

ORANGE COUNTY, NY  
OFFICE OF COMMUNITY DEVELOPMENT



*Steven M. Neuhaus, County Executive*

*HOME-ARP Allocation Plan*

*Draft for Public Display  
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## Consultation

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

See Appendix A for all Stakeholder Consultation materials. Stakeholder comments received throughout these various sessions and individual meetings are summarized below and are referenced appropriately throughout the Needs Assessment & Gaps Analysis.

Orange County engaged in an extensive stakeholder consultation process during May and June 2022. During this time, the County engaged with a variety of shelter and service providers serving each of the qualifying populations; the Continuum of Care Executive Committee; County Department of Social Services, including the Office of Mental Health and Substance Abuse; victim service providers; the Newburgh and Port Jervis Housing Authorities; Housing Choice Voucher administrators in the County and organizations addressing fair housing and Civil Rights in the County.

Each of the focus group sessions focused on identifying the Qualifying Populations and their unmet housing and service needs. A brief Power Point presentation on the HOME-ARP program was presented followed by questions meant to engage participants in identifying unmet needs among the qualifying populations they served.

***List the organizations consulted:***

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>Port Jervis Housing Authority</b>	PHA	Telephone Interview	Three year wait for public housing; Public housing preferences include residency preference for those living or working in Port Jervis.
<b>City of Port Jervis</b>	HCV Administrator for City	Email Survey	One to two year wait for vouchers; HCV preferences include working preference (live or work in Port Jervis); disabled (eligible for Mainstream voucher); domestic violence (occurrence within 90 days of application); Generally latter two preferences have been sufficient to meet the needs of the most vulnerable; Rents are increasing above payment standards, but landlords have been willing to negotiate, but this may not continue and rents will be too expensive for

			voucher holders. There is a willingness to project base vouchers. TBRA could be helpful to offset wait list times. The FSS program is not funded by HUD, but is successful in Port Jervis.
<b>Newburgh Housing Authority</b>	PHA	Virtual Interview	Housing Choice Voucher authority for 431 vouchers; however, due to budget authority limitations and increasing rents and payment standards, the Housing Authority is only able to provide 331 households with voucher assistance. As of July 2022, there were 332 families on the HCV waiting list, which has been closed since 2018. Payment standards up to 110%, but rents are still 10-20% higher than FMR/payment standards and not considered rent reasonable. HA does not issue PBVs.
<b>Pathstone</b>	HCV Administrator for County	Virtual Interview	Pathstone administers the Housing Choice Voucher program on behalf of NY Homes and Community Renewal in Orange County and the City of Middletown. As of May 2022, there were 2964 voucher holders in the County and 928 in the City of Middletown, with wait lists of approximately the same size in both the County and City. Payment standard authorized at 120%, but rents are still 10-20% higher than the payment standard and are not rent reasonable. Mainstream vouchers are returned at higher rates due to unavailable inventory.
<b>Orange County Department of Social Services</b>	Public Agency that addresses the needs of people experiencing	Virtual Interview	Emergency shelters are understaffed; service gaps for people residing in shelters and transitional housing; local barriers

	homelessness		to developing affordable housing (political, zoning, architectural review); eviction history, credit history act as barriers for QPs to obtain housing; there is a shortage of quality units in price ranges that are affordable; low barrier housing options are not widely available; there are high rates of evictions among people with pending emergency rental assistance applications;
<b>Orange County Mental Health-Chemical Dependence</b>	Public Agency that addresses the needs of people experiencing homelessness	Virtual Interview	Need for recovery housing for people experiencing homelessness with SMI and/or substance misuse disorders particularly for women; people with SMI and/or substance misuse disorders are at highest risk for housing instability;
<b>Orange County Mental Health-SPOA</b>	Public Agency that addresses the needs of people experiencing homelessness	Virtual Interview	There are service gaps in connecting people discharging from treatment facilities to housing; transitional housing/step-down housing is an unmet need; case management and other services during non-traditional hours (outside normal business hours) are not available but are needed; there are transportation needs for people experiencing homelessness to destinations besides medical appointments; low barrier housing options are not widely available;
<b>Orange County Veterans Services</b>	Public Agency that addresses the needs of people experiencing homelessness Veterans' Groups	Virtual Interview	Orange County does not have shelter space or permanent housing dedicated to homeless Veterans; transportation services for Veterans is an unmet need;
<b>Orange County Human Rights Commission</b>	Public Agency that addresses Fair Housing/Civil Rights	Virtual Interview	People with disabilities, racial/ethnic minorities, people experiencing domestic violence

