Supported	Increase & Preserve the Supply of Affordable Housing
	Needs Addressed	Supply of Affordable Housing
	Funding	Housing Bond: \$1,500,000 CDBG: \$200,000 HOME: \$200,000
	Description	Down payment assistance and second mortgages to low-and-moderate-income homebuyers.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	25 low-and-moderate-income homebuyers will benefit from homebuyer assistance.
	Location Description	Citywide
	Planned Activities	75 households will receive down payment assistance and second mortgages through homebuyer assistance.
3	Project Name	Rental Dev- 22/23
	Target Area	CITYWIDE DOWNTOWN NEIGHBORHOODS
	Goals Supported	Increase & Preserve the Supply of Affordable Housing
	Needs Addressed	Supply of Affordable Housing Co-locate Affordable Housing & Transit Affordable housing connected to public amenities
	Funding	Local General Fund: \$7,800,000 Housing Bond: \$4,800,000 Bond Revenue: \$1,115,000 HOME: \$1,039,991 (Includes CHDO)
	Description	Funding of the development/production of affordable rental housing.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 550 housing units will be constructed or preserved to benefit low-to-moderate income households.
	Location Description	Citywide Downtown Neighborhoods

	Planned Activities	Financial assistance to create affordable housing units over several years. Out of the HOME funding total, \$217,232 will be provided for Community Housing Development Organization (CHDO) activities.
4	Project Name	Pub Works/Site Improvements – 22/23
	Target Area	COLLEGE PARK NRSA, CITYWIDE
	Goals Supported	Increase & Preserve the Supply of Affordable Housing
	Needs Addressed	Supply of Affordable Housing Affordable housing connected to public amenities
	Funding	CDBG: \$221,133
	Description	Design/Planning Contracts, Environmental Assessments, Street Infrastructure, Site Improvements. An additional \$69,133 CDBG will be spent on Activity Delivery Costs.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The site improvements in the upcoming year are expected to have an area-wide benefit citywide and in the NRSA, particularly the East College Park portion.
	Location Description	Proposed area: East College Park, Citywide
	Planned Activities	Installation of infrastructure and grading sites to prepare for development.
5	Project Name	Acquisition – 22/23
	Target Area	CITYWIDE
	Goals Supported	Increase & Preserve the Supply of Affordable Housing
	Needs Addressed	Supply of Affordable Housing Co-locate Affordable Housing & Transit Affordable housing connected to public amenities
	Funding	Bond: \$8,000,000
	Description	Acquisition of property to benefit Low/Mod Renters.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Future acquisition will support LMI housing benefit.
	Location Description	Citywide
	Planned Activities	Targeted acquisition to support ongoing projects through a Request for Letters of Interest process.
6	Project Name	Relocation – 22/23
	Target Area	CITYWIDE DOWNTOWN NEIGHBORHOODS

	Goals Supported	Increase & Preserve the Supply of Affordable Housing
	Needs Addressed	Supply of Affordable Housing
	Funding	CDBG: \$89,099
	Description	Provision of moving expenses and relocation costs for existing occupants of units to be demolished. Relocation Assistance provided to Low/Mod Beneficiaries.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Occupants affected by City-sponsored redevelopment activities will be relocated.
	Location Description	N/A
	Planned Activities	Relocation from redevelopment.
7	Project Name	Demolition – 22/23
	Target Area	CITYWIDE
	Goals Supported	Increase & Preserve the Supply of Affordable Housing
	Needs Addressed	Supply of Affordable Housing
	Funding	CDBG: \$45,000
	Description	Demolition of blighted properties.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Area-wide benefit
	Location Description	Citywide
	Planned Activities	N/A
8	Project Name	Admin– 22/23
	Target Area	CITYWIDE
	Goals Supported	Increase & Preserve the Supply of Affordable Housing
	Needs Addressed	Increase & Preserve the Supply of Affordable Housing Homelessness & Low-Income to Housing Continuum Increase Services to Vulnerable Populations
	Funding	Local: \$1,200,000 CDBG: \$623,697 HOME: \$118,225
	Description	Administration Costs for Program Year 2022-2023, including admin for a new bond, and support for the fair housing hearing board conference (\$5,000).
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	These are administrative costs which allow the City to carry out activities proposed in this plan.
	Location Description	Citywide
	Planned Activities	Eligible costs to administer federal grants and locally funded housing initiatives.
9	Project Name	HESG- 22/23
	Target Area	CITYWIDE
	Goals Supported	Enhance the homeless to housing continuum
	Needs Addressed	Homelessness & Low-Income to Housing Continuum Increase Services to Vulnerable Populations
	Funding	ESG: \$272,266
	Description	HESG funds will be used to provide: (1) emergency shelter to homeless individuals and families; (2) rapid re-housing; and (3) funds to support the Homelessness Management Information System (HMIS) for the Continuum of Care (CoC) area.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 300 individuals will receive overnight emergency shelter and 8 households will receive rapid re-housing assistance.
	Location Description	Citywide
10	Planned Activities	The following organizations were selected for funding from the City's Emergency Solutions Grant (ESG) allocation: Healing Transitions: \$132,715 Emergency Shelter for Single Women Passage Home: \$63,051 Rapid Re-Housing for Families and Individuals Raleigh Wake Partnership to End & Prevent Homelessness: \$76,500 HMIS Management
	Project Name	Public Service – 22/23
	Target Area	CITYWIDE
	Goals Supported	Increase Services to Build Self-Sufficiency & Sustainability
	Needs Addressed	Increase Services to Vulnerable Populations Homelessness & Low-Income to Housing Continuum
	Funding	CDBG: \$490,000
	Description	Public Service Activities - Community Enhancement Grants – Non-Profit Support and Emergency Shelter Support
	Target Date	6/30/2023

Estimate the number and type of families that will benefit from the proposed activities	Approximately 5,260 low- and moderate-income individuals will benefit from public services, including workforce training, through the Community Enhancement Grant. Homebuyer counseling will assist approximately 200 people. The men's shelter will assist approximately 635 people. The white flag shelter will assist approximately 650 people.
Location Description	Citywide
Planned Activities	Federal funding will go toward Homebuyer Counseling (\$60,000); Wilmington St. Men's Shelter Operations (\$100,000); the Community Enhancement Grant (\$230,000) agency funding recommendations, and white flag shelter support (\$100,000).

AP- 50 Geographic Distribution

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed.

College Park NRSA:

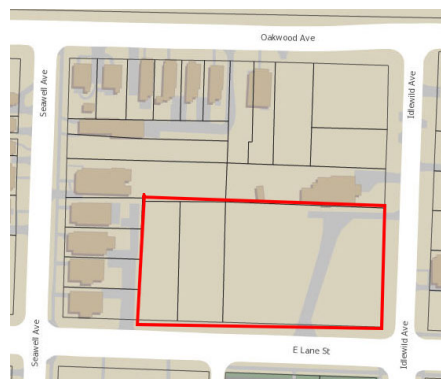
East College Park is part of the Neighborhood Revitalization and Strategy Area (NRSA). The City sought the NRSA designation for many reasons, including helping to mitigate the rising cost of housing in the area due to market forces. Once the plan was approved, the City began to undertake the largest infrastructure project it's ever implemented with CDBG funds. The construction began in Spring of 2016 with project costs over \$5 million. The City is focusing on building infill housing on lots purchased with previous investments. These investments are providing citizens with a range of incomes access to homeownership. In East College Park, the City is managing a mix of 60% of homebuyers under 80% of the Area Median Income and 40% of homebuyers unrestricted by income limits. The mixed pricing strategy is being used to establish a diverse mixed-income community.

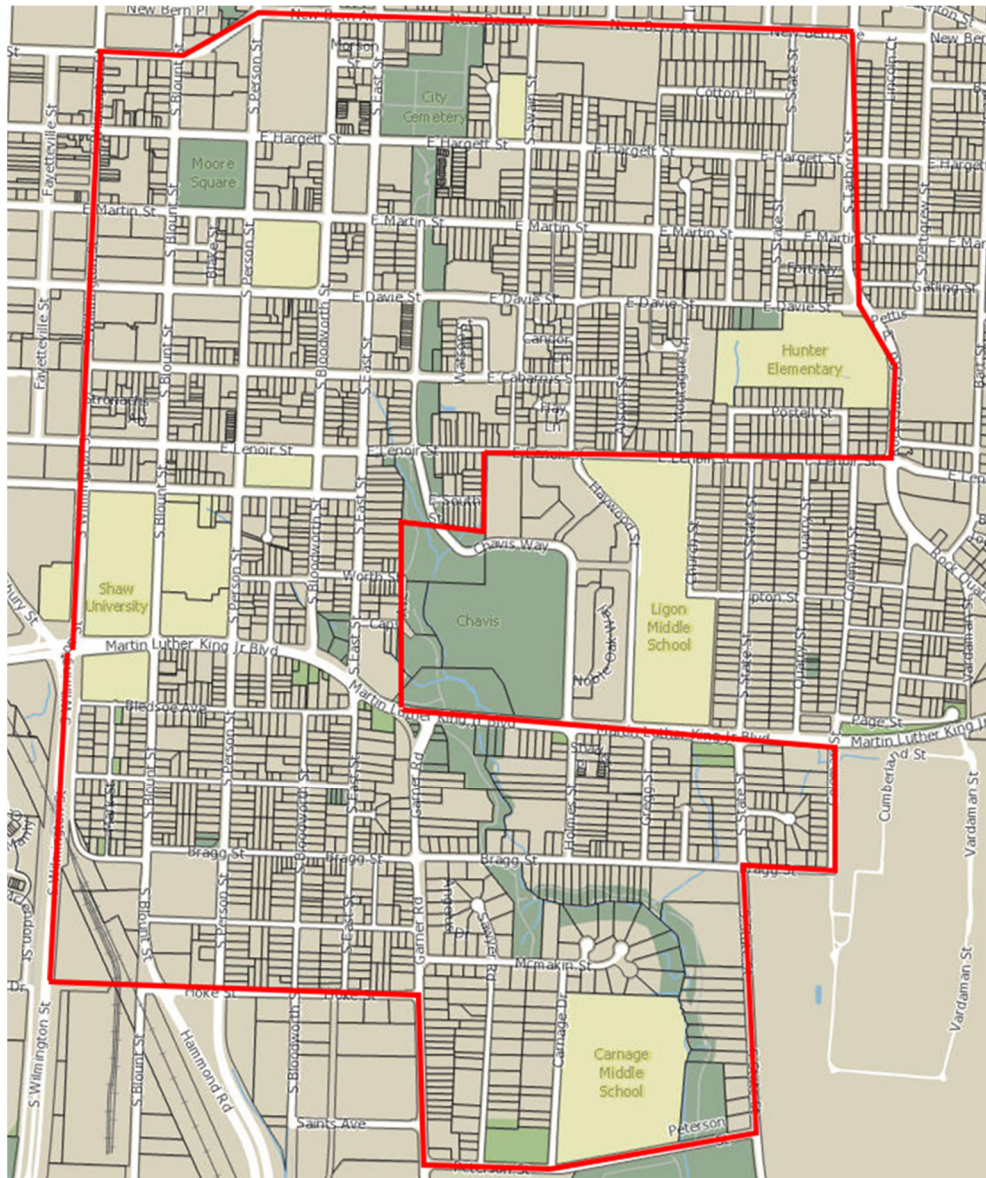
developer is working with Passage Home, a non-profit and a multi-family developer, to build additional affordable rental units in the adjacent area as well with LIHTC. The City of Raleigh will assist in the financing of approximately 200 apartments units that are being proposed on the Brown Birch apartment site.

West Idlewild: The West Idlewild area has been a focus area for many years. The City is in the process of selling its final 1.1-acre site in this area through a public land disposition process to the Raleigh Area Land Trust (RALT). RALT is currently in the site planning process and will likely close on the property in FY 2022-2023.

Downtown East: The Downtown East area has also been a focus area for years. It is the intent that City will dispose of several properties in the area through a Request for Proposal (RFP) process. It is projected that these properties will produce higher density affordable rental housing.

Martin-Haywood (23 City-owned lots): The City selected a builder to complete construction of affordable (LMI homebuyers) single-family homes on the remaining 10 lots. All houses will be built and sold by December 31, 2023.





Downtown Neighborhoods Geographic Priority Area

Citywide:

City-owned properties are being sold for the purpose of creating affordable housing development throughout the City of Raleigh. The City of Raleigh is focusing on creating affordable housing through rental development. Rental Development loans are applied citywide. Homeowner Rehabilitation programs (substantial and limited repair) and the Homebuyer Assistance program can be used by residents anywhere in Raleigh. Furthermore, funding awarded for non-profit services, workforce training programs, and homebuyer counseling benefit Raleigh residents regardless of where they live in the city. Because most of Community & Economic Development's programs are not bound by a specific target area, the majority of funding is described as "citywide."

Geographic Distribution

Target Area	Percentage of Funds
DOWNTOWN NEIGHBORHOODS	5
CITYWIDE	80
COLLEGE PARK NRSA	15

TABLE 4 - GEOGRAPHIC DISTRIBUTION

Rationale for the priorities for allocating investments geographically

Historically, the City of Raleigh has invested Community Development Block Grant (CDBG) funds in its Redevelopment Areas. Redevelopment Areas were created in “blighted” neighborhoods and served as target areas for neighborhood revitalization programs. The City remains active in redeveloping blighted areas and created a Neighborhood Revitalization Strategy Area (NRSA) and the geographic priority area of “Downtown Neighborhoods” to serve as a target area for investment. Within the NRSA, East College Park is being developed with affordable single-family housing and townhomes. The Downtown Neighborhoods area encompasses many different redevelopment areas, including South Park, Garner Road, West Idlewild, Downtown East, and Thompson Hunter (Martin-Haywood). During the next two years, the primary City action in Downtown Neighborhoods will be *sale* of lots acquired in the past which is reflected in the lower percentage of funds projected to be spent in this area.

In recent years, a greater percentage of federal funding (CDBG, HOME) has been allocated to affordable rental development and rehab. The affordable apartment development is not isolated to the NRSA and may occur in any area throughout the city. Therefore, the “Citywide” designation has grown as a percentage of geographic distribution. ESG funds are used to serve a population that is not tied to any specific area and are considered “Citywide.”

Discussion

The City of Raleigh has been successful in its geographic allocation of housing and community development investments. Investment activities have been focused in target areas within the NRSA, such as the NRSA and the East College Park Neighborhood. Over the years, the City has removed blight and created new affordable housing opportunities. The South Park and Garner Road areas have been focus areas for several years. In both target areas, the City is working with developers to create new affordable infill housing.

There has been a shift since 2016 to sponsor new affordable rentals citywide outside of redevelopment areas. This has caused the percentage of funds in the Citywide target area to expand. The Affordable Housing Improvement Plan focuses on the need for affordable rental and a constant funding source. Subsequently, a General Fund source fund was created, and the City began soliciting 4% bond deals along with the 9% tax credit deals. This strategy has allowed the

City to participate in additional affordable housing developments, many along transit corridors and in areas that had never had affordable housing investment.

AP-55 Affordable Housing 91.220(g)

Introduction

The one-year goals for affordable housing are outlined below.

Homeless Shelter Support

Approximately 1,585 people experiencing homelessness will also be served in the coming year through overnight shelter by providing funding for shelter operating costs, including white flag shelter support.

Additional Housing Support

An additional City-funded grant that the Community and Economic Development Division administers is to Catholic Charities for their Support Circles program. This program is projected to serve 5 families through homeless prevention and/or rapid re-housing and stably re-house 15 homeless families in permanent housing. The goal for special needs households supported estimates the number of units to be developed for special needs populations based on previous years. Special needs households include the elderly, persons with mental, physical, and developmental disabilities, persons with alcohol or other addictions, persons with HIV/AIDS, and victims of domestic violence. For most of these populations, the City of Raleigh can only report on these populations if they are self-identified.

The one-year goal of households supported through “Rental Assistance” is an estimation of the households to be assisted through ESG funded rapid re-housing (8 households). Added with locally funded re-housing and homelessness prevention services (15 households), a total of 23 households experiencing homelessness are estimated to receive rental assistance. The goal for “the Production of New Units” estimates the number of new units to be constructed. This total includes 550 federally funded and locally funded through the General Fund and Bond, plus homeowner housing units added through the construction of single-family and townhomes. The goal for the “Rehab of Existing Units” estimates the number of homeowners that will receive funding to rehabilitate their homes through the substantial and limited-repair programs (40 households federally and locally funded). The City’s Limited Repair Rehab program provides forgivable loans to very low-income, elderly and/or disabled owner households, with priority given to those who are elderly or disabled.

Homeless	1598
Non-Homeless	6050
Special Needs	25

**One Year Goals for the Number of
Household Type**

Total	7,673
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Households to be Supported by

One Year Goals for the Number of Households Supported by Program:

Rental Assistance	23
The Production of New Units	567
Rehab of Existing Units	153
Acquisition of Existing Units	1
Total	744

Discussion

Raleigh is one of the fastest growing cities due in part to the growth of companies coming the city and in the region. Raleigh is home to a cluster of technology-based companies, and the technology industry is growing rapidly. According to the Census Bureau, Wake County is growing by an average of 22,600 people each year. This growth has created an influx of new, high-income residents moving into the city, and the high-income residents can afford to pay higher rents and purchase more expensive homes. The area's prosperity creates a challenge for low- and moderate-income (LMI) residents. LMI residents must compete with high-income residents for available housing, and this competition causes LMI residents to become cost-burdened (spend over 30% of income on housing). Median household income has not kept pace with rising housing costs.

The rising cost of housing has also created challenges for agencies working to develop affordable housing, especially with declines in federal funding for housing programs. The need for affordable housing is large and growing. Naturally occurring affordable housing (NOAH) and publicly subsidized units are lost each year, and it is a challenge to provide housing for the growing need. The City is striving to meet the housing challenge through increased investment of local funds and selling city-owned land for the development of affordable housing. The City is also seeking ways to preserve and expand the supply of affordable housing in high-cost areas and near transit lines.

AP-60 Public Housing

Introduction

The ability to serve families in need of subsidized housing depends on federal appropriations. Budgetary constraints on the federal level directly impact the Raleigh Housing Authority (RHA). RHA operates one conventional public housing waiting list and four incentive public housing waiting lists. Individuals interested in applying are encouraged to submit applications for all programs in which they wish to participate as this provides the greatest number of options to the family. Public housing waiting lists have a one-in, one-out process, which means that in order to house a family from the waiting list, another family must first vacate the home. Wait times for public housing is pending the rate of turnover and varies based on family size and need. Currently, the typical Wake County family will wait between one and five years.

