



# HOME-ARP ALLOCATION PLAN DRAFT FOR PUBLIC REVIEW

CAMDEN COUNTY, NJ

Substantial Amendment to the 2021 Annual Action Plan  
FEBRUARY 2023

**CAMDEN COUNTY HOME CONSORTIUM  
HOME-ARP ALLOCATION PLAN  
DRAFT FOR PUBLIC REVIEW  
CAMDEN COUNTY  
NEW JERSEY**

**Participating Jurisdiction:** Camden County, NJ

**Date:** February 24, 2023

The American Rescue Plan Act of 2021 was signed into law on March 11, 2021, providing over 1.9 trillion dollars to address the impact of the COVID-19 pandemic on the nation. Of those funds, \$5 billion was earmarked for homelessness assistance and supportive services for individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include the development and support of affordable housing, Tenant-Based Rental Assistance (TBRA), the provision of supportive services, and the acquisition and development of congregate and non-congregate shelter units (NCS). Camden County received a HOME-ARP allocation of \$ 4,108,852. Current inventory of these resources is considered in the development of the HOME-ARP allocation plan as well as affordable and permanent supportive rental housing. ARP authorizes the Secretary of HUD to waive or specify alternate requirements for any provision of the National Affordable Housing Act (NAHA) or regulation for the administration of the HOME-ARP program, except requirements related to fair housing, civil rights, nondiscrimination, labor standards, and the environment, upon a finding that the waiver or alternate requirement is necessary to expedite or facilitate the use of HOME-ARP funds. Reasonable preferences among qualifying populations may be established to prioritize applicants for HOME-ARP projects or activities based on the Participating Jurisdiction's (PJ) needs and priorities.

## **Consultation**

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

Camden County began the HOME-ARP planning process by first consulting with Camden County Homeless Network Planning Committee (HNPC) on December 15, 2022. In South Jersey there is a Four County Continuum of Care (CoC), which includes the Counties of Camden, Cape May, Cumberland and Gloucester. This CoC is known as the Southern New Jersey Continuum of Care (SNJCoC). The HNPC Committee represents Camden County on the Continuum of Care, with representatives regularly attending the SNJCoC meetings.

The Camden County HNPC includes representatives from the following agencies:

- Camden Coalition of Healthcare Providers
- NJ Department of Community Affairs
- Taylor Care
- Catholic Charities
- Community Support Programs of NJ
- Volunteers of America – Delaware Valley
- Center for Family Services
- SNJCoC Coordinated Entry

- Camden County Domestic Violence Services
- Acenda
- Family Services Re-Entry
- Senior Citizens Untied Community Services
- Cathedral Kitchen
- Camden County Board of Social Services
- NJ Juvenile Justice
- Belmont Homes

Camden County also consulted with the SNJCoC on January 2, 2023. The CoC Executive Board includes representation from the following organizations:

- ACENDA Health
- CAMcare
- Camden City
- Cape May County
- Cape May County Habitat for Humanity
- Care and Share Meals
- Catholic Charities
- Center for Family Services
- Collaborative Support Programs of New Jersey
- Community Planning & Advocacy Council
- Cumberland County
- Cumberland Family Shelter (Rural Development Corp)
- Hannah’s House
- Housing Authority of Gloucester County
- Monarch Housing
- Camden County Domestic Violence Center (NJAC)
- NJ Housing and Mortgage Finance Agency
- Rutgers Southern Region Child Care Resource & Referral Agency
- South Jersey Behavioral Health
- Veterans Administration
- Volunteers of America

In addition, the following agencies were contacted via email to give direct input into the Allocation Plan:

- Clementon Housing Authority
- Fair Share Housing Center
- Pennsauken Housing Authority
- South Jersey Legal Services
- Veterans Multi-Service

Lastly, the SNJCoC recently conducted a series of focus groups that were also helpful input into the Allocation Plan and the County recently issued a report based on input from 50 individuals with lived experience in the shelter system.

