

MIDDLESEX COUNTY, NJ HOME-ARP ALLOCATION PLAN

Executive Summary

As part of the American Rescue Plan, Congress created a new program, known as the HOME-American Rescue Plan Program (HOME-ARP), to be administered by the U.S. Department of Housing and Urban Development to primarily benefit individuals and families that are homeless and/or at increased risk of homelessness.

Middlesex County was awarded \$5,844,246 in HOME-ARP funding from the U.S. Department of Housing and Urban Development (HUD). The HOME-ARP program required each jurisdiction that receives funding to prepare and submit a HOME-ARP Allocation Plan that outlines how the HOME-ARP funds will be apportioned among the eligible activities and for which populations.

The Middlesex County Division of Housing, Community Development and Social Services has prepared the following Allocation Plan, which will be submitted to HUD for their review and approval on or around March 22, 2023 after following the guidance and requirements outlined in HUD's Notice CPD-21-10 "Requirements for the Use of Funds in the HOME-ARP Program" and Notice CPD-22-13 "Revisions to HOME-ARP Allocation Plan Requirements and Final Submission Deadline for all HOME-ARP Allocation Plans." This allocation plan also follows the HUD suggested template. HUD language that explains the purpose of a template section has been left in for clarity on some occasions.

There are six eligible activities in the HOME-ARP program.

- Production or Preservation of Affordable Rental Housing
- Purchase and Development of Non-Congregate Shelter
- Tenant Based Rental Assistance (TBRA)
- Supportive Services (either in conjunction with another eligible activity or as a standalone activity)
- Non-Profit Organization General Operating Cost Assistance (limited to 5% of grant)
- Non-Profit Organization Capacity Building Assistance (limited to 5% of grant)
- Administrative & Planning Costs (limited to 15% of grant)

There are four eligible populations, known as "Qualifying Populations" or QP's. HOME-ARP funds must primarily benefit individuals and families from the following Qualifying Populations:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#)); (referred to in the plan as the Homeless QP)
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(1\)](#)); (referred to in the plan as the At Risk QP)

- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary; (referred to in the plan as the Fleeing DV QP)
- In other populations where providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\)](#)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability; (referred to in the plan as the Other Housing Instability QP)
- Veterans and families that include a veteran family member that meet one of the preceding criteria. (Veterans are considered a subset of the four qualifying populations.)

The Allocation Plan will further detail these different Qualifying Populations including their size and demographics as part of the required Needs and Gap Analysis before listing the eligible activities proposed by Middlesex County for its HOME-APR funding.

Middlesex County has conducted outreach and gathered input from a broad array of individuals and organizations prior to the development of this Allocation Plan, as required by HUD consultation process. When this Allocation Plan is submitted to HUD, the required Public Participation requirements, including at least one Public Hearing and a minimum 15-day comment period where all relevant comments will be considered.

Consultation

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

The Middlesex County Division of Housing used multiple consultation methods to solicit feedback prior to creating and finalizing this HOME-ARP Allocation Plan.

The first major form of consultation was through a special meeting on May 17, 2022 that included an opportunity for small group discussions and sharing of information on system gaps and needs of qualifying populations. Participants representing homeless services providers, domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies serving the different qualifying populations, and public or private organizations addressing fair housing, civil rights, and the needs of persons with disabilities were invited to participate.

After HUD provided additional guidance on the components of the HOME-ARP Allocation Plan, the eligible uses, and the qualifying populations (QPs), Middlesex County wanted to have another broad session to solicit information about needs and systems gaps and also specifically on what eligible uses the county should include in its plan. This session was held as part of the monthly Middlesex County Housing Continuum of Care Committee (MCHC3) meeting on February 2, 2023. This session included a detailed review of the differences in the four QPs and eligible uses. It provided for small group discussions on helping to identify the size and demographic composition of the QPs through different data sources and their person experiences

and anecdotal information about the QPs they were familiar with. It concluded with recommendations on allocations for the eligible activities, with a mindfulness to examine existing resources available in the community.

Middlesex County also deployed a survey in February 2023. The purpose of the survey was to garner feedback from stakeholders and community members on how Middlesex County should use its allocation of HOME-ARP funds. It asked questions about the needs of each QP and what activities were the highest need/priority for that QP. It then asked which eligible activities should be funded and why. A total of 25 responses were received.

Below is the list of the following organizations/entities that participated in one or both in person HOME-ARP sessions or submitted a survey.

| Name of Organization | Attend5 //17/22 | Attend 2/2/23 | Survey | Type of Organization and/or Population Served |
|-------------------------------|------------------------|----------------------|---------------|---|
| Coming Home of Middlesex Co. | X | X | | Homeless service provider, affordable housing (AH) provider, HMIS Lead, Coordinated Entry Lead |
| Garden State Home | X | X | X | Homeless service provider, especially for homeless unaccompanied youth; AH provider |
| Raritan Bay Area YMCA | X | X | | Homeless service provider, AH provider |
| Triple C Housing | X | | | Homeless service provider, AH provider, service provider for persons with disabilities (mental health) |
| Women Aware | X | X | | Homeless service provider, DV shelter, DV services, AH provider for DV clients |
| Volunteers of America | X | X | X | Homeless service provider, AH provider, service provider for persons with disabilities (mental health & addictions) |
| Middlesex College | X | X | | 2-year public higher education institute |
| Region Nine Housing Corp. | X | | | AH provider |
| City of Perth Amboy | X | | X | Municipal government |
| Fair Share Housing Center | X | | | Fair housing & civil rights non-profit focused on racial, economic and housing justice |
| Central Jersey Legal Services | X | X | | Non-profit legal services to all QP's, especially around fair housing |

| | | | | |
|--|---|---|---|--|
| Middlesex County Human Services Office (Human Services Advisory Council) | X | X | X | Unit of local government providing access to services for homeless, persons with disabilities, and low-income populations. |
| Still Waters | X | | | Anti-trafficking program affiliated with non-profit RCHP Affordable Housing Corp. |
| Monarch Housing Associates | X | | | Non-profit organization concerned with fair and affordable housing, especially for homeless populations. |
| NJ Division of Child Protection & Permanency (DCP&P) | X | | X | Unit of state government focused on investigating child abuse & neglect and also overseer of state foster care system. |
| Alliance Center for Independence | X | | | Non-profit Center for Independent Living serving and advocating for persons with disabilities |
| The Center for Great Expectations | X | | X | Non-profit serving pregnant & parenting youth, AH provider; services to persons with mental health and addiction disabilities. |
| Healthier Middlesex / St. Peter's University Hospital | X | | | A multi-sector private/public collaborative stakeholders working together to integrate health & wellness. A non-profit teaching hospital |
| Community Member | X | | | N/A |
| Middlesex County PHA | X | X | X | Public Housing Agency providing Housing Choice Vouchers countywide |
| Middlesex County Office of Health Services | X | | | Unit of local government providing health services including disease protection, health promotion, and environmental protection. |
| NJ Citizens Action | X | | | A stateside civil rights advocacy group focused on racial, social and economic justice. |
| MIPH/Mission First | X | X | X | Homeless service provider, AH provider |
| SHILO | X | | X | Support services to homeless individuals and vulnerable populations |
| Housing and | X | | | Non-profit advocating for affordable and fair housing and economic justice. |

| | | | | |
|--|--|---|---|--|
| Community Development Network of NJ | | | | |
| Acelero Learning | | X | | Head Start/early childhood education nonprofit provider |
| Catholic Charities, Diocese of Metuchen | | X | | Homeless service provider, emergency shelter, street outreach (PATH), especially for persons with mental health disabilities, AH provider, RRH provider |
| Community Affairs & Resource Center (CARC) | | X | X | Non-profit homeless services provider, services to low-income populations. |
| Community Hope | | X | X | Veterans' homeless services organization, SSFV provider, AH for veterans provider |
| Edison Housing Authority | | X | | Public Housing Authority operating both public housing and Housing Choice Voucher program |
| HomeSharing | | X | | Housing services to low-income households, including homeless households |
| NJ Harm Reduction | | X | | Advocacy, services and street outreach to persons with substance abuse/addiction disabilities |
| Rutgers University Behavioral Health Care (UBHC) | | X | X | Homeless services provider, PATH street outreach for persons with mental health disabilities, services to persons with behavioral health concerns and disabilities including mental health and addictions. |
| Soldier On | | X | | Veterans' homeless services organization, SSFV provider, AH for veterans provider |
| Town Clock CDC | | X | X | Homeless services provider, AH provider for persons impacted by DV |
| Veterans Affairs | | X | | Federal government agency serving veterans, including homeless veterans with VASH program |
| Zufall Health | | X | | Non-profit health organization providing centers serving low-income population. |
| Board of Social Services | | | X | County government welfare agency for GA/TANF, homeless services provider |

| | | | | |
|------------------------------------|--|--|---|--|
| PRAB | | | X | Non-profit provider serving low-income families; certified housing counseling agency |
| American Legion | | | X | Veterans' advocacy organization |
| Middlesex County Veterans Services | | | X | County government office providing services to veterans, including homeless & at risk of homeless. |
| Woodbridge Township | | | X | Municipal Government |
| Beginning World Changers | | | X | Homeless service provider, outreach |
| Hyacinth Foundation | | | X | Homeless services provider, working with disabled, youth, and DV populations |

There are 10 Public Housing Agencies/Authorities (PHAs) operating in Middlesex County. They are Carteret HA, Edison HA, Highland Park HA, Middlesex County PHA, New Brunswick HA, Old Bridge HA, Perth Amboy HA, Sayreville HA, South Amboy HA, and Woodbridge HA. All were sent email invitations to participate in the 5/17/22 HOME-ARP session and all were invited to complete a HOME-ARP survey in February 2023. Edison, Woodbridge, and the County were also invited as CoC members to participate in the Feb. 2023 session. Despite this outreach only Edison HA and Middlesex County PHA participated in the consultation process. The County will reach out to these entities again by email and inform them of the ability to submit comments during the Public Participation process. While they didn't respond, it is very rare that any of the PHAs located in Middlesex County have their Housing Choice Voucher waiting lists open and only on occasion do they have their Public Housing lists open. So, while they didn't participate formally in the consultation, the rarity that their waiting lists are open helps support the need under all QPs for more affordable housing.