			<p>experience higher levels of housing insecurity and challenge obtaining and maintaining housing. Poor rental history and credit often force the unstably housed into poor quality units. Complicated application processes act as barriers-services to assist in completion; it is likely applicants are facing bias based on the name used on their application;</p>
<b>Access Supports for Living</b>	Public or Private Agency that addresses needs of people with disabilities	Virtual Interview	<p>There are gaps in the services system to connect people to housing; services to assist people complete applications and obtain documents required for the application (ID, birth certificate, etc.) are insufficient; even subsidized, rents are often unaffordable for vulnerable populations</p>
<b>Independent Living</b>	Public or Private Agency that addresses needs of people with disabilities	Virtual Interview	<p>Emergency shelters are not always accessible; congregate bathrooms pose challenges for people with certain medical conditions (catheters, colostomies). Development of new rental units should ensure units are accessible and have bathrooms that can accommodate wheelchairs, walkers and crutches. Rehabilitated buildings should consider zero step entrances and first floor accessibility. Coordinated entry/intake for aging populations (and those with physical disabilities) to receive supports is an unmet need as the current system focused on behavioral health.</p>
<b>Continuum of Care Strategic Development Committee</b>	Continuum of Care Homeless service providers	Virtual Interview	<p>The inventory of substandard units, both vacant and occupied, can be used to fill unmet needs; additional low- no-barrier housing is a significant unmet need; elderly households, LGBTQAI are at high risk</p>

			for homelessness;
<b>HONORehg</b>	Emergency Shelter Provider	Virtual Interview	Shelters do not have capacity to provide increased clinical services to guests with SMI and substance misuse disorders; families tend to experience longer stays in shelter due to inadequate supply of larger affordable units to accommodate families with children; shelters are experiencing increases in single females and single dads;
<b>Fearless!</b>	Domestic Violence shelter/service provider	Virtual Interview	Domestic violence shelter providers do not have sufficient bed capacity to house singles due to social distancing and ongoing mask mandates in NY; influx of single women from NYC and other NY counties creates bed capacity shortages

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

All stakeholders identified a need for more affordable rental housing units as well as permanent supportive housing units and other low-barrier housing options. There have been significant rent increases across the County and Fair Market Rents are becoming less competitive with market rents. This has resulted in increased competition for limited affordable inventory. Continuum of Care providers indicated a growing number of landlords unwilling to accept rental assistance payments. This was a challenge prior to the pandemic and has exacerbated the last two years. Shelter staff capacity is extremely limited. Due to lack of medical respite, many shelter residents are discharged from hospitals and have needs that exceed the capacity and skills of emergency shelter staff. Unmet supportive service needs include housing location and stabilization services, transportation services, and services during non-traditional hours (after business hours, weekends). Several specific subpopulations with unmet needs were identified including youth, LGBTQ, and dual /co-occurring diagnoses. People with disabilities, racial/ethnic minorities, people experiencing domestic violence experience higher levels of housing insecurity and challenges obtaining and maintaining housing.

## Public Participation

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

- ***Date(s) of public notice:*** 12/5/2022
- ***Public comment period:*** start date – 12/6/2022 end date – 12/20/2022
- ***Date(s) of public hearing:*** 12/12/2022

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

Orange County published a notice in the Times Herald Record informing the public of the availability of the HOME-ARP Allocation Plan, as well as the public hearing, on December 5, 2022. A copy of the notice and Plan were also made available on the County's Website. The Plan was available for a 15 day period, and the County conducted a public hearing on December 12, 2022. The public hearing was held in person, with a virtual option. Comments on the Plan were accepted via US mail, e-mail, telephone or at the public hearing.

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

Orange County offered multiple opportunities and methods for interested parties to provide comment and participate in the public participation process (such as virtually, in person, written or verbal comments). Language services for the Limited English Proficient were available upon request. Reasonable accommodations to allow broader participation by LEP persons or persons with disabilities in the hearing either in person or virtually were made available.

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

No comments or recommendations were received.

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

N/A-no comments were received.

## Needs Assessment and Gaps Analysis

Like many communities, Orange County has insufficient inventory of emergency and transitional housing options. Over 38% of those in shelter remain as such for more than 30 days. Longer lengths of stay may increase the need for beds, as there is less movement for new clients to be able to use those resources. This could also point to a need for additional housing inventory, as fewer available options lead to less turnover in shelter beds.

