



# HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME) - AMERICAN RESCUE (ARP) ALLOCATION PLAN

**Cumberland County Community Development Department  
707 Executive Place  
Fayetteville, NC 28305**

Public Review and Comment Period: January 13, 2023 – January 27, 2023  
Public Hearing: January 17, 2023 @ 6:45 p.m.  
Cumberland County Courthouse  
117 Dick Street (Room 118), Fayetteville, NC

DRAFT #1

Amendments to the Draft and Final Reports Can Be Found at  
[www.cumberlandcountync.gov](http://www.cumberlandcountync.gov). Click on Community Development's Webpage

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## Introduction and Background

The U.S. Department of Housing and Urban Development (HUD) through the Home Investment Partnerships (HOME) Program grant has allocated \$1,435,021 of the American Rescue Plan (ARP) Act of 2021 to Cumberland County to perform eligible activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations.

Prior to using the HOME-ARP funds, Cumberland County is required to prepare an allocation plan to outline how the funds will be used to address the needs of qualifying populations. To begin preparing the allocation plan, Cumberland County must consult with housing and service providers whose clientele include the qualifying populations to identify unmet needs and gaps in housing and service delivery systems. Feedback provided by the service providers will aid Cumberland County in determining how to best use the HOME-ARP funds to meet the needs of the qualifying populations.

ARP defines qualifying individuals or families as those that are:

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

Eligible activities include:

- 1) development and support of affordable housing;
- 2) tenant-based rental assistance (TBRA);
- 3) provision of supportive services; and
- 4) acquisition and development of non-congregate shelter units.

During the development of the HOME-ARP allocation plan, Cumberland County will hold a public hearing for public review and comment at the Board of Commissioners meeting held on January 17, 2023, at 6:45 p.m. The draft copy of the allocation plan will be made available for review from January 13, 2023 – January 27, 2023 (5:00 p.m.).

For more information regarding the HOME-ARP Allocation Plan and other information, please refer to Cumberland County Community Development Department’s webpage:

[https://www.cumberlandcountync.gov/departments/community-development-group/community\\_development/plans-reports/other-current-plans-reports](https://www.cumberlandcountync.gov/departments/community-development-group/community_development/plans-reports/other-current-plans-reports)

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### Template:

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

Cumberland County, through the Community Development Department, incorporated input and data from various methods and tools. In the spring of 2021, the County hired a consultant to assist the County with conducting an assessment of the needs of the homeless population, identifying available resources in the community, and preparing a three-year strategic plan with recommendations to develop goals and objectives that address the needs of the homeless community. The data from the gap analysis is incorporated into this allocation plan.



The Community Development Department developed a survey for local agencies with expertise and knowledge of the homeless community to complete. The survey was made available beginning December 16, 2022 through December 30, 2022. The deadline date was extended to January 9, 2023 to include additional input. The survey was developed using JotForm with the capability of completing the survey in both English and Spanish languages. The survey was distributed to agencies listed on the local Continuum of Care listserv. A public notice was published in the Fayetteville Observer on December 16, 2022 and January 8, 2023 to inform the public of the survey, dates of the public review and comment period, and the date of the public hearing. The public notice was also posted on the County's website under the Community Development Department public notices page and distributed to several locations such as the Town Halls and the Cumberland County offices.

In addition to the survey, the Community Development Department staff held one-on-one virtual meetings with several agencies to hold detailed discussions regarding the needs of the Qualifying Population.

***List the organizations consulted (December 2022 – January 2023:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
Fayetteville Metropolitan Housing Authority	PHA / Section 8 Voucher Program / Project-Based / EHV Program / HUD-VASH / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those fleeing from domestic violence. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of accessibility for people with disabilities, lack of housing units for large families, and lack of landlord participation in rental subsidy assistance. Recommended making a minimum of 70% of the units available to the Qualifying Populations and the remaining units to all other low-income renters. Two activities that are considered high priority include tenant-based rental assistance/rental assistance to prevent homelessness and supportive services (case management, counseling, financial assistance, etc.). Additional comments included the need for transportation to get to and from work, medical facilities, employment and educational training programs, child care

			facilities, etc. for those who do not live on the bus line. Although public transportation (FAST Bus) is available it is extremely difficult for this population to reach their destination on time which often results in the loss of employment, not being seen by the doctor because they arrived late for their appointment, or child arrives too late at daycare to be accepted for the day.
Hodges Lodges, LLC and Life Matters Centers for Hope, Health, and Healing	Nonprofit / Domestic Violence Service Provider / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons who are homeless. Those homeless persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, lack of housing units for large families, lack of landlord participation in rental subsidy assistance, issues with NIMBY, lack of flexibility with program policies and processes, and lack of knowing what resources are available. Suggested making a minimum of 70% of the units available to the Qualifying Populations and the remaining units to all other low-income renters. Top two highest activities that are highest priority include development of affordable housing and supportive services (case management, counseling, financial assistance, etc.)
Care Center Family Violence Program	Public Agency / Domestic Violence Service Provider	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons fleeing from domestic violence. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of funding sources to build affordable units, lack of accessibility for people with disabilities, lack of housing units for large families, lack of landlord participation in rental subsidy assistance, and economic factors. Suggested making 100% of the units available to the Qualifying Populations. Top two highest activities that are highest priority include development of affordable housing and supportive services (case management, counseling, financial assistance, etc.). Two activities

			that are considered high priorities include acquisition/development of non-congregate shelters and development of affordable housing units.
United Management II, Inc.	Landlord/Property Manager	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons fleeing from domestic violence followed by persons who are at-risk of homelessness. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, and lack of flexibility with program policies and processes, too much red tape. Suggested making 100% of the units available to the Qualifying Populations. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services.
Endeavors	Nonprofit / Homeless Service Provider / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those who are homeless. Those persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Major barriers included low supply of affordable housing units, substandard housing units, and NIMBY. Suggested making 100% of the units available to the Qualifying Populations. Activities that are highest priority include development of affordable housing units and support services.
Cumberland County Community Development / Fair Housing Specialist	Local Government / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are persons who are homeless. Families with children have the highest need for housing and services. Major barriers included rent increase, substandard housing units, lack of accessibility for people with disabilities, and lack of landlord participation in rental subsidy assistance. Suggested making 70% of the units available to the Qualifying Populations and the remaining available to other low-income households. Two activities that are considered high priorities include development of affordable housing units and support services.
Kingdom Community Development Corporation	Developer / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons at-risk of becoming homeless followed by those fleeing from domestic violence.