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

Summary from 5/17/22 HOME-ARP Session

After an explanation of the HOME-ARP program, eligible uses and qualifying populations, the individuals present were divided into four small groups for discussion on potential needs/system gaps and also potential uses of HOME-ARP funding.

One major area of need outlined by all the groups were Supportive Services. Specifically, housing search; legal services; credit building; obtaining documents needed for ID's; transportation; childcare; trauma informed mental health services; support services for persons with disabilities, persons with limited English proficiency, and undocumented persons; services for DV victims; support services to prevent people falling back into homelessness; application fees and general case management, especially for housed clients. There was also discussed by multiple groups the need for landlord outreach and engagement, including education on vouchers and the creation and provision of landlord incentives to help offset barriers to renting units by households with vouchers.

There were discussions on the lack of affordable housing, made worse by increasing rent costs, including the lack of affordable SRO (single room occupancy) units for the many single people who are homeless in our jurisdiction. Other challenges include high costs of acquisition and rehabilitation of existing units, which has been a strategy in creating more affordable housing. Housing prices are up significantly throughout our area and construction costs have also greatly increased since the start of the pandemic.

Another need specifically mentioned is the lack of emergency shelter space, since our existing shelter programs operated at capacity and there always exists a prioritized waiting list for shelter. Lack of non-congregate shelter was also identified as a concern.

Another area of need mentioned were funding to cover situations like car repairs, where reliably transportation is needed for work and ability to have income to support housing costs, or other costs that could impact a household budget and decrease housing stability.

Regarding proposed uses of funding, the need for non-congregate shelter was included and the idea that it could be accomplished through acquisition of hotel(s). Another group suggestion for the rental housing category was to focus on acquisition of condo units, which wouldn't require as much in rehabilitation costs and some of the maintenance would be covered by the association. Tenant based vouchers were also suggested as a good use since they could happen quicker and don't take as long as new construction or acquisition with or without rehabilitation. It was noted that tenant-based vouchers that could be used as part of a Moving On program would be desirable. Moving On is where a formerly homeless household that was provided a permanent supportive housing voucher that included services has been successfully housed and no longer requires or is no longer using services is provided with a different voucher that doesn't include

services. Then their original voucher is freed up to use on a currently homeless household in need of housing and services. The last suggestion was for a medical respite program for people who are discharged from hospitals, but are temporarily not able to live independently, but don't have other options.

Summary from February 2, 2023 HOME-ARP Session

This session took place during a regularly scheduled meeting of the Middlesex County Housing Continuum of Care Committee meeting, since that meeting had many stakeholders that represents the required types of organizations needed for HOME-ARP consultation. For many, this was the 2nd meeting they participated in on HOME-ARP, and they were able to have clearer guidance, especially around the use of eligible activities and preference.

After a brief introduction of the four QPs and the seven eligible activities, the group was split into four smaller groups to aid in discussion.

The first part of the small group discussion focused on best resources, including specific data sources, to help identify and accurately describe the different QPs for this allocation plan. The Homeless QP wasn't a topic since that is the one QP with good data sources through PIT and HMIS.

For "At Risk" QP, comments noted that this group is composed of many subgroups, like "couch surfers" that move to different places and tend to be younger; individuals and families who were previously evicted and lived with friends/family temporarily but have been asked to leave; people paying for their own motel stays; and people who are discharged from institutions for mental health, healthcare, foster care or corrections; and also undocumented individuals and families who often live in places without a legal lease and are susceptible to illegal landlord evictions because they aren't familiar with tenancy laws or are afraid to fight illegal evictions. Any data would be incomplete due to the fact that there is no one source that aggregates all of these populations and that people in these different situations are often well hidden.

For the "Fleeing DV" QP, comments noted that Women Aware would likely have good statistical information on the clients that they serve. Still Waters is an organization situated in Highland Park that assists victims of human trafficking.

For the "Other Housing Instability" QP, this again is a difficult category to quantify because there are many subsets of population that could be included in this QP. Also, if a particular characteristic that might make some one more likely to need assistance to remain stably housed, it is usually not an absolute indicator, meaning others with that same characteristic won't likely to have housing instability.

The next part of this HOME-ARP consultation session revolved around what eligible activities should be funds, which should not, and to what extent should the individual activities be funds (expressed as either a percentage or actual dollars.)

Non-Congregate Shelter was the highest ranked activity among three of the four groups, with those three groups averaging about \$3.5M or approximately 60% of the grant. The fourth group ranked it 2nd highest and recommended about \$2M for this activity. One group noted it was especially a need in Perth Amboy, which has no emergency shelters.

Affordable Rental Housing was supported by all four groups, with one group recommending approximately \$580,000; two groups recommending \$1M, and one group recommending approximately \$2.65M.

Supportive Services was also supported by all four groups, with most commenting on the need for community-based case management and/or wrap-around services tied to housing. One group noted that the services should not be carved out for any special homeless subpopulation but be available broadly. All four groups recommended between \$460K - \$580K be dedicated for this activity.

For Tenant Based Rental Assistance (TBRA) one group said “maybe” fund; another group said yes, but with no specific amount, and the other two groups said no. For the groups that said no, they mentioned that they thought that while more TBRA was needed, that it should be advocated to be funded by other means, especially since having funding specifically available for emergency shelters is rare and any TBRA funded would be limited for just a few years and not a permanent voucher.

For Non-profit Operating and Non-Profit Capacity Building there was consensus on funding. Three of the four groups recommended funding Operating at the 5% maximum (approximately \$290K). The 4th group recommended about \$167,000 or about 2.8%. For Non-Profit Capacity, two groups recommended the 5% maximum, another group recommended \$167,000, and the last group recommended \$150,000. It was also noted by one group that although there is different capital funding sources, they rarely, if ever, include this type of flexible funding for non-profits to help them be able to bring a project to fruition. While the HOME program can fund CHDOs (Community Housing Development Organizations), some non-profit housing developers aren't able to meet CHDO qualifications.

Planning/Administrative activities was also agreed to by all four groups, with amounts ranging from \$167,000 - \$580,000.

Summary from HOME-ARP Survey Results

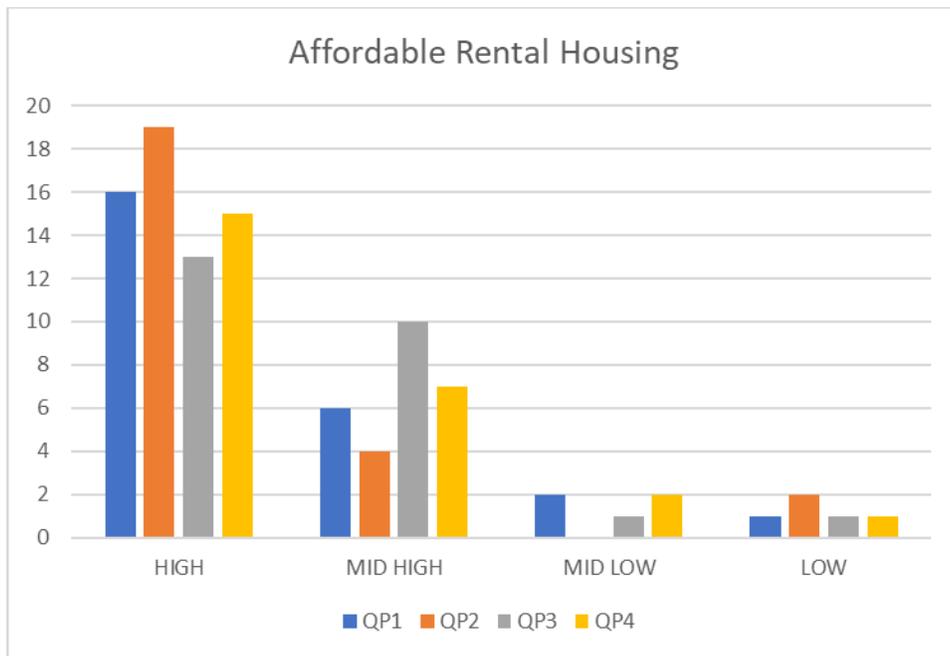
There were 25 survey responses received and reviewed, including from seven entities that hadn't previously participated in the consultation process.