Actions planned during the next year to address the needs to public housing

RHA receives HUD funding through the Capital Fund Program (CFP) to assist with unit modernization, development, and maintenance costs of public housing units community wide. The following Capital Fund work items are either underway or recently completed:

- Installation of security cameras throughout sites as needs are identified.
- Replacement of outdated plumbing in a 60-unit development as units are turned during vacancies.
- Asbestos abatement portfolio wide during vacancy turns as needed.
- Installation of new luxury vinyl-plank flooring during vacancy turns.
- Installation of smart burners and other safety equipment during vacancy turns as needed.
- Roof replacement, façade replacement and exterior waterproofing at 14-story senior building, Glenwood Towers.
- Roof replacement, façade replacement and exterior waterproofing at 8-story senior building, Carriage House.
- New fire alarm system installation at Carriage House.
- Parking lot pavement resurfacing at communities as needed.
- Lead based paint testing at all pre-1978 multifamily developments.
- Radon testing and mitigation at vacancy turns as needed.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

RHA recognizes the benefit of having its residents be involved with the communities while working towards a greater level of self-sufficiency. RHA regularly shares and promotes opportunities to achieve this with residents. RHA promotes the following programs for residents:

a. **Homeownership:** RHA offers an Incentive Public Housing program that helps ready families for homeownership. The families that qualify for these homes based on a working preference are required to attend and complete home buyer's training classes annually. RHA continues to offer or provide referrals to workshops on money management and homebuyer education to assist in future homeownership. This program works with families to establish and/or improve credit, save for down payments, shop for financing, and select houses. The residents of this program have a ten-year rental program opportunity to prepare and achieve their goals.

b. **Supportive Services:** RHA has developed Memoranda of Understanding with community partners to better serve the needs of families of public housing. Communities In Schools of Wake County (CIS Wake) continues to be a crucial partner in the delivery of services in public housing. CIS Wake operates after-school and summer programs in several public housing communities. The children attend these centers at no cost to their families. In partnership with AT&T and Google Fiber, free internet service and digital literacy classes are offered in some of the public housing communities. Partnerships such as these provide a plethora of resources and benefits to residents that would otherwise not be possible due to lack of additional funding for supportive services.

c. **Community Involvement:** RHA continues to coordinate services with other agencies in the Raleigh area; including the Police Department, City Inspections, Community & Economic Development, and Parks and Recreation Department. In addition to the CIS centers, RHA provides space to a daycare center, Meals on Wheels, Inter-Community Council office, St. Saviour's Outreach Center, the Diaper Train and Arts Together. The RHA staff is actively involved with coordinating programs with many community agencies; including Wake County Human Services, Communities-In Schools of Wake County, InterAct, Coordinated Entry, and Alliance Health. The faith community is involved in the public housing communities, and many churches take an active role in programs in various communities.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The Raleigh Housing Authority continues to be rated as a high performer by the U. S. Department of Housing and Urban Development's management assessment system. RHA's Housing Choice Voucher program maintains high usage percentages and is highly rated by HUD. RHA is not designated as troubled by HUD and remains committed to its mission to provide safe, quality, affordable housing to low- and moderate-income families in the greater Raleigh community. RHA also promotes personal responsibility and self-sufficiency of residents while maintaining the fiscal integrity of the agency.

Discussion

As a federally funded agency, RHA is impacted by budget decisions made by HUD. HUD provides guidance that funding for public housing will remain less than 100% of eligibility, so funds are not available to serve 100% of eligible families. Housing authorities are encouraged to find alternative means to modernize public housing units and use operating capabilities for activities that depend less on federal subsidies.

RHA is taking steps to preserve and enhance its housing inventory through the Rental Assistance Demonstration Program (RAD). RHA has successfully received a RAD portfolio award to convert some public housing communities to a project-based voucher platform. This conversion provides a more stable funding source from HUD as well as provide residents with a greater variety and choice of housing options. The conversion process has begun for the first four communities and RHA anticipates closing on this in 2022.

RHA has been selected as one of three Building Futures Initiative pilot sites. This program aims to increase and improve employment opportunities for residents to participate in Section 3 employment, education and training opportunities in the construction and building performance sectors. Partner agencies have been brought in to help create a well-rounded environment for our residents. RHA has sponsored virtual and outdoor events to help educate residents on the current offerings, scholarships available, childcare, transportation assistance and more.

RHA has been moving forward with exploring the possibility of redeveloping the Heritage Park community. Strategizing for the potential and impact of a redevelopment has begun. RHA remains committed to protecting and increasing affordable housing within the city of Raleigh. Future activities may include affordable housing purchases, redevelopment, demolition and/or disposition.

RHA works with supportive services and other agencies to promote employment and personal responsibility for residents. RHA intends to provide residents with a pathway to financial stability and self-sufficiency. RHA will work to maintain a quality portfolio of affordable housing despite proposed changes to regulations and declining federal funding.

AP-65 Homeless and Other Special Needs Activities - 91.220(i)

Introduction

The information in this section discusses the current state of homeless services in Raleigh and Wake County. This section also discusses activities that the City of Raleigh, Wake County Government, and the Continuum of Care (CoC) work together to complete. All partners are working toward full incorporation of HUD requirements and best practices in service delivery to homeless households and consistent services and programs across the CoC.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs:

Outreach to homeless persons is done in a variety of ways:

1. Oak City Cares is a non-profit and multi-services center that connects individuals and families at risk of, or currently experiencing, homelessness to coordinated services. Through partnerships with more than 20 community providers the Center serves as an entry point for accessing programs operated by local partner agencies. The property for Oak City Cares was acquired by Wake County on March 29, 2017, and the City contributed \$3.14 Million toward the property purchase and construction costs. The County and City were the primary funding sources for acquisition and construction. Oak City Cares is located next to the South Wilmington Street Center, which is the single men's homeless shelter owned and operated by the County. Oak City Cares provides an integrated set of homelessness prevention, assessment, case management, advocacy, access, and referral services and resources targeted to:

- Reduce the number of contacts people experiencing homelessness must make before finding crisis housing or services;
- Reduce new entries into homelessness through coordinated, system wide diversion and prevention efforts;
- Prevent people experiencing homelessness from entering and exiting multiple programs before getting their needs met;
- Minimize the need for individual provider wait lists for services;
- Foster increased collaboration between homelessness assistance providers;
- Improve a community's ability to perform well on Homeless Emergency Assistance and Rapid Transition to Housing outcomes and make progress on ending and reducing homelessness;
- Make efficient use of system resources, ensuring persons receive services appropriate to their level of need; and
- Support a Housing First approach and will work to connect households with the appropriate permanent housing opportunity, as well as any necessary supportive services to help maintain housing, as quickly as possible.

2. The Raleigh Wake Partnership to End and Prevent Homelessness (Partnership), Wake County CoC's lead agency, administers the Housing Wake! Access Hub, the CoC's Coordinated Entry System, which includes Access Sites and a Call Center. The Partnership also administers HMIS and facilitates monthly membership and governance committee meetings for the CoC, which allows representatives from the City, County, and service providers to give updates and discuss pertinent issues.

3. Wake County Human Services' McKinney Team offers behavioral health support to persons who are mentally ill and homeless. Through a HUD grant, the team provides outreach, assessment, assistance with housing access, and on-going support to maintain housing through medication management, therapy, and case management.

4. The Wake County Human Services Department operates Cornerstone, a day shelter for individuals who are homeless. Cornerstone provides case management, counseling services, food, showers, laundry services, employment services, mental health assessment, and medication management services.

5. The South Wilmington Street Center is a men's shelter run by the Wake County Human Services Department. The Center offers emergency beds to men through a lottery system. Staff encourages men at the Center to become part of the housing program because the program provides a path to permanent housing. If men participate in the housing program, they are guaranteed a bed each night as they work toward permanent housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

The emergency and transitional housing needs of homeless persons will be addressed through emergency shelter, rapid rehousing, and tenancy support/care coordination. The following initiatives provide more detail:

- Targeting High Needs Clients - The Raleigh-Wake Continuum of Care implemented and is continuing to refine a process to improve the delivery of housing and crisis response services and to assist people experiencing homelessness or at imminent risk of homelessness. This process, the Coordinated Entry System (Housing Wake! Access Hub), institutes consistent and uniform access, assessment, prioritization, and referral processes to determine the most appropriate response to each person's immediate housing needs. Coordinated Entry is recognized nationally as a best practice which can improve efficiency, provide clarity for people experiencing homelessness, and can help serve more people more quickly and efficiently with assistance targeted to address their housing needs. Coordinated Entry has established a protocol for prioritizing higher needs clients presenting for emergency shelter and transitional housing.
- Shelter and Supportive Services - The City of Raleigh and Wake County partnered to release a combined Request for Proposals to fund emergency shelter, rapid re-housing, homelessness prevention, street outreach, and the Homeless Management Information System. This combined funding process simplifies the application for providers, streamlines the contracting and reimbursement process, and enables agencies to provide consistent services to consumers. The result is more efficiency in working toward a seamless safety net for households who are homeless or at-risk of becoming homeless.
- Emergency Shelter for Singles - In Wake County, there is an insufficient number of emergency overnight shelter beds for unaccompanied single men and women experiencing homelessness. Wake County currently contracts with Urban Ministries of Wake county and Healing Transitions of Wake county to provide emergency overnight and program beds for women. The City has also provided ESG funding to Healing Transitions to operate their shelter. South Wilmington Street Center, operated by Wake County, provides emergency shelter for single men. The City has and continues to fund the South Wilmington Street Center with CDBG funds. In addition, the City will contribute CDBG funds for white flag shelter support.

The 8 other emergency shelter providers serve single women, families, and/or domestic violence survivors. The CoC has three transitional housing providers: The Caring Place, Family Promise, and South Wilmington Street, who have limited beds reserved. Oak City Cares serves as a multi-services center and provides coordinated assessment and connection to housing assistance and community resources, assessment for and connection to medical, mental health, and substance

use care, Weekend meals for people experiencing homelessness and food insecurity, and laundry facilities, showers, computers, and phones.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

1. Since 2015, the City of Raleigh and Wake County have partnered on funding ESG-eligible activities by issuing a Combined Request for Proposals (RFP) with a two-year funding cycle. The Combined RFP for Fiscal Years 2021-22 and 2022-23 was issued January 19, 2021 and is funded with the City's ESG entitlement and the County's local Homeless Funds. The funds for this Combined RFP will total approximately \$1,100,000 and will fund the following ESG-eligible activities: Emergency Shelter, Street Outreach, Rapid Re-housing, Homelessness Prevention, and Homeless Management Information System (HMIS). This combined funding process streamlines the process and enables the CoC to provide consistent services according to adopted communitywide standards for consumers. The City, County, and CoC meet regularly and continue to work with grant recipients and help them adapt to the Combined RFP approach.

2. Shortening shelter stays: The Combined RFP requires all shelter providers to have at least one MOU with a Rapid Re-Housing provider. These purposeful connections are intended to decrease the number of days involved in an average shelter stay. Rapid Re-Housing programs are expected to operate on a Housing First model, where clients are placed in housing first and provided with the support services appropriate to their need. The Housing First model should eventually result in shorter stays at shelters and increase access to Rapid Re-Housing programs and permanent housing. The communitywide standard is no more than 45 days in shelter before being rehoused.

3. Access to housing units: One priority in the City of Raleigh Consolidated Plan (ConPlan) is to "Enhance the Homeless to Housing Continuum." One strategy for achieving this goal is through increasing the production of affordable and permanent supportive housing. Additional affordable and permanent supportive housing will make more units available to persons in Rapid Re-housing programs.

4. Preventing homeless from becoming homeless again: The goal is to help individuals avoid becoming homeless after being discharged from a publicly funded institution or system of care. Alliance Behavioral Healthcare assures that services are provided to persons who are being discharged from mental health care facilities.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address

housing, health, social services, employment, education, or youth needs.

The City/County Combined Request for Proposals (RFP) will focus on Homeless Management Information System (HMIS), Emergency Shelter, Street Outreach, Rapid Re-Housing, and Homelessness Prevention.

For FY 2022-23, the City will fund with ESG dollars the following agencies / activities:

Agency	Approximate Award (year 1)	Use of the Funds
Healing Transitions	\$132,715	Emergency Shelter
Passage Home	\$63,051	Rapid Re-Housing
Raleigh Wake Partnership to End & Prevent Homelessness	\$76,500	HMIS
Total City ESG Funding	\$272,266	

In addition, the City of Raleigh works to prevent low-income individuals and families from becoming homeless in various ways. The efforts below are included in the City strategy:

- Providing CDBG-funded public service grants to nonprofits that provide services to homeless subpopulations.
- City support for Support Circles, a Rapid Re-housing program managed by Catholic Charities
- City administrative support for Passage Home, a nonprofit that works to find housing for ex-offenders and homeless veterans.
- Partnerships with community agencies that provide case management, budget counseling, employment training, and financial assistance to help households who are at risk of homelessness.
- Homebuyer counseling and training for potential first time homebuyers.

Discussion

The City of Raleigh and Wake County work in partnership with the Continuum of Care (CoC) to address homelessness in our community and region. The actions outlined above are designed to improve the movement of homeless citizens from shelter to stable, permanent housing as well as ensuring those housed remain housed. The actions are also intended to reduce the length of time individuals and families are homeless; create a communitywide coordinated intake / assessment process (Coordinated Entry), establish a tool for compiling a comprehensive list of prioritized persons needing permanent supportive housing (the By-Name List), and reduce the average number of nights spent by anyone at a shelter. The goal is to make homelessness rare, brief, and nonrecurring.

AP-75 Action Plan Barriers to Affordable Housing - 91.220(j)

Introduction:

The U.S. Census Bureau estimates that between 2010-2020 Raleigh experienced a 15.8% population growth, adding

63,773 residents to Raleigh over the decade. With this rapid growth, affordable housing continues to be a primary need for the low- and moderate- income residents, with approximately a third of residents being severely cost burdened. To help address housing affordability, in 2016 the City established an aspirational goal to create 570 affordable housing units per year for 10 years, with a grand total of 5,700 additional affordable housing units by 2026. The new \$80 million affordable housing bond will aid significantly in the meeting of this goal, as will several local land use policy changes.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment:

The Raleigh City Council in recent years has directed staff to reduce the regulatory barriers to the production of denser housing in residential zoning districts, such as Accessory Dwelling Units, duplexes, triplexes, and townhouses. Most of this will occur during the ConPlan period and involve amending the City's Unified Development Ordinance.

Many of the planned housing initiatives center around the planned Bus Rapid Transit (BRT) routes and encouraging equitable development around transit stations. The City has adapted the existing Transit Overlay District (TOD) to achieve this end, providing additional building height when affordable units are included. The City has also expanded existing residential zoning districts to allow denser housing types (townhouses, duplexes, triplexes), sometimes called Missing Middle housing by right, with additional changes under consideration.

In the Summer of 2020, the City published the Equitable Development Around Transit (EDAT) Guidebook. The Guidebook represents phase one of the City's EDAT process. That process established a community vision for how much of the city's growth should be accommodated near Bus Rapid Transit (BRT) and set goals for locating affordable housing near BRT. It determined that a substantial share of new housing and jobs should be accommodated near BRT stations, and it is critical to ensure that affordable housing at multiple income levels exists along the corridors. The Guidebook will guide station area planning in all BRT corridors in Raleigh.

The second EDAT phase, currently underway, will involve more specific station-area planning work. While the EDAT Guidebook establishes Raleigh's philosophy and vision for EDAT, the Station Area Planning process will provide location- or parcel-specific implementation actions, such as city-initiated rezoning, affordable housing investments, and capital projects for first mile/last mile safety interventions.

The City also works to reduce barriers to affordable housing by using its housing subsidy programs to help achieve the 10-year goal of 5,700 units by 2026.

For homeownership, the City offers a down payment assistance loan of up to \$20,000 for low- to moderate-income first-time homebuyers. When this loan is paired with other first-time homebuyer loans available through other agencies, like

the North Carolina Housing Finance Agency, a first-time homebuyer is able to increase their purchase power and create an affordable mortgage. One requirement of this loan is that the buyer must take a first-time homebuyer course and the City provides grant funding to a local non-profit to provide these courses to the homebuyers. This program is available to any home located within the City Limits. The City anticipates being able to provide the down payment assistance to 25 homebuyers a year.

To assist with home retention and the ability to make necessary repairs to homes, the City has a limited repair and substantial repair program. Both programs are City wide and limited to low- to moderate incomes homeowners who resided in the homes for at a minimum of 5 years and must continue to reside in home upon completion of the repairs. It is anticipated that funding will allow the City to continue to complete up to 40 home rehabilitations a year.

The lack of affordable lots for builders to acquire for building within the City limits, especially near the center of downtown, is causing builders to lose the ability to provide affordable housing options. To help with land costs, the City has been partnering with local builders to build single family and townhomes near downtown core areas that are available for purchase at or below the HUD housing price limit. In these areas, the City funded and completed infrastructure and storm water improvements and provided lots for purchase at a reduced cost. To help with the lot purchase, the builders are also provided a 0% interest loan that requires no monthly payment but requires payment at the time the builder sells the home to the homeowner. During the 2016-2020 Consolidated Plan, the City began on three projects: East College Park, Martin/Haywood and Idlewild/Jones. All three infill developments will be completed during the 2021-2025 Consolidated Plan. All homes that are constructed through this partnership are limited for homeownership and cannot become a rental investment property. Also, there is a 10-year equity sharing deed restriction that is recorded with the deed at the time the homeowner purchases that property. This 10-year restriction helps to ensure that the buyers will live in the homes, create a community, building personal wealth through this homeownership opportunity.

Assisting in joint ventures to provide gap financing for low-income housing tax credit (LIHTC) developments in the City has provided another avenue that the City is using to help increase the number of affordable rental units. Through the City's ability to provide gap financing, DHIC was able to provide 84 units at Beacon Ridge. This is a complex for under 60% AMI residents to live within a short distance to schools and a YMCA. The City's use of gap financing is key to allowing the preservation and production of affordable developments to move forward. The \$80 million local bond is significantly increasing the City's ability to be a partner in preserving existing affordable rental communities, as well as creating new ones.

Discussion

As the population in Raleigh continues to grow, along with the increasing value of land and the expense of building, the City is going to look at multiple methods to provide affordable housing in areas where it is most needed. With the possibility of a Bus Rapid Transit, it will be important to look towards those corridors and promote the development of affordable housing options along those lines. A few methods that can be considered is leveraging land value in developing small scale rental opportunities and a land trust option to help develop affordable housing options. Partnering with Wake County to identify affordable rental units that are about to “age out of” HUD requirements is also going to be key. Early identification of these properties will allow the City and County to join forces to discuss ways to preserve the units with the developer before the option to sell to a market developer becomes available. To this end the City and County are creating a joint acquisition and preservation loan fund that aims to acquire legally binding or naturally occurring affordable housing units in strategic locations. By continuing the strategies above and looking for opportunities to create avenues for affordable housing, the City will be able to meet the goal of creating 5,700 units by 2026.

AP-85 - Other Actions

The actions below describe the City of Raleigh’s planned actions to carry out the following:

- Increase & preserve the supply of affordable housing;
- Increase services to build self-sufficiency & sustainability; and
- Enhance the homelessness to housing continuum

Actions planned to address obstacles to meeting underserved needs

Every year the City uses its ESG and CDBG funds to offer grant programs to help address needs of underserved populations:

The City partners with the County to award ESG funds to help aid the multiple areas of need for the homelessness populations. The City and Wake County jointly issue a competitive RFP every two years that is funded with ESG funds. This combined application seeks to create a streamlined application for nonprofits and also allows the City and County an opportunity to combine its resources to address homelessness. The City currently provides funding for emergency shelter, rapid rehousing, and the administration of the Homeless Management Information System (HMIS).

The City also provides Subrecipient grants to nonprofits through RFPs to address community needs. The first is the Community Enhancement Grant (CEG) program. This is an annual grant that is awarded through a competitive RFP process. The programs that are awarded the funds must provide direct client assistance to an underserved population within the City limits. The City is going to continue to offer this grant and focus on non-profits that have programs

targeting at-risk populations.

The second is a workforce training program. Raleigh has an expanding workforce and other occupational skills are in demand. To help meet the needs of the growing diverse workforce, this grant will provide funds to training organizations to assist low-income persons become equipped to compete in a competitive job market.

Finally, low-income families wanting to purchase their first home will receive training through a local nonprofit.

Actions planned to foster and maintain affordable housing

Affordability with rental and homeownership options is becoming a major concern within Raleigh. Land is rapidly increasing in value and construction materials continue to rise making housing options more and more expensive.