			<p>Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of funding sources to build affordable housing units, lack of housing units for large families, lack of landlord participation in rental subsidy assistance, land use policies and zoning regulations, NIMBY, and economic factors (low wage jobs, gap in education/job preparation and workplace needs). Suggested making 100% of the units available to the Qualifying Populations. Two activities that are considered high priorities include development of affordable housing units and support services. Additional comments: need for transportation. Units need to be close to public transportation. Need more TRAUMA-INFORMED counseling. Also need incentives to cover operating costs (i.e. maintenance, etc.) because rents will be very low. Operating costs would make it difficult to maintain affordable housing.</p>
Cumberland HealthNET	Nonprofit / Homeless Service Provider / CoC Member	Virtual Meeting / Survey	<p>The Qualifying Population that has the highest priority need are those persons who are homeless, followed by those fleeing from domestic violence. Those persons with two or more of the following barriers: lack of a high school diploma/GED; illiteracy; low English proficiency; or, a history of unstable employment have the highest need for housing and services. Major barriers to accessing housing include rent increase, low supply of affordable housing units, economic factors (low wage jobs, gap in education/job preparation and workplace needs), and lack of flexibility with program policies and processes, too much red tape. Suggested making 70% of the units available to the Qualifying Populations. Two activities that are considered high priorities include development of affordable housing units and acquisition/development of non-congregate shelters. Additional comments: when we are talking about</p>

			affordable housing, it must be designed for very low to no income residents and we need more funding to assist with paying rent to help stabilize this population. In addition, whatever funding is used for, there needs to be a requirement that all individuals accessing this funding must go through coordinated entry.
ServiceSource	Nonprofit / Serving People with Disabilities	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those fleeing from domestic violence. Those with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of funding sources to build affordable housing units, lack of accessibility for people with disabilities, lack of housing units for large families, and economic factors (low wage jobs, gap in education/job preparation and workplace needs). Suggested making 100% of the units available to the Qualifying Populations. Two activities that are considered high priorities include development of affordable housing units and tenant-based rental assistance.
Fayetteville Area Habitat for Humanity	Nonprofit / Developer	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those at-risk of homelessness. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of funding sources to build affordable housing units, lack of accessibility for people with disabilities, lack of housing units for large families, lack of landlord participation in rental subsidy assistance, NIMBY, and economic factors (low wage jobs, gap in education/job preparation and workplace needs). Suggested making 100% of the units available to the Qualifying Populations. Two activities that are considered high priorities include development of affordable housing units and acquisition/development of non-congregate shelters.

Cumberland County Health Department	Public Agency / CoC Member	Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those at-risk of homelessness. Families with children have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services. Additional comments: Fayetteville-Cumberland County is in dire need of a centralized homeless services approach to reducing homelessness that includes local government and CoC collaboration. More oversight in distribution of HUD funds at the local level and use of evidenced based practices as recommended by HUD such as Housing First and Low Barrier approaches.
United Way of Cumberland County	Nonprofit / CoC Member	Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those fleeing domestic violence. Families with children have the highest need for housing and services. Two activities that are considered high priorities include tenant-based rental assistance and development of affordable housing.
Fayetteville Urban Ministry	Nonprofit / Homeless Service Provider / CoC Member	Survey	The Qualifying Population that has the highest priority need are at-risk of homelessness followed by those fleeing domestic violence. Those with chronic physical or mental health conditions requiring supportive services has have the highest need for housing and services. Two activities that are considered high priorities are the development of affordable housing and support services.
Legal Aide of North Carolina, Inc.	Legal Services Agency / CoC Member	Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those at-risk of homelessness. Families with children have the highest need for housing and services. Two activities that are considered high priorities include tenant-based rental assistance/rental assistance to prevent homelessness and support services. Additional comments: the development of an eviction-diversion program will benefit the City of Fayetteville/Cumberland County and would be instrumental in the reduction of homelessness in the City/County.

Cumberland County Community Collaborative	Public Agency / CoC Member	Survey	The Qualifying Population that has the highest priority need are those who are defined as homeless and those at-risk of homelessness. Families with children have the highest need for housing and services. Two activities that are considered high priorities include the development of affordable housing units and tenant-based rental assistance/rental assistance to prevent homelessness.
Fayetteville Police Department	Public Agency / CoC Member	Survey	The Qualifying Population that has the highest priority need are those who are defined as homeless and those at-risk of homelessness. Those with substance use disorders requiring supportive services have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services. Additional comments: emergency immediate drop-in shelters do not currently exist in Cumberland County. When there is an urgency for immediate shelter, citizens are left sleeping in woods, doorways, park benches and along the streets. There needs to be a strategic plan to address the urgent need for immediate drop-in shelters.
Cumberland County Communicare, Inc.	Nonprofit / Mental Health / CoC Member	Survey	The Qualifying Population that has the highest priority need are those persons fleeing from domestic violence. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, lack of funding sources to build affordable units, lack of housing units for large families, and other economic factors. Suggested making a minimum of 70% of the units available to the Qualifying Populations and the remaining units to all other low-income renters. Top two highest activities that are highest priority include development of affordable housing and supportive services (case management, counseling, financial assistance, etc.)
Alliance Health	Public Agency / Mental Health / CoC Member	Survey	The Qualifying Population that has the highest priority need are those at-risk of homelessness and those who are defined as homeless. Those with substance use disorders requiring supportive services have the highest need for housing and services. Two activities that are

			considered high priorities include tenant-based rental assistance to prevent homelessness and acquisition/development of non-congregate shelters.
Cumberland County EMS	Public Agency	Survey	The Qualifying Population that has the highest priority need are those who are homeless followed by those at-risk of homelessness. Those with substance use disorders requiring supportive services have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and the development of affordable housing units.
Chacola Dream House	Nonprofit / Homeless Service Provider	Survey	The Qualifying Population that has the highest priority need are those 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 stability. The next to the highest priority are those fleeing from domestic violence. Single adults and/or two adult households (married/domestic partners/close relatives) have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services.
North Carolina Community Housing & Consulting, Inc.	Nonprofit / Housing Counseling Agency	Survey	The Qualifying Population that has the highest priority need are those at-risk of homelessness followed by other population. Families with children have the highest need for housing and services. Two activities that are considered high priorities include tenant-based rental assistance/rental assistance to prevent homelessness and support services. Additional comments: the other unmet need is housing counseling to assist those qualifying clients to minimize the continued reliance on government/private assistance funds.
Better Health of Cumberland County	Nonprofit / Emergency Health Assistance / CoC Member	Survey	The Qualifying Population that has the highest priority need are those who are homeless followed by those at-risk of homelessness. Those persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and



			services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and development of affordable housing units.
DC	CoC Member	Survey	The Qualifying Population that has the highest priority need are those who are homeless followed by homeless veterans and families. Those persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and development of affordable housing units.
Savannah Missionary Baptist Church	Faith-based	Survey	The Qualifying Population that has the highest priority need are those who are fleeing from domestic violence followed by those at-risk of homelessness. Families with children have the highest need for housing and services. Two activities that are considered high priorities include development of affordable housing units and tenant-based rental assistance/rental assistance to prevent homelessness.
Angela Berry Lewis Writings	Resident/Advocate	Survey	The Qualifying Population that has the highest priority need are those who are homeless followed by those at-risk of homelessness. Those persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services.

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

Based on the feedback from the stakeholders, the top three priority needs include:

1. Development of affordable housing units
2. Acquisition / development of non-congregate shelters; and
3. Tenant-based rental assistance.

Out of the 25 respondents, 11 recommended the funds be used for the development of affordable housing units and 9 recommended funding be used for non-congregate shelter. The remaining 5 respondents recommended funding be used for tenant-based rental assistant. Several respondents

felt strongly that the development of affordable housing be complimented with supportive services that would include more transportation options, housing counseling, and case management (short-term and long-term).

Regarding the type of populations to be served, the majority indicated the population with the highest needs are the following ranked from highest priority to lowest:

1. Families with children;
2. Those persons with chronic physical or mental health;
3. Those with substance use disorder;
4. Single adults and/or two adult households; and
5. Those persons with two or more of the following barriers: lack of a high school diploma/GED; illiteracy; low English proficiency; or, a history of unstable employment has the highest need for housing and services.