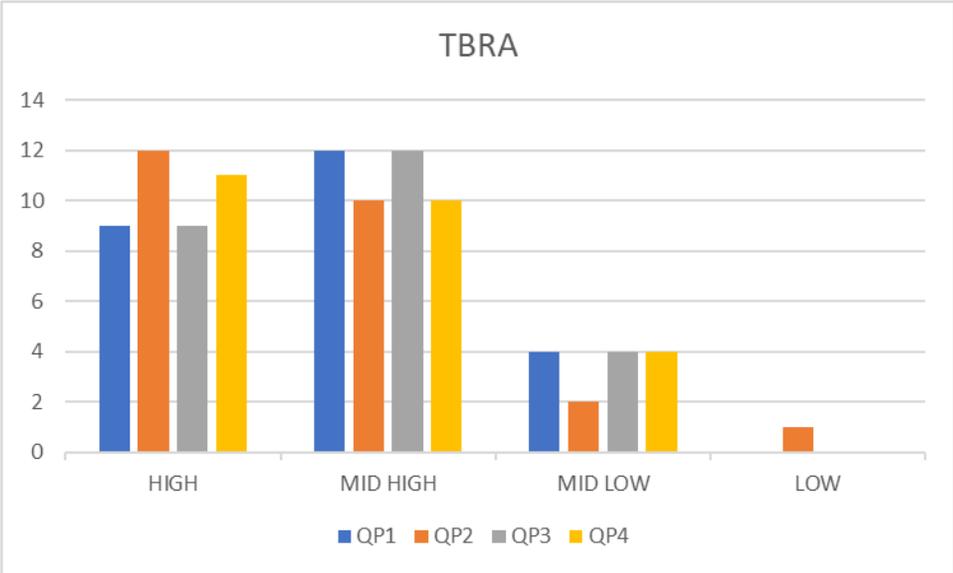
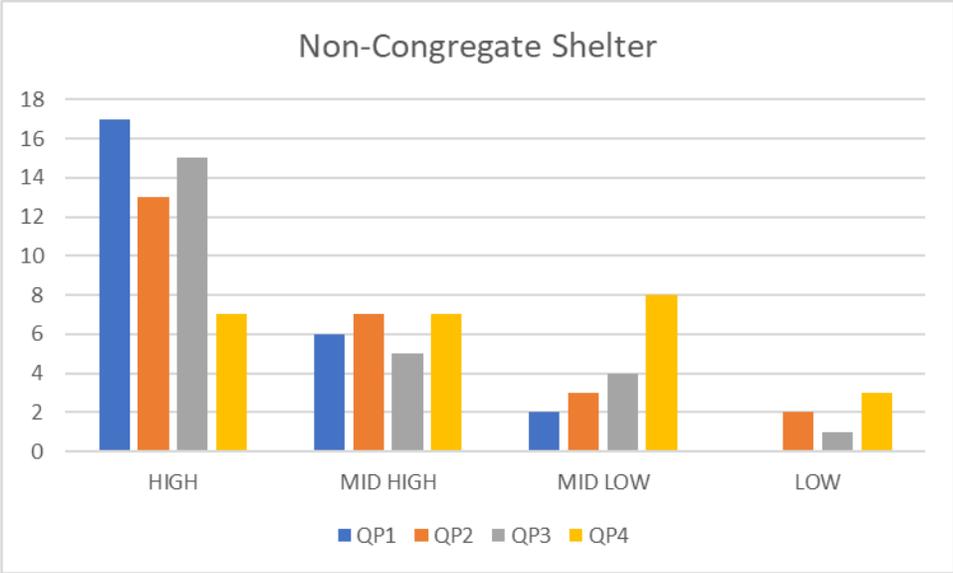
In answering the question about unmet housing and survey needs, 16 respondents indicated more affordable housing; 12 indicated various supportive services, 9 indicated emergency shelter, and 2 indicated TBRA. Some specifics on this question included increased permanent supportive

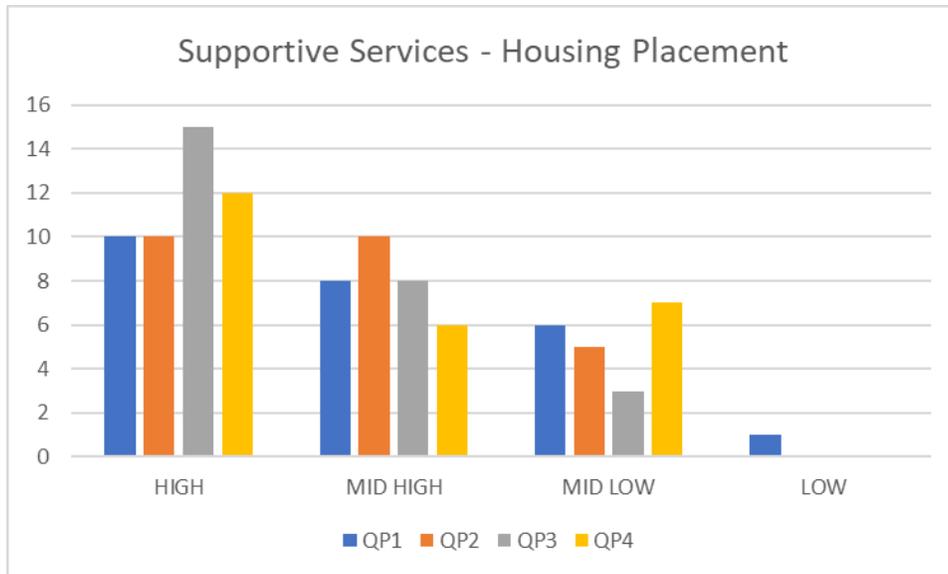
housing, options for undocumented households, more flexible prevention funding, affordable housing and/or TBRA for homeless youth and youth aging out of foster care, shelter options for persons with medical disabilities or those existing mental health and substance abuse facilities, transportation and case management focused on financial literacy, life skills, service navigation, application assistance, mental health services, and housing search.

Here are some charts showing the summary of the prioritization from the surveys.

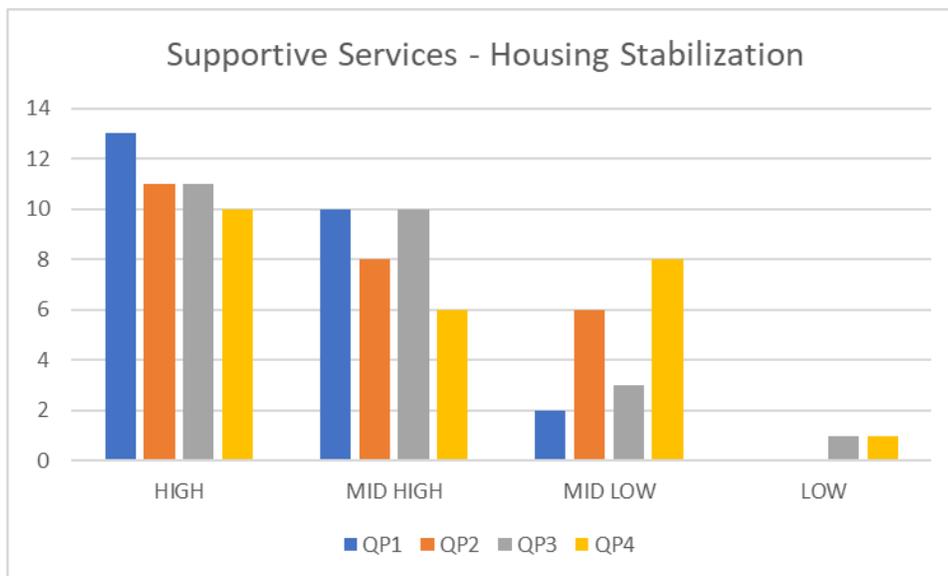
- QP1 – Homeless
- QP2 – At Risk of Homelessness
- QP3 – Fleeing Domestic Violence
- QP4 – Other Populations at Risk of Homelessness or Housing Instability



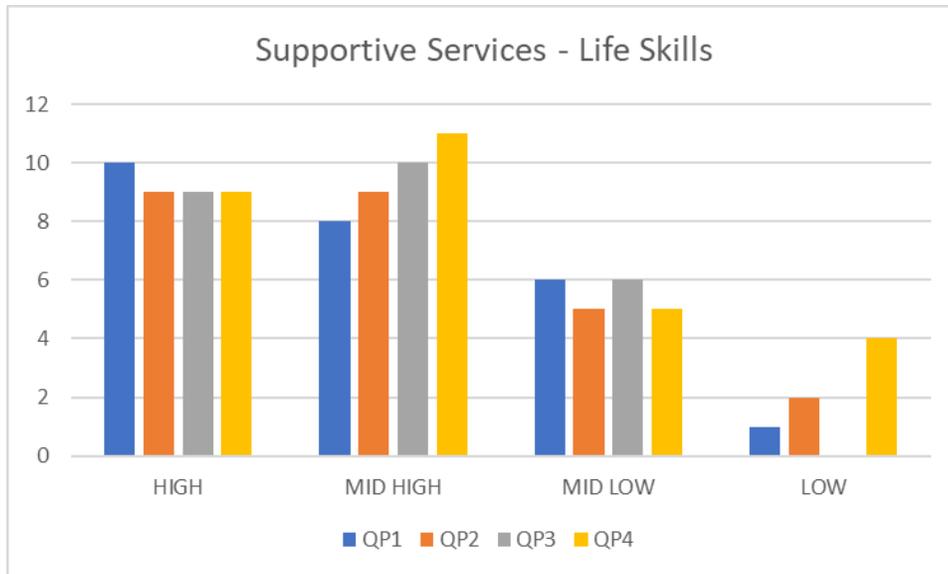




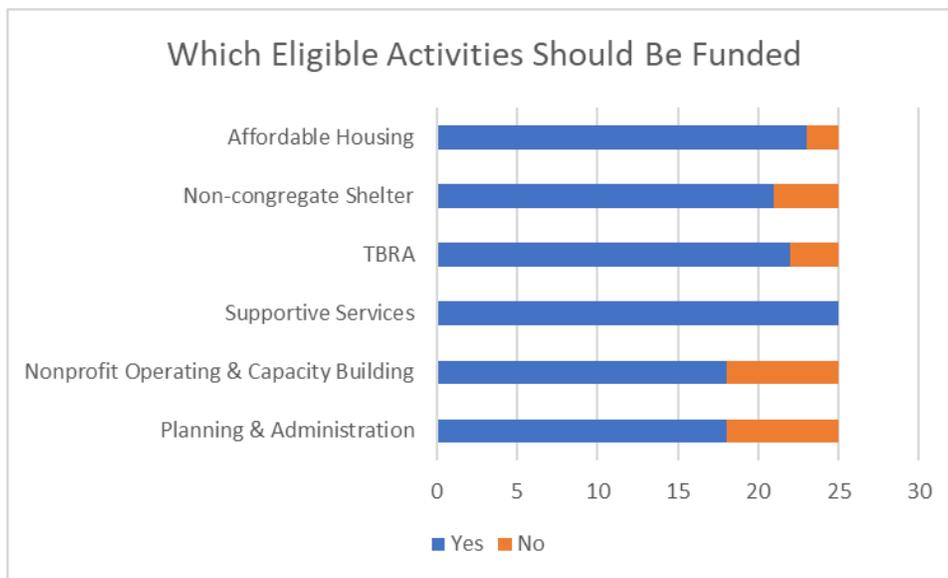
Housing Placement/Retention Services include locating housing, legal services, landlord/tenant issues



Housing Stabilization Services include comprehensive supportive services offered after housing placement.