***List the organizations consulted:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>ACENDA Health</b>	Integrated Healthcare	Presentation at CoC Meeting, Discussion at HNPC Meeting	The HNPC/CoC provided feedback on housing/service needs and process
<b>CAMcare</b>	Healthcare	Presentation at CoC Meeting	The CoC provided feedback on housing/service needs and process
<b>Camden City</b>	City Government	Presentation at CoC Meeting	The CoC provided feedback on housing/service needs and process

<b>Care and Share Meals</b>	Food Resource	Presentation at CoC Meeting	The CoC provided feedback on housing/service needs and process
<b>Catholic Charities</b>	Social Services, Rental Assistance, Fair Housing, Veterans Assistance, Re-Entry	Presentation at CoC Meeting, Discussion at HNPC Meeting	The HNPC/CoC provided feedback on housing/service needs and process
<b>Center for Family Services</b>	Social Services including homeless service provider, homelessness prevention, domestic violence and more.	Presentation at CoC Meeting, Discussion at HNPC Meeting	The HNPC/CoC provided feedback on housing/service needs and process
<b>Collaborative Support Programs of New Jersey</b>	Behavioral Health	Presentation at CoC Meeting, Discussion at HNPC Meeting	The HNPC/CoC provided feedback on housing/service needs and process
<b>Community Planning &amp; Advocacy Council</b>	Social Services including Senior and Homeless Services	Presentation at CoC Meeting, Discussion at HNPC Meeting	The HNPC/CoC provided feedback on housing/service needs and process
<b>Hannah's House</b>	Domestic Violence Shelter and Services	Presentation at CoC Meeting	The CoC provided feedback on housing/service needs and process
<b>Monarch Housing</b>	Housing Consultant	Presentation at CoC Meeting	The CoC provided feedback on housing/service needs and process
<b>Camden County Domestic Violence Center (NJAC)</b>	Domestic Violence Shelter and Services	Presentation at CoC Meeting	The CoC provided feedback on housing/service needs and process
<b>NJ Housing and Mortgage Finance Agency</b>	Housing Finance Agency	Presentation at CoC Meeting, Discussion at HNPC Meeting	The HNPC/CoC provided feedback on housing/service needs and process
<b>Rutgers Southern Region Child Care Resource &amp; Referral Agency</b>	Early Childhood Education and Social Services	Presentation at CoC Meeting	The CoC provided feedback on housing/service needs and process
<b>South Jersey Behavioral Health</b>	Behavioral Health	Presentation at CoC Meeting	The CoC provided feedback on housing/service needs and process
<b>Veterans Administration</b>	Veterans Services	Presentation at CoC Meeting	The CoC provided feedback on housing/service needs and process
<b>Volunteers of America</b>	Services include homelessness, reentry, veterans assistance, affordable housing services, substance misuse disorders, mental health, etc.	Presentation at CoC Meeting, Discussion at HNPC Meeting	The HNPC/CoC provided feedback on housing/service needs and process
<b>Clementon Housing Authority</b>	Housing Authority	Email outreach	No feedback provided.
<b>Fair Share Housing Center</b>	Fair Housing	Email outreach	No feedback provided.
<b>Pennsauken Housing Authority</b>	Housing Authority	Email outreach	No feedback provided.

<b>South Jersey Legal Services</b>	Legal Services	Email outreach	No feedback provided.
<b>Camden Coalition of Healthcare Providers</b>	Health and Data Services	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>NJ Department of Community Affairs</b>	Government Agency, Housing	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>SNJCoC Coordinated Entry</b>	Coordinated Entry	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>Camden County Domestic Violence Services</b>	Social Services, Domestic Violence	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>Family Services Re-Entry</b>	Social Services, Re-Entry	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>Senior Citizens United Community Services</b>	Senior Services	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>Cathedral Kitchen</b>	Food Resources, Workforce Development	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>Camden County Board of Social Services</b>	Government Agency, Social Services	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>NJ Juvenile Justice</b>	Government Agency, Juvenile Justice	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>Belmont Homes</b>	Affordable Housing	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process
<b>Taylor Care</b>	Adult Behavioral Health	Discussion at HNPC Meeting	The HNPC provided feedback on housing/service needs and process

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

Much of the feedback received focused on the need for affordable housing. Those consulted shared the need for both housing units and vouchers, recognizing that vouchers are only helpful when there are affordable units available. HOME-ARP provides an opportunity to close some of the gaps in the existing system through the ability to pair wraparound services with vouchers and the ability to issue rental assistance beyond Fair Market Rent (FMR), which is important since landlords are raising rents.

Additionally, those agencies working with clients at-risk of homelessness advocated for additional rental vouchers. They discussed the importance of being able to transition households to voucher as a strategy to maintain their housing instead of needing a household to become homeless in order to be eligible for a voucher. There is still a need for emergency housing/utility assistance, as well as

security/utility deposit assistance. There is a long-term need for social program to address low credit scores and criminal records, as both of these are barriers in renting housing.

Feedback from those in the shelter system included the need for increased cleanliness, increased security and more basic amenities such as showers, laundry, storage, etc. Additionally, feedback included change in hours of operation, additional staff training and social services/workforce development. Lastly, those utilizing shelters prefer a Non-Congregate model to the often traditional Congregate model.