## Public Participation

In accordance with Section V.B of the Notice (page 13), PJs 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.

### **Template:**

***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:*** 12/16/2022 and 1/8/2023

- **Public comment period:** start date - 1/13/2023 end date - 1/27/2023
- **Date(s) of public hearing:** 1/17/2023

***Describe the public participation process:***

At the December 14, 2022 CoC meeting, Community Development staff announced to the members that the HOME-ARP consultation survey was made available for homeless providers and other stakeholders to complete and provide input on how to best use the HOME-ARP funds. The public notice was published in the Fayetteville Observer on December 16, 2022 and on again on January 8, 2023 to describe the HOME-ARP grant, amount, survey, allocation plan process, dates of the public hearing and the public review and comment period.

Out of the twenty-five (25) respondents, Community Development staff held one-on-one virtual meetings with eight (8) respondents and the remaining respondents completed the survey only. The survey consisted of approximately 17 questions of which 10 were directly related to HOME-ARP program implementation, priorities, and preferences.

***Describe efforts to broaden public participation:***

The survey was distributed to all CoC members that included homeless providers, Fayetteville Metropolitan Housing Authority, developers, and other agencies and advocates of the homeless community. The HOME-ARP Allocation Plan is made available on the Cumberland County Community Development website and will be available at several locations to include the Community Development office, Spring Lake Town Hall, Hope Mills Town Hall, Headquarters Library, and at the County Board of Commissioners office.

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

[Pending responses. Responses will be included in the final draft of the Allocation Plan.]

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

[Pending response. Response will be included in the final draft of the Allocation Plan.]

## **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.

**Template:**

**OPTIONAL 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	14	3	14	14	0								
Transitional Housing	40	12	0	0	0								
Permanent Supportive Housing	121	38	137	132	0								
Other Permanent Housing	0	0	7	7	0								
Sheltered Homeless						54	14	1	7				
Unsheltered Homeless						5	387	19	13				
<b>Current Gap</b>										-	-	373	373

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

**OPTIONAL 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	61,805		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	11,535		
Rental Units Affordable to HH at 50% AMI (Other Populations)	9,660		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		8,750	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		8,635	
<b>Current Gaps</b>			17,385

**Source:** 2015-2019 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***

A homeless person is defined as:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, [transitional housing](#), and hotels and motels paid for by charitable organizations or by federal, [state](#), or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an [emergency shelter](#) or place not [meant](#) for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for [homeless](#) assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, [e.g.](#), family, friends, faith-based or other social networks needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as [homeless](#) under this definition, but who:

(i) Are defined as [homeless](#) under section 387 of the [Runaway and Homeless Youth Act](#) (42 U.S.C. 5732a), section 637 of the [Head Start Act](#) (42 U.S.C. 9832), section 41403 of the [Violence Against Women Act of 1994](#) (42 U.S.C. 14043e-2), section 330(h) of the [Public Health Service Act](#) (42 U.S.C. 254b(h)), section 3 of the [Food and Nutrition Act of 2008](#) (7 U.S.C. 2012), section 17(b) of the [Child Nutrition Act of 1966](#) (42 U.S.C. 1786(b)), or section 725 of the [McKinney-Vento Homeless Assistance Act](#) (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for [homeless](#) assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for [homeless](#) assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, [e.g.](#), family, friends, faith-based or other social networks, to obtain other permanent housing.

According to the 2022 Point-in-Time Homeless Count conducted for the Fayetteville / Cumberland County area, the report estimates 475 persons who are homeless. This number include those persons who were in an emergency shelter, transitional housing, or unsheltered. Of the 475 reported, 307 persons are males and 168 are females. The racial demographics and ages are as follows:

Race	Total = 475
American Indian, Alaska Native, or Indigenous	21
Asian or Asian American	10
Black, African American, or African	279
Native Hawaiian or Pacific Islander	6
White	99
Multiple Races	60

Age Group	Total = 475
Under age 18	30
Ages 18 to 24	1
Over age 24	444

***At Risk of Homelessness as defined in 24 CFR 91.5***

At risk of homelessness is defined as:

(1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately [available](#) to prevent them from moving to an [emergency shelter](#) or another place described in paragraph (1) of the “Homeless” definition in this section; and
- (iii) Meets one of the following conditions:
  - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - (B) Is living in the home of another because of economic hardship;
  - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
  - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, [State](#), or local government programs for low-income individuals;
  - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
  - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved [consolidated plan](#);

According to the 2015-2019 CHAS data, Cumberland County has 61,805 renters. Out this number, approximately 20,230 (33%) of renters are cost burdened. Cost burdened is the ratio of housing costs to household income. The housing cost includes the contract rent plus utilities. Out of the 20,230 renters that are cost burdened, 11,535 households have incomes that are less than or equal to 30% of the area median income. Of this number, 7,855 are cost burdened and are paying over 50% of their income toward housing costs (contract rent plus utilities). Of those households with incomes between 31% and 50% of the area median income, 4,830 renters are cost burdened and paying over 50% of their income toward housing costs.

According to the North Carolina Housing Coalition, the agency reported in the 2021 Housing Need for Cumberland County that out of 45,610 households, 36% of the households are cost burdened. Renters make up 29,912 (48%) households and have reported having difficulty affording their homes. The income that is needed to afford a two-bedroom apartment is \$34,760.

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

The Care Center Family Violence Program serves as one of the main programs available for victims of domestic violence. However, during the 2022 Point-in-Time Homeless Count, the program reported only having a capacity of 8 beds. The number of units varies based upon the household composition.

***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***

The populations requiring services or housing assistance include populations already mentioned above. In addition to short-term or long-term rental assistance or utility assistance, these populations need additional support services to help them maintain housing stability. The main support services include long-term case management, transportation, housing counseling, and mental health services.

***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):***

Cumberland County manages the Robin's Meadow transitional housing program which targets homeless families with children. The program provides 12 units and approximately 36 beds for



homeless families with children. Cumberland County used Community Development Block Grant funds and local general funds to provide additional support to the program. This program, with the partnership of Coordinated Entry (managed by Cumberland HealthNET) and shelters, allow families who are homeless to reside in an apartment for up to 12 months while they receive case management services and apply for permanent housing.

Cumberland County, in partnership with Cumberland Interfaith Hospitality Network, manages the Safe Homes for New Beginnings program which provides permanent supportive housing program (5 units) for individuals who have substance abuse disorders and are literally homeless. This program designates 60% of its beds for chronically homeless individuals.

Cumberland County, in partnership with the City of Fayetteville, used local general funds to provide housing assistance and other supportive services to promote housing stability by avoiding evictions and foreclosure to individuals that are at or below the eighty percentile of the Area Median Income preventing individuals and families of becoming homeless or may become homeless again. Program participants are able to receive financial assistance for security deposits, rental and/or utility assistance, hotel/motel assistance, and other support services needed to obtain and maintain permanent housing.

Bonanza (managed by Endeavors) is a permanent supportive housing program (7 units) which targets individuals and families who are homeless with a disability. Leath Commons (managed by Cumberland Interfaith Hospitality Network) serves as a permanent supportive housing program (5 units/10 beds) for families who are homeless and have a disability.

Volunteers of America, through the Supportive Services for Veteran Families Program, offers a permanent housing program that provides short-term/medium-term financial assistance to veterans and their families. The Fayetteville Metropolitan Housing Authority (FMHA) in partnership with the Fayetteville Veteran Affairs Medical Center, provides HUD-VASH vouchers to eligible homeless veterans.