### 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	130	51	115		0								
Transitional Housing	86	35	105		0								
Permanent Supportive Housing	133	54	180		67								
Other Permanent Housing	14	7	23		0								
Sheltered Homeless						207	180	6	20				
Unsheltered Homeless						0	83	2	19				
<b>Current Gap</b>													

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

### OPTIONAL Housing Needs Inventory and Gap Analysis Table

Orange County (total)

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households



Total Rental Units	42,595		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	5,690		
Rental Units Affordable to HH at 50% AMI (Other Populations)	8,145		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		9,215	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		6,665	
<b>Current Gaps</b>			14,765

**Suggested Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Middletown, New York

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	# of Units	# of Households	# of Households
Total Rental Units	4,930		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	760		
Rental Units Affordable to HH at 50% AMI (Other Populations)	875		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		1,280	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		790	
<b>Current Gaps</b>			2,075

Newburgh, New York

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	# of Units	# of Households	# of Households
Total Rental Units	7,030		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,340		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,875		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,080	

30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,220	
Current Gaps			2,930

Port Jervis, New York

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	1,990		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	310		
Rental Units Affordable to HH at 50% AMI (Other Populations)	685		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		755	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		365	
Current Gaps			920

Balance of Orange County, NY

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	25,660		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,810		
Rental Units Affordable to HH at 50% AMI (Other Populations)	3,635		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,550	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,725	
Current Gaps			7,290

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

**Homeless as defined in 24 CFR 91.5**

The number of Orange County residents that meet the definition of homeless under 24 CFR 91.5 was derived from the 2020 PIT Count, conducted on January 24, 2020. While the 2021 PIT Count is available, challenges to conducting a complete unsheltered count during the COVID-19 pandemic preclude the County’s use of the 2021 data. The 2020 PIT Count identified a total of 471 persons experiencing homelessness, down from 589 persons (-20.0%) identified in 2019. Of the counted homeless individuals, 331 (82.3%) were sheltered and 83 (17.6%) were unsheltered. From January 2021 through December 2021, a total of 1,613 persons were served by the CoC. In terms of racial and ethnic demographics, 215 (45.6%) of homeless individuals were Black or African American and 226 (48.0%) were White according to the 2020 PIT count.

<b>Program</b>	<b>Persons Served</b>
Emergency Shelter	906
Permanent Supportive Housing	293
Rapid Re-Housing	102
Transitional Housing	118
Street Outreach	4
Homelessness Prevention	190
<b>Total</b>	<b>1,613</b>

According to the FY2021 Performance Measurement Module, 668 individuals experienced homelessness for the first time during the period October 1, 2020-September 30, 2021. This is a decrease from 2020, which had 821 persons experiencing homelessness for the first time; however, eviction moratoria and supplemental assistance provided in response to the coronavirus pandemic impacted the number of individuals experience homelessness for the first time. These measures took into account persons entering emergency shelter, transitional housing, safe haven, and permanent housing programs.

The Orange County Department of Social Services reported over 145 individuals/families stayed in hotels due to lack of shelter capacity and inventory of affordable housing units during 2021.

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

According to 2014-2018 CHAS data, there are 17,335 Orange County residents, or 13.6% of residents, with an annual income below 30% of median family income. Renters are disproportionately at-risk, with 27.9% of renters below 30% of median family income. Additionally, 18,950 renter households, or 46.9% of renter households, in Orange County are considered cost burdened, spending more than 30% of their income on housing costs. Finally,

there are 900 renter households that are living in severely overcrowded housing conditions with more than 1.5 persons per room.

Based on HMIS data for January 1, 2021-December 31, 2021, over 40% of leaver households exited to temporary housing destinations. Exiting to a temporary destination may indicate greater risk of instability and returning to the homeless system.

In addition, Orange County assisted 2,322 households with the Emergency Rental Assistance Program since inception through September 7, 2022. Of these households, over 56% had incomes at or below 30% AMI. Many households receiving assistance received support for arrears *and* prospective rent payments. Households requiring rental assistance may be at greater risk of experiencing homelessness if they cannot sustain ongoing rent and utility payments.

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

In the 2020 PIT Count, 39 individuals in the system were identified as survivors of domestic violence. In the 2020 CARES Collaborative HMIS Annual Report for Newburgh, Middletown/Orange County CoC, 37 domestic violence survivors currently fleeing received homeless services, primarily through emergency shelter. An additional 103 persons had a history of domestic violence but were not currently fleeing.