## **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: 2/24/23**
- **Public comment period: start date - 2/24/2023 end date - 3/10/2023**
- **Date(s) of public hearing: 3/8/2023**

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

The HOME-ARP Public Hearing was held in on March 8, 2023. The hearing was held as a virtual hearing, During the hearing, an overview of HOME-ARP was given including the County's allocation amount and the range of possibly eligible activities. Participants had an opportunity to share their input. [ADD ATTENDANCE INFORMATION POST-HEARING]

The public review process and the public hearing were noticed in the local paper, in accordance with the County's Citizen Participation Plan. The County posted the draft of the Allocation Plan on their website for public review.

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

Camden County, as a HOME Consortium Participating Jurisdiction (PJ), followed their adopted Citizen Participation process, except that the length of the public comment period was shortened to 15 days as allowed by HUD guidance. The public notice for the hearing was run in the local paper and posted to the County's website. The public notice included instructions on how the public can request reasonable accommodations and meaningful access to the plan in accordance with the County's citizen participation plan. Although willing to consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan; none have been submitted. [UPDATE IF COMMENTS ARE SUBMITTED]

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

No comments have been submitted. [UPDATE IF COMMENTS ARE SUBMITTED]

*Summarize any comments or recommendations not accepted and state the reasons why:*  
All comments have been accepted.

DRAFT

## Needs Assessment and Gaps Analysis

This Needs Assessment and Gap Analysis evaluates the size, demographic composition, and priority needs of qualifying populations in Camden County as identified in 24 CFR 91.5, 24 CFR 5. 2003, 42 U.S.C. 12742(a), and by the U.S. Department of Housing and Urban Development (HUD). These include the following:

- *Individuals or families who are homeless*
- *Individuals or families who are at risk of homelessness*
- *Individuals or families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking*
- *Populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability*
- *Veterans and families that include a veteran family member that meet the criteria in one of the aforementioned.*

This document identifies the existing shelter and housing inventory in Camden County as well as the service delivery system. Additionally, a gap analysis is provided to explore the need for additional housing, shelter, and/or services by using current data, including Point in Time count (PIT), Housing Inventory Count (HIC), data provided by the Continuum of Care (CoC), and consultations with service providers. Additional consideration is provided for the identification of housing characteristics associated with instability and an increased risk of homelessness. Unless otherwise specified, information presented in this report is provided by the NJ Counts Report compiled by Monarch Housing Associates and The New Jersey Housing and Mortgage Finance Agency.

In this analysis it is important to consider the impact that the COVID-19 pandemic had on the nation. HUD and the CDC issued a number of safety measures for all communities conducting the 2022 PIT Count. These included but were not limited to the following:

- *Decrease face-to-face interactions with clients;*
- *Decrease the number of volunteers who would need to work in physical proximity*
- *Providing PPE to all volunteers; and*
- *Designing a process that minimizes close contact*

Additional precautions were taken in NJ in the following ways:

- *Elimination or changes to Project Homeless Connect events*
- *7-day outreach and service-based count*
- *Reduction in use of volunteers to support the unsheltered count*
- *Increased connection with community-based services providers such as day-centers, soup kitchens and medical facilities to identify and connect with unsheltered persons*

Due to the COVID-19 pandemic, HUD gave communities the option to cancel or modify the unsheltered portion of the PIT count based on the potential risk of transmission associated with conducting an in-



person survey. Thus, it is important to note that there are significant differences between the 2022 PIT count and that of 2021 as vaccines had not been widely distributed at the time, and outreach restrictions were issued on both the state and federal level. Though most of the report 2022 is utilized, some consideration is given to 2021 data when compared to 2019 data in the interest of evaluating the early impacts of the COVID-19 pandemic.

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

The Point In-Time (PIT) Count of the Homeless is an analysis of the sheltered and unsheltered population experiencing homelessness on a single night in January. Continuums of Care (CoCs) are required by the United States Department of Housing and Urban Development (HUD) to conduct an annual PIT Count of the population experiencing *sheltered homelessness*, staying in emergency shelters, safe havens, or transitional housing programs. An additional count of the *unsheltered homeless* is conducted every other year on odd numbered years.

Unless otherwise specified, information presented in this section is provided by the NJ Counts Report compiled by Monarch Housing Associates and The New Jersey Housing and Mortgage Finance Agency.