To continue the development of rental units, the City will continue to provide gap-financing to developers that have been awarded housing tax credits. The Housing and Neighborhoods Department will also be looking at leveraging the value of City owned lots to help produce smaller rental developments like duplexes, cottages, or quads. Funds will also be available to developers seeking to preserve affordable units through rehabilitation.

As housing prices speedily rise, the need for housing assistance will continue to increase. For those looking to purchase a home, the City provides newly constructed affordable homes and mortgage assistance. The East College Park area is a partnership with local builders to provide newly constructed homes. Over the next 5 years, 60% of the units will be sold to low to moderate households. By the end of the project over 90 single-family homes, and at least 12 townhomes, will have been built, with 60% of the homes being sold to household with incomes under 80% HUD AMI. The City will also continue to provide direct financial assistance in the form of a 0% interest forgivable second mortgage. This loan is offered to first-time homebuyers that have a qualifying household income. Funds will also continue to be made available for first time homebuyer housing counseling services.

Because Raleigh is a high-cost housing market, the City has decided to set its own home purchase price limit for homebuyer assistance and homeowner rehabilitation programs, rather than using the limits established annually by HUD. The purchase price limit for 2022 is \$323,000. This limit was established in accordance with a market analysis conducted following the required framework laid out by federal regulation in 24 CFR 92.254(a).

Federal regulation requires that the 95 percent of median area purchase price must be established in accordance with a market analysis using a sufficient number of recent housing sales. Sales must cover the requisite number of months based on volume: For 500 or more sales per month, a one-month reporting period; for 250 through 499 sales per month, a 2-month reporting period; for less than 250 sales per month, at least a 3-month reporting period. The housing

sales data must reflect all, or nearly all, of the one-family house sales in the entire City.

The 2022 analysis used real estate sales data from the Wake County Tax Administration (available at <https://www.wakegov.com/departments-government/tax-administration/data-files-statistics-and-reports/real-estate-property-data-files>). The analysis included six months of data (from October 1, 2021, through March 8, 2022) on single-family home sales within the City limits of Raleigh. The data used in the analysis is included in this plan as an attachment.

The median sales price was determined following the methodology from 24 CFR 92.254(a): the data was listed in ascending order of sales price, and then the middle sale on the list was considered the median (\$340,000). This amount was then multiplied by 0.95 to determine the 95 percent of the median area purchase price of \$323,000. In the next five years it is going to be important to continue to look for other means to provide affordable housing options that will connect citizens to public amenities like parks and transit. Throughout this ConPlan period, the City is planning to have the first section of the Bus Rapid Transit (BRT) completed. It will be important for our department to forge partnerships that will help develop affordable rental units and affordable homeownership options.

Actions planned to reduce lead-based paint hazards

Lead-based paint remediation is an integral part of CD's rehab program. All rehabs of owner-occupied homes are tested for lead-based paint and any lead-based paint found is appropriately remediated.

Actions planned to reduce the number of poverty-level families

The City will continue to work with multiple partners to provide services to help alleviate poverty. We provide funds yearly to non-profits to assist with shelter needs, meals, and basic needs for those who are in need. The CEG grants will continue to focus on providing funds for non-profits to provide direct services to clients with services or programs that will help reduce barriers for housing and employment related needs. The Workforce Development grant will be provided yearly to provide an in-demand employment skill to those looking to receive training for a better employment opportunity.

Actions planned to develop institutional structure

Efforts have continued to create collaborative and efficient processes between funding sources, such as the City/County Combined RFP for homeless and housing services. The Combined RFP has a two-year funding cycle and that began in FY2021-2022 and will continue during FY2022-FY2023. The City also works closely with the Raleigh/Wake Partnership to End and Prevent Homelessness (Partnership) and Oak City Cares (OCC). The Partnership is the CoC's lead agency and administers House Wake! Access Hub (Coordinated Entry System), HMIS, as well as facilitates trainings monthly

continuum of Care (CoC) meetings. OCC serves as an access site for connecting homeless individuals and families to a network of support services offered by local organizations. OCC utilizes community collaborations with government, non-profit and faith-based organizations to strengthen the pathways to these life rebuilding services for its clients by providing the following services on-site: coordinated entry & assessment; urgent care health clinic; behavioral healthcare; Veterans Services; street outreach; homeless prevention & diversion; domestic violence services; Medicaid & SNAP application assistance; and employment readiness. On-site service partners include: Advance Community Health; Haven House Services; InterAct; Monarch Behavioral Health; SNAP; StepUp Ministry; Durham VA Health Care System; Raleigh/Wake Partnership to End Homelessness; Triangle Family Services; WakeMed; Wake County Public Health and Human services; Alliance Behavioral Health; NC FIT; SouthLight; Project CATCH; and Church in the Woods. The purpose of providing COORDINATED SERVICES in one location is to make homelessness RARE, BRIEF AND NON-RECURRING for the people served.

Actions planned to enhance coordination between public and private housing and social service agencies

The City collaborated with the Partnership to End and Prevent Homelessness and Catholic Charities to build on the success of its Oak City Outreach Center. These three agencies partnered with Wake County to buy and retrofit a building into a multi-purpose center, Oak City Cares, to serve the homeless population with a new coordinated entry facility, which opened in April 2019. The City also works with nonprofit developers to construct and preserve affordable rental housing. Some of the nonprofit developers have public service programs, such as homebuyer training, financial counseling, and job training, included as a component of their housing programs. The City has also issued Requests for Proposals (RFP) to sell and convert city-owned land into affordable housing units feature scoring criteria seeking creative use of City land to include partnerships with nonprofits providing social services within City-sponsored rental housing development (e.g., Sawyer Road). The City also provides operational grant funding to local nonprofits involved in affordable housing development and provision of public services.

Discussion:

The City of Raleigh will continue its long-term partnerships with the Raleigh Housing Authority, Wake County, the CoC, and private nonprofit in addressing needs that do not stop at the City border. The City will continue the coordination to include significant investments in land and development of affordable housing options – as well as changes to local land use regulations - in areas that will help connect lower-income residents to transit.

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The

following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	93.85%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Raleigh uses HOME funds to assist existing owner-occupants with the rehabilitation of their homes, to finance the acquisition of homes for homebuyers by providing down payment and closing cost assistance and/or gap financing, and to assist developers with the acquisition, new construction, or rehabilitation of affordable rental

housing. The City of Raleigh invests these HOME funds as interest- and non-interest-bearing loans and deferred payment loans, both forgivable and non-forgivable.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Raleigh uses the recapture provision to secure long-term affordability. Under this mechanism, the City of Raleigh recaptures a portion of the direct subsidy if the HOME recipient sells the house within the 20-year loan term, which is 10 years beyond the required affordability period. The recipient's HOME direct subsidy is discounted (reduced) 25% on the fifth, tenth, and fifteenth anniversary of the Note and then forgiven in its entirety at 20 years. The recapture provisions are outlined in the HOME agreement with the HOME-assisted homebuyer and in Deed Restrictions.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The recipient of a direct HOME subsidy is required to execute a HOME written agreement, which explains the recapture provision, prior to sale. Furthermore, deed restrictions that run with the land are recorded to enforce the provision.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Raleigh does not use HOME funds to refinance existing debt on a property.

Emergency Solutions Grant (ESG)

Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

See Attachment "ESG Written Standards," Coordinated Entry System Policies and Procedures Manual.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Raleigh/Wake Partnership to End and Prevent Homelessness is the Local System Administrator (LSA) for NC 507's coordinated assessment system – the House Wake! Access Hub. The House Wake! Access Hub, which includes Access Sites and the Call Center, is the entry point for connecting individuals and families experiencing a housing crisis to appropriate programs. The coordinated assessment system was developed with input from service providers to ensure.

Access Point meetings and trainings are regularly offered and well attended. The Operations Manual has been reviewed by the Coordinated Access Committee (CAS), a CoC committee of service providers. Staff from the service providers who work on this committee are licensed users of HMIS and use the Vi-SPDAT as the assessment tool to determine acuity for the by-name list. This improvement process has continued and is ongoing.

Other meetings of service providers continue, as well, to make ongoing improvements to the coordinated entry system:

1. The Raleigh/Wake Partnership to End and Prevent Homelessness (CoC lead agency) facilitates the NOFA process with homeless services within NC 507, the official designation for the CoC.
2. The CoC holds regular monthly Governance Committee, Membership Committee, and subcommittee meetings, which include representatives from agencies providing shelter, street outreach, rapid re-housing, and/or prevention services, as well as City and County staff to coordinate how issues are consistently and collaboratively addressed.
3. A formal partnership was formed between the CoC, the City, the County, and Catholic Charities to develop Oak City Cares, a multi-service center, which also provides a variety of services, housing options, and training opportunities for homeless individuals and families.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Since 2015, the City of Raleigh has conducted a “Combined Request for Proposals (RFP)” with Wake County. This has increased efficiency, reduced administrative burdens on the homeless service providers, and increased standardized practice among homeless service providers communitywide. Contracts have been awarded as 2-year contracts, as noted in the RFP. For the providers that met performance metrics at the end of the first year, as specified in their contract, contracts were extended for the second year using new ESG allocations, which were distributed proportionally among the subgrantees based on their first-year awards.

A new combined RFP is issued every two years. The fourth Combined RFP was issued in mid-January 2021 for the period July 1, 2021—June 30, 2023. For the fiscal year beginning July 1, 2022, the following agencies/activities will be funded by the City: Healing Transitions, Emergency Shelter, \$132,715; Passage Home, Rapid Re-housing, \$63,051; and Raleigh Wake Partnership to End & Prevent Homelessness, HMIS, \$76,500.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Raleigh/Wake Partnership to End and Prevent Homelessness (the Partnership) is the Wake County Continuum of

Care lead agency. The Partnership is a 501(c)3. The Partnership's Bylaws reserve a few seats on the Board, one of which is for an individual who is currently or has in the past experienced homelessness.

5. Describe performance standards for evaluating ESG.

The following performance standards are used to evaluate ESG. These are applicable to all project types and are tracked by HUD and the CoC to measure the efficacy of the system.

- Length of Time Homeless
- Number of exits to Permanent Housing (rental or ownership)
- Number of Returns into Homelessness

As shown in the answers to Questions 1-5 above, the City of Raleigh works closely with its CoC and Wake County to address homelessness in the City and County in a comprehensive fashion.

Attachments

Annual Action Plan Public Hearing on December 7, 2021

FY 2022-2023 ANNUAL HOUSING ACTION PLAN – HEARING – COMMENTS RECEIVED

The U.S. Department of Housing and Urban Development (HUD) requires entitlement communities under the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs to hold two public hearings annually. The first hearing occurs at the beginning of the process associated with the preparation of the Annual Action Plan to provide an opportunity for citizens to comment on housing and community development needs, including priority non-housing community needs. A second hearing will be scheduled to provide an opportunity for citizens to comment on the proposed draft of the Annual Action Plan prior to submission to HUD in May 2022.

Recommended Action: None.

The following information was included with the agenda materials:

On November 16, 2021, the City Council authorized a public hearing to be held at their meeting on December 7, 2021 to receive public comments on City housing and community development needs in support of the FY2022-2023 Annual Action Plan.

The U.S. Department of Housing and Urban Development (HUD) requires entitlement communities receiving funding under the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs to hold two public hearings annually. The hearings are part of the seven-month Annual Action Plan process as outlined in the City's Citizen Participation Plan. The first hearing is scheduled at the beginning of the process to provide citizens an opportunity to comment on housing and community development needs, including priority non-housing community needs. A second hearing will be scheduled to provide citizens an opportunity to comment on the draft Annual Action Plan prior to submission to HUD in May 2022 submission to HUD. A summary of citizens' comments received during the process will be included with the submission.

Other than conducting the public hearing itself, no Council action is required at this time.

Housing and Neighborhoods Director Larry Jarvis used a PowerPoint presentation to summarize the information.

Mayor Baldwin opened the hearing noting each speaker would have 3 minutes to make their presentation.

It was noted that **Kristen Havlik** and **Surena Johnson** had signed up to speak on the matter, however, did not call in.

Octavia Rainey, 1516 East Lane Street, Raleigh, NC, wished everyone Happy Holidays and made the following comment:

I would like to speak on 3 parts.

The first part is the ***Analysis of Impediment***. In order to do the consolidated plan, you must to the Analysis of Impediment. I have followed the City of Raleigh since 1988 when they first introduced the Analysis of Impediment. I am very concerned that the City do not follow the Analysis of Impediment at all. It really concerns me that here you have a city—since 1988—and have not enforced the Analysis of Impediment. I think that it is time that the City takes the Analysis of Impediment seriously; not to rubber-stamp it, but seriously take every aspect, every part of it.

And the first thing, you must give the Fair Housing Hearing Board enforcement powers. Recently you passed all of this new legislation, but there's no enforcement of that legislation on top of enforcement of the Fair Housing Act itself, so it really concerns me. And I must remind the Council that, although you have the State, but that is a gentlemen's agreement. As large as the city is, the City should be enforcing its own act, and that really bothers me. I have 40 years of experience, and the City do not enforce the AI (Clerk's note: "Analysis of Impediment").

Now I could go into 12 parts of the AI, but time does not permit. But I think that it is a serious here. You do this year after year since 1988, and you don't enforce. You don't do anything.

Second of all, CDBG has more than one focus on housing. And I challenged Larry [Jarvis] that when he opens up the CDBG hearing tell everybody all the activities of CDBG; not one part of it, but it has a huge part of what you can do with the funding.

Third. I think it is time for the City to pick a project. And looking at all the eligibility of the CDBG, and stop moving out Black folk. You don't preserve Black neighborhoods at all. I am doing a tour in December of the inner city neighborhoods to point out you have not saved not one Black neighborhood. Not one. And the bus is half-way full. Not one.

This goes back to the Raleigh Development Commission of 1947...(time expired).

Mayor Baldwin reminded everyone that written comments could be submitted as well.

Jacquie Ayala, Director of Advocacy for Habitat for Humanity of Wake County, pointed out that Habitat has built more than 850 homes in Wake and Johnston counties with more than 600 built in Wake County and read the following statement:

I'm here to speak on behalf of the Wake Affordable Housing Coalition, which is an assembly of nonprofit organizations working together to provide affordable housing opportunities throughout the county. This includes Families Together, Passage Home, The Raleigh Area Land Trust, The Raleigh/Wake Partnership to Prevent Homelessness, CASA, Oak City Cares, and Southeast Raleigh Promise.

The Coalition is encouraged by the steps outlined in the Annual Action Plan to address resident needs across the affordable housing continuum. We strongly support the City's efforts to fund the construction of new, affordable multi-family rental units and affordable units for first-time homebuyers. We also commend the City for investing in housing rehabilitation and preservation programs which help displacement and allow residents to have safe living conditions. The City's investments in the Homeless to Housing Continuum for rapid rehousing efforts and maintaining high quality shelters are also critical to our community's future, and future Annual Action Plans should continue to prioritize the needs of these residents.

But the need is great, and 1 in 4 families currently lack access to affordable housing. COVID has only exacerbated the situation putting more people at risk of eviction and displacement; and so, we need more new affordable units.

In addition to the steps outlined in the Annual Action Plan, the Wake Affordable Housing Coalition encourages the City to allocate 25% of its \$73 million in American Rescue Plan Act funding towards affordable housing, particularly to land acquisition and new construction. The City should implement a robust land banking strategy to ensure possible future development of affordable housing. City-owned land should be allocated to nonprofit affordable housing providers instead of being sold on the open market and using the funds to invest in affordable projects. Nonprofit affordable developers like ours are currently unable to compete in the open market for land, so leveraging City land is one of our only options.

We should also reevaluate the development and review process for affordable housing projects to expedite the process and help affordable developers save time and resources, and we recommend the City extend property relief to longtime homeowners with low incomes through a grant program. Since 2016 property taxes have skyrocketed increasing in some places by as much as 150%. These tax increases are disproportionately impacting neighborhoods where Black families were historically segregated and remain under-served. We ask that the City address these disparities through its affordable housing strategy.

Thank you so much to the City Staff and leadership for your work to provide affordable housing. We hope that you will consider our feedback, and I hope that you will also know Habitat Wake and the members of the Wake Affordable Housing Coalition are committed to work with you all the way through. Thank you.

No one else had signed up to speak on the matter; therefore, Mayor Baldwin closed the hearing at 7:56 p.m.

Mayor Baldwin noted staff would continue this discussion and continue meeting with the public in getting public comment.

Councilor Branch requested that the Communications staff get an email link out to the public and requested that spoke at the hearing provide ideas for affordable housing projects.

Councilor Knight indicated he met with Ms. Ayala and indicated that her organization and the Wake Affordable Housing Coalition are key partners and urged staff to work with them closely.

Annual Action Plan Public Hearing on April 5, 2022

FY2022-2023 ANNUAL HOUSING ACTION PLAN – HEARING – COMMENTS RECEIVED

This was a hearing to receive comments on the following:

The U.S. Department of Housing and Urban Development (HUD) requires entitlement communities under the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs to hold two public hearings annually.

The first hearing, held December 7, 2021, occurred at the beginning of the process associated with the preparation of the Annual Action Plan to provide an opportunity for citizens to comment on housing and community development needs, including priority non-housing community needs. This second hearing was held to provide an opportunity for citizens to comment on the proposed draft of the Annual Action Plan prior to submission to HUD in May 2022. A summary of citizens' comments received during the process will be included with the submission.

Additional information was included with the agenda materials.

Recommended Action: Other than conducting the public hearing itself, no Council action is required at this time.

Community Development Specialist John Niffenegger used a PowerPoint presentation to illustrate his report; with portions of the presentation outlined as follows:

What is the Annual Action Plan?

- Application to the U.S. Department of Housing and Urban Development (HUD) for Entitlement Funding
- Provides a framework for annual strategic and production goals
- Each Annual Action Plan (AAP) is tied directly to the 5-year Consolidated Plan (ConPlan)
- FY 2022-2023 AAP is the third year of the current ConPlan

Goals & Priorities 2021-2025

- Increase the supply of affordable housing
- Increase Services to Build Self-Sufficiency & Sustainability
- Enhance the homeless to housing continuum

Proposed Uses of Funds

FY 2022-2023 Housing and Community & Economic Development Budget					
Activity	Funding Source				
	Home	CDBG	ESG	Local	Total
Affordable Housing	\$1,329,991	\$1,756,654		\$28,817,000	\$31,903,645
Homeless to Housing Continuum Grants		\$20,000	\$272,266		\$472,266
Self-Sufficiency & Sustainability		\$518,133			\$518,333
Program Administration	\$218,225	\$923,697		\$1,368,518	\$2,510,440
Total	\$1,548,216	\$3,398,484	\$272,266	\$30,185,518	\$35,404,484

Funding Recommendations for FY 2022-2023

Emergency Solutions Grant

Agency	Project	Recommended Funding
1 Healing Transitions	Emergency Shelter	\$132,715
2 Passage Home	Rapid Re-Housing	\$63,051
3 Raleigh Wake Partnership to End and Prevent Homelessness	HMIS	\$76,500
	Total	\$272,266

Community Enhancement Grant

Agency	Project	Recommended Funding
1 Raleigh Wake Partnership to End Homelessness	Access Hub Expansion	\$58,000
2 The Green Chair Project	Family Furnishings Program	\$51,000
3 StepUp Ministry	Advancing Opportunities for Low-Income Residents	\$56,000
4 YMCA of the Triangle	Workforce Development	\$43,000
5 Loaves and Fishes Ministry	Out-of-School Tutoring and Youth Engagement	\$22,000
	Total	\$230,000

Opportunities for Public Participation

- Public Hearing #1 on December 7, 2021
- Three Public Meetings in March 2022
- Virtual on March 15
- In-person on March 17 and 22
- Public Hearing #2 on April 5, 2022

Next Steps

- City Council adopts Annual Action Plan at the May 3rd Council meeting
- Submit Final Plan to HUD by May 15th

Mayor Baldwin opened the hearing.