Life skills services includes but is not limited to budgeting, employment & job training



Public Participation

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

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

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

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

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

- ***Date(s) of public notice:*** Published in the Home News Tribune on **2/28/2023**
- ***Public comment period:*** start date – **3/1/2023** end date - **3/16/2023**
- ***Date(s) of public hearing:*** **3/7/2023, 3/8/2023, 3/13/2023**

Describe the public participation process:

The Public Notice was advertised in the Home News Tribune on 3/1/23 in both English and Spanish. The Public Notice not only provided notification of the public comment period, but also included the dates for the two public in person meetings and the one virtual TEAMS meeting. One in person meeting was scheduled for Tuesday, March 7th in the evening in Perth Amboy and another in person meeting was scheduled on Wednesday, March 8th in the afternoon in New Brunswick. There was also a virtual public meeting scheduled using the TEAMS platform from 12-1PM on Monday, March 13th. The Public Notice also provided the link to the county website to access the full HOME-ARP Allocation Plan and a summary of uses.

The two public meetings will include a brief explanation of the four QPs and the eligible activities before explaining the actual allocation funding recommendation. In both cases, it will be done in English and Spanish and handout materials will be made available in both. The public will have the opportunity to comment, and their comments will be noted for inclusion in this plan. The virtual TEAMS meeting will also have a quick explanation of HOME-ARP and then allow for public comments.

Describe efforts to broaden public participation:

While only required to hold one public meeting, Middlesex County scheduled three public meetings at different locations/format and at different times so there was hopefully an option for everyone interested to attend at a time that worked for them. The two public in person meetings were scheduled in our two largest urban areas, Perth Amboy and New Brunswick. In annual Point In Time (PIT) counts, these two cities had the highest homeless populations. The virtual TEAMS option was scheduled at lunch time so a person with less flexibility to attend in person.

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

TO BE ENTERED AT THE CONCLUSION OF THE COMMENT PERIOD

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

TO BE ENTERED AT THE CONCLUSION OF THE COMMENT PERIOD.

Needs Assessment and Gaps Analysis

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

Homeless Needs Inventory and Gap Analysis Table

| Homeless | | | | | | | | | | | | | |
|------------------------------|-------------------|------------|-------------|------------|-----------|------------------------------|----------------------|------|---------------|--------------|------------|-------------|------------|
| | Current Inventory | | | | | Homeless Population | | | | Gap Analysis | | | |
| | Family | | Adults Only | | Vets | Family HH (at least 1 child) | Adult HH (w/o child) | Vets | Victims of DV | Family | | Adults Only | |
| | # of Beds | # of Units | # of Beds | # of Units | # of Beds | | | | | # of Beds | # of Units | # of Beds | # of Units |
| Emergency Shelter | 111 | 32 | 72 | - | 0 | | | | | | | | |
| Transitional Housing | 0 | 0 | 25 | - | 0 | | | | | | | | |
| Permanent Supportive Housing | 348 | 128 | 296 | - | 127 | | | | | | | | |
| Other Permanent Housing | 125 | 45 | 84 | - | 0 | | | | | | | | |
| Sheltered Homeless | | | | | | 76 | 265 | 15 | 82 | | | | |
| Unsheltered Homeless | | | | | | 0 | 85 | 4 | 0 | | | | |
| Current Gap | | | | | | | | | | 125 | 50 | 65 | 65 |

Data Sources: 1. Point in Time Count (PIT) 2022; 2. Continuum of Care Housing Inventory Count (HIC) 2022; 3. Consultation

Housing Needs Inventory and Gap Analysis Table

| Non-Homeless | | | |
|---|-------------------|-----------------|-----------------|
| | Current Inventory | Level of Need | Gap Analysis |
| | # of Units | # of Households | # of Households |
| Total Rental Units | 104,025 | | |
| Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness) | 22,270 | | |
| Rental Units Affordable to HH at 50% AMI (Other Populations) | 37,395 | | |
| 0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness) | | 22,635 | |
| 30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations) | | 15,955 | |
| Current Gaps | | | 23,205 |

Data Sources: 1. Comprehensive Housing Affordability Strategy (CHAS)

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

Homeless as defined in 24 CFR 91.5

The best source of information about this Qualifying Population (QP) will be from the annual Point in Time Count (PIT) which is a county of individuals and families experiencing homelessness, required by HUD to occur at least every other year during the last 10 days of January. In the State of New Jersey, it is done annually and coordinated by Monarch Housing Associates and takes place across a single day to help eliminate duplication of persons being counted in more than one jurisdiction.

According to the 2022 Point In Time Count, there were 586 persons experiencing homelessness in Middlesex County on 1/25/22. This included 499 people who were sheltered and 87 that were unsheltered. There were 426 households experiencing homelessness. (A household can be a single person.) Some key demographic information:

- 56% identified as Male
- 44% identified as Female
- 24% were Children under 18 years of age
- 18% were Adults ages 55+
- 37% have been Homeless for 1+ years
- 62% reported 1 or more Disabilities
- 4% were Veterans
- 27% were Chronically Homeless (Homeless for at least 1 year or having at least 4 episodes of homelessness over the past 3 years totaling at least 12 months AND has a disability)

Homeless Families with Children

76 households containing at least one child under the age of 18 and one adult were identified as being homeless. These Homeless Families consisted of 221 persons, including 138 children under age 18 and 83 adults, with the average family size 2.9 persons. All 76 households were staying in emergency shelters and none were unsheltered. The 76 households represent 18% of all homeless households, but the 221 persons in these households represent 37.7% of all homeless persons.

Adult Only Households

350 households consisted of adults only, representing 82% of all homeless households. These adult only households were composed of 365 adults, so the greatest majority of these adult households consist of just 1 person. (Other examples of adult only households would be a couple or a parent with an adult child.) 261 of these households (75%) were staying in emergency shelters and 85 of these households (24%) were unsheltered, with 4 household (less than 1%) were in transitional housing.

Disabilities

PIT count homeless respondents reported the following disabilities:

- Mental Health Issues – 247 persons
- Chronic Health Condition – 163 persons
- Substance Abuse Disorder – 146 persons
- Physical Disability – 110 persons
- Developmental Disability – 29 persons
- HIV/AIDS - 6 persons

Income and Benefits

- 109 (26%) of all PIT count homeless households reported no source of income, including 47 unsheltered households (55%) of all unsheltered households.
- 107 households (25%) were receiving GA/Welfare
- 85 households (20%) were receiving SSI and/or SSDI
- 56 households (13%) had wage or work income
- 35 households (8% of all households but 46% of homeless families with children) were receiving TANF/Welfare
- 16 households (4%) were receiving Social Security
- 11 households (3% of all households but 14.5% of homeless families with children) were receiving child support

Length of Homelessness Among Households

- 0-2 months – 66 households
- 3-6 months – 112 households
- 7-9 months – 44 households
- 10-12 months – 44 households
- 1 – 3 years - 143 households
- 3+ years – 16 households

Racial Disparities in Homeless QP

Black, non-Hispanic/Latino are overrepresented in the homeless population. While they are 9.1% of the total populations, they account for 41.6% of the population experiencing homelessness. Hispanic/Latinos are also overrepresented in the homeless population to a lesser degree. They represent 22.4% of the total population but are 36.7% of the population experiencing homelessness.

White, non-Hispanic/Latino represents 38.6% of the total population, but only 18.8% of the populations experiencing homelessness. Asian, non-Hispanic/Latino represents 26.4% of the total population, but only 1.7% of the population experiencing homelessness.

At Risk of Homelessness as defined in 24 CFR 91.5

This QP is especially difficult to summarize since it represents persons who are very low income (less than 30% Area Median Income) and may be very shortly likely to enter the homeless system. This QP includes “couch surfers” who may move frequently between different friend and family members or others who may have been previously evicted from housing and are either paying for their own motel or temporarily living with friends or family and that living situation is not sustainable.

Some reasons that households that are temporarily living with friends or family becomes unsustainable is that they are legally not supposed to be living in the unit. This is particular a concern when families temporarily move in with others, which may cause overcrowding in the shared unit, or the unit is some type of subsidized housing where having occupants not on the lease puts the tenant in lease violation and at risk of losing the subsidy. Even in situations where these are not concerns, if the individual or family who temporarily moved in has been staying for a much longer time period than expected, the tenant/owner of the shared housing will ask them to leave. Other instances that lead to couch surfing or where individuals end up homeless is often with the homeless youth or young adult population, where for various reasons they are sometimes “kicked out” of their housing by their parents. This happens because the individual is LGBTQ, has turned 18, and/or living together becomes combative and has been reported as such by entities like the Board of Social Services, DCP&P, and Garden State Home.

Point In Time (PIT) data for the past four years (2019 - 2022) has shown that the number one cause of a household’s homelessness was that they were asked to leave a shared residence. This was the cause listed for over 20% of the respondents in 2020 – 2022 and by 16.7% of the respondents in 2019. In the past seven years (2016 – 2022), asked to leave a shared residence was always the number one reason, except for in 2018, when it was the 2nd most stated reason after loss of wages/employment. If 20% of the homeless population became homeless because they were asked to leave a shared residence, and the 2022 PIT data indicated that the county had 426 households experiencing homelessness, it can be assumed that at a minimum there are 85 households that may be in a unsustainable living situation and will be asked to leave the residence by the lease holder or owner.