HMIS data for the period 1/21/2020 - 6/30/2022 indicate 77 persons served by the County's domestic violence shelter, including 28 children under 12. Thirty six percent (36.0%) served were White; 33.8% were Black or African American. Nearly 34% identified as Hispanic. Of the 44 adults served in the shelter 59% had no income upon entering the shelter. Data was not readily available on the number of victims of human trafficking in the County.

***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***

Those at greatest risk of housing instability include 6,845, Orange County renters with an annual income less than or equal to 30% AMI and experiencing severe cost burden. This represents or 16.6% of all Orange County renter households. Additionally, 420 County residents earn less than or equal to 50% AMI and live in overcrowded housing conditions.

Other populations requiring services or housing assistance to prevent homelessness that were identified in the 2020 PIT Count include 87 persons with serious mental illness, 61 persons with a substance use disorder, and 8 veterans. The following is a breakdown of these populations' sheltered and unsheltered status:

	Sheltered	Unsheltered	Total
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	Emergency	Transitional		
Adults with a Serious Mental Illness	36	7	44	<b>87</b>
Adults with a Substance Use Disorder	26	1	34	<b>61</b>
Adults with HIV/AIDS	0	0	3	<b>3</b>
Veterans	6	0	2	<b>8</b>
Transgender/Gender Non-Conforming	0	0	0	<b>0</b>

According to HMIS data, 118 people were living in transitional housing during the period January 1, 2021-December 31, 2021; of these 58 or 49% were White; 48 (41%) were Black, African American, or African. During the same time period, 102 people were receiving rapid rehousing assistance; of these, 57% were Black, African American, or African. Nearly 20% were Hispanic. Of households that exited Rapid Rehousing programs during this period, 24% of adult leavers had no income, putting these households at greater risk of returning to homelessness if unable to support ongoing housing payments. Of those served with rapid rehousing, 77% remained enrolled in the program for more than six months, indicating a need for ongoing rental assistance in order for households to maintain stability in housing.

During the period January 1, 2021-December 31, 2021, 891 households exited the homeless system. Of these, 361 households, or 40%, exited to temporary destinations and 142 households exited to unknown destinations. The 2021 System Performance Measures indicated 185 of households exiting the homeless system to permanent housing destinations return to the system within two years. For households exiting emergency shelter to permanent housing, the rate of return within six months was 13% and 21% within two years. Households receiving temporary assistance and those exiting to temporary destinations may be more likely to return to homeless or face greater risk of housing instability than those exiting to permanent destinations. Data was unavailable for returns to homelessness for those exiting to temporary destinations in calendar year 2021. However, data for the period 10/1/2020 – 9/30/2021 indicates that 595 households exited the homeless system. Of these, 55% (325 households) went to temporary destinations. Among households exiting to temporary destinations during the first six months of this reporting system, 34% of returned to the homeless system within the reporting period.

Orange County's Homeless Services Plan indicates risk factors contributing to first time homelessness include, but are not limited to: unemployment, substance abuse, history of evictions, incarceration and/or hospitalization 90 days plus, mental health diagnosis, low social economic status and young age with history of adversity in their childhood. According to Orange County CoC System Performance data for 2021, 627 people experienced homelessness for the first time.

***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):***

The Orange County 2021 Housing Inventory Chart (HIC) indicated 204 year-round emergency shelter beds were available, including 13 beds for children-only households. In addition, the HIC identified 54 transitional housing beds; 313 Permanent Supportive Housing beds; 38 Rapid Rehousing beds. For victims of domestic violence, there are 33 shelter beds available year-round.

There is not a Public Housing Authority for the county as a whole. The Port Jervis Housing Authority maintains 75 units of public housing; 25 units are for families. The City of Port Jervis administers the Housing Choice Voucher program. Neither has an established preference for households experiencing homelessness; however, the City of Port Jervis provides preferences for individuals that have experienced domestic violence within 90 days of application.

The Newburgh Housing Authority has Housing Choice Voucher authority for 431 vouchers; however, due to budget authority limitations and increasing rents and payment standards, the Housing Authority is only able to provide 331 households with voucher assistance. As of July 2022, there were 332 families on the HCV waiting list, which has been closed since 2018.

Pathstone administers the Housing Choice Voucher program on behalf of NY Homes and Community Renewal in Orange County and the City of Middletown. As of May 2022, there were 2964 voucher holders in the County and 928 in the City of Middletown, with wait lists of approximately the same size in both the County and City.