Support

Kim Crawford, Executive Director, Raleigh/Wake Partnership To End Homelessness, read the following statement:

Homelessness IS the manifestation or symptom of other system failures (education, employment, foster care, health care, mental health). Housing barriers are system barriers — they're not people barriers.

Homelessness in our community has been going up slightly every year since 2016. Due to the pandemic, we are most certainly experiencing a spike in homelessness.

Given the reduction in shelter beds, over 200 since March 2020, it is our belief that unsheltered homelessness has increased, and as a result, overall homelessness has increased. People of color are disproportionately homeless, to the tune of nearly 7 to 1.

The inability of people to find and afford housing is the major driver of homelessness, and the major solution to it.Everything works better when people have safe, stable, affordable housing.

During the past two years, you have generously provided assistance, through the CARES Act and the American Rescue Plan. These resources are not going to be enough to end homelessness, but they can surely reverse its course.

Certainly, there are also many challenges to making progress.

A key challenge is to apply the resources provided in the most strategic way possible. It is easier to house people who have lower needs, who do not require services, who are more “acceptable” to property owners, or who are not yet homeless, than it is to house people who are literally homeless, unsheltered, and have high service needs.

A critical priority is the need to address the needs of unsheltered people. Data indicate that people who are unsheltered have much more serious health problems and shorter life expectancies than people living in shelter. This group should be a top priority for us.

Another challenge is staff shortages and space. Our CoC partners continue to report shortages in staff and space across the board. While our sector welcomes and appreciates added resources and initiatives, without the space & staff we struggle to implement.

Given these opportunities and challenges,

We recommend the use the funds to help people with the highest needs. With this in mind we would propose:

- A day drop-in center – these past few “white flag” months have made it quite clear that there is a critical need for a place for people to go during the day – not only to get out of the elements but to connect with critical resources – focusing on ending homelessness, not simply helping to be comfortable in their homelessness
- Rapid Exit Funds and Emergency Assistance funds
- allocation of resources to strategies that are specifically designed to reduce racial disparities and eliminate racial disproportionality.
- A separate application process from the County – there is too much confusion and perceived conflicts of interest involved in the “combined application” process, and.....
- Most certainly affordable housing units

In closing, while people experiencing homelessness have suffered tremendously, the resources that the City of Raleigh has provided, has ended homelessness for hundreds of people, and we thank you for that.

Opposition

Leon Cooke, 1300 Whittington Drive, Raleigh, NC, indicated he represents the Wake County Housing Justice Coalition. He expressed his opposition to the Plan and called for increased funds for relocation and asserted the funds allocated for economic development is too low.

Octavia Rainey, 1516 East Lane Street, Raleigh, NC, talked about relocation and expressed concern regarding how since 1955 when the Raleigh Redevelopment Commission was in place people have been “relocated”. She compared the relocation to a “dangling of the carrot” and talked about HUD rules on relocation. She also pointed out that Devereaux Meadows was a slave plantation and indicated she would talk about that issue at a future meeting.

Hwa Huang, 7401 Ebenezer Church Road, Raleigh, NC, read a statement in opposition to the Plan. He talked about City’s Fair Housing Hearing Board and called for written reports on funds spent.

Cole McMullin, 10530 Sablewood Drive, Raleigh, NC, read a statement in opposition to the Plan and called for a written report on how the funds are proposed to be spent.

Wanda Hunter, spoke in opposition expressing concern that the BRT development would adversely impact affordable housing in Heritage Park, Kentwood, etc. and called for an increase in relocation funds per HUD regulations.

Mayor Baldwin requested an explanation of available funds, notably the loan program and rehabilitation and indicated she believed there was about \$6 million available for each with CD Specialist Niffenegger responding staff would provide the information in the City Manager's Update to Council members.

No one else had requested to speak on the matter; therefore, Mayor Baldwin closed the hearing.

Mayor Baldwin indicated the Council will be voting on the plan in May.

Written Public Comments on FY2022-23 Annual Action Plan

From: Robert Kucab
<arkucab1@gmail.com> Sent: Thursday,
March 31, 2022 11:15 AM To: info, CD
<CD.info@raleighnc.gov> Subject: Annual
Action Plan comments

Thanks for the opportunity to comment on the Annual Action Plan.

I commend the City leaders and staff for aggressive work to expand affordable housing opportunities. Clearly, the direction is positive.

Here are two comments:

First, in addition to the efforts underway, the City Council should allocate at least 30% of the American Rescue Plan funding received by Raleigh for affordable housing solutions. The City is falling further behind each year despite best efforts with existing funding-more investment is desperately needed and should be considered a very high priority.

Second, the City Council should streamline the time, and reduce the cost, to produce affordable housing by waiving relevant fees and, more importantly, fast-tracking affordable housing development applications so that projects can get under construction more quickly. Lengthy delays result in higher building costs and more hardship for those who are on waiting lists. The City can do much more to help.

The problems of seniors, working families, and persons with disabilities throughout the City are severe and warrant urgent and creative approaches.

Bob and Ruth Kucab 2012
Torrington Street
Raleigh, 27615

From: [Hartye, William](#)
To: arkucab1@gmail.com
Subject: Annual Action Plan comments
Date: Monday, April 4, 2022 1:30:00 PM

Mr. Kucab,

Thank you for your comments.

In response to your first comment regarding the use of American Rescue Plan Act funds awarded to the City, Homelessness/Housing is one of the five areas the City is committing resources to. The City has committed \$10 million for the acquisition and refurbishment of the hotel at Brentwood and Capital Blvd in order to provide services to address homelessness such as supportive housing and improving access to stable, affordable housing among unhoused individuals. The City is also committing more than

\$12 million for Community Health initiatives and non-profit support. These include partnerships to expand support around mental health, food security, and assistance for those disproportionately impacted by the pandemic. More than \$5 million in HOME-ARP funding has been awarded to the City, and the creation of an allocation plan for this funding is currently underway. This plan will include consultation with area agencies, citizen feedback, and will also use gaps analysis to determine the optimal distribution of funds.

For the second comment regarding streamlining review processes and fee reductions, the City, as part of its Strategic Plan, has an initiative well underway that seeks to examine and implement changes such as these. For the past year, staff from Planning and Development and Housing and Neighborhoods have been looking at ways to reduce review times, complexity, and fees, particularly for projects that further the City's affordable housing goals.

Thank you again for your comments,

Will

Will Hartye, AICP

Senior Community Development Coordinator City of Raleigh Housing & Neighborhoods

Department One City Plaza

421 Fayetteville Street, Suite 1200

Raleigh, NC 27601

Phone: (919) 996-6944

Raleighnc.gov

From: Frank Baldiga <Frank.Baldiga@uss.salvationarmy.org>

Sent: Monday, April 12, 2021 1:25 PM

To: info, CD <CD.info@raleighnc.gov>

Cc: Stephen Gruver <Stephen.Gruver@uss.salvationarmy.org>

Subject: Public Hearings, April 6: Draft FY21-22 Annual Action Plan, CARES Act Funding

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you verify that the attachment and content are safe. If you believe this email is suspicious, please click the 'Phish Alert' link in the banner to report this message. **EXTERNAL EMAIL ADDRESS:** Frank.Baldiga@uss.salvationarmy.org

Hi,

I am sorry this is late. I am a shelter case manager at the Salvation Army, the county's largest family shelter. This email is in request to the 30 day comment period on the draft Fiscal Year 2021-2022 Annual Action Plan (AAP), the draft Substantial Amendment to the FY 2020-2021 AAP, and the 2021-2025 Consolidated Plan for the proposed uses of the CDBG-CV3 funding (CARES Act) to address impacts of COVID-19 on low-income residents.

My comments address the needs of the homeless population and very low and extremely low income residents (< 30% AMI). In particular I focus on the Draft AAP priority to enhance the homeless to housing continuum. First, your plan will do a lot to increase the amount of affordable housing. Thank you. This will help my low income clients even if they can't afford or qualify for them by increasing the number of vacancies.

1. Utilize the city owned rental units to house very low and extremely low income families. Currently these apartments are out of reach for our families due to their qualifications. For example, few of my working clients have a monthly income of 3 times the rent. Many homeless individuals have a prior eviction, conviction and poor rental history. The city should master lease a portion of the units to homeless service providers so they can then lease them to their clients. I also request the city's property manager to communicate with homeless service providers and provide preferences for homeless individuals. All calls and emails with Barker Realty have gone unanswered.
2. Amend the city's fair housing ordinance to include source of income protections so landlords and property managers are prohibited from refusing to accept a voucher.
3. Fund additional longer term rental assistance vouchers. The plan funds rapid rehousing which is good. However for very low and extremely low income residents, longer term rental subsidies are needed. See [Solving Urgent Housing Problems Requires Pairing Investments in Housing Stock With Expansion of Housing Vouchers](#) Today 3 out of 4 people in this country who qualify for housing choice vouchers do not receive one. We need to address this at the national, county and city level. I would like to see a program similar to the Wake County Rental Assistance Housing Program (RAHP). Another option is for the city to partner with Wake County to increase RAHP funding and serve more families.
4. All new affordable housing must accept housing choice vouchers.
5. Request the Raleigh Housing Authority to make the following improvements:
 - a. Recruit landlords and property managers to accept HCV through advertising, media articles, outreach, etc... According to the RHA only 30% of vouchers are utilized meaning that 70% of voucher holders cannot locate a unit. A national study in 2000 found that an average of 70% of households that received a voucher rented a unit in the timeframe allowed by the program. This means that RHA is much worse than the national average. The study also found that the frequency of landlord outreach was associated with higher success rates. Improvements to the inspection process will also help. The RHA should come up with a plan to address the poor rental rate.
 - b. Provide public data on the HCV and PH programs so that we can better understand performance of the RHA. In particular we need a county map showing where vouchers are being used. This will help us determine if voucher holders are being shut out of high opportunity areas of the city and county. RHA should also provide data on voucher utilization and the number of landlords and property managers who accept vouchers. It should provide data on the number of units that fail inspections.
 - c. RHA should provide a portal so that applicants can check their status on the waiting list and make it easier to update their address or contact information. Low income clients move frequently and often forget to update their contact information resulting in being dropped off the waiting list.
 - d. More coordination with the Raleigh Wake Partnership to End and Prevent Homelessness (the Partnership) to look for additional ways to move people out of homelessness.

Thank you for all you are doing to serve the homeless in Raleigh.

Sincerely,

Frank Baldiga,

Shelter Case Manager

The Salvation Army of Wake County

1863 Capital Blvd.

Raleigh, NC 27604

(919) 834-6733 ext.121

Fax: (919) 828-0911

www.wakearmy.org

From: Dula, Nicholas <Nicholas.Dula@raleighnc.gov>

Sent: Thursday, April 22, 2021 3:08 PM

To: Frank.Baldiga@uss.salvationarmy.org

Cc: Ramos, Sophia <Sophia.Ramos@raleighnc.gov>; Taylor, Lamont <Lamont.Taylor@raleighnc.gov>;

Stephen.Gruver@uss.salvationarmy.org

Subject: Response to FY2021-22 Annual Action Plan Comment

Mr. Baldiga,

Thank you for submitting a comment on the City of Raleigh FY2021-22 Annual Action Plan. Your comment will be included in the Annual Action Plan document. Thanks again.

Best regards,

Nick

Nicholas Dula

Program Development Administrator

City of Raleigh

Housing and Neighborhoods Department

Community Development Division

Office: 919-996-6935

Email: Nicholas.Dula@raleighnc.gov

Website: <https://www.raleighnc.gov/>

From: Paul Jervay <prjervay@gmail.com>

Sent: Thursday, March 10, 2022 8:10 AM

To: info, CD <CD.info@raleighnc.gov>; adria <adria@caro.news>;

octavia_rainey@yahoo.com

Subject: FEEDBACK ON HOUSING & NEIGHBORHOODS ANNUAL ACTION PLAN

Greetings:

This plan focuses on RENTALS. Why not RENT to OWN? Are we really investing in the community if those that are severely COST BURDENED can never own their housing?

Biltmore Hills is a textbook success story in AFFORDABLE HOUSING. The housing units that the developer offered gave Southeast Raleigh residents a hand-up from rental housing to HOME OWNERSHIP.

The COLLEGE PARK and DOWNTOWN NEIGHBORHOODS lend themselves to another Biltmore Hills kind of development. Middle Housing would fit well in this mix, and should be a component in the planning process.

Connecting Transit to Housing is a must, and should go hand-in-hand with the development. This obvious partnership enables residents to get to better education and job opportunities.

Finally, one question: How many Affordable Housing Units has the City of Raleigh completed to date since its goal of 5,700 set back in 2015?

Paul R. Jervay Jr.

The Carolinian Advertising Consultant

Email: prjervay@gmail.com

From: [Hartye, William](#)
To: prjervay@gmail.com
Cc: adria@caro.news; [Octavia Rainey](#); [Niffenegger, John P.](#)
Subject: RE: FEEDBACK ON HOUSING & NEIGHBORHOODS ANNUAL ACTION PLAN
Date: Tuesday, March 15, 2022 10:48:00 AM

Mr. Jervay,

Thank you for your feedback. The City currently is working with the Raleigh Area Land Trust (RALT) to explore the land trust model in the College Park area that will provide a path to ownership for those with lower incomes. A stop for the [#10 GoRaleigh](#) bus line is already located on this site and will be improved as part of the development. It is also located directly across from [LeVelle Moton Park](#) and will include parking for bicycles.

As part of the Action Plan draft, additional funding has been proposed for the Homebuyer Assistance program that may be accessed citywide and provides low-income buyers with down payment assistance and 0% interest forgivable second mortgages. A number of homebuyers in East College Park have utilized this assistance in addition to the reduced home prices.

The draft Action Plan also includes support for:

- Homebuyer Counseling to low-income, first-time buyers to navigate the homebuying process and various resources available to them;

- Rapid-rehousing assistance to help those experiencing homelessness secure stable housing; and
- Homeowner Rehabilitation to keep residents safe by providing 5-year forgivable loans to households with qualifying incomes below 50% of Area Median Income (AMI).

Thank you again for your comments. Homeownership is a goal the City shares as is permanent affordability.

Will Hartye, AICP

Senior Community Development Coordinator

City of Raleigh

Housing & Neighborhoods Department

One City Plaza

421 Fayetteville Street, Suite 1200

Raleigh, NC 27601

Phone: (919) 996-6944

Raleighnc.gov

From: [Yvette Holmes](#)
To: [Hartye, William](#)
Subject: Re: Annual Action Plan & General Comments
Date: Thursday, March 31, 2022 1:57:08 PM

Hi Will - Thanks for catching me and staying around to talk. It was a beautiful day for the conversation!

I made edits to your notes below. Please let me know if you have any questions. Thank you!

Yvette Holmes, CEO
919-417-2237
yvette@serpromise.org

From: Hartye, William <William.Hartye@raleighnc.gov>
Sent: Thursday, March 31, 2022 11:49 AM
To: Yvette Holmes <yvette@serpromise.org>
Subject: RE: Annual Action Plan & General Comments

Hi Yvette,

Are these comments you would like to submit for inclusion in the plan? The comment period ends tonight. Although you are certainly still welcome to speak at the public hearing next Tuesday.

Thanks, Will

From: Hartye, William
Sent: Wednesday, March 23, 2022 10:26 AM
To: Yvette Holmes <yvette@serpromise.org>
Subject: Annual Action Plan & General Comments

Yvette,

Thank you for spending time last night to provide comments and information about the City's programs. I have distilled a few main thoughts below and want to verify these with you, and also have you please fill in additional comments or items I may have missed.

- The City should explore additional opportunities to create and/or support small-scale residential projects, similar to the Small-Scale Rental NOFA out currently. Additional funding should be included to support the additional subsidy needed to make these smaller projects viable. Acquisition by the City of smaller sites should continue.
- Programs such as Home Rehabilitation could be executed through third parties to increase speed and interest on the part of contractors.
- The Rock Quarry corridor should receive a more coordinated planning effort, similar to the BRT corridor plans already underway.
- Consider targeted property tax relief programs for existing homeowners living in neighborhoods that are rapidly gentrifying. The program should target household incomes up to 60% AMI.
- Gen Operating and programmatic support should be considered for neighborhood-based or community development organizations.
- Provide technical assistance and Invest in programs that educate homeowners on how to retain wealth, navigate market pressures, and understand city zoning and land-use policies.

Anything else?

Thanks again for sitting down with me and providing additional context for your work and recommendations,

Will

Will Hartye, AICP

Senior Community Development Coordinator

City of Raleigh

Housing & Neighborhoods Department

One City Plaza

421 Fayetteville Street, Suite 1200

Raleigh, NC 27601

Phone: (919) 996-6944

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Citizen Participation Plan

1. Introduction

The Citizen Participation Plan provides for and encourages citizens, organizations, businesses and other stakeholders to participate in the development of the Consolidated Plan, the Annual Action Plan, and any substantial amendments to the Plans. This plan describes how the City of Raleigh encourages and promotes participation through the establishment of policies and procedures for participation in the implementation of the Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Solutions Grant (ESG) programs.

The City of Raleigh is required to adopt a Citizen Participation Plan that meets HUD's minimum requirement as set forth in the regulations for "Consolidated Submission for Community Planning and Development Programs" (24 CFR 91 Subpart B). In carrying out these requirements the City of Raleigh understands that participation on the part of its citizens, organizations, businesses and other stakeholders is vital to the effectiveness of all Consolidated Plan activities. All persons, but especially very low, low and moderate-income persons, particularly those living in slum and blighted areas and in areas where funds are proposed to be used, can actively participate in the planning, implementation, and assessment of such activities.

The Citizen Participation Plan outlines procedures by which each of the requirements set forth in 91:105 of the Federal Regulations are carried out. This Plan is effective as of May 16, 2020 and remains in effect until such time as all activities assisted are completed, or until superseded by a new Plan. This Plan also supersedes any Plan that may have been in effect prior to May 16, 2020.

2. Goals of the Citizen Participation Plan

- A. To provide for involvement of citizens, organizations, businesses and other stakeholders in the identification of community development needs and housing; review of proposed activities and assessment of program performance in accordance with the schedule that is adopted each year.
- B. To enable the City to respond to the needs of its citizens through community development and housing programs, policies and plans.
- C. To encourage citizens, particularly very low, low and moderate income persons, residents of blighted neighborhoods, members of minority groups, non-profit agencies, public housing residents, the business and civic community, and special populations to submit their comments, questions and proposals regarding the City's Community Development Program.

3. Development of the Consolidated Plan

The Citizen Participation Plan requires that before adoption of the Consolidated Plan the City will provide the following information:

- A. The amount of assistance the City expects to receive from any grant funds and program income
- B. The range of activities that may be undertaken including the estimated amount that will benefit very low, low and moderate income persons
- C. The City's plans to minimize displacement
- D. The City's specific action steps to end chronic homelessness
- E. The City's long-term and short-term objectives for neighborhood revitalization strategies
- F. The City's public hearing calendar and process for developing and submitting the Consolidated Plan
- G. Provisions for receiving public comments on the proposed Plan

4. The Participation Process

The participation process is conducted both at a community wide level and in neighborhoods where revitalization activity is proposed or under way. The community wide process involves consultations with businesses, developers, community and faith based organizations, and other interested citizens concerning housing and redevelopment issues.

A. Agency Consultation Process: Agency consultations are a part of the ongoing process that includes service providers, advocacy groups and coordinating bodies responsible for providing services, especially to populations with special housing needs. City staff meet throughout the year with a number of local housing, social service, homeless, and economic development agencies to determine the housing needs of specific populations and groups.