Another source that can capture this QP population is the people who seek tenancy help from Central Jersey Legal Services (CJLS), the county’s local free legal aid organization. Since you have to be low income to qualify for their assistance with housing concerns, their cases would likely mainly households that meet this QPs requirements. In calendar year 2022, CJLS they closed 1, 147 housing cases, 890 that were coded as being landlord/tenant issues, most commonly persons facing eviction. Evictions are primarily for non-payment of rent or a combination of lease violations and non-payment. CJLS reported that housing cases have increased greatly in the second half of 2022. For a comparison, in 4th quarter 2021, they opened 188 new housing cases in Middlesex County. In 4th quarter 2022, they opened 302 housing cases, which is over a 60% increase. CJLS also noted that they opened 169 new

housing cases in January 2023, which would put them on pace to open 500 new cases in 1st quarter 2023. If this happens, it will represent 65% increase from 4th quarter 2022. CJLS also noted that they currently have 173 open housing cases as of the end of February 2023.

While the official Point In Time (PIT) numbers that are reported to HUD only include those meeting the HUD definition of homeless (or for HOME-ARP comparisons, QP1 and QP3), Middlesex County usually also evaluates PIT surveys completed by households that are “precariously housed”. This includes people who do not have permanent housing and whose shelter is temporary. Most of these households reported staying temporarily with friends or family, while others reported staying in a hotel that they paid for without assistance or being in jail or a hospital. The data on the Precariously Housed population is a good representation of the At Risk QP. Here’s a summary from Coming Home’s 2021 PIT Analysis:

On the night of the 2021 PIT, there were 113 Households who were Precariously Housed:

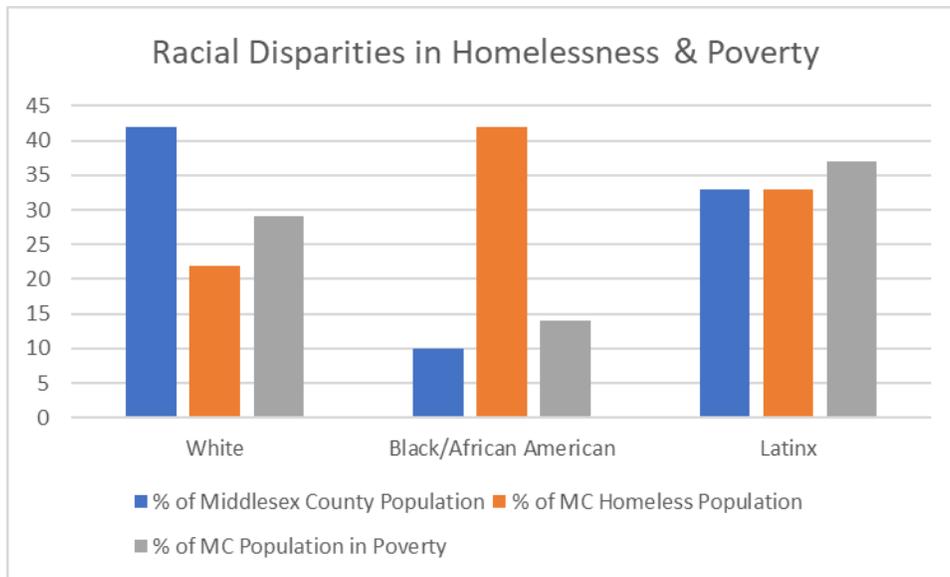
- 36 Households without Children (39 adults)
- 77 Families (102 adults and 151 children)
- This represents a 41% decrease from 2020 in households reporting being Precariously Housed, likely due to the impact of the pandemic, including the eviction moratorium and a reduction in the number of households presenting for assistance or participating in the survey.
- 4 Families were headed by single mothers who qualify as Homeless Youth (ages 18-24) and 2 families were young couples. There are also 3 young Adults (18-24) without Children.
- 11 women in families and 2 individuals reported being victims of domestic violence.
- The majority of households (73%) reported that they were staying “Temporarily with Friends or Family.”
- Of the 77 families, 82% were single mothers, 4% were single fathers, 13% were two parent households.

That 2021 Coming Home PIT Analysis also noted the following regarding Precariously Housed, especially compared with the population that met the HUD definition of homeless. The top cause of homelessness for precariously housed was economic, i.e. Loss of Job/Reduction of Income. Other factors, such as being Asked to Leave a Shared Residence and Household breakup or death also indicate probable financial problems or loss of income leading to homelessness. In 2021, Domestic Violence rose to the third cause of potential homelessness for those who were precariously housed. Overall, the causes leading to be precariously housed was like that of literally homeless households, although there was a significantly higher percentage of literally homeless households reporting Release from an Institution, Mental Illness, and Substance Abuse. Here is a chart comparison from the study’s data showing differences between Precariously Housed and Homeless (or the differences from this QP2 At Risk to QP1 & QP3).

| | Precariously Housed | Homeless (HUD Definition) |
|--|----------------------------|----------------------------------|
|--|----------------------------|----------------------------------|

| | | |
|---|-----|---|
| \$0 Income | 20% | 30% |
| Less than \$1500 income/month | 32% | 79% (Adults only – no breakdown for Families) |
| Employment Income | 23% | 15% |
| More than \$1500/month Income (any source) | 21% | 13% |
| Adult with a Disability | 46% | 74% |

This At Risk QP is likely to share many demographic characteristics with the Homeless QP1, since many households in this QP, do eventually end up homeless and a part of QP1. Here’s a chart from the Coming Home 2021 PIT Analysis that uses 2019 American Community Survey data.



This chart documents that populations in poverty or at risk of homelessness will have higher percentages of Black/African American and Latinx households compared to the total populations. While this is more extreme in the homeless population, it still shows a significant disparity for those in the At Risk QP.

So, while not a complete picture of the full scope of the At Risk QP, the above documents that at any given month, there are several hundred households (both single individuals and families) that could be At Risk of Homelessness.

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

Women Aware is the county’s domestic violence shelter provider, provides a multitude of services to survivors of domestic violence and also operates a 24/7 hotline. They have greatly increased their shelter capacity and services to meet increased demand. Here is a comparison over the past few years documented the growing demand and services provided.

| | 2020 | 2021 | 2022 | Increase from 2021-2022 |
|---|-------------|-------------|------------------------------------|--------------------------------|
| Persons Provided with Emergency Shelter | 186 | 250 | 278 (136 adults & 142 children) | 11% |
| Number of Bed Nights | 7,699 | 11,440 | 17,983 | 57% |
| Avg. Number of Persons/Night | 21 | 31 | 49 | 58% |
| Number of Hotline Calls | 6400 | 7,278 | 8,763 | 20% |
| Persons Served with Legal Advocacy | 821 | 1,137 | 1675 | 47% |

Women Aware was able to increase their provision of bed nights not by increasing actually emergency shelter facility capacity, but by being able to utilize motels for non-congregate shelter. The costs for this additional capacity were primarily covered with increased COVID related funding, such as the ESG-CV program. The above statistics regarding persons utilizing the DV shelter program is an indicator of the minimum size of this population.

The NJ State Police provide an annual Domestic Violence Report based on incidents reported by municipal police departments. For calendar year 2020, the following was reported:

- 4,783 incidents of domestic violence
 - 1,235 where children were present
 - 460 where DCP&P (child welfare/child abuse) were called
 - 982 where drugs/alcohol were involved*
 - 335 where victim was over 60 years old
- 1,681 offender was arrested
- 1,000 incidents where a prior Temporary Restraining Order (TRO) was issued
- 829 incidents where a new TRO was issued

* A few municipalities that had high DV incident numbers reported 0 for this category, so data was likely not collected or noted in incident reports, indicating this is likely an undercount. Most municipalities reported between 22-25% of all cases involved alcohol or drug involvement.

The same report for 2019 showed a total of 4,336 reported incidents. So, 2020 saw a 10.3% increase in the total number of DV incidents reported to Middlesex County police departments.

The 2020 Domestic Violence Report also had the following data about the type of offenses:

- 2,073 were Assault Offenses
- 1,731 were Harassment Offenses
- 224 were Terroristic Threats
- 401 were Criminal Mischief
- 30 were Sexual Assault and 5 Criminal Sexual Contact
- 16 were Stalking
- 14 were Criminal Restrain or False Imprisonment
- 3 were Homicides

The 2020 Domestic Violence Report also had information on the type of Offender:

- 1096 were a boyfriend/girlfriend
- 1055 were a spouse or common-law spouse
- 702 were ex-boyfriend or ex-girlfriend
- 197 were ex-spouses
- 359 were a parent

Still Waters, a program run by Reformed Church of Highland Park Affordable Housing Corp., provided a report of the assistance and programs they provide to victims of human trafficking. Their report noted that although there are two main types of trafficking, sex trafficking and labor trafficking, that in caring for victims of trafficking, the distinction between foreign nationals and domestic (US citizens and permanent residents) victims is more crucial due to the many additional barriers that foreign nationals face in obtaining recovery supports. US citizens and permanent residents are eligible for Medicaid, TANF, housing vouchers, etc. while these resources are not available to foreign nationals. Since Middlesex County and the State of NJ overall have a high immigrant population, meaning there is a greater likelihood to have more victims of labor trafficking and/or sex trafficking than in states or areas with lower immigrant populations.

Still Waters operated a Trafficking Victims Assistance Program (TVAP) for a 3-year period ending 9/29/22 where they served 105 clients. They have started a new program where they have already enrolled 11 new clients. They also have a 3-year Department of Justice grant that was due to expire in April 2023 that was anticipated to provides short term housing assistance to 30 clients, but they ended up serving three times the number anticipated and ran out of funds before the contract ended. They have started a new 3-year housing assistance grant as of Oct. 2022 that is anticipated to serve 50 individual victims of trafficking.