The County does not utilize HOME or CDBG resources for Tenant-Based Rental Assistance regularly. During the COVID-19 pandemic, the County utilized CDBG-CV and ERAP resources for emergency rent payments, but this is not expected to continue.

According to the County's Homeless Services Plan, there are 68 low income housing apartment complexes which contain 3,875 affordable apartments for rent in Orange County, New York. Many of these rental apartments are income-based housing with about 942 apartments that set rent based on your income. There are 451 Project-Based Section 8 subsidized apartments in Orange County. There are 2,903 other low-income apartments that don't have rental assistance but are still considered to be affordable housing for low-income families. These units are generally considered to be full, and turnover infrequently. Orange County received 28 Emergency Housing Vouchers. Of the 28, 12 vouchers have been utilized. Due to the high need and comparatively low supply, it has been extremely difficult to find housing for the qualifying populations.

Due to expiration of eviction moratoria, which offered protection for many low-income renter households, coupled with escalating rents, lack of affordable housing inventory, and continued economic effects of the COVID-19 pandemic, the homeless system in Orange County experienced significant strains. It lacks capacity across all systems to address the unmet needs of all qualifying populations. This includes staff capacity, inventory capacity and resource capacity to appropriately address growing needs among all of the QPs. Service providers and shelters alike experience ongoing staffing shortages that contribute to these capacity challenges, but also the housing market and inventory is rapidly changing.

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

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

HMIS indicated 710 individuals served by the homeless system during the period January 1, 2021-December 31, 2021. According to the 2021 HIC, Orange County has 313 permanent supportive housing beds, of which most are estimated to be occupied. The County also has 258 emergency shelter and transitional housing beds. There are no dedicated shelter beds for homeless veterans in Orange County. The available inventory is insufficient to meet the needs of the population experiencing homelessness.

All stakeholders consulted for this process expressed the same overwhelming need: affordable rental housing. The County collaborates with developers to invest its HOME funds in rental housing to expand the inventory of affordable rental units. However, many of those participating in consultations reported that even these units are not affordable to the extremely low-income populations. Further, there is increased competition for fewer affordable units. Many permanent supportive housing providers rely on scattered site privately owned units, and many providers are experiencing landlords who are no longer willing to accept assistance or who have tenant selection policies that act as barriers for special needs populations. Poor rental history and criminal histories, often force special needs populations into poor quality units. Landlords establish screening criteria that create barriers for entering permanent housing (including references, minimum income requirements, credit scores). Combined with escalating rents and low vacancy rates, it is difficult for this population to move out of shelter and into permanent housing.

According to stakeholders, there are service gaps for people residing in shelters and transitional housing, particularly in connecting those in shelter with appropriate resources and permanent housing. In addition, transportation service needs exist for people experiencing homelessness to destinations besides medical appointments. Emergency shelters are severely understaffed and lack capacity to provide increased clinical services to those with serious mental illness and substance misuse disorders. While numerous service providers are available in the County, their capacity to provide adequate levels of supportive services are strained due to staff shortages, staff burnout, and insufficient staff wages.

Low-barrier, year-round shelter is not widely available in the County. In addition, there are no dedicated shelter facilities for veterans, , LGTBQ+, subpopulations identified as having particular unmet needs. While there are 15 beds dedicated for unaccompanied youth, stakeholders reported that this subpopulation still has unmet needs for shelter and services. Shelters are often inaccessible for people with physical disabilities and congregate bathrooms pose challenges for people with certain medical conditions.

According to local service providers, accessibility for persons with disabilities is a challenge in both shelters and housing. Congregate bathrooms in emergency shelters pose a challenge for people with certain medical conditions (catheters, colostomies). Linked to this need, supportive services for the aging population entering the homelessness system facing both medical and physical disabilities are also unmet as a result.

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

According to 2014-2018 CHAS data, there are 11,315 Orange County renters that earn less than or equal to 30% AMI. With only 4,924 rental units considered affordable to them, there is a clear lack of affordable housing units in the market. As a result, these households must reside in housing units that are more costly than what would be considered affordable to these households. The low vacancy rates of rental units affordable to these households is indicative of a strong demand for affordable housing within these ranges. Furthermore, this does not consider additional costs such as transportation, childcare, and accessibility modifications for individuals with disabilities. With 46.8% of all Orange County renters considered cost burdened and 21.6% of renter households considered severely cost burdened, these additional costs further exacerbate the limited access to affordable housing in the county. Among extremely low-income households, who represent 27.9% of renter households in the County, 60.5% experience severe cost burden. This further suggests that the supply of affordable housing options for extremely low-income households is insufficient.