The Salvation Army continues to operate a homeless shelter that targets mostly single adults. The shelter has a two to three units designated for families with children. The shelter has a capacity of 44 beds.

The Care Center Family Violence Program manages a shelter with the capacity of approximately 8 beds that target victims of domestic violence.

***Describe the unmet housing and service needs of qualifying populations:***

***Homeless as defined in 24 CFR 91.5***

Based on current data and available resources, there is a need for emergency shelter beds that target families with children. Although, the PiT Count only reported 51 sheltered and unsheltered persons within a household with at least one adult and one child, this is not an accurate representation of the number of families with children who are homeless. The number of shelter beds available for families with children are limited to approximately 14 beds. Out of the 51 sheltered beds reported, 36 were occupied by persons within a transitional housing program which allows families to reside in the units for up to 12 months. Homeless families with children in need of shelter are unable to access shelter due to the limited number of emergency shelter beds and the long wait period for transitional housing and permanent housing beds. The homeless families are then forced to stay in an over-crowded unit with family or friends or other places where they are not easily found.

### ***At Risk of Homelessness as defined in 24 CFR 91.5***

Those persons at-risk of homelessness struggle to maintain housing stability due to several factors. Some of the barriers to accessing affordable housing and maintaining housing stability include:

1. Significant increase in rent, especially within the last two years;
2. Inadequate supply of affordable housing units;
3. Substandard housing units;
4. Lack of funding sources to develop more affordable housing units;
5. Lack of ADA compliant units for people with disabilities;
6. lack of affordable housing units for large families of five or more persons;
7. Lack of landlord participation in rental subsidy assistance;
8. Not in My Back Yard (NIMBY); and
9. Other economic factors to include low wage jobs, gap in education/job preparation and workplace needs.

According to NC 2-1-1 Counts, between January 1, 2022 to December 31, 2022, there were 11,985 requests for housing and services. Of those requests, at least 44.4% were for housing and shelter requests. Of the percentage of housing and shelter requests, at least 31.9% were for shelter requests, 24.2% were for low-cost housing requests, 39.3% were for rent assistance, and the remaining were for other housing related requests.

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

According to the North Carolina Council for Women and Youth Involvement statistics for the 2020-2021 year, there were 300 calls made to an agency's hotline serving the Cumberland County area. There were 420 clients served. Currently, there are only 8 beds designated for

victims of domestic violence in Cumberland County. Victims of domestic violence or human trafficking do not always have access to emergency shelter beds or housing. Many victims and survivors lack income and resources to access housing on their own and usually need financial assistance, long-term case management, counseling, legal services, transportation, and other support services to obtain and maintain 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***

The other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability have the same unmet needs as those populations already mentioned earlier.

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

A deficit in shelter beds for single adults also still exists. According to the 2022 PiT Count, out of the 424 homeless persons without children, 387 persons were unsheltered on the night of the PiT Count. That same night, the local homeless shelter had 20 beds occupied. This was the only shelter available to provide beds to the general homeless population.

The Coordinated Entry System is over-whelmed with inquiries for shelter, housing, and services with very limited resources to refer applicants to.

***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:***

Cumberland County Community Development Department normally give preference to activities and projects that target populations with income at or below 30% or 50% of the area median income. Cumberland County Community Development Department will not further identify characteristics of other populations.

***Identify priority needs for qualifying populations:***

Based on the feedback received from the stakeholders, respondents ranked the following activities in order beginning with the highest priority to lowest priority:

1. Development of affordable housing units

2. Acquisition / development of non-congregate shelters; and
3. Tenant-based rental assistance.

Those recommending the development of affordable housing units felt strongly that this activity should be complimented with supportive services that would include more transportation options, housing counseling, and case management (short-term and long-term).

Recommendations for the development of non-congregate shelter ranked high followed by the need for tenant-based rental assistance.

***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:***

Quantitative and qualitative data was obtained from the 2015-2019 CHAS, 2022 Point-in-Time Homeless Count, 2022 Housing Inventory Chart, Gaps Analysis report prepared in 2021 by OrgCode Consulting, and feedback obtained from the stakeholder survey. The data was used to prepare an updated assessment of the needs and priorities related to shelter and housing service delivery systems that exist in Cumberland County.

## **HOME-ARP Activities**

**Template:**

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

Cumberland County Community Development Department will issue a Request for Applications (RFA) or Request for Proposals (RFP) to solicit entities interested in the development and / or management of the activity(ies). The selection committee will review all proposals received through the RFA/RFP process. The criteria used to review proposals normally consist of reviewing eligibility, capacity, experience, financial feasibility, project readiness, leveraging, and other criteria.

***Describe whether the PJ will administer eligible activities directly:***

Cumberland County Community Development Department expects to administer most of the activities directly and will subcontract portions involving construction 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:***

Cumberland County Community Development has not used any HOME-ARP funds prior to HUD's acceptance of the HOME-ARP allocation plan.

In accordance with Section V.C.2. of the Notice (page 4), PJs 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.

**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 100,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,263,270		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 71,751	10 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 0</b>		

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

The development of affordable housing was the top priority need based on feedback from stakeholders. Therefore, the County will utilize \$1,263,270 (88%) for development of affordable rental housing, \$100,000 (7%) for supportive services, and \$71,751 (5%) for administrative and planning.

***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:***

Based on current inventory, there is a great need for affordable housing. Non-congregate shelter was another high priority indicated by the respondents. Although non-congregate shelter was another top priority need, the use of other funding sources to acquire and develop non-congregate shelter would allow more flexibility in the use of the shelter. Supportive services,

especially case management, is necessary for program participants to successfully achieve self-sufficiency throughout the program. It is important to ensure program participants are able to access much needed services while in housing, to include but are not limited to:

- Mental Health Services
- Transportation
- Employment Opportunities and Job Training
- Health Services
- Childcare services

Administration and planning costs include program oversight, monitoring, coordination, and evaluation.

## **HOME-ARP Production Housing Goals**

### **Template**

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

The number of housing units will depend on the amount of other funding sources used by the developer to leverage the total project costs. Cumberland County Community Development Department gives preference to those developers that use their own funding sources to leverage the County's funds to maximize the number of housing units. Most developers the County partners with are able to access additional funding made available through the Low-Income Housing Tax Credit (LIHTC) program. The goal of the County will be to support at least 25 affordable housing units through these funds and other funding resources.

***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:***

It is the desire of Cumberland County to meet the needs of all Qualifying Populations but in particular those who are considered hardest to house (chronic homeless, households with incomes below 30% of the AMI, disabled, etc.)

## 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).

#### **Template:**

*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:*

Cumberland County plans to target all Qualifying Populations. No preference has been identified.

*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:*

No preference has been identified.

#### **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).

**Template:**

***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):***

Not applicable.

***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):***

Not applicable.

***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):***

Not applicable.

***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):***

Not applicable.

## **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.

## **Template**

***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:***

Cumberland County does not intend to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population.

***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:***

Not applicable.

*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):*

Not applicable.

## **HOME-ARP Refinancing Guidelines**

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

Not Applicable. Cumberland County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

Not Applicable.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

Not Applicable.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

Not Applicable.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

Not Applicable.

- ***Other requirements in the PJ's guidelines, if applicable:***

Not Applicable.