Lastly, Still Waters noted that the number of trafficking victims reported through law enforcement is very low compared to numbers of victims served by non-government organizations, such as theirs. And even still they acknowledge that the clients they serve barely begin to form a base number from which an actual number of trafficking victims in any given geographic area could be projected.

While the above attempts to quantify this QP population, this just represents a percentage of the true potential number. Many individuals and families that would meet this QP criteria often go unreported and unknown, but the most recent data shows this is a growing QP.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

This is another QP that is composed of many different subsets, making it difficult to truly capture the full scope of the population. The below will attempt to provide some indications and characteristics of this QP.

One main component of this QP is households that were previously homeless and are currently receiving some temporary assistance that may be ending and that may have difficulty sustaining housing without continued assistance. As of December 2022, the local Board of Social Services had 43 households receiving Temporary Rental Assistance (TRA) from their Emergency Assistance (EA) Program. TRA is short term, usually only for up to 12 months. The 2022 Housing Inventory Count indicated that there were 55 formerly homeless households (28 families with children and 27 adults only) receiving Rapid Re-housing Assistance, which is capped at a maximum of 24 months, but usually provided for shorter periods of time. Middlesex County operated an Emergency Rental Assistance Program using US Department of Treasury COVID funding from May 2021 – August 2022. There were over 1500 applicants that were below 50% of Area Median Income (AMI) and were recommended for assistance.

Per the 2021 American Community Survey, there are 38,586 renter households paying more than 35% of their income towards housing cost making them cost burdened. The most recent Comprehensive Housing Affordability Strategy (CHAS) data (2015-2019 ACS 5-year estimates), there are 23,205 low-income renter households (households making below 50% AMI that are paying more than 50% of their income in housing costs, making them severely cost burdened. This equals 22% of the total renter households.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

As described elsewhere in this plan, there is not enough congregate and non-congregate shelter units available within the county to meet the demand. Prioritized shelter waiting lists, especially

for the Mens' Shelter are always long, with the demand far exceeding supply. Both the Board of Social Services and local non-profits have to use local motels for shelter placement.

While supportive services exist to some extent for all QP's that are not enough to meet demand. Often when there is case management provided to the Homeless QP's, there is the expectation for the assigned case manager to have expertise in all areas. For example, PATH street outreach case managers trained to work with unsheltered persons with mental illness also have to be housing search specialists. For other services, like legal services for tenancy issues, there is more demand than can be served by the local free Legal Services provider. These are just a few main examples of the need for more supportive services for all QPs.

The demand for TBRA is well evident by the long waiting lists for all county PHA's and the fact that it is very rare that the state PHA or any of the municipal PHA's in the county will have their Housing Choice Voucher program even open to accept applications.

The county has a low rental unit vacancy rate of 2% per the 2021 American Community Survey along with growing rental costs. Per the 2021 American Community Survey, approximately 46% of all rental units are paying more than 30% of their income towards housing costs. Affordable housing is definitely needed. There have been annual increases in Fair Market Rents that have far exceeded many households' income increases, with many landlords using this environment to raise rent by high percentages each year, further exacerbating the issue. Permanent Supportive Housing (PSH) is also a need, with many homeless households who would benefit from this being referred to housing sources with less services or who stay homeless for lack of units. The high cost of housing is also preventing households previously placed in PSH to move on to other housing, even if they no longer require the supportive services.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The most critical need for the Homeless QP is shelter space. Middlesex County currently has one emergency shelter for Men, another for Single Women and Families, and another for survivors of Domestic Violence. These are the units reflected on the previous chart entitled "Homeless Needs Inventory and Gap Analysis". Not shown on this chart, but present on the 2022 Housing Inventory Chart (HIC) is 347 Overflow Beds. In our community, these are a combination of motel placements by the Board of Social Services using EA (Emergency Assistance), a seasonal (winter only) rotating shelter for men, motel placements by non-profit organizations, and a few other emergency placements in temporary shelter space, such as a church facility or a Code Blue side. So, the county has over twice its Year-Round Emergency Shelter Bed capacity in these Overflow Beds. This situation has been long running and not just due to COVID, although COVID has made it worse with increased shelter demand. The individuals and households who are placed in these Overflow Beds also tend to have even less access to case management and housing search assistance than our year-round emergency shelter facilities. There is also a need for year-round emergency

shelter facilities to have additional staff or access to system wide staff that is dedicated to housing search and landlord engagement.

There is also a need for additional permanent supportive housing (PSH) for homeless persons with disabilities. Because of our two-part Coordinated Entry system, which also prioritizes Emergency Shelter based on need and length of homelessness, the shelter population, especially in the Men's Shelter will often have a high chronic homeless population. This population, even with vouchers, will often find it difficult to find suitable rental units. Homeless dedicated PSH units that have lower barriers for admission are needed in the jurisdiction.

There is also the need for dedicated affordable rental units for individuals and families at or below 40% area median income (AMI). More specifically, SRO/studio units for single men who are working or have a steady fixed income like SS or SSI, but that even "affordable housing" targeted for people with incomes up to 80% AMI are far out of reach for this population. This is also true for low-income homeless families, which are often composed of single parents with multiple minor children. According to the 2022 Out of Reach Report by the National Low Income Housing Coalition, the State of NJ ranks 7th in overall unaffordability based on the gap between renters' wages and the cost of rental housing. In Middlesex County, to afford a Fair Market Rent (FMR) \$1,851 two-bedroom unit, a household would need an annual income of over \$74,000 to avoid being cost burdened (paying more than 30% of income towards housing costs.) To achieve this salary would require 110 hours per week at minimum wage, making it difficult for even a household with two lower paying jobs to afford a two bedroom at FMR.

There is also a need for additional rental assistance, with and without supportive services. This includes short- and medium-term assistance, such as Rapid Re-Housing funds and long-term subsidies like vouchers. Vouchers that are either tenant based, sponsored based or project based are needed to help the Homeless QP exit emergency shelter placement to permanent housing.

The Homeless QP is also the most in need for additional Supportive Services, especially around housing search and then wrap around services that could assist with housing stabilization.

At Risk of Homelessness as defined in 24 CFR 91.5

Although the recent use of federal American Rescue Plan funds through the Department of Treasury's Emergency Rental Assistance Program provided a large infusion to help households facing eviction, and therefore, at risk of homelessness, these funds are ending.

This QP limits eligibility to those making at or below 30% AMI. While this population could be served through different homelessness prevention funds provided by federal, state

or local funding sources, the non-profit organizations administering these funds have always had more demand than funding available.

As stated previously, many in this populations don't have their own permanent housing but are couch surfing or staying with others temporarily usually due to a family breakup and/or loss of income. Their low incomes coupled with the high cost of housing makes it difficult to secure new permanent housing. This indicates that there is a great need for additional affordable rental housing.

There is a Diversion Program that provides assistance to households that may otherwise enter the homeless system without these interventions. Even with a recent expansion, there is more demand to meet all those households that may benefit from this assistance.

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

The local Domestic Violence shelter program, Women Aware, does not have sufficient capacity to meet needs and could especially use additional non-congregate shelter capacity to serve all victim populations. Women Aware also noted in their most recent Impact Report that there has been a great increase in demand not only for shelter, but for services across all their programs as evidenced by increased hotline call. This is especially true for legal advocacy.

This QP has the same issues as the Homeless QP in that more affordable rental housing is needed for all household sizes, including permanent supportive housing.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

This QP would mainly benefit from additional affordable housing options, both dedicated rental housing that's affordable to people at or below 50% Area Median Income (AMI) or long-term tenant-based vouchers.

There is also a need for additional prevention services that are more flexible and could provide financial assistance earlier in the eviction process. Most prevention funding has eligibility requirements that require a household to already have an eviction filing and be close to losing their housing before financial assistance can be provided. Lastly, for the subset of this QP that were previously homeless and in permanent supportive housing, there needs to be additional "Moving On" capacity, so these households could continue to receive the needed housing subsidy, but their original subsidy with housing and supportive services could be provided to a new homeless household.

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

Shelter

The Middlesex County CoC uses its Coordinated Entry system to prioritize placement in its emergency shelter facilities. Outside of dedicated beds for Board of Social Services (which does its own direct placement), other beds are filled through this prioritized list, which factors vulnerability, length of homelessness, presence of disabilities in establishing placement. When a shelter has an opening, it will go to the appropriate list (there are separate lists for Single Men, Single Women, and Families) and use the Shelter Prioritization list to fill the opening. Homeless individuals and families get on the list through either referral by the Homeless Hotline or referrals through various street outreach programs. Households are asked whether or not they want to be considered for shelter placement.

As stated above, there has constantly been a gap between the number of emergency shelter beds and the demand for these beds. Even with a large amount of Overflow beds provided through various means that supplement the year-round emergency shelter programs, there are still persons on shelter waiting lists and also other homeless persons who eschew these traditional shelters either because they don't like the congregate aspect of them or that their disabilities make the congregate shelters impractical. There is also an issue with where the existing emergency shelters are located. The Single Women and Family Shelter is located in Edison, which is somewhat centrally located in the county and close to municipalities that report the highest levels of homelessness (New Brunswick, Perth Amboy, Woodbridge, Edison). The only Mens' Shelter is located in New Brunswick. Many of the homeless population in the greater Perth Amboy area don't like to leave that locale because of jobs and/or the community supports they have their (social service agencies, medical personnel, friends/family etc.)

Women Aware has been able to increase their emergency shelter capacity using motels due to COVID related funding that has ended or will end soon. This documented a need for additional capacity to serve the QP3 population, especially non-congregate shelter space.