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

The 2022 PIT count identified 625 persons in 529 homeless households on January 25, 2022. Alarming, compared to its neighboring counties, the majority (428)<sup>1</sup> of these individuals were from Camden County.

Of the homeless individuals identified, 211 were "*chronically homeless*" and 136 were "*unsheltered*". Of the sheltered population, 375 were in Emergency shelter and 114 were in Transitional Housing.

Out of the 529 homeless households counted in 2022, 41 (8%) households (130 persons; 81 children) had at least one child under the age of 18. Of these households, 2 (0.4%) families were unsheltered, 36 (6.8%) were in emergency shelters, and 3 (0.6%) families were in transitional housing.

Additionally, 65% (406) of homeless persons identified as male, and 33.3% (208) identified as female.

Out of 441 respondents, 75.5% reported that their last permanent address prior to becoming homeless was inside of Camden County and 18.6% reported that their last address was from elsewhere in NJ. Only 5.9% of respondents said that they lived outside of NJ prior to becoming homeless. Out of the 625 homeless individuals surveyed in Camden County, approximately 132 (21%) reported that their last permanent address prior to becoming homeless was outside of the United States.

The 2022 PIT Count showed a strong correlation between poverty and homelessness, marking poverty as a key indicator to the issue. However, upon a closer examination of the racial breakdown of the general population, disparate impacts along racial lines are evident.

The Black or African American non-Hispanic community is overrepresented in the homeless population. While only 18.2% of the population in Camden County, persons identifying as Black or African American

made up 48.5% (303) of the population experiencing homelessness. Astonishingly, 55.5% of the chronically homeless in Camden County identify as Black or African American; and, approximately 39.7% of the unsheltered homeless identify in the same manner. Therefore, race is a critical component of the conversation of homelessness. It appears that race rather than poverty is the more accurate predictive indicator as to whom will experience homelessness.

The next largest racial subgroup of the homeless population in Camden County identified as White (29.6%, 185 counted persons), followed by those identifying as multi-racial (1.6%, 10 counted persons). Regarding ethnicity, 10.4% of those counted identified themselves as Hispanic/Latino. Given the impact that race so clearly has on homelessness, it is important that homeless service systems make efforts to both understand and address the racial disparities in Camden County to better serve their constituents.

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

In Camden County on the night of the PIT count, 39.6% of the households experiencing homelessness had no source of income. Of those surveyed, 9.4% reported having a source of earned income. The most common of these were Social Security Income (17.3%), followed by General Assistance/Welfare Programs, and Social Security Disability Income (SSDI).

Other sources of income reported included Unemployment, Worker's Compensation, Child Support, and Veterans Pension. The average monthly income among households in Emergency Shelter was \$ 676.81, \$4,695.53 for those in Transitional Housing Programs, and \$ 375.90 for the unsheltered. Additionally, out of those surveyed, 12.1% reported having received non-cash benefits such as Medicaid (49.9%), and Food Stamps aka. SNAP (41.6%).

Cost burden is the ratio of housing costs to household income. It serves as an indicator of housing need, and the need for reduced rental costs. For renters, housing costs is gross rent (contract rent plus utilities). Renter households who spend more than 30% of their income in rent and utilities are considered "*cost burdened*". Per HOME ARP Guidance, households at risk of homelessness are those whose income falls below 30% of Area Median Income (AMI) that do not have resources or family, friend, or faith-based support networks to prevent homelessness.

Renter households who spend more than 50% of their income on the same are considered "*severely cost burdened*". Those who fall under the severely cost burdened category are at imminent risk of becoming homeless.

Unless otherwise specified, the information provided in this section is gathered from the CHAS (Comprehensive Housing Affordability Strategy) database based on 2015-2019 ACS 5-year estimates. This data, broken down by Continuum of Care regions, demonstrates the extent of the housing problems and housing needs in the area of interest, particularly for low-income households.

A household is said to have a housing problem if they have any 1 or more of these problems:

- 1. housing unit lacks complete kitchen facilities***
- 2. housing unit lacks complete plumbing facilities***
- 3. household is overcrowded***
- 4. household is cost burdened***

According to CHAS, out of 62,155 renters in Camden County, it is estimated that 32,745 (52.7%) have a housing problem. Of those with a housing problem, 16,540 (50.5%) fall under the 30% HAMFI threshold, and 9,465 (28.9%) fall under the 50% HAMI threshold.

There is a significant overlap between income and those households in Camden County which are cost-burdened. When compared to the racial distribution/concentrations of the homeless populations in Camden County as exemplified in the map of the previous section, one point is evident. The African American community is overrepresented in both the low-income and cost burdened sections of this plan.