B. Public Housing Authority Consultation: The City consults with the Raleigh Housing Authority (RHA) to facilitate city understanding of public housing needs and planned RHA activities, which will provide the basis for local certification of RHA's annual plans. Such consultation also helps ensure coordination between ConPlan activities and RHA activities in addressing issues of joint concern.

C. Neighborhood Outreach: The City meets with citizens' groups and conducts public meetings primarily in downtown neighborhoods. The City may also meet with neighborhood associations and other citizen groups as requested.

5. Consolidated Plan/Annual Action Plan Public Hearings

Each year the City conducts two (2) public hearings for the development of an Annual Action Plan for the City's housing and community development programs at a City Council meeting. The State of North Carolina's Open Meeting Law is followed.

A. Public Hearing #1: The first hearing occurs at the beginning of the planning process to review past program performance, to obtain views on community development and housing needs and to identify general strategic priorities for projected funding. The purpose of this hearing is to let very low, low and moderate income persons and residents of blighted neighborhoods offer their perceptions of problems within their neighborhoods and in the community at large and present proposals aimed at solving the problems. This public hearing is held in the City Council Chambers, **except as described in E. below.**

B. Public Hearing #2: The public hearing is held after staff has drafted the proposed annual budget and Consolidated Plan (or annual Action Plan) but prior to City Council approval of the Plan. This public hearing is held in the City Council Chambers, **except as described in E. below.**

C. Public Notice: Notices of all hearings will be advertised **not less than 12 days and not more than 30 days** prior to the hearing. Public notices indicate the date, time and location of the hearing, and the topics to be covered. Mailings (electronic where appropriate) are sent to interested persons and entities and the public hearing notices are posted on the City of Raleigh's web site at www.raleighnc.gov

D. Accessibility: All public meetings are held at locations providing accessibility for persons with physical disabilities and take place in locations convenient to residents.

E. When circumstances prevent an in-person event for public meetings or one or both public hearings held in support of a Consolidated Plan or Annual Action Plan, or amendment(s) to one or both, a "virtual" public meeting or public hearing will substitute for in-person gatherings, as allowed by the U.S. Department of Housing and Urban Development (HUD).

6. Public Comment Period

The Consolidated Plan and each Annual Action Plan are made available in draft form to receive public comments for at least thirty (30) days, **except in emergency situations such as that created by COVID-19, in which case the public comment period can be shortened to 5 days, as suggested by HUD.** Before the Plan is sent to HUD it will be approved by City Council. Copies of the draft Plan are available at the Housing and Neighborhoods Department office. The draft plan is also posted on the City's website at www.raleighnc.gov and accessible through the City's automated e-mail delivery system.

The proposed plan includes public comments made either orally at a public hearing or in writing. A summary of these comments or views and a summary of any comments or views not accepted and the rationale for not accepting the comments is attached to the final Consolidated Plan. Written responses are provided to all comments including complaints and grievances and/or proposals submitted during the Citizen Participation Planning process. The City makes every reasonable effort to provide a written response to all written comments within fifteen days of receipt of the

comment. A concise summary of citizen participation and consultation process, including efforts to broaden public participation, is included in the Plan.

7. Adequate and Timely Information

All aspects of citizen participation in the City of Raleigh government are conducted in an open manner, with freedom of access for all interested persons or groups. Information pertinent to the activities of the Housing and Neighborhoods Department is circulated to the public and made available for review in the Community Development Division (CDD) during normal business hours of the City. This information is made public subject to all applicable laws regarding confidentiality and personal privacy in the CDD office. Access to all documents is open except where prohibited by law. There may be reproduction costs charged to persons requesting personal copies of CDD documents. Every attempt is made to respond to written requests for information within 15 days of receipt.

8. Non-English Speaking Persons

Where a significant number of very low, low- and moderate-income residents of blighted neighborhoods speak and read a primary language other than English, public hearing notices and basic information summaries are produced and made available in the appropriate language(s). The Community Services Division of the Housing and Neighborhoods Department has resources to help with this requirement but a qualified interpreter inventory is maintained by the City of Raleigh's Communications Department, which also has a responsibility to promote public awareness of this service. It is the responsibility of the Housing and Neighborhoods Department to request this service when needed.

Informational material is sent as appropriate to non-profit and social services organizations that serve non-English speaking residents.

9. Persons with Disabilities

The City of Raleigh has taken steps to ensure that individuals with disabilities are able to participate in the public hearings held in City Council Chambers.

Audio enhancements have been installed in the City Council Chamber. Assistive listening devices are available upon request. Interpreters for deaf and hearing impaired persons are available. Citizens in need of such assistance should provide a 24-hour notice by calling 919-996-3100 (voice) or 996-3107 (TDD).

10. Annual Performance Assessment and Reports

The Consolidated Annual Performance and Evaluation Report (CAPER) is a summary of Community Development Block Grant, HOME, ESG, and other housing program accomplishments for the past fiscal year. The CAPER is sent to HUD ninety days after the completion of the program year. Prior to its submission, the Housing and Neighborhoods Department will inform the public of the CAPER's availability for comment through a local newspaper, the City's web page (www.raleighnc.gov), and electronic notices.

Citizens have 15 days to examine the report and provide comments prior to its submission to HUD. A summary of all comments or views are attached to the CAPER submitted to HUD.

11. Program Amendments

From time to time, the Consolidated Plan or Annual Action Plan may be substantially amended to reflect changes in program activities and priorities. The following are considered substantial changes:

- A. Addition of a new activity or new priority not previously described,
- B. Cancellation of an activity category or deletion of a priority,
- C. A change in the purpose, scope, location, or beneficiaries of an activity, and
- D. A substantial change in the allocation or distribution of funds is defined as when the dollar amount of that change is equal to or greater than 25% of the City's current fiscal year federal budget by source (e.g., CDBG is undergoing a substantial change when 25% or more of that year's CDBG allocation plus program income is affected).

Prior to amending the Consolidated Plan or Action Plan, citizens will be given reasonable notice of, and opportunity to comment on, such proposed changes and the re-use of funds. The process to substantially amend the plan includes a public hearing using the public notice process described in section 5c above and a thirty (30) -day comment period to receive citizen comments on the proposed amendment prior to implementation. Citizens' comments, orally or in writing, will be considered. A summary of the comments and the rationale for not accepting any comments will be attached to the substantial amendment of the Consolidated Plan.

12. Technical Assistance

Technical assistance is provided to citizen organizations and very low, low and moderate-income persons who live in CD areas through a number of city departments. Staff support is provided through Community Specialists in the Community Engagement Division of the Housing and Neighborhoods Department who provide technical assistance to citizen groups. Assistance consists in part in helping to organize meetings, explaining City policies and referring questions and concerns to appropriate City departments and other agencies. Within the Housing and Neighborhoods Department, there are staff persons who are available to answer questions related to the CDBG, HOME, and ESG programs, as well as to offer technical assistance to groups representative of LMI citizens in developing proposals for assistance under these programs.

13. Complaint Procedure

Written or oral complaints or grievances concerning the Consolidated Planning process or the CDBG, HOME, and ESG programs should first be directed to the City's Housing and Neighborhoods Department. It is the policy of the City to provide a procedure for the acknowledgment, presentation, consideration, investigation and disposition of complaints received concerning Community Development programs.

The Housing and Neighborhoods Department makes every effort to respond to all complaints within fifteen (15) days of receipt by sending a written response. Should the complainant not be satisfied, the complainant may arrange a meeting with the Housing and Neighborhoods Director or the Assistant City Manager for Community to discuss the complaint. If the complaint can still not be satisfied, a written complaint may be submitted in writing to the City's Compliance Officer located in the City Manager Office. Any citizen may make an oral or written petition to the City Council to discuss problems not resolved at the staff level.

14. Relocation Plan and Anti-Displacement Policy

Displacement will be minimized but when it is unavoidable, any person(s) displaced due to the activities of the Consolidated Plan Programs receive(s) relocation assistance and relocation payments in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act) or 106(d) of the Housing and Community Development Act of 1974. The Relocation Staff provides information and assistance one-on-one to prospective displaced persons.

City of Raleigh, NC Recapture Policy

The City of Raleigh (City) offers a Homebuyer Assistance Program through which funds are made available to Low and Moderate Income (LMI) homebuyers. Funds may be used for down-payment assistance, closing costs and/or to cover any senior loan financing gap for the purchase of single family housing that is modest housing as set forth in 24 CFR §92.254(a). Funding sources for these activities include City affordable housing bond program income and/or federal HOME Investment Partnership Program (HOME) as well as Community Development Block Grant (CDBG) funds. If CDBG funds are used, 24 CFR 570.201(n) applies and CDBG assistance is limited to 50% of costs.

The City, in compliance with 24 CFR Part 254(a)(5), uses the recapture provision for its HOME assisted activities, and applies the HOME regulations regardless of funding source used (i.e., where “HOME” is used below, it means “HOME or other funds provided for these uses by the City of Raleigh”). The recapture policy will be in effect for a timeframe equal to the period of affordability as described by the HOME program regulations under 24 CFR 92.254(a)(5)(i). The following table outlines the required minimum affordability periods.

HOME Amount Per Unit	Minimum Period of Affordability
Under \$15,000	5 years
\$15,000 - \$40,000	10 years
Over \$40,000	15 years

The City will use the following provisions when providing direct HOME subsidies to LMI homebuyers:

- The City will not use subrecipients, urban counties, CHDOs, or consortium members to make these direct HOME subsidies.
- Only the City’s Housing and Neighborhood Department will make direct HOME subsidies available to LMI homebuyers.
- The City requires full or partial repayment of the direct HOME subsidy when resale occurs during the affordability period. Direct subsidies are provided in the form of deferred payment, subordinate loans at 0% interest rate. During the term of the Note, the balance due under the Note shall be reduced by twenty-five percent (25%) of the loan amount at the five, ten, fifteen, and twenty-year anniversaries of the date of the Note.
- If there are no net proceeds or insufficient proceeds to recapture the HOME investment due, the amount subject to recapture is limited to what is available from net proceeds.
- The City will use a Note, Deed of Trust, Loan Agreement and Deed Restrictions to enforce the recapture provisions of the HOME program found at 24 CFR 92.253(a)(5)(ii).
- The City will permit the homeowner to refinance the first mortgage without repayment of the subordinate mortgage (direct subsidy) for the purpose of lowering the interest rate. The homeowner is not permitted to consolidate debts or take cash out.
- In the event of foreclosure or short sale, in addition to the collection of the remaining balance of City’s subordinate mortgage, if any, the City will receive from said sale a percentage of the increase, if any, as computed by subtracting the greater of (1) Homeowners’ purchase price mentioned above or (2) in the case of a foreclosure or short sale, the total debt secured by the mortgagee’s lien, from the purchase price of the sale to the third-party purchaser.

DEFINITIONS

DIRECT HOME SUBSIDY is the amount of federal HOME assistance, including any program income that enables the homebuyer to buy their house. The direct subsidy includes HOME funds used for down payment, closing costs and/or to cover any senior loan financing gap.

NET PROCEEDS are defined as the proceeds from the sale, transfer or alienation of the Property minus non-HOME Loan repayments and any closing costs.

NC507 Continuum of Care Written Standards

OVERVIEW

The Raleigh-Wake Partnership to End and Prevent Homelessness (The Partnership) serves as the NC-507 Wake County Continuum of Care lead agency for the City of Raleigh and Wake County. The Partnership has developed these program standards to establish specific community-wide expectations for the best chance of ending homelessness. These guidelines create consistency across the community, protect our clients by putting their needs first, and provide a baseline for holding all CoC programs to a specific standard of care.

The Department of Housing and Urban Development (HUD) requires every Continuum of Care to evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program and report to HUD (24 CFR 578.7(a)(7)). In consultation with recipients of federal program funds within the geographic area, CoCs must establish and operate either a centralized or coordinated entry system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services.

In consultation with recipients of ESG program funds within the geographic area, CoCs must establish and consistently follow written standards for providing CoC assistance. At a minimum, these standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance (these policies must include the emergency transfer priority required under §578.99(j)(8));
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance (these policies must include the emergency transfer priority required under §578.99(j)(8));
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance (these policies must include the emergency transfer priority required under §578.99(j)(8))

In addition, the following are the requirements for Written Standards for all Emergency Solution Grant (ESG) funded program types per 24 CFR Part 576(3): Emergency Solutions Grant Program Interim Rule:

- ESG funded programs are required to coordinate with other programs targeted to people experiencing homelessness in the area covered by the CoC to provide a strategic, community-wide system to prevent and end homelessness for the CoC; and
- ESG funded programs are required to coordinate to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for households experiencing homelessness or at-risk of homelessness.

DEFINITIONS

Acuity: When using the VI-SPDAT prescreens, acuity means the presence of a presenting issue based on the prescreening score. Acuity on the prescreening tool is expressed as a number with a higher score representing more complex, co-occurring issues likely to impact overall stability in permanent housing. When using a case management tool, acuity refers to the severity of the presenting issue and the ongoing goals in addressing these issues.

Case Management Tool: A standardized or community-approved tool for case management to track outcomes in the coordinated entry process. Housing programs administer this tool at program entry, housing entry, and every six months thereafter until program discharge. Upon discharge from the program, housing case managers administer the tool one final time 12 months later, when possible, to ensure the household continues to make progress.

Chronically Homeless: (1) an individual with a disability as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)) who: (i) lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) has Page 4 of 11 been homeless and living as described in (i) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating occasions included at least 7 consecutive nights of not living as described in (i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12- month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility; (2) an individual who has been residing in an institutional care facility, including jail, substance abuse, or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or (3) a family with an adult head of household (or if there is not an adult in the family, a minor head of household) who meets all of the criteria in (1) or (2) of this definition, including a family whose composition had fluctuated while the head of homelessness has been homeless. (24 CFR 578.3)

Comparable Database: HUD-funded providers of housing and services (recipients of ESG and/or CoC funding) who cannot enter information by law into HMIS (victim service providers as defined under the Violence Against Women and Department of Justice Reauthorization Act of 2005) must operate a database comparable to HMIS. According to HUD, “a comparable database . . . collects client-level data over time and generates unduplicated aggregate reports based on the data.” The recipient or sub-recipient of CoC and ESG funds may use a portion of those funds to establish and operate a comparable database that complies with HUD’s HMIS requirements. (24 CFR 578.57)

Coordinated Entry: “A centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals across a geographic area. The . . . system covers the geographic area (designated by the CoC), is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool” (24 CFR 578.3). CoC’s have the ultimate responsibility to implement coordinated entry in their geographic area.

Developmental Disability: As defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002): (1) A severe, chronic disability of an individual that (i) is attributable to a mental or physical impairment or combination of mental and physical impairments; (ii) is manifested before the individual attains age 22; (iii) is likely to continue indefinitely; (iv) results in

substantial functional limitations in three or more of the following major life activities: (a) self-care; (b) receptive and expressive language; (c) learning; (d) mobility; (e) self-direction; (f) capacity for independent living; (g) economic self-sufficiency; (v) reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated. (2) an individual from birth to age 9, inclusive, who has a substantial developmental disability or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria in (1)(i) through (v) of the definition of "developmental disability" in this definition if the individual, without services or supports, has a high probability of meeting these criteria later in life. (24 CFR 578.3) Page 5 of 11

Disabling Condition: According to HUD: (1) a condition that: (i) is expected to be of indefinite duration; (ii) substantially impedes the individual's ability to live independently; (iii) could be improved by providing more suitable housing conditions; and (iv) is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury; or a developmental disability, as defined above; or the disease of Acquired Immunodeficiency Syndrome (AIDS) or any conditions arising from AIDS, including infection with the Human Immunodeficiency Virus (HIV). (24 CFR 583.5)

Diversion: Diversion is a strategy to prevent homelessness for individuals seeking shelter or other homeless assistance by helping them identify immediate alternate housing arrangements, and if necessary, connecting them with services and financial assistance to help them return to permanent housing. Diversion practices and programs help reduce the number of people becoming homeless and the demand for shelter beds.

Family: A family includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status: (1) a single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or (2) a group of persons residing together, and such group includes, but is not limited to: (i) a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family); (ii) an elderly family; (iii) a near-elderly family; (iv) a disabled family; (v) a displaced family; and (vi) the remaining member of a tenant family. (24 CFR 5.403)

Homeless: Category 1: an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (ii) an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals); or (iii) an individual who exits an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution; Category 2: an individual or family who will immediately lose their primary nighttime residence, provided that: (i) the primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) no subsequent residence has been identified; and (iii) the individual or family lacks the resources or support networks (e.g. family, friends, faith-based or other

social networks) needed to obtain other permanent housing; or Category 4: any individual or family who: (i) is fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or family member, including a child, that has either taken place within the individual's or family's primary nighttime residence; (ii) had no other residence; and (iii) lacks the resources or support networks (e.g. family, friends, and faith-based or other social networks) to obtain other permanent housing. (24 CFR 578.3) Page 6 of 11

Housing First: A national best practice model that quickly and successfully connects individuals and families experiencing homelessness to permanent housing without preconditions such as sobriety, treatment compliance, and service and/or income requirements. Programs offer supportive services to maximize housing stability to prevent returns to homelessness rather than meeting arbitrary benchmarks before permanent housing entry.¹

Prevention and Diversion Screening Tool: A tool used to reduce entries into the homeless service system by determining a household's needs upon initial presentation to shelter or other emergency response organizations. This screening tool gives programs a chance to divert households by assisting them to identify other permanent housing options and, if needed, providing access to mediation and financial assistance to remain in housing.

Rapid Re-housing: A national best practice model designed to help individuals and families exit homelessness as quickly as possible, return to permanent housing, and achieve long-term stability. Like Housing First, rapid rehousing assistance does not require adherence to preconditions such as employment, income, absence of a criminal record, or sobriety. Financial assistance and housing stabilization services match the specific needs of the household. The core components of rapid rehousing are housing identification/relocation, short- and/or medium-term rental and other financial assistance, and case management and housing stabilization services. (24 CFR 576.2)

Transitional Housing: Temporary housing for participants who have signed a lease or occupancy agreement with the purpose to transition households experiencing homelessness into permanent housing within 24 months.

VI-SPDAT (Vulnerability Index-Service Prioritization Decision Assistance Tool): An evidence-based tool used throughout NC-507 to determine initial acuity and set prioritization and intervention for permanent housing placement.

¹ <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1448313/pdf/0940651.pdf>

Street Outreach Written Standards

The NC-507 Continuum of Care developed the following Street Outreach performance standards to ensure:

- Program accountability to individuals and families experiencing unsheltered homelessness, specifically populations at greater risk or with the longest histories of homelessness
- Program compliance with the Department of Housing and Urban Development
- Service consistency within programs
- Adequate program staff competence and training, specific to the target population served

EXPECTATIONS

These performance standards attempt to provide a high standard of care that places community and client needs first. Based on best practices, this high standard of care is necessary to achieve our goal of ending homelessness in Raleigh/Wake County. The Partnership recommends that street outreach programs funded through other funding sources also follow these standards.

Unless otherwise outlined by the programs funding source, providers of Street Outreach must target unsheltered homeless individuals and families who lack a fixed, regular, and adequate nighttime residence, such as an individual or family with a primary nighttime residence that is in a public or private place not meant for human habitation including but not limited to a car, park, abandoned building, bus or train station, airport, or camping ground.

Outreach programs must meet people where they are, both geographically and emotionally. This means meeting people in locations that are most convenient for them as well as developing trusting relationships with unsheltered people through active listening, persistence, consistency, and without judgment. Because outreach happens in non-traditional settings with people who often have complex needs, outreach workers face challenges that require special skills to do their job well.