Coming Home has been operating an emergency sheltering program with COVID funding targeting unsheltered homeless who are at higher risk of contracting COVID due to age and/or certain disabilities, such as chronic heart or lung issues, asthma, immune compromised, etc. They also used motels for this additional non-congregate shelter space. Once sheltered, case management staff then worked with them on obtaining permanent housing and many individuals went from being unsheltered (and often chronically homeless) to being permanently and sustainably housed.

Housing Inventory

Data from multiple sources already cited in this document point very clearly to there being not enough affordable housing for individuals and families in all four QPs.

For the Homeless QP, even those who obtain some type of tenant-based voucher, often have difficulty finding landlords willing to rent to them because of their poor or non-existent credit history. For others in the Homeless QP, with temporary or no housing subsidy, their income is

often too low to be able to find suitable housing that won't have them paying more than 50% of their income in housing costs.

For QP3 (Fleeing Domestic Violence), they may or may not have higher incomes than QP1, but are still facing challenges in that their income isn't enough to obtain market rate rents and there are often long waits for affordable rental units.

QP2 (At Risk) and QP4 (Other/Housing Instability) that live in their own permanent housing have incomes lower than 50% AMI and are very likely to be paying much more than 30% of their income in housing costs, which makes them susceptible to losing their housing if they have one large unplanned expense or temporary loss of income, such as a major car repair, unable to work due to a medical issue or family breakup.

The 2022 Out of Reach Report issued jointly by the National Low Income Housing Coalition (NLIHC) and the Housing and Community Development Network of New Jersey noted that in Middlesex County the Fair Market Rent (FMR) for a 2-bedroom unit is \$1,851. For that to be affordable to a household (not paying more than 30% of their income towards housing cost), the household would have to earn over \$74,000. For a 1-bedroom unit with a FMR of \$1,455, the household would have to make over \$58,000 for that unit to be affordable.

According to the 2021 American Community Survey, out of over 105,000 rental units, there were only just over 11,000 that were priced under \$1,000/month in rent. There are most definitely not enough housing units priced at levels that most of the households in any of the QPs could afford. There is a high need for more affordable rental housing that is either dedicated specifically for homeless individuals and families or that is targeted to households making less than 40% of area median income.

Service Delivery System

There are multiple Street Outreach programs operating in the county, including two PATH programs targeting unsheltered persons with serious mental illness. These programs were able to expand during pandemic with additional COVID funding, but in some cases that funding is or has ended. Street Outreach programs work by continually engaging with individuals and being able to offer them access to shelter, non-congregate shelter, and/or permanent housing (either through a voucher or dedicated affordable unit.) The system could benefit from additional street outreach staffing, but also additional non-congregate shelter options and additional affordable rental housing options.

In the existing shelter systems, there is case management offered and some limited assistance with housing search. Shelter clients would benefit from additional staffing that could provide housing search assistance and system wide landlord engagement. In addition to the housing search help, the main issue is that there is not enough affordable rental housing, units dedicated or priced to very low-income households, and housing vouchers.

Households that are on the waiting list for housing are offered case management, but there is more demand than the case managers could realistically provide. This could be alleviated by additional case managers and additional housing supports. There is also a Diversion program that has been funded by NJ Department of Community Affairs for the past year that was recently expanded to include a second funded non-profit agency. While this increased capacity is appreciated, there is still not likely enough to assist all who would benefit or desire to access this program.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

N/A

Identify priority needs for qualifying populations:

The main priority need identified by both consulting with organizations working with or representing the different QPs and by data, is the need for non-congregate shelter. Since the implementation of Coordinated Entry for shelter placement in 2015, there has never been a time when there weren't multiple people waiting on a list for the congregate shelters for Men, Single Women, or Families. These lists exceed demand even with the use of overflow units in motels by the Board of Social Services and non-profit agencies help increase shelter capacity. While primarily benefiting the Homeless QP and the Fleeing Domestic Violence QP, it will also benefit the other two QPs (At Risk of Homelessness and Other Populations/Housing Instability) who could end up falling into the Homeless QP and be in need of emergency shelter.

Another main priority need is to develop more affordable rental housing, especially for those at or below 50% of Area Median Income. This would benefit all four QPs. Permanent Supportive Housing, which couples low-income rental housing with offered supportive services was specifically identified as a need for the Homeless and Fleeing Domestic Violence QPs. Individuals and families are staying in shelters longer because of the lack of affordable housing in the community. All four QPs need affordable rental housing that is targeted to households making no more than 50% of Area Median Income (AMI), but ideally set for households making no more than 30% AMI. Any units dedicated to serve the QPs will be helpful, but it is especially crucial for those in most need, or the Homeless and Fleeing DV QPs.

Supportive Services have been identified as a priority need, both in conjunction with non-congregate shelter and affordable rental housing and also as standalone services to all QPs. One crucially identified service need was the need for housing search assistance and landlord engagement. There are many other needs that could benefit all QPs from obtaining permanent housing, maintaining permanent housing, increasing income (through accessing qualified mainstream resources or increased employment opportunities), transportation, childcare assistance, and many more.

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

Middlesex County used both the data cited in this allocation plan, plus the information derived from the subject matter experts through the consultation process in making determinations of the needs and gaps in the shelter and housing inventory and service delivery system. Data used included HMIS data, Point in Time Count data and analysis, Housing Inventory Count, and Census data including from the American Community Survey. Many non-profit agencies that work directly with one or more of the QPs also provided data on clients served, documented increased demand, and noted where there is increased level of need than they are able to provide. Since Middlesex County Division of Housing is both the prepared of this plan and also the lead entity for the jurisdiction's CoC, there is also known information about how the system operates and existing service gaps and unmet need.

HOME-ARP Activities

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

There will be different processes depending on the HOME-ARP eligible activity.

For the **Development of Affordable Rental Housing**, Middlesex County will use a similar process as it does for the HOME Program and its county funded Housing First Capital Fund (HFCF). Potential applicants will be required to submit an application that includes detailed project description, a development budget, sources and uses of funds, an operating pro forma for the applicable term of affordability, agency experience and capacity, social services provided, rents and utilities, and municipal approval, endorsement or support.

The Rental Housing applicant could within the same application, request funding for Non-Profit Operating and/or Capacity Building and/or Supportive Services. They would have to describe how these funds would be used and why they are needed to bring the project to fruition.

The application will be evaluated by a special committee consisting of county staff, members of the county's Housing & Community Development (HCD) Committee and Coming Home staff. All these individuals/entities currently review applications for either the HOME, HFCF or both. The committee will evaluate the project on several factors, including: overall costs and cost per unit; location (proximity to transportation, stores, employment opportunities, social services, schools); rental affordability; unit size; social services offered onsite and ability to connected to mainstream resources; agency experience in development & management; leveraging of other funding sources; and project timeline for completion. Projects recommended by the committee will be submitted to County Administration for final review and then placed on a Board of County Commissioners meeting for approval.

Non-Congregate Shelter was identified as the highest need activity and represents the largest portion of our HOME-ARP allocation. Because the development of sustainable non-congregate shelter is more difficult in many ways than the development of affordable rental housing, Middlesex County will hold a Technical Assistance (TA) session for agencies interested in potentially applying for this portion of funding. This TA session will not only go over federal HOME-ARP requirements, but also State of NJ requirements for the operation of emergency shelters and explain the process that the county will use to select applicants under this eligible activity.

The county anticipates using a Notice of Intent (NOI) process for the development of non-congregate shelter. It will solicit NOI applications from agencies interested in developing non-congregate shelter and they will be evaluated on criteria such as agency experience, planned service area, and fiscal feasibility. The NOI will also include an opportunity to apply for Non-Profit Operating Assistance and/or Capacity Building Assistance for qualified applicants.

The county will select one or more applicants through the NOI process. The NOI selection will indicate that the applicant is eligible to receive HOME-ARP funds for the development of a non-congregate shelter, upon successful submission of a full application that will include the site selected, full development and operating pro forma and sources and uses of funds. The full application can also request Supportive Services if they can be shown to be an eligible HOME-ARP expense and not part of operating cost. The full application will then be reviewed by the County, in consultation with the CoC, with the funding recommendation made and authorized by the County Board of Commissioners.

Supportive Services, as stated above, can be part of applications for Development of Affordable Rental Housing and for Non-Congregate Shelter. Those requests will be evaluated, and funding decisions made based on the overall application and in conjunction with the primary HOME-ARP activity.

The county will also have a process for standalone Supportive Services. It is anticipated that the county will use Competitive Contracting to award such funds to applicant organizations. Competitive Contracting is a purchasing process where the county will solicit proposals from organizations to provide staffing for the provision of specific services. The proposals will be evaluated on not only price, but on agency capacity, experience, and the effectiveness of their program design and service delivery model. The services will have been identified as crucial to the homeless system through consultation with the CoC and based on input received from this process on system gaps and identified need. The Supportive Services may be for an expansion of existing services, for new services, or to continue a provided services that have an expiring funding source, such as CDBG-CV. Final funding recommendations will be approved by the County Board of Commissioners.

Requests for **Non-Profit Operation & Capacity Building Assistance**, as stated above, can be included with other HOME-ARP applications for Development of Affordable Rental Housing and Non-Congregate Shelter. The county will also accept on a rolling basis, applications for this activity not connected to another project. These applications will have to identify what type of HOME-ARP project they intent to later apply for, how the funds will be used, how funding will enable them to submit a full HOME-ARP application, and the agency experience and capacity. Decisions on funding for this category will also depend on the amount of HOME-ARP funding uncommitted in the activity category the applicant proposes for their project, in addition to evaluative criteria on project feasibility and agency capacity. Funding decisions will be made by the county and authorized by the County Board of Commissioners.

The county did not include **Tenant Based Rental Assistance** in its Allocation Plan.