## Appendices

- SF 424s and Certifications
- Public Notice of Public Hearing and Comment and Review Period
- HOME-ARP Consultation Survey
- Stakeholders Survey Results
- Gap Analysis Report



# HOME-ARP Stakeholder Survey

Cumberland County Community Development Department

The U.S. Department of Housing and Urban Development (HUD) through the Home Investment Partnerships (HOME) Program grant has allocated \$1,435,021 of the American Rescue Plan (ARP) Act of 2021 funds to Cumberland County to perform eligible activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations.

Prior to using the HOME-ARP funds, Cumberland County must consult with housing and service providers whose clientele include the Qualifying Populations to identify unmet needs and gaps in housing and service delivery systems. Feedback provided by the service providers and citizens will aide Cumberland County in determining how to best use the HOME-ARP funds to meet the needs of the qualifying populations.

To learn more about the Qualifying Populations, eligible activities, and other information about the HOME-ARP program, please refer to [Cumberland County Community Development Webpage](#) and / or [HUD's website](#).

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1. Please rank the Qualifying Populations below beginning with the population you believe should have the highest priority. Please place your mouse over the item and drag the selection to the appropriate ranking level. Note: the selected items will be re-ranked in ascending order.

- 1: Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a));
- 2: At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1));
- 3: Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- 4: In other populations where providing supportive services or assistance under section 212(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;
- 5: Veterans and families that include a veteran family member that meet one of the preceding criteria.

**2. Select the supportive services your organization currently offers to the Qualifying Populations:**

- ☐ Case Management
- ☐ Legal Services
- ☐ Moving Cost Assistance
- ☐ Employment Assistance
- ☐ Educational Assistance
- ☐ Development of Affordable Housing
- ☐ Rental Assistance (Short-Term/Medium-Term)
- ☐ Emergency Shelter for Homeless Persons
- ☐ Tenant Based Rental Assistance
- ☐ Acquisition / Development of Non-Congregate Units (i.e., Emergency Shelter Providing Individual Rooms Other than a Traditional Homeless Shelter)
- ☐ Not Applicable
- ☐ Other

3. Please select from the list below, the special population you believe has the highest need for housing and services.

- ☐ Single adults and/or two adult households (married/domestic partners/close relatives)
- ☐ Families with children and youth
- ☐ Individuals/family members with a permanent disability that limits housing options
- ☐ Those with chronic physical or mental health conditions requiring supportive services
- ☐ Those with substance use disorders requiring supportive services
- ☐ Those with histories of domestic violence abuse
- ☐ Those with two or more of the following barriers: lack of a high school diploma/GED; illiteracy; low English proficiency; or, a history of unstable employment

4. Please rank the following activities beginning with the activity you believe should have the highest priority. Please place your mouse over the item and drag the selection to the appropriate ranking level. Note: the selected items will be re-ranked in ascending order.

- 1: Development of affordable housing units (incl rehab of existing units)
- 2: Tenant-based rental assistance / Rental assist to prevent homelessness
- 3: Acquisition/development of non-congregate shelters (shelter consisting of private rooms for individuals or families)
- 4: Support Services: homeless prevention, housing counseling, financial assistance, case management

5. What do you see as major barriers to affordable housing? Please select all that is applicable.



- ☐ Acceleration in rent
- ☐ Low supply of affordable housing units
- ☐ Substandard housing units
- ☐ Lack of funding sources to build affordable units
- ☐ Lack of accessibility for people with disabilities
- ☐ Lack of housing units for large families (of 5 or more people)
- ☐ Lack of landlord participation in rental subsidy assistance
- ☐ Land use policies and zoning regulations
- ☐ Not in my backyard (NIMBY)
- ☐ Economic factors (low wage jobs, gap in education/job preparation and workplace needs)
- ☐ Lack of flexibility with program policies and process, too much red tape
- ☐ Other

**6. If HOME-ARP funds were used for development of new affordable housing units, would you prefer the option of all units being made available to all of the Qualifying Populations, or making at least 70% available to the Qualifying Populations and making the remaining units available for the rest of the low-to-moderate-income renters?**

- ☐ Make all units available to Qualifying Populations
- ☐ Make a minimum of 70% available to the Qualifying Populations and the rest available to other renters of all income levels

**7. If HOME-ARP funds were used for tenant-based rental assistance, what type of assistance do you believe should be provided. Please select all that is applicable.**

- ☐ Security Deposit
- ☐ Rental Assistance
- ☐ Utility Deposit
- ☐ Utility Payment
- ☐ Other

**8. If HOME-ARP funds were used for non-congregate shelter, what do you believe is the area of greatest need for shelter facilities?**



- ☐ Costs for increasing EXISTING shelter capacity and operations
- ☐ Costs for the development of NEW shelter facilities
- ☐ Costs associated with increasing access to supportive services
- ☐ Shelter operating costs
- ☐ Administration and planning costs for shelter facilities

**9. If HOME-ARP funds were used for providing supportive services, what are the top three services you believe should have the highest priority? Please select up to three services.**

- ☐ Housing Counseling (i.e. landlord/tenant rights, housing search, budgeting, credit education/repair, etc (does not include first time home buyer / foreclosure counseling))
- ☐ Mental Health Services
- ☐ Substance Abuse Treatment Services
- ☐ Engagement / Outreach
- ☐ Homelessness Prevention Services
- ☐ Health Services
- ☐ Transportation Services
- ☐ Job Readiness / Employment Assistance
- ☐ Life Skills Training
- ☐ Case Management Services
- ☐ Child Care
- ☐ Legal Services

**10. Are there any additional unmet needs / services you see among the Qualifying Populations, or any additional remarks you wish to add?**

**11. Which type of organization best describes your group or affiliation?**

- ☐ Homeless Service Provider - Emergency or Temporary Shelter/housing
- ☐ Homeless Service Provider - Rapid Rehousing or Permanent Supportive Housing
- ☐ Public Housing Authority
- ☐ Domestic Violence Service Provider
- ☐ Veteran Affairs / Veteran's Group
- ☐ Human Relations / Fair Housing / Civil Rights Organization
- ☐ Organization Serving People with Disabilities
- ☐ Organization Serving People Living with HIV/AIDS
- ☐ Other Public Agency (i.e. Local Government, etc.)
- ☐ Continuum of Care
- ☐ Landlord / Property Manager
- ☐ Developer
- ☐ Resident / Advocate
- ☐ Other

**12. How long has your organization been operating in the Fayetteville/Cumberland County area?****13. If representing an organization, what is your organization's mission statement or focus area?****14. Name of Person Completing Survey:****15. Name of Organization (If Applicable)**

16. Email Address:

17. Telephone Number:

Submit

# HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME) – AMERICAN RESCUE PLAN (ARP)

## ALLOCATION PLAN

**Presented by:**  
**Cumberland County Community Development Department**  
**707 Executive Place**  
**Fayetteville, NC 28305**

**Board of Commissioners Meeting**  
**Public Hearing: January 17, 2023 @ 6:45 p.m.**

# Background

- HUD allocated \$1,435,021 of HOME-ARP funds to Cumberland County
- Prior to using funds, must prepare and submit an Allocation Plan
- Must consult with:
  - Homeless Providers
  - Domestic Violence Service Providers
  - Public Housing Agencies
  - CoC
  - Other Public and Private Agencies that serve the Qualifying Populations
- A Public Hearing must be held
- 2021 Annual Action Plan must be amended
- Allocation Plan must be submitted to HUD for Approval

# Qualifying Populations

Homeless

At-Risk of  
Homelessness

Fleeing from  
Domestic  
Violence...