Engaging unsheltered people on their turf means workers must be able to maintain their and their client's safety, have strong ethics and boundaries, and good coping skills after working under very difficult and stressful circumstances. Outreach workers must make frequent judgment calls about balancing safety and ethics with clients' needs.

Since street outreach programs work with a vulnerable population that often has little or no access to services, the main component of street outreach work is to ensure the survival of people living on the streets. Street outreach programs provide necessary supplies for living unsheltered and assist people to access emergency shelters, especially during very cold or hot times of the year.

Regularly engaging community providers, including law enforcement and other city and county departments encountering unsheltered people, and creatively including homeless and formerly homeless individuals to assist in the engagement of this population are necessary to provide effective street outreach.

Street outreach programs must operate with a Housing First approach. Housing First programs believe that anyone can and should be housed and the barriers to permanent housing should be minimized. Housing First allows street outreach programs to move unsheltered individuals more quickly from places

not meant for human habitation into permanent housing.

PERFORMANCE STANDARDS PERSONNEL

STANDARD:

The program shall adequately staff services with qualified personnel to ensure the quality of service delivery, effective program administration, and the safety of staff and program participants.

Benchmarks

- The organization selects employees and/or volunteers with adequate and appropriate knowledge, experience, and stability for working with unsheltered individuals and families.
- The organization provides time for all employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance, and best practices.
- The organization trains all employees and/or volunteers on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program.
- All programs should use the Homeless Management Information System (HMIS) wherein all end users must abide by the NC HMIS User and Participation Agreements, including adherence to the strict privacy and confidentiality policies.
- Staff supervisors of casework, counseling and/or case management services have, at a minimum, a bachelor's degree in a human service-related field and/or experience working with unsheltered individuals and families.
- All program staff have written job descriptions that address tasks staff must perform and the minimum qualifications for the position.
- The organization will train program staff on general topics such as self-care, teamwork, boundaries and ethics, and personal safety. It will also train staff on specific skills necessary to effectively connect with unsheltered individuals, including, but not limited to, relationship- building, motivational interviewing, cultural competence, effective referrals and linkages, basic medical and mental health care, and conflict de-escalation.

STREET OUTREACH

Standard: Street outreach programs will provide assertive outreach and engagement to unsheltered individuals living in places not meant for human habitation, and assist them in accessing emergency shelter, physical and behavioral health services, income supports, and permanent housing.

Benchmarks:

- Street outreach programs will assertively outreach and engage unsheltered individuals where they are, seeking them in campsites, under bridges, near the entrance and exit ramps to roads and highways, in abandoned buildings, living in bus or train stations, or other places not meant for human habitation.
- Street outreach programs will collaborate with local service or basic needs providers and organizations where unsheltered individuals seek basic services such as food pantries, crisis centers, community centers, day shelters, and others, setting up regularly scheduled times to outreach and engage unsheltered individuals in these locations.
- Street outreach programs should provide outreach and engagement, crisis intervention counseling, case management, emergency and permanent housing planning, employment and other income assistance, and life skills training. Program staff will help unsheltered individuals connect to physical and mental health services, substance abuse treatment, transportation, services for special populations (i.e. developmental disabilities, HIV/AIDS), and other mainstream services, including public benefits such as Social

Security Disability, Medicaid/Medicare, Food Stamps, TANF.

- Street outreach programs may not deny or terminate services to individuals unwilling or unable to obtain higher-level services or follow a basic case management plan.
- Street outreach programs must actively participate in the NC-507 Coordinated Access System. Program staff will assess unsheltered individuals with the VI-SPDAT as soon as possible and participate in community bi-weekly case conferencing meetings.
- Street outreach programs shall not charge money for any housing or supportive service provided.
- Street outreach programs must work to connect their clients to permanent housing programs, such as rapid re-housing and permanent supportive housing, in the community. When appropriate based on the individual's needs and wishes, the provision of or referral to rapid rehousing services that can quickly assist individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to an emergency shelter or transitional housing services. If a permanent housing program does not have availability or the client is not currently matched to a program, Street Outreach programs must continue to engage clients and discuss alternative housing options.
- Communities will share information across outreach teams and sites and engage with other systems, including law enforcement, hospitals, and emergency departments, corrections, libraries, and job centers to proactively seek all unsheltered people within CoC, including people living in encampments or tent cities, and not be limited to serving only persons seeking assistance. This *must* be conducted by prioritizing the client's privacy, health, and safety above all else.
- All outreach should be person-centered and emphasize building rapport and trust as a means of helping people obtain housing with appropriate services.

OUTREACH AND ENGAGEMENT

Standard: Programs will locate, identify, and build relationships with unsheltered people experiencing homelessness and engage them to provide immediate support, intervention, and connections with homeless assistance programs, essential services, and permanent housing programs.

Benchmarks:

- All participants must meet the following program eligibility requirements for street outreach programs unless otherwise specified by a program funder:
 - Unsheltered homeless, living in places not meant for human habitation such as campsites, abandoned buildings, bus or train stations, in cars, or under bridges
 - All Street Outreach providers must use the standard order of priority for documenting evidence to determine unsheltered homeless status. Street Outreach must document in the client file that the agency attempted to obtain the documentation in the preferred order. The order should be as follows:
 - Third-party documentation (including HMIS)
 - Intake worker observations through outreach and visual assessment
 - Self-certification of the person receiving assistance
 - Programs should engage individuals, make an initial assessment of needs, and determine unsheltered homeless status. During outreach, if programs determine that an individual does not meet the definition of unsheltered homelessness, they should still connect any literally homeless person needing assistance to the Coordinated Entry System to access needed services, but not enroll them for expanded services in the street outreach program.
 - Programs can only turn away unsheltered individuals from program entry for the following reasons:

- The individual does not meet the unsheltered homeless definition
- The safety of staff is at imminent risk
- The individual does not meet other program requirements set by the program funder. i.e. PATH, Runaway and Homeless Youth (RHY) Street Outreach, etc.
- Programs cannot disqualify an individual or family from entry because of:
 - Employment status or lack of income.
 - Evictions or poor rental history.
 - Unwillingness or inability to obtain higher-level services or follow a basic case management plan.
- Programs may make services available and encourage engaged individuals to participate in higher-level services but cannot make service usage a requirement.
- Street outreach programs must continue to outreach and engage unsheltered individuals regularly, offering them higher-level services, and ensuring basic needs are met.
- Programs will maintain releases of information, case notes, and all pertinent demographic and identifying data in HMIS as allowable by program type. Paper files should be maintained in a locked cabinet behind a locked door with access strictly reserved for caseworkers and administrators.

CASE MANAGEMENT SERVICES

Standard: Street outreach programs shall provide access to case management services by trained staff to any unsheltered individuals, matching their needs and desires.

Benchmarks:

- Street outreach staff provide regular and consistent case management and connect program participants to essential services based on the individual's specific needs and the level at which the participant desires.
 - Case management includes:
 - Building trusting, lasting relationships with unsheltered individuals.
 - Providing access to essential services, such as emergency health services, emergency mental health services, and transportation to eligible services.
 - Assessing, planning, coordinating, implementing, and evaluating the services delivered to the participant. Program staff will engage participants in an individualized housing and services plan. Participants do not need to access additional services to be referred to permanent housing providers.
 - Helping clients to create strong support networks and participate in the community, as they desire.
 - Encouraging unsheltered individuals to seek emergency shelter and advocating with local shelter providers to accept and work with the individual, per the Coordinated Entry System.

TERMINATION STANDARD:

Termination should be limited to only the most severe cases. Programs will exercise sound judgment and examine all extenuating circumstances when determining if violations warrant program termination (24 CFR 576.402).

Benchmarks:

- In general, the program may terminate assistance under a formal process established by the program

that recognizes the rights of individuals and families affected.

- The program is responsible for providing evidence that extenuating circumstances were considered and significant attempts were made to help the client continue in the program. Programs should have a formal, established grievance process in its policies and procedures for participants who feel assistance was wrongly terminated.
- Programs should only terminate assistance when a participant has presented a terminal risk to staff or other clients. If a barred client presents him/herself later, programs should review the case to determine if the debarment can be removed to give the participant a chance to receive further assistance.
 - Programs may deny entry or terminate services for program-specific violations relating to the safety and security of program staff and participants.

Emergency Shelter Written Standards

The NC-507 Continuum of Care developed the following Emergency Shelter performance standards to ensure:

- Program accountability to individuals and families experiencing homelessness, specifically populations at greater risk or with the longest histories of homelessness
- Program compliance with the Department of Housing and Urban Development and the Department of Veteran Affairs
- Service consistency within programs
- Adequate program staff competence and training, specific to the target population served

EXPECTATIONS

All program grantees using the Department of Housing and Urban Development Continuum of Care and the Department of Veteran's Affairs VA Supportive Housing (VASH) funding must adhere to these performance standards. Programs funded through the Continuum of Care will be monitored by The Partnership to ensure compliance. These performance standards attempt to provide a high standard of care that places community and client needs first. Based on proven best practices, this high standard of care is necessary to achieve our goal of ending homelessness in Wake County.

EMERGENCY SHELTER

Emergency shelter is any facility whose primary purpose is to provide temporary housing for individuals or families experiencing homelessness for 90 days or less. Emergency shelters, as we know them today, emerged during the late 1970s and early 1980s in response to an increasing number of individuals experiencing homelessness. These initial shelters were meant to provide a short-term emergency stay for individuals as they rehoused themselves. However, because of decreased affordable housing in urban centers, a lack of substantive supportive services catering to the needs of homeless individuals, and a large subpopulation of individuals with disabling conditions, the movement out of the emergency shelter into permanent housing stalled with many individuals staying in the shelter for long periods of time.

With the advent of permanent supportive housing and rapid rehousing based on the national best practice, Housing First, communities are moving some of their most vulnerable homeless individuals and families with the longest histories of homelessness into permanent housing. This allows the emergency shelter system to regain its original intention, providing individuals experiencing homelessness a temporary stay until they can regain permanent housing.

Emergency shelters serve a wide variety of people experiencing homelessness in our communities and may target their services to a population. Many emergency shelters serve a single-gender, individuals and/or families, people fleeing domestic violence, or a combination thereof. The most effective emergency shelters direct their services and resources toward a truly interim housing solution and have strong connections to permanent housing programs catering to the needs of people experiencing homelessness. Emergency shelters can provide short-term housing for individuals and families waiting for placement in a rapid rehousing or permanent supportive housing program.

PERFORMANCE STANDARDS PERSONNEL

STANDARD:

Programs shall adequately staff services with qualified personnel to ensure the quality of service delivery, effective program administration, and the safety of program participants.

Benchmarks

- The organization selects employees and/or volunteers with adequate and appropriate knowledge, experience, and stability for working with individuals and families experiencing homelessness and/or other issues that place individuals and/or families at risk of homelessness.
- The organization provides time for all employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance, and best practices.
- The organization trains all employees and/or volunteers on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program.
- All paid and volunteer staff participate in ongoing internal and/or external training on the community-approved prevention and diversion screening tool, the individual and family VI-SPDAT screening tool, and the community-approved case management tool.
- For programs using the Homeless Management Information System (HMIS), all end users must abide by the NC HMIS End User and Participation Agreements, including adherence to the strict privacy and confidentiality policies.
- Staff supervisors of casework, counseling, and/or case management services have, at a minimum, a bachelor's degree in a human service-related field and/or experience working with individuals and families experiencing homelessness and/or other issues that place individuals and/or families at risk of homelessness.
- Staff supervising overall program operations have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
- All program staff have written job descriptions that address tasks staff must perform and the minimum qualifications for the position.
- If the shelter provides case management as part of its programs, case managers provide case management with the designated case management tool frequently (every six months minimum) for all clients.
- Organizations should share and train all program staff on the NC-507 Emergency Shelter Written Standards.

CLIENT INTAKE PROCESS STANDARD:

Programs will actively participate in their community's coordinated entry system. Programs will serve the most vulnerable individuals and families needing assistance.

Benchmarks

- All adult program participants must meet the following program eligibility requirements in ESG-Funded Emergency Shelter:
 - 18 years or older
 - Literally homeless, imminently at-risk of homelessness, and/or fleeing or attempting to flee domestic violence (see definitions listed above for Category 1, 2, and 4 of the

homeless definition)

- All ESG recipients must use the standard order of priority for documenting evidence to determine homeless status and chronically homeless status. Grantees must document in the client file that the agency attempted to obtain the documentation in the preferred order. The order should be as follows:
 - Third-party documentation (including HMIS)
 - Intake worker observations through outreach and visual assessment
 - Self-certification of the person receiving assistance
- Programs can only turn away individuals and families experiencing homelessness from program entry for the following reasons:
 - Household makeup (provided it does not violate HUD's Fair Housing and Equal Opportunity requirements): singles-only programs can disqualify households with children; families-only programs can disqualify single individuals
 - All program beds are full
 - If the program has in residence at least one family with a child under the age of 18, the program may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the program so long as the child resides in the same housing facility (24 CFR 578.93)
- Programs cannot disqualify an individual or family because of employment status or lack of income.
- Programs cannot disqualify an individual or family because of evictions or poor rental history.
- Programs may make services available and encourage adult household members to participate in program services but cannot make service usage a requirement to deny initial or ongoing services.
- Programs will maintain release of information, case notes, and all pertinent demographic and identifying data in HMIS as allowable by program type. Paper files should be maintained in a locked cabinet behind a locked door with access strictly reserved for caseworkers and administrators.
- Programs may deny entry or terminate services for program-specific violations relating to the safety and security of program staff and participants.

EMERGENCY SHELTER STANDARD:

Shelters will provide safe, temporary housing options that meet participant needs under guidelines set by the Department of Housing and Urban Development.

Benchmarks:

- Shelters must meet state or local government safety, sanitation, and privacy standards. Shelters should be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- Shelters must be accessible under Section 504 of the Rehabilitation Act, the Fair Housing Act, and Title II of the Americans with Disabilities Act, where applicable.
- Shelters may provide case management, counseling, housing planning, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment, transportation, and services for special

populations per 24 CFR 576.102 but cannot deny shelter services to individuals and families unwilling to participate in supportive services. See the next section for specific required and optional services shelters must provide.

- Shelters providing shelter to families may not deny shelter to a family based on the age and gender of a child under 18 years of age.
- Shelters must comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821- 4946), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851- 4956), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R.
- Shelters must actively participate in their community's coordinated entry system.
- Shelters shall not charge money for any housing or supportive service provided.
- Programs must work to link their clients to permanent housing programs, such as rapid rehousing and permanent supportive housing, in the community.

CASE MANAGEMENT SERVICES STANDARD:

Shelters shall provide access to case management services by trained staff to each individual and/or family in the program.

Benchmarks (Standard Available Services)

- Shelters must provide the client with a written copy of the program rules and the termination process before he/she begins receiving assistance.
- Shelter staff provide regular and consistent case management to shelter residents based on the individual's or family's specific needs. Case management includes:
 - Assessing, planning, coordinating, implementing, and evaluating the services delivered to the resident(s).
 - Assisting clients to maintain their shelter bed in a safe manner and understand how to get along with fellow residents.
 - Helping clients to create strong support networks and participate in the community as they desire.
 - Creating a path for clients to permanent housing through providing rapid rehousing or permanent supportive housing or a connection to another community program that provides these services.
 - If the shelters provide case management as part of its programs, use of the community-approved case management tool for ongoing case management and measurement of acuity over time, determining changes needed to better serve residents.
- Shelter staff or other programs connected to the shelter through a formal or informal relationship will assist residents in accessing cash and non-cash income through employment, mainstream benefits, childcare assistance, health insurance, and others. Ongoing assistance with basic needs.

Benchmarks (Optional but recommended services, often from other providers)

- Representative payee services.
- Basic life skills, including housekeeping, grocery shopping, menu planning, and food preparation, consumer education, bill paying/budgeting/financial management, transportation, and obtaining vital documents (social security cards, birth certificates, school records).
- Relationship-building and decision-making skills.

- Education services such as GED preparation, post-secondary training, and vocational education.
- Employment services, including career counseling, job preparation, resume-building, dress, and maintenance.
- Behavioral health services such as relapse prevention, crisis intervention, medication monitoring, and/or dispensing outpatient therapy and treatment.
- Physical health services such as routine physicals, health assessments, and family planning.
- Legal services related to civil (rent arrears,

TERMINATION STANDARDS:

Termination should be limited to only the most severe cases. Programs will exercise sound judgment and examine all extenuating circumstances when determining if violations warrant program termination (24 CFR 576.402). NC-507 CoC recommends programs work with other community service providers to develop a board to hear client grievances.

Benchmarks

- In general, if a resident violates program requirements, the shelter may terminate assistance under a formal process established by the program that recognizes the rights of individuals and families affected. The program is responsible for providing evidence that it considered extenuating circumstances and made significant attempts to help the client continue in the program. Programs should have a formal, established grievance process in its policies and procedures for residents who feel the shelter wrongly terminated assistance.
- Shelters must provide the client with a written copy of the program rules and the termination process before he/she begins receiving assistance and keep a copy signed by the client in the file.
- Programs may carry a barred list when a client has presented a terminal risk to staff or other clients. If a barred client presents him/herself at a later date, programs should review the case to determine if the debarment can be removed to give the program a chance to provide further assistance at a later date.

CLIENT AND PROGRAM FILES STANDARD:

Shelters will keep all client files up-to-date and confidential to ensure effective delivery and tracking of services.

Benchmarks

- Client and program files should, at a minimum, contain all of the information and forms required by HUD at 24 CFR 576.500 and the state ESG office, service plans, case notes, referral lists, and service activity logs including services provided directly by the shelter program and indirectly by other community service providers. ESG requires:
 - Documentation of homeless status (see above for the priority of types of documentation)
 - Determination of ineligibility, if applicable, which shows the reason for this determination
 - Annual income evaluation
 - Program participant records
 - Documentation of using the community's coordinated entry system
 - Compliance with shelter and housing standards
 - Services and assistance provided
 - Expenditures and match
 - Conflict of interest/code of conduct policies

- Homeless participation requirement
- Faith-based activity requirement, if applicable
- Other Federal requirements, if applicable
- Confidentiality procedures
- All client information should be entered into the NC HMIS under data quality, timeliness, and additional requirements found in the agency and user participation agreements. At a minimum, programs must record the date the client enters and exits the program, enter HUD required data elements, and update the client's information as changes occur.
- Programs must maintain the security and privacy of written client files and shall not disclose any client-level information without written permission of the client as appropriate, except to program staff and other agencies as required by law. Clients must give informed consent to release any client identifying data to be utilized for research, teaching, and public interpretation. All programs must have consent for release of information form for clients to use to indicate consent in sharing information with other parties.
- All records about ESG funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Agencies may substitute written files with microfilm, photocopies, or similar methods.

EVALUATION AND PLANNING STANDARD:

Shelter will conduct ongoing planning and evaluation to ensure programs continue to meet community needs for individuals and families experiencing homelessness.

Benchmarks

- Agencies maintain written goals and objectives for their services to meet the outcomes required by ESG.
- Programs review case files of clients to determine if existing services meet their needs. As appropriate, programs revise goals, objectives, and activities based on their evaluation.
- Programs conduct, at a minimum, an annual evaluation of their goals, objectives, and activities, adjusting the program as needed to meet the needs of the community.
- Programs regularly review project performance data in HMIS to ensure the reliability of data. Programs should review this information, at a minimum, quarterly.