Describe whether the PJ will administer eligible activities directly:

The county does not plan on administering the eligible HOME-ARP activities directly. HOME-ARP funding will be awarded to eligible entities through the processes outlined above. The county will provide technical assistance, monitoring and report on all HOME-ARP activities.

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

N/A

HOME-ARP Funding by Eligible Activities

In accordance with HUD regulatory guidance, the county must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

| | Funding Amount | Percent of the Grant | Statutory Limit |
|--|---------------------|----------------------|-----------------|
| Supportive Services | \$ 504,246 | | |
| Acquisition and Development of Non-Congregate Shelters | \$ 3,500,000 | | |
| Tenant Based Rental Assistance (TBRA) | \$ 0 | | |
| Development of Affordable Rental Housing | \$ 1,000,000 | | |
| Non-Profit Operating | \$ 290,000 | 4.96 % | 5% |
| Non-Profit Capacity Building | \$ 150,000 | 2.57 % | 5% |
| Administration and Planning | \$ 400,000 | 6.84 % | 15% |
| Total HOME ARP Allocation | \$ 5,844,246 | | |

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

Middlesex County is utilizing HOME-ARP funding to increase non-congregate shelter capacity, to fund the Development of Affordable Rental Housing, and to fund Supportive Services to support these two eligible activities and to provide other system supports. These activities were all noted as high priority needs by all data metrics and by consultation required for this HOME-ARP plan.

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

The shelter and housing inventory, service delivery system, and the needs identified in the gap analysis indicated a strong need for all the eligible activities under HOME-ARP funding. This was especially true of the Homeless QP and the Fleeing DV QP, as they are the populations most in need of increased shelter capacity. All four QPs would benefit from additional rental housing that is affordable to households making less than 50% AMI, and especially households at or below 30% AMI.

Since there is only limited HOME-ARP funding, it's a one-time funding source and it has a longer expenditure time frame than other CARES and American Rescue Plan funding targeting homeless or at-risk households, the allocation plan did not recommend funding for Tenant Based Rental Assistance (TBRA). Developing more Non-Congregate Shelter was the highest priority, and it is a continual system need, which is why it is the highest funded eligible activity. The next

highest need was creation of more affordable housing. This could be accomplished through allocating funding to the Development of Affordable Rental Housing and/or through allocation of funding to TBRA. Middlesex County is recommending that funding be used for the Development of Affordable Housing and not TBRA. Based on current Fair Market Rents, to fund a 1-bedroom unit for 3 years, could cost over \$50,000 in funding. While the \$1M currently allocated to Development of Affordable Rental Housing could potentially serve 20 households using TBRA, it would only be for a 3-year period and then there is no sustainability. So, while that same \$1M in Affordable Rental Housing is projected to create 10 dedicated units, these units will be available for a minimum of 15 years. It was determined that this is more desirable to have a longer-term impact. There are other funding sources for the Development of Affordable Housing, so HOME-ARP funds are anticipated to be used as gap funding in projects. HOME-ARP allow rental housing projects to fund operating reserves, which isn't usually allowable with other sources. There is also the ability to couple HOME-ARP rental housing development funds with supportive services funding and for non-profit developers to apply for operating and capacity building funding. This flexibility in the Affordable Rental Housing activity was the reason it was chosen as a way to increase the county's dedicated housing inventory.

Supportive Services were also a high priority need and have been funded accordingly. Non-Profit Operating and Capacity Building were also recommended for funding. This was seen as necessary to allow non-profits to submit competitive applications for HOME-ARP funding for rental housing development and for non-congregate shelter development.

HOME-ARP Production Housing Goals

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

The county estimates that approximately 10 affordable rental housing units for qualifying populations will be produced with the HOME-ARP allocation. The \$100K/per unit is a typical level of assistance for similar HOME and county funded Housing First Capital Fund (HFCF) projects. This estimation is based on HOME-ARP not being the sole source of funding used in the creation of these units, but that HOME-ARP may be primarily used as a gap financing source to help bring planned rental housing units for qualifying populations to fruition.

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

Middlesex County anticipates using HOME-ARP funding to create 10 affordable rental housing units. Because of the deed restrictions required for HOME-ARP funds, these created units will serve the CoC homeless system for a minimum of 15 years. The County and CoC continually looks to increase the number of dedicated homeless units since they will be able to serve multiple families during the deed restricted period and helps address a priority need identified by consultation and substantiated by data.

Preferences

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

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

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

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

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

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

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

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project: Middlesex County will give preference to the Homeless QP and the Fleeing or Attempting to Flee Domestic Violence QP for all HOME-ARP funded activities and projects. This preference is in line with how the Coordinated Entry system works to prioritize shelter and permanent housing opportunities to those identified as having the most critical need at that time as evidenced by criteria such as length of homelessness, chronic homeless history, and having disabilities.

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

The Middlesex County Allocation Plan prioritized Non-Congregate Shelter as its primary need and is allocating over 60% of its overall HOME-ARP funding for this purpose. Through both the comprehensive consultation process and the examination of Point in Time, Housing Inventory Count, and HMIS data, there is a clear need for our jurisdiction to increase its shelter capacity. Therefore, it makes sense for Middlesex County to prioritize the two QPs that contain homeless persons with no other safe or accessible shelter options. The households in these two QPs are the most vulnerable and are currently having a housing crisis.

HOME-ARP Rental Housing activities will also prioritize the Homeless QP and the Fleeing or Attempting to Flee Domestic Violence QP. These two QPs are comprised of households that are unsheltered and living in places not meant for human habitation or currently in emergency shelter or overflow shelter beds, including motels paid for by agencies. For the past decade and likely much longer, Middlesex County has lacked shelter capacity to serve its homeless population. There are often significant barriers for homeless persons & DV households in being able to exit shelter into permanent housing opportunities, which results in longer shelter stays,

especially when persons prioritized for shelter through the Middlesex County Coordinated Entry process are often chronically homeless and/or previously unsheltered for long periods of time. By prioritizing these two QPs for HOME-ARP Rental Housing activities, it will enable them to more quickly exit shelter, which then frees up those shelter units for persons waiting for and in need of shelter opportunities.

For standalone Supportive Services project, the Homeless QP and the Fleeing or Attempting to Flee Domestic Violence QP may be utilized if that particular HOME-ARP support service activity does not have the capacity to serve all QPs or households in all QPs desiring that service. It is anticipated that HOME-ARP funded Supportive Services project will be made available system wide and county wide.

Referral Methods

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

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

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

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

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of

prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

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

Middlesex County proposed to use an enhanced Coordinated Entry process as the referral method for its HOME-ARP projects and activities. The Middlesex County CoC implemented its Coordinated Entry (CE) system in 2015. It was implemented for both prioritizing most Emergency Shelter placements and for prioritizing permanent housing (with or without supports). While all CoC funded housing projects are required to use CE, the county has also been successful in getting other permanent housing dedicated for the homeless to also agree to use CE as its only referral method.

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

All four QPs will be eligible for HOME-ARP activities through the enhanced CE process. Currently, all four QPs are eligible for CE screening and placement on lists for shelter and permanent housing opportunities and the expansion of the CE system (which will have multiple physical locations to access CE) planned for July 2023 will also aid in more QP households being aware of all potential CoC system resources, not just HOME-ARP. The HOME-ARP funding will not be enough to serve all those in the four QPs that have needs, especially around affordable rental housing, which is why the prioritization is so important. So, while households in QP2 and QP4 aren't as likely to receive referrals for HOME-ARP placements, they will also be referred for other system programs they may be eligible to receive and can help them maintain existing permanent housing or locate new permanent housing. For example, QP2 and QP4 households are likely eligible for Diversion funding. HOME-ARP funding for standalone supportive services will be available for households in all four QPs.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

The current CE process for shelter placement maintains lists for openings for men, single women, and families with minor children. The lists are done through a prioritization that factors their current housing situation is, the length of time they may have been homeless, if they are chronically homeless, any previous homeless history, and any disabilities. This means that someone who is living in their car would "jump over" someone who is couch surfing on a shelter list even if the couch surfer has been in their situation longer. When HOME-ARP non-congregate shelter is created, that program will use this same priority lists, but since its non-congregate, they would take the household prioritized highest for that unit size regardless of whether its from the men's, single female, or family list.

CE is already used for almost all permanent supportive housing within the CoC and for many permanent housing programs. Using CE is a requirement for any program that has been funded by federal CoC or any county funding and for any projects with homeless dedicated unit that have requested a letter of support from the CoC. CE prioritization for permanent housing factors in whether the household has been chronically homeless; their history with institutions like foster care medical, mental health, or corrections; presence of disabilities; and also now includes a metric to check for COVID vulnerability. CE also collects data on current household income. When there is a housing opportunity, a CE referral is made based on the unit size and that the household meets whatever requirements that particular housing may require. For example, some homeless units aren't subsidized by a voucher, but are targeted to a household at 20-30% AMI. This means that when a referral is made, it won't necessarily be the household at the top of the list, but the household the furthest up the list that has income to support that unit. HOME-ARP units will be handled the same. Because of how the CE system works, households in QP1 and QP3 are almost always likely to be prioritized higher than households in QP2 and QP4.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

N/A

Limitations in a HOME-ARP rental housing or NCS project

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.

- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

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

Middlesex County does not intend to use any limitations or limit eligibility for any particular QP for any of the funded HOME-ARP activities.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

N/A

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

N/A

HOME-ARP Refinancing Guidelines

Middlesex County does not currently intend to use HOME-ARP funds to refinance existing debts secured by multifamily rental housing that may be rehabilitated with HOME-ARP funds.

If the County determined at a future date that it was in the best interest to allow this activity, then it would be considered a Substantial Amendment, and this HOME-ARP Allocation Plan would have to be amended to include guidelines in accordance with [24 CFR 92.206\(b\)](#) and will describe and provide the necessary detail the conditions under which such refinance would occur. This type of Substantial Amendment would include additional public participation requirements.