Other  
Populations

# Eligible Activities

Development of  
Affordable Housing

Tenant-Based  
Rental Assistance  
(TBRA)

Provision of  
Supportive  
Services

Acquisition and  
Development of  
non-congregate  
shelter units

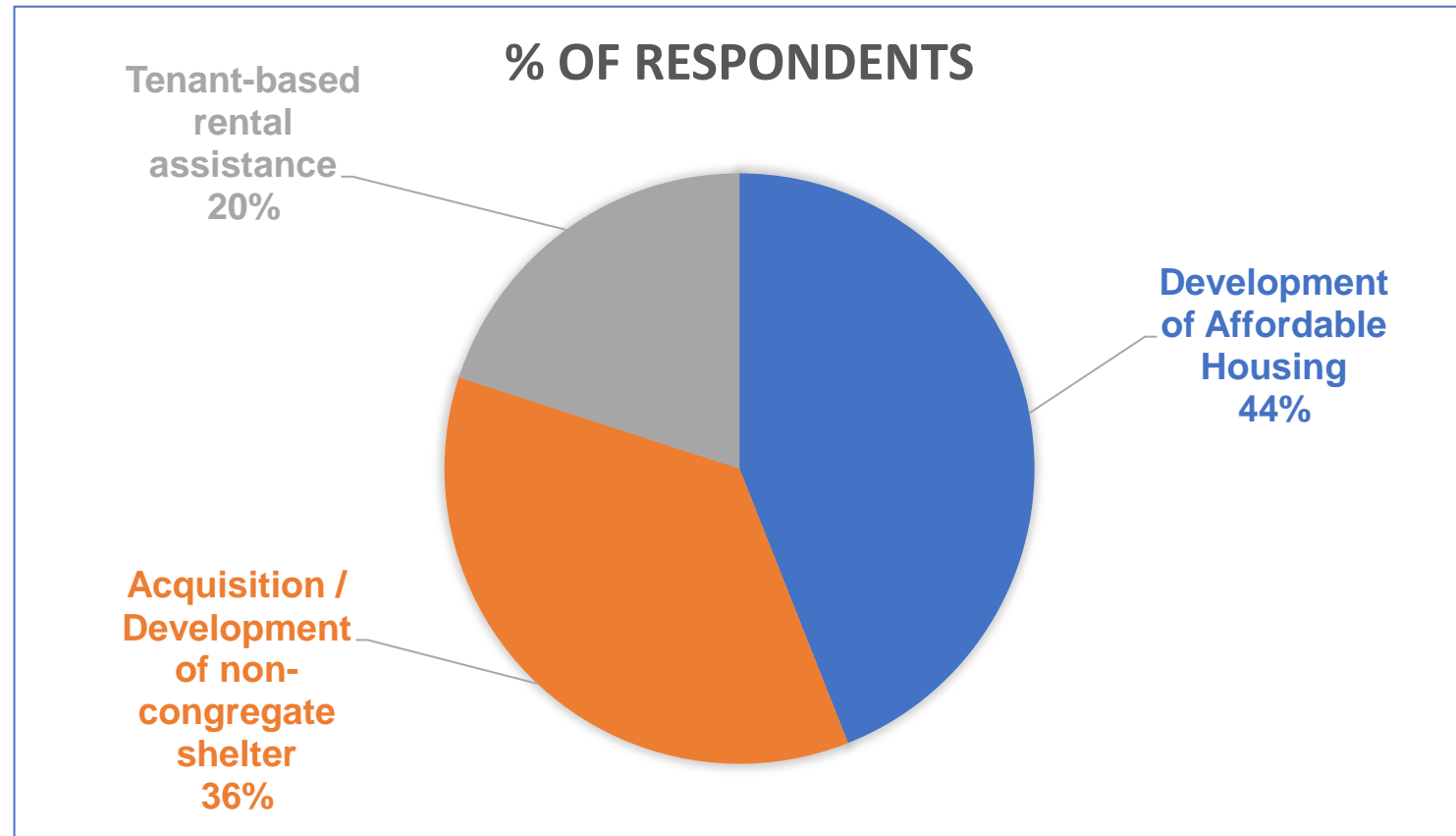
# Assessment of Needs / Consultation

- Survey was utilized to obtain feedback
  - Discussions on how funds should be used, priority needs, Qualifying Populations
- Received 25 responses
- Held one-on-one virtual meetings with 10 providers
- Gap Analysis Report (2021) prepared by OrgCode Consulting was used
- Recent HUD CHAS data was used
- 2022 Point-in-Time Homeless Count / Housing Inventory Chart
- Other Information