Rapid Rehousing Written Standards

The NC-507 Continuum of Care developed the following Rapid Rehousing performance standards to ensure:

- Program accountability to individuals and families experiencing homelessness, specifically populations at greater risk or with the longest histories of homelessness
- Program compliance with the Department of Housing and Urban Development and the Department of Veteran Affairs
- Service consistency within programs
- Adequate program staff competence and training, specific to the target population served

EXPECTATIONS

All program grantees using Department of Housing and Urban Development Continuum of Care, Emergency Solutions Grant, VA SSVF, and HOME TBRA funding must adhere to these performance standards. Rapid Rehousing programs funded through the Continuum of Care and Emergency Solutions Grant will be monitored by the Partnership to ensure compliance. The NC-507 CoC recommends that rapid rehousing programs funded through other sources also follow these standards. These performance standards attempt to provide a high standard of care that places community and client needs first. Based on proven best practices, this high standard of care is necessary to achieve our goal of ending homelessness in Wake County.

Some requirements and parameters for rapid rehousing assistance vary from program to program. It will be necessary to refer to the regulations for each program along with these program standards (CoC: 24 CFR 587; ESG: 24 CFR 576; SSVF: 38 CFR 62; HOME: 24 CFR 570). The program standards note many of the differences below in each of the following sections. For other helpful documents to check for compliance with requirements, see the footnotes below.²

RAPID REHOUSING

Rapid rehousing provides an immediate permanent housing solution for vulnerable homeless individuals and families by providing short-term rental assistance and services.³ Common publicly-funded types of rapid rehousing programs include HUD CoC-funded rapid rehousing, Emergency Solutions Grant-funded rapid rehousing, Supportive Services for Veteran Families (SSVF) programs funded through the Department of Veteran Affairs, and Tenant-Based Rental Assistance programs funded through the HOME Investments Partnership (HOME) formula grant program. Research shows rapid rehousing to be one of the most effective types of contemporary homeless service programs to end homelessness from a financial and housing stability perspective.⁴

² https://www.hudexchange.info/resources/documents/Rapid_Re-Housing_ESG_vs_CoC.pdf;

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2

³ <https://www.gpo.gov/fdsys/granule/CFR-2012-title24-vol3/CFR-2012-title24-vol3-part576/content-detail.html>

⁴ <http://www.urban.org/sites/default/files/alfresco/publication-pdfs/2000265-Rapid-Re-housing-What-theResearch-Says.pdf>

In general, rapid rehousing programs have latitude in determining the target population the program will serve and a great degree of flexibility in how programs apply subsidies, in duration and amount, to house and stabilize individuals and families experiencing homelessness. Many rapid rehousing programs focus on ending homelessness among youth and family populations. Other programs focus exclusively on veterans and veteran families. Others design their programs to target the needs of survivors of domestic violence or persons experiencing chronic or episodic homelessness. Rapid rehousing is an intervention that can adapt to serve individuals, families, and youth with a variety of housing barriers.

No matter the focus population, all rapid rehousing programs should adopt a Housing First philosophy by reducing barriers to eligibility (i.e. no income, sobriety, and rental history) and housing people as quickly as possible. These programs should also participate in the coordinated entry process, including the local prioritization of individuals and families for permanent housing interventions. In Wake County, each Access Site and Emergency Shelter utilizes a community-approved prevention and diversion screening tool and the Individual and Family VI-SPDAT Prescreen Tools to assist in determining priorities and housing triage methods, while permanent housing programs use a case management tool for more developed housing placement purposes and intensive case management over time. Communities use the VI-SPDAT to prioritize individuals and families experiencing literal homelessness based on chronicity, length of time homeless, and an acuity score that indicates the type of housing intervention best suited to their ongoing needs.

PERFORMANCE STANDARDS PERSONNEL

STANDARD:

Programs shall adequately staff services with qualified personnel to ensure the quality of service delivery, effective program administration, and the safety of program participants.

Benchmarks

- The organization selects employees and/or volunteers with adequate and appropriate knowledge, experience, and stability for working with individuals and families experiencing homelessness and/or other issues that place individuals and/or families at risk of homelessness.
- The organization provides time for all employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance, and best practices.
- The organization trains all employees and/or volunteers on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program.
- Program designates staff whose responsibilities include identification and recruitment of landlords, encouraging them to rent to homeless households served by the program. Staff have the knowledge, skills, and agency resources to understand landlords' perspectives, understand landlord and tenant rights and responsibilities, and negotiate landlord supports. Grantees should train their case management staff who have housing identification responsibilities on this specialized skill set to perform the landlord recruitment function effectively.
- For programs using the Homeless Management Information System (HMIS), all end users must abide by the NC HMIS End User and Participation Agreements, including adherence to the strict privacy and confidentiality policies.
- Staff supervisors of casework, counseling, and/or case management services have, at a minimum, a bachelor's degree in a human service-related field and/or experience working with individuals and families experiencing homelessness and/or other issues that place individuals and/or families at risk of homelessness.

- Staff supervising overall program operations have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
- All program staff have written job descriptions that address tasks staff must perform and the minimum qualifications for the position. Ideally, rapid rehousing programs would have staff dedicated to housing identification and landlord recruitment. However, if programs cannot have dedicated staff, case manager job descriptions must include responsibilities for landlord recruitment and negotiation.
- Case managers provide case management with an approved case management tool frequently (minimum of bi-monthly) for all clients.
- Organizations should share and train all program staff on the NC-507 Rapid Rehousing Written Standards.

PRIORITY FOR TENANTS WHO NEED EMERGENCY TRANSFERS UNDER VAWA 2013 STANDARD:

Tenants eligible for emergency transfers under the NC-507 emergency transfer policy and VAWA statute and regulations have priority for open rapid rehousing units if they also meet all eligibility requirements and relevant prioritization requirements for the project.

CLIENT INTAKE PROCESS STANDARD:

Programs will actively participate in their community's coordinated entry system by only taking referrals from the coordinated entry system for their program. At a minimum, programs will perform the Prevention and Diversion screening tool to determine the ability of the program to divert the presenting household from the homeless service system and/or the VI-SPDAT Prescreen on all program applicants to determine their acuity score. The program will limit entry requirements to ensure that the program serves the most vulnerable individuals and families needing assistance.

Benchmarks

- All adult program participants must meet the following program eligibility requirements:
 - Rapid rehousing programs work with households who meet the definition of homelessness in the definitions section of the performance standards (CoC RRH programs may work with participants in Categories 1 and 4. ESG RRH programs may work with participants in Category 1 and literally homeless participants in Category 4). SSVF programs should follow specific guidelines for eligible participants.
 - Adult household members can participate in developing and carrying out an appropriate housing stability plan and maintain accountability of said plan.
 - CoC programs should also assess participant eligibility based on eligibility criteria established by the NOFA for the year of the award.
- Programs cannot disqualify an individual or family because of prior evictions, poor rental history, criminal history, or credit history.
- Programs focus on engaging participants by explaining available services and encouraging each adult household member to participate in said services, but programs do not make service usage a requirement or the denial of services a reason for disqualification or eviction.
- Programs must use the standard order of priority of documenting evidence to determine homeless status and chronically homeless status per the program's eligibility requirements. Grantees must document in the client file that the agency attempted to obtain the documentation in the preferred order. The order should be as follows:

- Third-party documentation (including HMIS)
- Intake worker observations through outreach and visual assessment.
- Self-certification of the person receiving assistance.
- Programs will maintain release of information, case notes, and all pertinent demographic and identifying data in HMIS as allowable by program type. Paper files should be maintained in a locked cabinet behind a locked door with access reserved for caseworkers and administrators.
- Programs can turn away individuals and families experiencing homelessness from program entry for only the following reasons:
 - Household makeup (provided it does not violate HUD's Fair Housing and Equal Opportunity requirements): singles-only programs can disqualify households with children; families-only programs can disqualify single individuals
 - Rapid rehousing subsidy money has been exhausted
 - If the housing has in residence at least one family member with a child under the age of 18, the program may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the program so long as the child resides in the same housing facility (24 CFR 578.93)
 - For SSVF and HOME programs only, the family or individual has household income over 50% of area median income

RAPID REHOUSING STANDARD:

Programs will assist participants in locating and moving into safe, affordable housing, providing housing stabilization and case management services meant to provide long-term sustainability as defined under the specific program type.

Benchmarks

- Programs explain program rules and expectations before admitting the individual or family into the program. Programs have rules and expectations that ensure fairness and avoid arbitrary decisions that vary from client to client or staff to staff.
- Programs consider the needs of the household in terms of location, cost, number of bedrooms, handicap access, and other pertinent information when moving a household into housing. Programs will assess potential housing for compliance with program standards for habitability, lead-based paint, and rent reasonableness before the individual or family signing a lease and the program signing a rental assistance agreement with the landlord.
- Programs may assist with rental application fees (ESG, CoC and SSVF only), moving costs (ESG, SSVF, and CoC only), temporary storage fees (ESG and SSVF programs only), security deposits (up to 2 months for ESG, CoC and HOME), last month's rent (ESG, CoC and SSVF only), utility deposits, utility payments, rental arrears (up to 6 months for ESG), utility arrears (up to 6 months for ESG), credit repair (ESG and CoC only), and legal services (ESG and CoC only) related to obtaining permanent housing. Grantees should follow the specifics of the grant program under which their program is funded to understand specific restrictions for each program and the maximum number of months allowed for rental and utility assistance.
- Lease: The program participant will sign a lease directly with a landlord or property owner. Grantees may only make payments directly to the landlord or property owner. Initial lease agreements should be for one year, renewable for a minimum term of one month, and terminable only for cause. HOME TBRA leases should not have prohibited lease provisions (24 CFR 92.253).

- Rental Assistance Agreement: Grantees may make rental and utility assistance payments only to an owner with whom the household has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided. The rental assistance agreement must provide that, during the term of the agreement, the landlord must give the grantee a copy of any notice to the program participant to vacate the housing unit or any complaint used under state or local law to commence a legal eviction against a program participant.
- Programs should take a progressive approach when determining the amount that households will contribute toward their monthly rent payment. Programs should remain flexible, considering the unique and changing needs of the household. The household's payment cannot exceed ESG, CoC, SSVF, or HOME regulations. Except for the HOME TBRA program, programs can choose not to charge households rent during their participation in the program. All rent payments made by program participants must be paid directly to the landlord or property owner. Programs will review the amount of rental assistance paid for the participating household every 3 months and changes made to the agreement will be determined by continued need and ability of the household to sustain housing long-term. Programs should have written policies and procedures for determining the rent amount participants pay towards housing costs. This amount must be reasonable based on household income (this could potentially be 50-60% of their monthly income), including \$0 for households with no income. These policies should also address when and how programs use financial assistance as a bridge to housing subsidy or a permanent supportive housing program.
- When determining the amount and length of financial assistance, programs should base their decision on the needs of the household and its long-term housing stability plan. Programs should have well-defined policies and procedures for determining the amount and length of time for financial assistance to program participants as well as defined and objective standards for when case management and/or financial assistance should continue or end. Programs must review the amount of rental assistance provided every 3 months and continued need determined through consultation between the participant and the case manager. Programs should review regulations for the funding source to determine maximum months they can pay for rental assistance.
- Use with other subsidies: Except for the one-time payment of rental arrears on the program participant's portion of the rental payment, rental assistance cannot be provided to a program participant who receives other tenant-based rental assistance or who is living in a housing unit receiving project-based rental or operating assistance through public sources. Programs can pay for security and utility payments for program participants to move into these units when other funding sources cannot be identified.
- HUD CoC grantees will adhere to the responsibilities of grant management outlined by the CoC Written Standards.

HOUSING STABILIZATION/CASE MANAGEMENT SERVICES STANDARD:

Programs shall provide access to housing stabilization and/or case management services by trained staff to each individual and/or family in the program.

Benchmarks (Standard Available Services)

- Programs provide individual housing stabilization and/or case management services to program participants at least monthly. These services include:
 - Housing stability services to assist participants in locating and obtaining suitable, affordable permanent housing, including:

- Assessment of housing barriers, needs, and preferences.
- Development of an action plan for locating housing.
- Housing search.
- Outreach to and negotiation with landlords or property owners.
- Tenant counseling.
- Assessment of housing for compliance with program type requirements for habitability, lead- based paint and rent reasonableness.
- Assistance with submitting rental applications.
- Understanding lease agreements.
- Arranging for utilities.
- Making moving arrangements.
- Assuring participants have the basics at move-in, including simple furnishings, mattresses, and cooking utensils like pots and pans.
- o Case management services, including assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for participants who have obtained and maintained permanent housing through the homelessness prevention or rapid rehousing program by:
 - Developing, in conjunction with the participant, an individualized housing and service plan with a path to permanent housing stability.
 - Developing, securing, and coordinating services.
 - Obtaining federal, state, and local benefits.
 - Monitoring and evaluating program participants' progress towards goals.
 - Providing information about and referrals to other providers.
 - Conducting 3-month evaluations to determine ongoing program eligibility.
- o Programs may offer other services, including:
 - Legal services to resolve a legal problem prohibiting a program participant from obtaining or retaining permanent housing (only ESG and CoC), including:
 - Client intake.
 - Preparation of cases for trial.
 - Provision of legal advice.
 - Representation of legal advice.
 - Counseling.
 - Filing fees and other necessary court costs.
 - Mediation between the program participant and the owner or person(s) with whom the participant is living (only ESG and CoC).
 - Credit repair (only ESG and CoC), including:
 - Credit counseling.
 - Accessing a free personal credit report.
 - Resolving personal credit problems.
 - Other services needed to assist with critical skills related to household budgeting and money management.
- Case management includes the following types of contact: home visits, office visits, meeting in a location in the community, or phone calls (at least one visit per month must be in person). Programs should use an approved case management tool as a guide for their case management services to program participants. Meeting times, place, and frequency should be mutually agreed upon by both the participant and case manager.

- CoC and ESG RRH programs must meet with participants at least once per month to assist the participant in long-term housing stability. Program staff must conduct an annual assessment of service needs.
- The program will evaluate the household for continued eligibility every three months or as changes are reported in household income and housing stability. To continue receiving rapid rehousing assistance, the household must demonstrate:
 - Lack of resources and support networks. The household must continue to lack sufficient resources and support networks to retain housing without program assistance.
 - Need. The program must determine the amount and type of assistance that the household needs to (re)gain stability in permanent housing.
 - For ESG, at the 12-month annual recertification, the client's income must be at or below 30% Area Median Income.

Benchmarks (Optional but recommended services, often from other providers)

- Representative payee services.
- Relationship-building and decision-making skills.
- Education services such as GED preparation, post-secondary training, and vocational education.
- Employment services, including career counseling, job preparation, resume-building, dress, and maintenance.
- Behavioral health services such as relapse prevention, crisis intervention, medication monitoring, and/or dispensing, outpatient therapy, and treatment.
- Physical health services such as routine physicals, health assessments, and family planning.
- Legal services related to civil (rent arrears, family law, uncollected benefits) and criminal (warrants, minor infractions) matters.
- For CoC PSH, in addition to the services mentioned such as one-time moving costs and case management, other eligible supportive service costs include childcare, food, housing search and counseling, outreach services, transportation, and one-time utility deposit.

SERVICE COORDINATION STANDARDS:

Programs will assist program participants in obtaining appropriate supportive services and other federal, state, local, and private assistance as needed and/or requested by the household. Program staff will be knowledgeable about mainstream resources and services in the community.

Benchmarks:

- Programs should arrange with appropriate community agencies and individuals the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; substance abuse assessments and treatment; legal services, credit counseling services; and other assistance requested by the participant, which programs do not provide directly to clients.
- Programs coordinate with other mainstream resources for which participants may need assistance: emergency financial assistance; domestic violence shelters; local housing authorities, public housing, and Housing Choice Voucher programs; temporary labor organizations; childcare resources and other public programs that subsidize childcare; youth development and child welfare; WIC; Supplemental Nutritional Assistance Program (SNAP); Unemployment Insurance; Social Security benefits;

Medicaid/Medicare or other comparable services if available.

- For CoC RRH, in addition to one-time moving costs and case management, other eligible supportive service costs include child care, education, and employment services, food, housing search and counseling, legal services, life skills training, mental health and outpatient health services, outreach services, substance abuse treatment, transportation, and a one-time utility deposit.

TERMINATION STANDARDS:

Termination should be limited to only the most severe cases. Programs will exercise sound judgment and examine all extenuating circumstances when determining if violations warrant program termination. The Partnership recommends programs work with other community service providers to develop a board to hear client grievances.

Benchmarks

Emergency Solutions Grant Rapid Rehousing

- To terminate assistance to a program participant, the agency must follow the due-process provisions outlined in 24 CFR 576.402 as follows:
 - If a program participant violates program requirements, the grantee may terminate the assistance under a formal process established by the grantee, recognizing the rights of the individuals affected. The grantee must exercise sound judgment and examine all extenuating circumstances in determining when violations warrant termination so that programs terminate assistance to program participants in only the most severe cases.
 - To terminate rental assistance and/or housing relocation and stabilization services to program participants, the required formal process, at a minimum, must consist of:
 - Written notice to the program participant containing a clear statement of the reasons for termination;
 - A review of the decision, in which the program participant has the opportunity to present written or oral objections before a person other than the person who made or approved the termination decision;
 - Prompt written notice of the final decision to the program participant.
 - Termination under this section does not preclude the program from providing further assistance later to the same individual or family.

Continuum of Care Rapid Rehousing, HOME Tenant-Based Rental Assistance

- To terminate assistance to a program participant, the agency must follow the provisions described in 24 CFR 578.91 of the HEARTH Continuum of Care Interim Rule as follows:
 - The grantee may terminate assistance to program participants who violate program requirements or conditions of occupancy. Termination under this section does not preclude the program from providing further assistance at a later date to the same individual or family.
 - To terminate assistance to program participants, the grantee must provide a formal process, recognizing the rights of the individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:
 - Providing program participants with a written copy of program rules and the termination process before the participant begins to receive assistance with a copy signed by the client;
 - Written notice to program participants containing a clear statement of the reasons for termination;

- A review of the decision, in which the program participant has the opportunity to present written or oral objections before a person other than the person who made or approved the termination decision;
- Prompt written notice of the final decision to the program participant.

Supportive Services for Veteran Families –Rapid Rehousing

- Limitations on and continuations of the provision of supportive services can be found under 38 CFR 62.35 as follows:
 - Extremely low-income veteran families: a participant classified as an extremely low-income veteran family will retain that designation as long as the participant continues to meet all other eligibility requirements.
 - Limitations on the provisions of supportive services to participants classified under 62.11(c): a grantee may provide supportive services to a participant until the earlier of two dates:
 - The participant commences receipt of other housing services adequate to meet the participant's needs;
 - Ninety days from the date the participant exits permanent housing.
 - Supportive services provided to participants classified under 62.11(c) must be designed to support the participants in their choice to transition into housing that is responsive to their individual needs and preferences.
 - Continuation of supportive services to veteran family member(s): if a veteran becomes absent from a household or dies while other members of the veteran family are receiving supportive services, then such supportive services must continue for a grace period following the absence or death of the veteran. The grantee must establish a reasonable grace period for continued participation by the veteran's family member(s), but that period may not exceed 1 year from the date of absence or death of the veteran, subject to the requirements of bullets (1) and (2) of this section. The grantee must notify the veteran's family member(s) of the duration of the grace period.
 - Referral for other assistance: if a participant becomes ineligible to receive supportive services under this section, the grantee must provide the participant with information on other available programs and resources.
 - *Families fleeing domestic violence*: Notwithstanding the limitations in 62.34 concerning the maximum amount of assistance a family can receive during a defined period of time, a household may receive additional assistance if it otherwise qualifies for assistance under this part and is fleeing from a domestic violence situation. A family may qualify for assistance even if the veteran is the aggressor or perpetrator of domestic violence. Receipt of assistance under this provision resets the maximum limitation for assistance under the regulations for the amount of support that can be provided in a given amount of time under 62.34

FOLLOW-UP SERVICES STANDARD:

Programs must ensure a continuity of services to all clients exiting their programs. Agencies can provide these services directly or through referrals to other agencies.