	Total		Cost burdened		Severely Cost burdened	
	#	%	#	%	#	%
Total Renters	40,510	-	18,950	46.8%	8,755	21.6%
Very Low-Income Renters (0-50% AMI)	18,955	46.8%	13,530	71.4%	9,455	49.9%
<i>30-50% AMI</i>	<i>7,640</i>	<i>18.9%</i>	<i>5,690</i>	<i>74.5%</i>	<i>2,610</i>	<i>34.2%</i>
Extremely Low-Income Renters (0-30% AMI)	11,315	27.9%	9,925	87.7%	6,845	60.5%

Poor rental history is often identified as a barrier for households accessing affordable housing. Rental assistance and legal services for eviction prevention were identified as needed services to help salvage tenancies and prevent poor rental history from becoming a barrier for future tenancies. CHAS data reveals that there is a shortage of 14,125 units for households with income below 50% AMI. This gap indicates that 14,125 households in this income tier live in rental units that are not considered affordable to them.

Long waiting lists for Housing Choice Vouchers and public housing also indicate lack of affordable inventory for those who require subsidized or other affordable housing options. Households in need of rental assistance are at greater risk for homelessness as rents continue to skyrocket and housing becomes increasingly unaffordable. Stakeholders also reported high rates of evictions among households with pending emergency rental assistance applications, indicating both a great need for additional rental assistance resources, as well as a large population of households that are facing eviction and considered at risk of homelessness.

Stakeholders reported service gaps in connecting people discharging from treatment facilities to housing, identifying transitional housing/step-down housing as an unmet need and an effective model



for populations discharging from institutional care. Services such as case management and other services during non-traditional hours (outside normal business hours) are not available but are needed.

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

HMIS data for the period 1/21/2020 - 6/30/2022 indicate 40% of households fleeing domestic violence exited the homeless system to temporary or unknown destinations. This suggests a lack of permanent, affordable options for this qualifying population. In fact, according to the 2021 HIC, only 33 shelter beds are dedicated for survivors of domestic violence.

Domestic violence shelter providers do not have sufficient bed capacity to house singles due to social distancing and ongoing mask mandates in New York resulting from the COVID-19 pandemic. Additionally, an influx of single women from New York City and across New York State is placing further pressure on the bed capacity issue at the County’s domestic violence shelters.

***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***

During the period January 1, 2021-December 31, 2021, 891 households exited the homeless system. Of these, 361 households, or 40%, exited to temporary destinations and 142 households exited to unknown destinations. Households without permanent housing may be more likely to experience returns to homelessness. Even among households exiting to permanent destinations, 25% exited to rentals without ongoing subsidy. Together, these suggest a need for both affordable housing units, as well as tenant based-rental assistance to support extremely low, and low-income households.

**Veterans:** There are a total of 67 beds available for veterans according to the Newburgh, Middletown/Orange County CoC 2021 HIC. In FY2021, a total of 82 veterans were served, broken down by program in the following table:

<b>Program</b>	<b>Veterans Served</b>
Emergency Shelter	17
Permanent Supportive Housing and Supportive Housing	34
Rapid Re-Housing	2
Transitional Housing	0
Street Outreach	2
Homelessness Prevention	27
<b>Total</b>	<b>82</b>

The County’s Homeless Services Plan identifies Veterans at high risk of homelessness if they have low socioeconomic status, a mental health disorder, or a history of substance abuse. Veterans are at a

higher risk of experiencing Traumatic Brain Injuries (TBI) and Post-Traumatic Stress Disorder (PTSD), both of which have been found to be among the most substantial risk factors for homelessness. The Orange County Service Provider Network consists of numerous providers working together to meet the needs of Veterans, Women Veterans and Veteran families. Their network members provide direct care and support in the following areas: Employment, education, family support, domestic violence, children services, counseling, suicide prevention, PTSD treatment, legal services, rape crisis, addiction, housing/homelessness. Transportation services for Veterans were an identified unmet need.