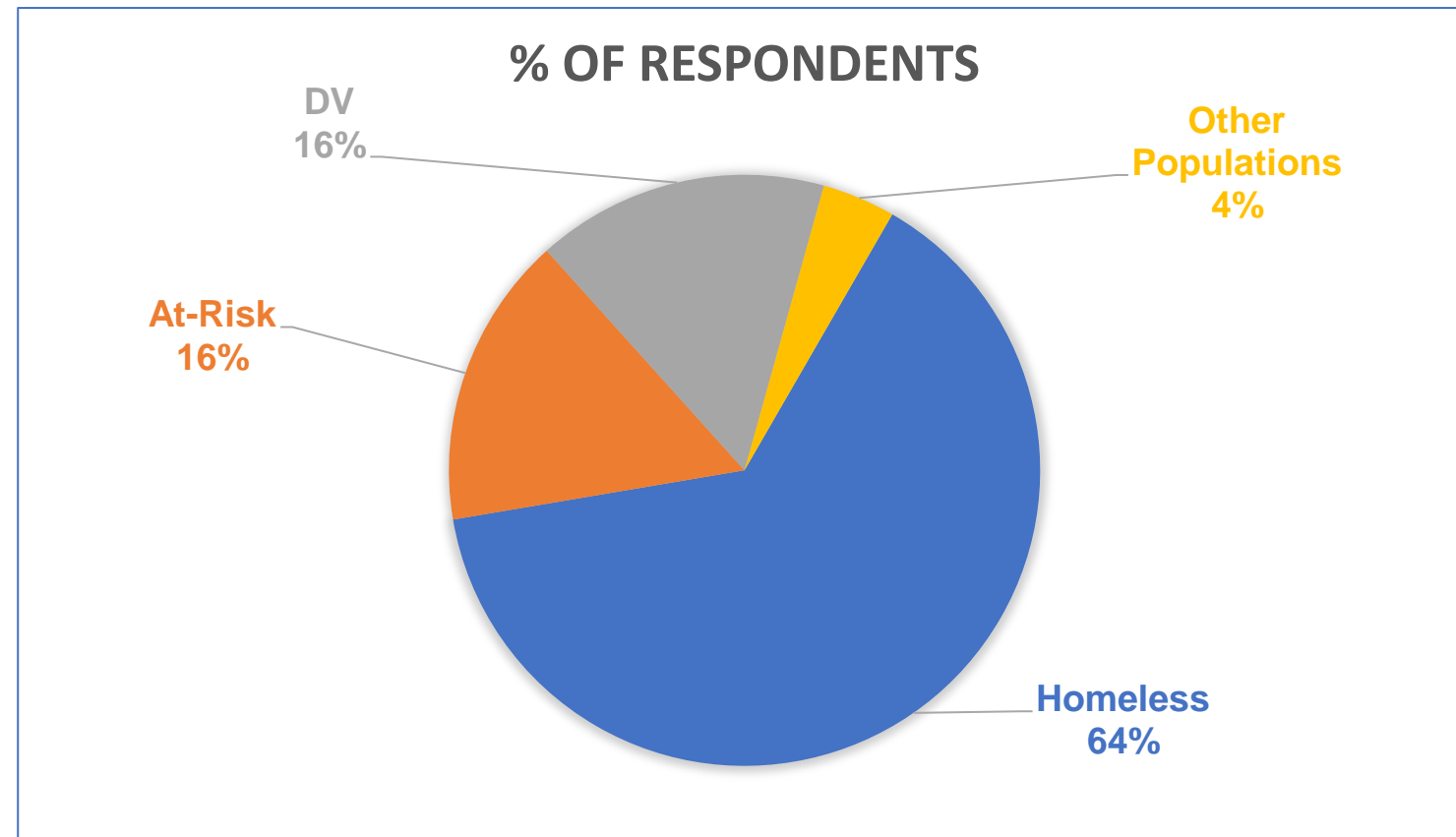
# Feedback

Activities considered as high priority



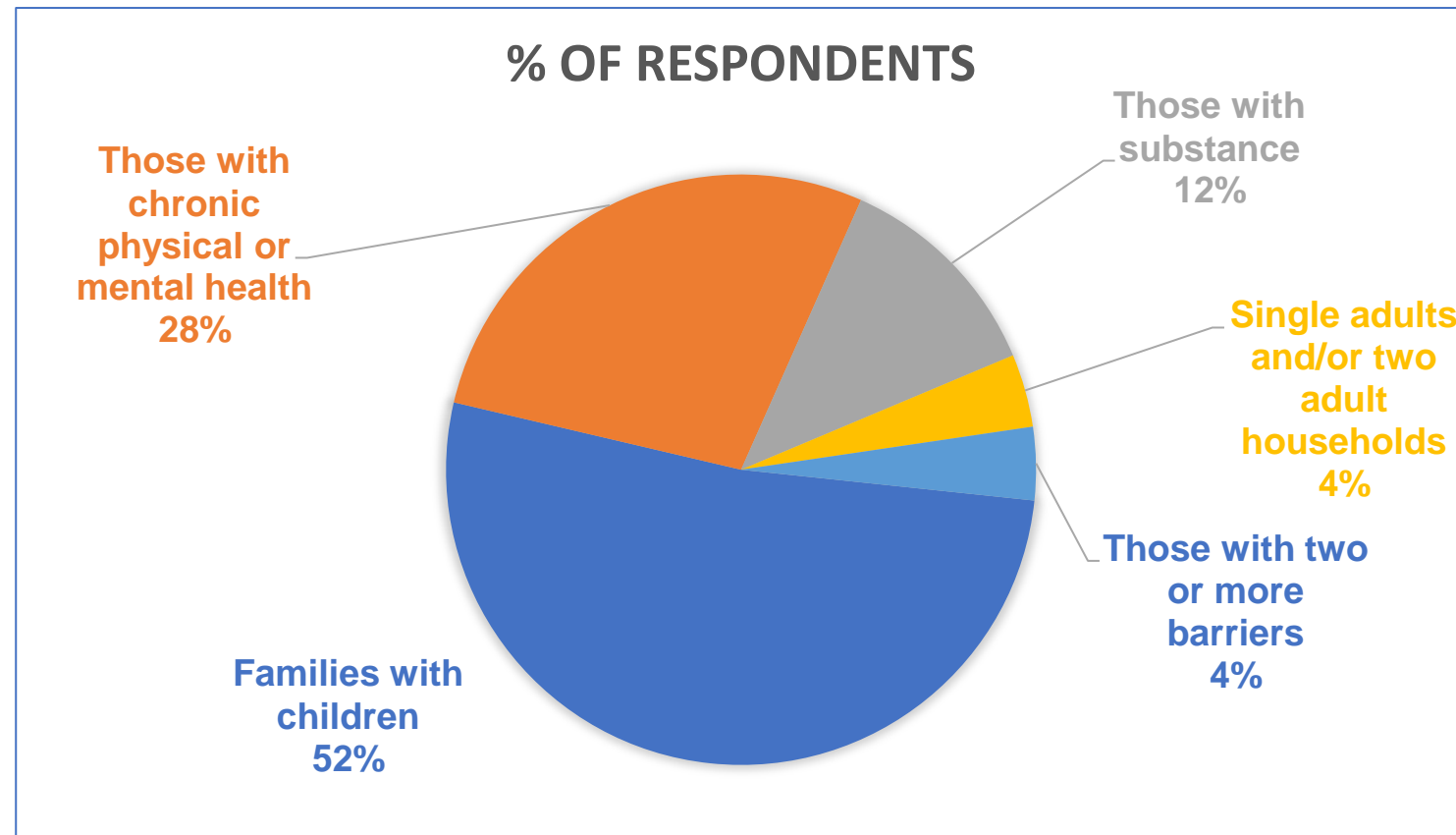
# Feedback (Cont'd)

Qualifying Populations considered as high priority



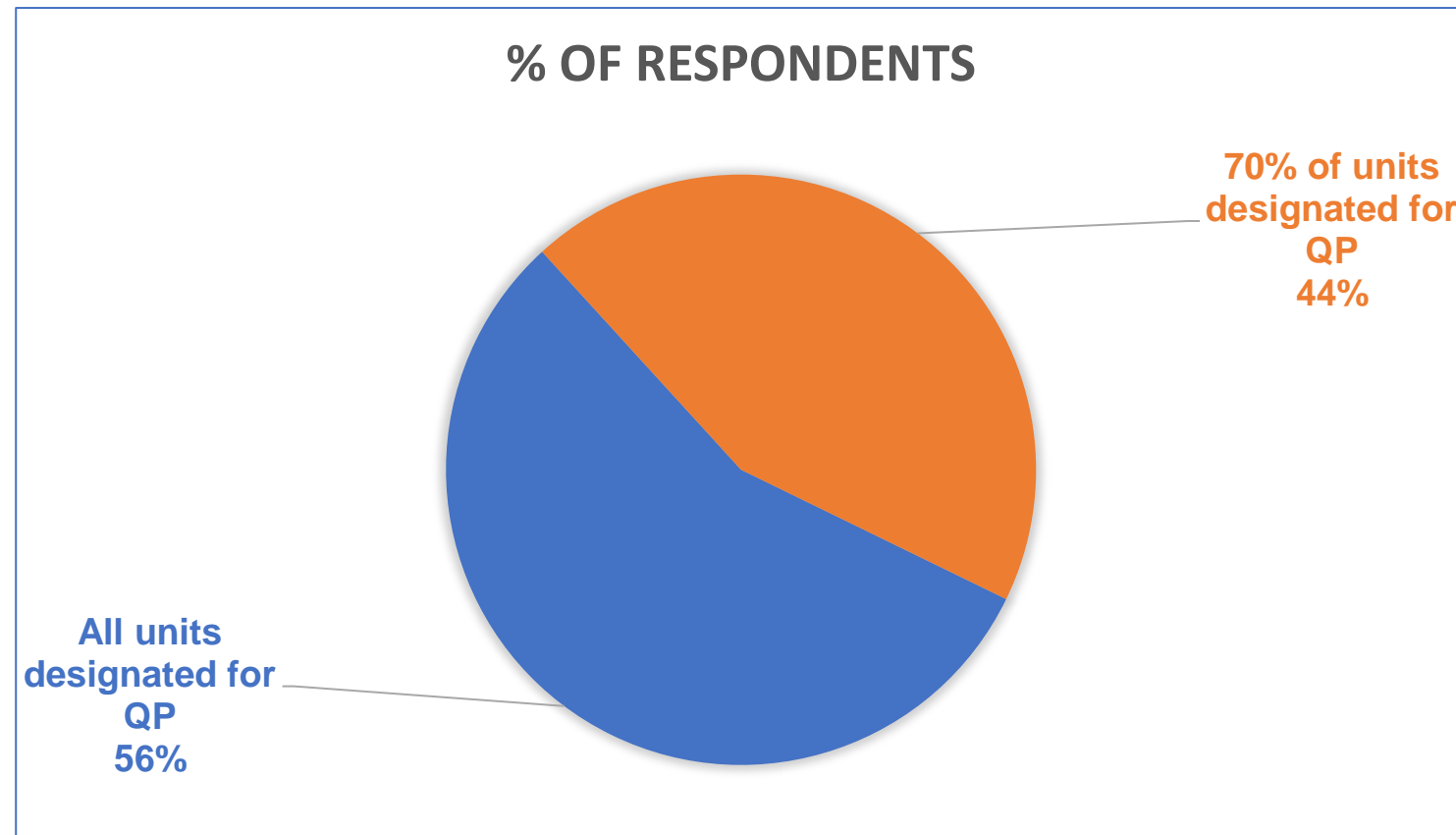
# Feedback (Cont'd)