Benchmarks

- Programs prioritize the development of exit plans for each participant to ensure continued permanent housing stability and connection to community resources as well as a list of prevention and diversion services available if another housing crisis occurs, as desired.
- Programs should attempt to follow up with participants through verbal or written contact at least once 6 months after the client exits the program. A program may provide follow-up services to include identification of additional needs and referrals to other agencies and community services to prevent future episodes of homelessness.

CLIENT AND PROGRAM FILES STANDARD:

Programs will keep all program participant files up-to-date and confidential to ensure effective delivery and tracking of services.

Benchmarks

- Client and program files should, at a minimum, contain all the information and forms required by HUD (24 CFR 576.500), and the VA, service plans, case notes, referral lists, and service activity logs, including services provided directly by the permanent supportive housing program and indirectly by other community service providers. Programs should have:
 - Documentation of homeless status, chronic homelessness status (where applicable), and disabling condition.
 - Determination of ineligibility, if applicable, which shows the reason for this determination.
 - Initial and annual income evaluation, per program rules.
 - Program participant records.
 - Documentation of using the community's coordinated entry system.
 - Compliance with shelter and housing standards.
 - Services and assistance provided.
 - Expenditures and matches.
 - Conflict of interest/code of conduct policies.
 - Homeless participation requirement.
 - Faith-based activity requirement, if applicable.
 - Other Federal requirements, if applicable.
 - Confidentiality procedures.
- All client information should be entered in HMIS under data quality, timeliness, and additional requirements found in the agency and user participation agreements. At a minimum, programs must record the date the client enters and exits the program, HUD required data elements, and an update of the client's information as changes occur.
- Programs must maintain a release of information form for clients to use to indicate consent in sharing information with other parties. This cannot be a general release but one that indicates sharing information with specific parties for specific reasons.
- Programs must maintain the security and privacy of written client files and shall not disclose any client- level information without written permission of the client as appropriate, except to program staff and other agencies as required by law. Clients must give informed consent to release any client identifying data to be utilized for research, teaching, and public interpretation.
- All records about CoC and ESG funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the

program participant was served. Agencies may substitute written files with microfilm, photocopies, or similar methods. Records about other funding sources must adhere to those record retention requirements.

EVALUATION AND PLANNING STANDARD:

Homelessness prevention and rapid rehousing programs will work with the community to conduct ongoing planning and evaluation to ensure programs continue to meet community needs for individuals and families experiencing homelessness or at-risk of homelessness.

Benchmarks

- Agencies maintain written goals and objectives for their services to meet outcomes required by the HUD CoC and ESG programs or other funding sources. These written goals and objectives should strive to meet these performance benchmarks (for programs serving a high need population such as chronically homeless or no income, the CoC will take targeting efforts into account):
 - Reduce the length of time program participants spend homeless. Households served by the program should move into permanent housing in an average of 30 days or less.
 - Maximize permanent housing success rates. Programs should ensure that at least 80% of households exit to a permanent housing setting.
 - Decrease the number of households returning to homelessness. Programs should ensure that at least 85% of households exiting the program do not become homeless again within one year of exit.
- Programs review case files of clients to determine if existing services meet their needs. As appropriate, programs revise goals, objectives, and activities based on their evaluation.
- Programs conduct, at a minimum, an annual evaluation of their goals, objectives, and activities, making adjustments to the program as needed to meet the needs of the community.

Prevention and Diversion Written Standards

Homelessness prevention programs can play an important role in ending homelessness. Like rapid rehousing programs, homelessness prevention programs can focus on financial assistance and housing stabilization services on specific populations, including survivors of domestic violence, families with children, and formerly homeless individuals and families. While research clearly shows the effectiveness of rapid rehousing programs on reducing homelessness in communities, homelessness prevention programs demonstrate mixed results. In order to end homelessness, communities understand they must prevent new episodes of homelessness and returns to homelessness for individuals and families in housing crises. However, it can be difficult to determine which households would have become homeless if not for this intervention. Data suggests that only one out of ten households presenting for prevention programs would become homeless without financial assistance. In light of this research, homelessness prevention programs should target their limited financial assistance and housing stability resources appropriately and develop methods to determine which households are at greatest risk of becoming homeless. In order to do so, prevention programs are encouraged to focus their spending on households who are at imminent risk of homelessness (within 72 hours) or those households who can be diverted from the shelter system with the aid of financial assistance. Homelessness prevention programs should target their funding towards households that have similar characteristics to the general homeless population in their community.

No matter the focus population, all prevention and diversion programs should adopt a Housing First philosophy by reducing barriers to eligibility (i.e. no income, sobriety, and rental history) and maintaining existing housing or rehousing people as quickly as possible. These programs should also participate in the coordinated entry process, including the local prioritization of individuals and families for permanent housing interventions. In Wake County, each Access Site and Emergency Shelter utilizes a community-approved prevention and diversion screening tool and the Individual and Family VI-SPDAT Prescreen Tools to assist in determining priorities and housing triage methods, while permanent housing programs use a case management tool for more developed housing placement purposes and intensive case management over time. NC-507 CoC uses the VI-SPDAT to prioritize individuals and families experiencing literal homelessness based on chronicity, length of time homeless, and an acuity score that indicates the type of housing intervention best suited to their ongoing needs.

EXPECTATIONS

All program grantees using the Department of Housing and Urban Development Continuum of Care, Emergency Solutions Grant, VA SSVF, and HOME TBRA funding must adhere to these performance standards. Prevention and Diversion programs funded through the Continuum of Care (applicable for high-performing CoC's) and Emergency Solutions Grant will be monitored by the Partnership to ensure compliance. The NC-507 CoC recommends that Prevention and Diversion programs funded through other sources also follow these standards. These performance standards attempt to provide a high standard of care that places community and client needs first. Based on proven best practices, this high standard of care is necessary to achieve our goal of ending homelessness in Wake County.

Some requirements and parameters for Prevention and Diversion assistance vary from program to program. It will be necessary to refer to the regulations for each program along with these program standards (CoC: 24 CFR 587; ESG: 24 CFR 576; SSVF: 38 CFR 62; HOME: 24 CFR 570). For other helpful documents to check for compliance with requirements, see the footnotes below.²

PERFORMANCE STANDARDS PERSONNEL

STANDARD:

Programs shall adequately staff services with qualified personnel to ensure the quality of service delivery, effective program administration, and the safety of program participants.

Benchmarks

- The organization selects employees and/or volunteers with adequate and appropriate knowledge, experience, and stability for working with individuals and families experiencing homelessness and/or other issues that place individuals and/or families at risk of homelessness.
- The organization provides time for all employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance, and best practices.
- The organization trains all employees and/or volunteers on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program.
- For programs using the Homeless Management Information System (HMIS), all end users must abide by the NC HMIS End User and Participation Agreements, including adherence to the strict privacy and confidentiality policies.
- Staff supervisors of casework, counseling, and/or case management services have, at a minimum, a bachelor's degree in a human service-related field and/or experience working with individuals and families experiencing homelessness and/or other issues that place individuals and/or families at risk of homelessness.
- Staff supervising overall program operations have, at a minimum, a bachelor's degree in a human service-related field and/or demonstrated ability and experience that qualifies them to assume such responsibility.
- All program staff have written job descriptions that address tasks staff must perform and the minimum qualifications for the position. Ideally, Homeless Prevention and Diversion programs would have staff dedicated to diversion mediation and prevention services. However, if the programs cannot have dedicated staff, case manager job descriptions must include responsibilities for diversion conversations and prevention strategizing.
- Case managers provide case management with an approved case management tool frequently (every six month's minimum) for all clients.
- Organizations should share and train all program staff on the NC-507 Rapid Rehousing Written Standards.

PRIORITY FOR TENANTS WHO NEED EMERGENCY TRANSFERS UNDER VAWA 2013 STANDARD:

Tenants eligible for emergency transfers under the NC-507 emergency transfer policy and VAWA statute and regulations have priority for open rapid rehousing units if they also meet all eligibility requirements and relevant prioritization requirements for the project.

CLIENT INTAKE PROCESS STANDARD:

Programs will actively participate in their community's coordinated entry system by only taking referrals from the coordinated entry system for their program. At a minimum, programs will administer the community- approved prevention and diversion screening tool to determine the ability of the program to divert the presenting household from the homeless service system and/or the VI-SPDAT Prescreen on all program applicants to determine their acuity score. The program will limit entry requirements to ensure that the program serves the most vulnerable individuals and families needing assistance.

Benchmarks

- All adult program participants must meet the following program eligibility requirements:
 - Homelessness prevention programs work with households who meet the at-risk of homelessness definition (Category 2) in the definitions section of the performance standards.
 - Adult household members can participate in developing and carrying out an appropriate housing stability plan and maintain accountability of said plan.
 - CoC programs should also assess participant eligibility based on eligibility criteria established by the NOFA for the year of the award.
- Programs cannot disqualify an individual or family because of prior evictions, poor rental history, criminal history, or credit history.
- Programs focus on engaging participants by explaining available services and encouraging each adult household member to participate in said services, but programs do not make service usage a requirement or the denial of services a reason for disqualification or eviction.
- Programs must use the standard order of priority of documenting evidence to determine homeless status and chronically homeless status per the program's eligibility requirements. Grantees must document in the client file that the agency attempted to obtain the documentation in the preferred order. The order should be as follows:
 - Third-party documentation (including HMIS)
 - Intake worker observations through outreach and visual assessment.
 - Self-certification of the person receiving assistance
- Programs will maintain release of information, case notes, and all pertinent demographic and identifying data in HMIS as allowable by program type. Paper files should be maintained in a locked cabinet behind a locked door with access reserved for caseworkers and administrators.
- Programs can turn away individuals and families experiencing homelessness from program entry for only the following reasons
 - Opportunity requirements): singles-only programs can disqualify households with children; families-only programs can disqualify single individuals
 - Prevention and Diversion money has been exhausted

HOMELESSNESS PREVENTION STANDARD:

Programs will assist participants in staying in their current housing situation, if possible, or assist households at imminent risk of homelessness to move into another suitable unit as defined under the specific program type.

Benchmarks

- Programs are encouraged to target prevention funds toward community diversion efforts. When paying financial assistance to divert households from homelessness, programs should target assistance to households most likely to experience homelessness if not for this assistance.
- Programs explain program rules and expectations before admitting the individual or family into the program. Programs will have rules and expectations that ensure fairness and avoid arbitrary decisions that can vary from client to client or staff to staff.
- In evaluating current housing, programs consider the needs of the individual or family living there to decide if the current unit meets Housing Quality Standards and long-term sustainability (ESG and SSVF only).

- When moving the individual or family into a new unit, programs consider the needs of the household in terms of location, cost, number of bedrooms, handicap access, etc. Programs will assess potential housing for compliance with program standards for habitability, lead-based paint, and rent reasonableness before the individual or family signing a lease and the program signing a rental assistance agreement with the landlord.
- Programs may assist with rental application fees (ESG and SSVF only), moving costs (ESG, CoC, and SSVF only), temporary storage fees (ESG and SSVF programs only), security deposits (up to 2 months for ESG, CoC and HOME), last month's rent (ESG, CoC and SSVF only), utility deposits, utility payments, rental arrears (up to 6 months for ESG), utility arrears (up to 6 months for ESG), credit repair (ESG and CoC only), and legal services (ESG and CoC only) related to obtaining permanent housing. Grantees should follow the specifics of the grant program under which their program is funded to understand specific restrictions for each program and the maximum number of months allowed for rental and utility assistance.
- Lease: The program participant will sign a lease directly with a landlord or property owner. Grantees may only make payments directly to the landlord or property owner.
- Rental Assistance Agreement: Grantees may make rental and utility assistance payments only to an owner with whom the household has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided. The rental assistance agreement must provide that, during the term of the agreement, the landlord must give the grantee a copy of any notice to the program participant to vacate the housing unit or any complaint used under state or local law to commence a legal eviction against a program participant.
- Programs will determine the amount that households will contribute toward their monthly rent payment. The household's payment cannot exceed ESG, CoC, SSVF, or HOME regulations. Except for the HOME TBRA program, programs can choose not to charge households rent during their participation in the program. All rent payments made by program participants must be paid directly to the landlord or property owner. Programs will review the amount of rental assistance paid for the participating household every 3 months, and changes made to the agreement will be determined by continued need and ability of the household to sustain housing long-term.
- Programs may provide no more than 3 months of rental and utility assistance to a participating household for homelessness prevention. If the household needs more than 3 months of financial assistance, the agency Executive Director or his/her designated proxy may extend financial assistance month-to-month based on proof of continued need and demonstrated success of stated housing sustainability plan.
- Use with other subsidies: Except for the one-time payment of rental arrears on the program participant's portion of the rental payment, rental assistance cannot be provided to a program participant who receives other tenant-based rental assistance or who is living in a housing unit receiving project-based rental or operating assistance through public sources. Programs can pay for security and utility payments for program participants to move into these units when other funding sources cannot be identified.

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HOUSING STABILIZATION/CASE MANAGEMENT SERVICES

STANDARD:

Programs shall provide access to housing stabilization and/or case management services by trained staff to each individual and/or family in the program.

Benchmarks (Standard Available Services)

- Programs provide individual housing stabilization and/or case management services to program participants at least monthly. These services include:
 - Housing stability services to assist participants in maintaining current or obtaining an alternative suitable, affordable permanent housing unit, including:
 - Assessment of current housing and client needs to retain current housing.
 - Development of an action plan for locating new housing.
 - Housing search.
 - Outreach to and negotiation with landlords or property owners.
 - Tenant counseling.
 - Assessment of housing for compliance with program type requirements for habitability, lead-based paint, and rent reasonableness. ▪ Assistance with submitting rental applications.
 - Understanding lease agreements.
 - Arranging for utilities.
 - Making moving arrangements.
 - Assuring participants have the basics at move-in, including simple furnishings, mattresses, and cooking utensils like pots and pans.
 - Case management services, including assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for participants who have obtained and maintained permanent housing through the homelessness prevention or rapid rehousing program by:
 - Developing, in conjunction with the participant, an individualized housing and service plan with a path to permanent housing stability.
 - Developing, securing, and coordinating services.
 - Obtaining federal, state, and local benefits.
 - Monitoring and evaluating program participants' progress towards goals.
 - Providing information about and referrals to other providers.
 - Conducting 3-month evaluations to determine ongoing program eligibility.

Programs may offer other services, including:

- Legal services to resolve a legal problem prohibiting a program participant from obtaining or retaining permanent housing (only ESG and CoC), including:
 - Client intake.
 - Preparation of cases for trial.
 - Provision of legal advice.
 - Representation of legal advice.
 - Counseling.
 - Filing fees and other necessary court costs.
- Mediation between the program participant and the owner or person(s) with whom

- the participant is living (only ESG and CoC).
 - Credit repair (only ESG and CoC), including:
 - Credit counseling.
 - Accessing a free personal credit report.
 - Resolving personal credit problems.
 - Other services needed to assist with critical skills related to household budgeting and money management.
- Case management includes the following types of contact: home visits, office visits, meeting in a location in the community, or phone calls (at least one visit per month must be in person). Programs should use an approved case management tool as a guide for their case management services to program participants. Meeting times, place, and frequency should be mutually agreed upon by both the participant and case manager.
- The program will evaluate the household for ongoing eligibility or as changes are reported in household income and needed to maintain housing stability. To continue receiving prevention services, the client must indicate a need, including relevant and appropriate documentation.

Benchmarks (Optional but recommended services, often from other providers)

- Representative payee services.
- Relationship-building and decision-making skills.
- Education services such as GED preparation, post-secondary training, and vocational education.
- Employment services, including career counseling, job preparation, resume-building, dress, and maintenance.
- Behavioral health services such as relapse prevention, crisis intervention, medication monitoring, and/or dispensing, outpatient therapy, and treatment.
- Physical health services such as routine physicals, health assessments, and family planning.
- Legal services related to civil (rent arrears, family law, uncollected benefits) and criminal (warrants, minor infractions) matters.

SERVICE COORDINATION STANDARDS:

Programs will assist program participants in obtaining appropriate supportive services and other federal, state, local, and private assistance as needed and/or requested by the household. Program staff will be knowledgeable about mainstream resources and services in the community.

Benchmarks:

- Programs should arrange with appropriate community agencies and individuals the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; substance abuse assessments and treatment; legal services, credit counseling services; and other assistance requested by the participant, which programs do not provide directly to clients.
- Programs coordinate with other mainstream resources for which participants may need assistance: emergency financial assistance; domestic violence shelters; local housing authorities, public housing, and Housing Choice Voucher programs; temporary labor organizations; childcare resources and other public programs that subsidize childcare; youth development and child welfare; WIC; Supplemental Nutritional Assistance Program (SNAP); Unemployment Insurance; Social Security benefits; Medicaid/Medicare or other comparable services if available.

TERMINATION STANDARDS:

Termination should be limited to only the most severe cases. Programs will exercise sound judgment and examine all extenuating circumstances when determining if violations warrant program termination. The Partnership recommends programs work with other community service providers to develop a board to hear client grievances.

Benchmarks

- To terminate assistance to a program, agencies must follow the due process outlined under the formal process established by the CoC that recognizes the rights of individuals and families affected. The program is responsible for providing evidence that it considered extenuating circumstances and made significant attempts to help the client continue in the program. Programs should have a formal, established grievance process in its policies and procedures for residents who feel the program wrongly terminated assistance.
- Agencies must provide the client with a written copy of the program rules and the termination process before he/she begins receiving assistance and keep a copy signed by the client in the file.
- Programs may carry a barred list when a client has presented a terminal risk to staff or other clients. If a barred client presents him/herself at a later date, programs should review the case to determine if the debarment can be removed to give the program a chance to provide further assistance at a later date.

FOLLOW-UP SERVICES STANDARD:

Programs must ensure a continuity of services to all clients exiting their programs. Agencies can provide these services directly or through referrals to other agencies.

Benchmarks

- Programs prioritize the development of housing stability plans for each participant to ensure continued permanent housing stability and connection to community resources as well as a list of additional prevention and diversion services available if another housing crisis occurs.
- Programs should attempt to follow up with participants through verbal or written contact at least once 6 months after the client exits the program. A program may provide follow-up services to include identification of additional needs and referrals to other agencies and community services to prevent future episodes of homelessness.

CLIENT AND PROGRAM FILES STANDARD:

Programs will keep all program participant files up-to-date and confidential to ensure effective delivery and tracking of services.

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- Client and program files should, at a minimum, contain all of the information and forms required by HUD (24 CFR 576.500), and the VA, service plans, case notes, referral lists, and service activity logs, including services provided directly by the permanent supportive housing program and indirectly by other community service providers. Programs should have:
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- Determination of ineligibility, if applicable, which shows the reason for this determination.
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EVALUATION AND PLANNING STANDARD:

Homelessness prevention programs will work with the community to conduct ongoing planning and evaluation to ensure programs continue to meet community needs for individuals and families experiencing homelessness or at-risk of homelessness.

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- Agencies maintain written goals and objectives for their services to meet outcomes required by the HUD CoC and ESG programs or other funding sources. These written goals and objectives should strive to meet these performance benchmarks (for programs serving a high need population such as chronically homeless or no income, the CoC will take targeting efforts into account):
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 - Decrease the number of households returning to homelessness. Programs should ensure that at least 85% of households exiting the program do not become homeless again within one year of exit.

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- Programs conduct, at a minimum, an annual evaluation of their goals, objectives, and activities, making adjustments to the program as needed to meet the needs of the community.