**People with Disabilities:** For people with disabilities, accessible housing is a continuing and critical need, ranging from individuals in wheelchairs to needs for medical beds and in-home healthcare services in order to maintain housing stability. Overall, there is a severe need for permanent housing that can accommodate persons with disabilities. This typically includes a bathroom equipped with grab bars, installation of handrails, walk-in showers and tubs, along with handicapped accessible doors and cabinets. Medical respite care was identified as a need for individuals discharging from hospital settings. Other needs of this population to maintain housing stability are the same as everyone else: access to employment and accessible public transportation.

The Orange County Homeless Services Plan identifies transitional housing as an effective intervention for households that experience repeated episodes of homelessness; however, there are only 16 units of transitional housing in the County.

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

According to NY 2-1-1 Counts, 3,083 requests were made for housing and shelter assistance between June 2021 and June 2022 in Orange County. This was the ninth highest rate out of all counties in the State of New York. Approximately 77.4% of these requests were made seeking shelter, the third highest rate among counties in the state. Shelter is defined by 2-1-1 as temporary housing solutions for adults, children, and families experiencing homelessness, violence, abuse, illness, weather extremes, or other emergency events. Other requests include low-cost housing assistance (8.2%), rental assistance (6.2%), and landlord/ tenant legal issues (4.9%).

Since PIT and HIC data only provide a snapshot of persons experiencing homelessness on a single night, a broader picture can be provided through data presented in HMIS for FY 2021 (1/1/2021 to 12/31/2021). From January 2021 through December 2022, 967 households stayed at least one night in emergency shelter (ES), permanent supportive housing (PSH), rapid re-housing (RRH), transitional housing (TH), or received homelessness prevention (HP) assistance. Of those served, 43.2% or 418 households exited the HMIS system to either permanent, temporary, or unknown destinations.

Exits from the Homelessness System			
	% Exits to Positive Destinations	# of Households Exited to Positive Destinations	Total # of Households Exited
<i>By Household type</i>			
Adult-only Households	32.9%	184	559
Households with Children	57.2%	190	332
Child-only Households	57.9%	44	76
<i>By Pathway</i>			
ES	36.0%	261	725
PSH	55.2%	16	29
RRH	80.9%	38	47
TH	32.5%	26	84
HP	93.9%	77	82
<b>All Households</b>	<b>43.2%</b>	<b>418</b>	<b>967</b>

This data suggests that there is an overall lack of permanent housing resources for all household types that entered the homelessness system, especially for those who were only able to access emergency shelter rapid re-housing resources.

Stakeholders also identified a critical need for recovery housing for people experiencing homelessness with co-occurring serious mental illness and/or substance misuse disorders particularly women. Individuals with SMI and/or substance misuse disorders are at highest risk for housing instability and require services while in stable housing in order to prevent experiencing or returning to homelessness.

***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:***

Orange County is not establishing additional characteristics at this time.

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

Based on stakeholder consultations and data analysis, rental housing that is affordable and accessible to individuals and households at 0-30% AMI is the priority need. An adequate inventory of deeply subsidized housing for Qualifying Populations is a priority due to low vacancy rates and escalating rental costs. Coupled with this is a priority for rental assistance and supportive services (including case management, legal services and homeless prevention services) to assist the homeless to identify and access housing and become stably housed, as well as to prevent homelessness among households who are at greatest risk.

***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:***

In addition to feedback from stakeholders and consultation sessions, the following plans and data sources were consulted to determine needs and system gaps for HOME-ARP qualifying populations:

- American Community Survey (ACS), 2016-2020
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018
- 2021 Housing Inventory County (HIC)
- Newburgh/Middletown/Orange County CoC 2021 Consolidated Annual Performance and Evaluation Report (CAPER)
- Newburgh/Middletown/Orange County CoC 2021 Annual Performance Report (APR)
- United Way of New York's 2-1-1 Counts
- 2020 CARES Collaborative HMIS Annual Report for NY-602 Newburgh, Middletown/Orange County CoC
- ERAP Dashboard NY Office of Temporary Disability Assistance
- Orange County Homeless Services Plan 2022-2024

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## 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:***

The Orange County Office of Community Development (OCD) will invite any Developer/Owner that is looking to apply for funding and/or other resources from OCD for the new construction, substantial rehabilitation, and/or preservation of affordable housing to submit a proposal for funding. The proposed activity, including the proposed qualifying population(s) to be served, will be evaluated in accordance with the County's HOME-ARP allocation priorities, preferences and prioritization (if any), and projects that address qualifying populations will be considered. The County is not currently establishing preference or priority as part of its scoring criteria for HOME ARP proposals for funding. Should the County establish preference or priorities, a substantial amendment may be duly publicized and submitted to HUD for review. Applicants for HOME-ARP must meet the minimum program eligibility and threshold requirements. Depending on the nature of the proposed activity, site inspections may be conducted by OCD staff and the County's HOME Advisory Committee. An evaluation of the site's feasibility, financial underwriting and developer capacity assessment will be completed and considered as part of the review process.