Population types considered as high priority



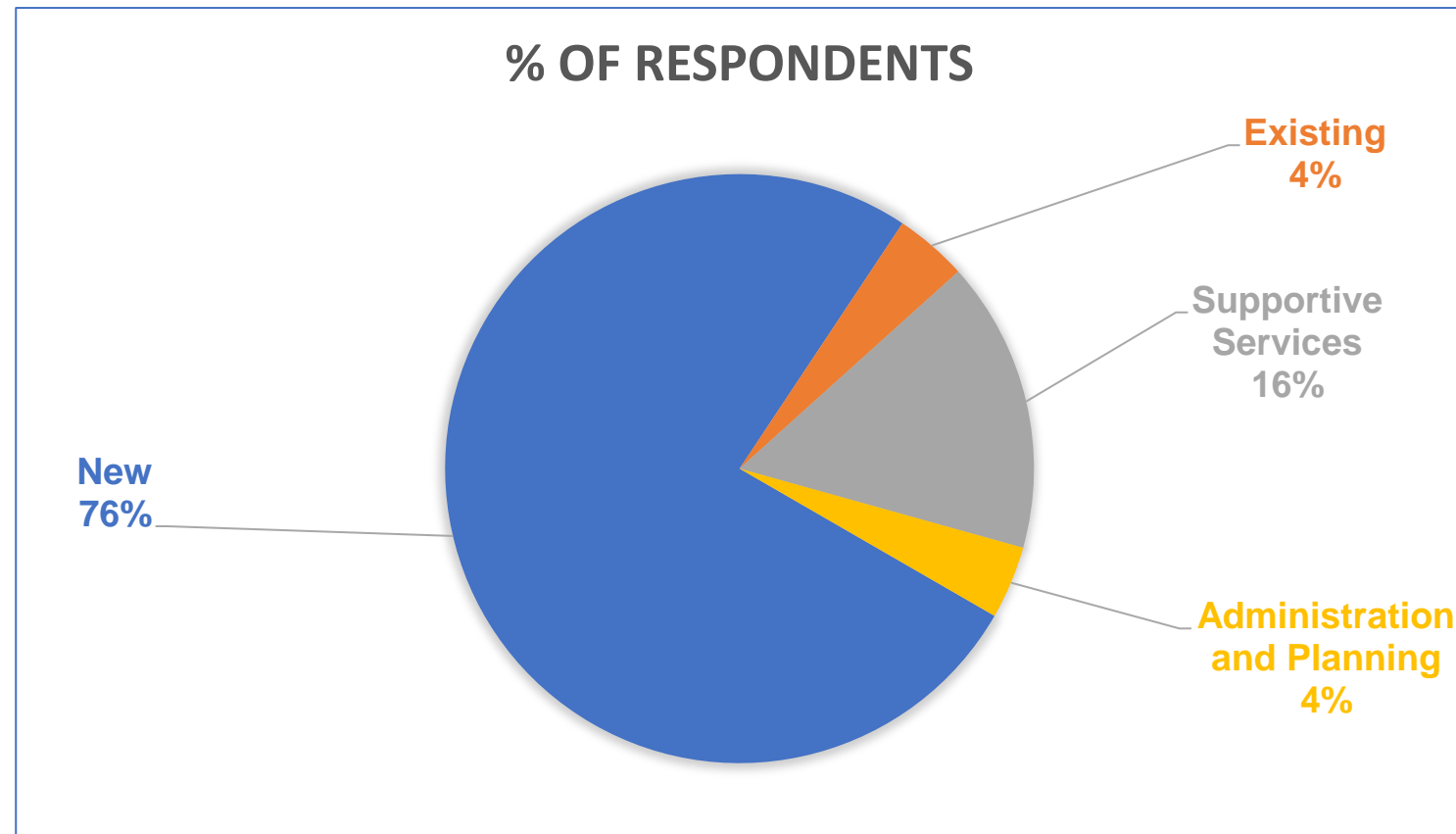
# Feedback (Cont'd)

Percentage of units designated for Qualifying Populations



# Feedback (Cont'd)

Should Funds be used for New or Existing Non-Congregate Shelter



# 2022 Point-in-Time Homeless Count

N = 475

Persons in Households without Children (Total = 424)	
Female	136
Male	288

Ages 18 - 24	0
Ages 24 and Over	424

Non-Hispanic	404
Hispanic	20

American Indian, Alaska Native, or Indigenous	11
Asian or Asian American	10
Black, African American, or African	246
Native Hawaiian or Pacific Islander	4
White	96
Multiple Races	57

Persons in Households with Children (Total = 51)	
Female	32
Male	19

Under age 18	30
Ages 18 - 24	1
Ages 24 and Over	20

Non-Hispanic	51
Hispanic	0

American Indian, Alaska Native, or Indigenous	10
Asian or Asian American	0
Black, African American, or African	33
Native Hawaiian or Pacific Islander	2
White	3
Multiple Races	3

# Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 100,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,263,270		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 71,751	10 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,435,021</b>		

# Next Steps

- After comment review period (January 13 – 27, 2023), will bring final Allocation Plan to Board of Commissioners for approval at the first February 2023 meeting
- 2021 Annual Action Plan will be amended to include HOME-ARP funds
- Allocation Plan will be submitted to HUD for Approval



## **Questions or Comments**

**For more information contact:**

**Cumberland County  
Community Development  
707 Executive Place  
Fayetteville, NC 28305  
[cccdinfo@co.cumberland.nc.us](mailto:cccdinfo@co.cumberland.nc.us)**

**910-323-6112**