Orange County has reviewed other state and federal funding resources available to the agency that potentially can be used as leverage for maximizing its HOME-ARP investment. The County's goal of producing 20 affordable rental units serving Qualifying Populations is meant to foster the production of additional affordable units as HOME-ARP funds are combined with other resources (state funds, LIHTC, Housing Trust Funds, etc.)

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

Orange County will administer and oversee its eligible activities directly and will enter into HOME Agreements with developers of affordable rental housing projects.

***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:***

Orange County will not be distributing any portion of its HOME – ARP administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

### Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		

Development of Affordable Rental Housing	\$ 3,185,653.50	75%	0
Non-Profit Operating	\$ 212,376.90	5 %	5%
Non-Profit Capacity Building	\$ 212,376.90	5 %	5%
Administration and Planning	\$ 637,130.70	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 4,247,538</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 HOME-ARP budget was driven by the priority needs identified as a result of stakeholder consultation and data analysis. Orange County will distribute 75% of its HOME-ARP allocation for the development of affordable rental housing. An overall lack of affordable rental units was one of the most frequently identified unmet needs among stakeholders. Tight rental markets and high rents make it extremely difficult for housing and service providers to find units that are affordable and in decent condition for their clients. The Office of Community Development is prioritizing the creation of affordable housing units for qualified populations. HOME – ARP funds will be used for individuals or families from all of the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability.

As an opportunity to build capacity among provider organizations and assist with operational expenses related to HOME-ARP funded activities, Orange County will allocate 5% of its grant to nonprofit capacity building and 5% to nonprofit operating expenses. According to stakeholders, many of which are stretched thin with staffing, they have the expertise to provide new or additional services but need adequate funding to do this.

***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 affordable rental housing inventory in Orange County is severely limited, a challenge that existed long before and has been exacerbated by the pandemic. There is increased competition for fewer affordable units throughout the County. Privately owned units are no longer available for affordable housing in many places as landlords are no longer willing to accept rental assistance or have tenant selection policies that act as barriers for special needs populations. Shelters lack bed capacity for households experiencing homelessness, primarily because it is increasingly challenging to move people out of shelter into permanent housing due to lack of affordable inventory. Therefore, the County’s emphasis with HOME ARP funds will be to create new units to add to the affordable housing inventory in the County.

## 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:***

It is anticipated that the County's HOME ARP funds will be used to create 20 new units affordable to households at or below 30% AMI.

***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 anticipated that the County's HOME ARP funds will be used to create 20 new units affordable to households at or below 30% AMI. The County's priority goal established by this Allocation Plan is to increase the number of affordable housing units in the County. Providing funds for rental housing production directly supports the advancement of that goal.

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## Preferences

***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:***

Orange County will not establish a preference; all qualifying populations will be eligible to apply for assistance under the County's HOME-ARP assisted program(s). Any preferences established in the future will be described in an amendment to this Allocation Plan and will not violate any fair housing, civil rights, or nondiscrimination requirements at the federal, state, or local level, which includes but is not limited to requirements found in 24 CFR 5.105(a).

***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 preferences are established.

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## Referral Methods

*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):*

Orange County will use the Coordinated Entry system as an indirect referral source. That is, the CE will be used for intake in order to add the eligible applicant to a HOME-ARP project waiting list, which will be selected from in accordance with the preference and prioritization described above. Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project

*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):*

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be placed on the project(s) waiting list and admitted in accordance with the preference and prioritization established earlier in this Plan

*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):*

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project, and the CoC CE prioritization will not be utilized.

*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):*

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be placed on the project(s) waiting list and admitted in accordance with the prioritization described earlier in this plan. Source of referral will not give one applicant preference or prioritization over another.

## Limitations in a HOME-ARP rental housing or NCS project

***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:***

Orange County is not establishing limitations on eligibility.

***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:***

Orange County is not establishing limitations on eligibility.

***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.

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## HOME-ARP Refinancing Guidelines

Orange County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing in order to rehabilitate the units with HOME-ARP funds.

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