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

HOME ARP guidelines identify victims of domestic violence as a qualifying population eligible to receive assistance. Specifically, those individuals “Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking”. Individuals whom fleeing, or attempting to flee other dangerous or life-threatening conditions that relate to violence against the individual or a family member are also included as part of this qualifying population.

Out of the 625 individuals who identified as homeless on January 25, 2022, 46 (7.4%) were victims of domestic violence. Out of those identified as victims of DV, 41.3% identified as Black/African American. The majority of DV victims were in emergency shelter (31) on the night of the count, the rest (15) were unsheltered.

***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.***

**CHRONICALLY HOMELESS:**

Chronically homeless households, as defined by HUD, are those with a long-term disabling condition who have been continually homeless for a year or more, or at least four times in the past three years where the length of time in those episodes add up to a year or more. Supportive services and enhanced case management are required for the chronically homeless once housing is secured.

Of 625 surveyed, 211 (33.8%) individuals were chronically homeless. Just over half of the chronically homeless (108; 51.2%) were in emergency shelter at the night of the count, and the rest (103; 48.8%) were unsheltered. Out of those who identified as chronically homeless, 55.5% also identified as Black / African American, and 64% identified as male.

**UNSHELTERED HOMELESS:**

HUD identifies the unsheltered homeless population as any 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.”

The unsheltered are especially vulnerable in extreme weather conditions; thus, it is imperative to understand why some of the homeless remain unsheltered. It is also important understand that these categories are not mutually exclusive as one respondent may identify with one or more of these classifications.

#### VETERANS:

The United States Interagency Council on Homelessness (USICH) has prioritized ending homelessness among veterans. Thus, veterans are identified as a qualifying population in the HOME ARP guidelines. Veterans are those persons at or above the age of 18 who have served in any branch of the US Armed Forces. For the PIT count this definition also includes those whom have served but are not eligible for services through the U.S Department of Veteran Affairs.

Out of the 625 individuals who identified as homeless on January 25, 2022, 92 (14.7%) were homeless veterans. The majority of veterans were in transitional housing programs (80; 87%), some were in emergency shelter (5), and the rest (7) were unsheltered. Of the homeless veterans identified, 77.2% identified a disability.

Out of the 92 homeless veterans whom responded to this question (129 responses), the most common disability was substance abuse disorder (40), followed by chronic health condition (38) and mental health issues (35). Other responses included physical disability (14) and developmental disability (2). It is important to understand that these categories are not mutually exclusive, hence the 129 responses form 92 respondents; some veterans identified more than one option.

#### PEOPLE WITH DISABILITIES:

Out of those individuals whom identified as homeless during the PIT count in January of 2022, 62.2% reported having some type of disability; additionally, 70.6% of adults of 18 years of age or older reported having some disability.

The most common form of disability identified was substance abuse disorder, followed closely by chronic health conditions.

#### HOMELESS YOUTH:

Youth are defined as persons under the age of 25 whom are not accompanied by a parent or guardian. Homeless youth can include individual youth (18-24 years old), unaccompanied minors (17 years old or younger), households of 2 or more youth presenting together as a household, and pregnant or parenting youth who are the legal guardians of one or more children.

Of those surveyed, 40 (6.4%) were homeless youth (individuals and families with heads of household under 24 years old or younger).

***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):***

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

The Housing Inventory Count (HIC) is a point-in-time inventory of provider programs within a CoC that provides beds and units for people experiencing homelessness.

#### Congregate and Non-Congregate Shelter Units

As of 2021, Camden County's homeless system had a total of 741 year-round beds available for people experiencing homelessness in its congregate and non-congregate shelters; 364 (49%) beds for "households with no children" and 377 (51%) beds for "households with children". Of these, 120 were reserved for homeless veterans and 21 for homeless youth.

#### Affordable and Permanent Supportive Rental Housing

As of 2021, Camden County's homeless system had a total of 1273 year-round beds in permanent housing available through Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing programs; 670 (53%) beds were for "households with no children" and 603 (47%) beds are for "households with children". Of these total year-round beds, 410 were reserved for veterans and 59 for homeless youth.

#### Social Services

The Housing Network Planning Committee (HNPC) is a county-wide association of service providers and government agencies that are collaborating on the sharing of information, services, and advocacy for and on behalf of the homeless population in the area of service within Camden County, a significant portion of whom is located in Camden City. The mission of the HNPC is to work to prevent and end homelessness, they work across the region to ensure those in need have connection to services and supports. There are a number of agencies within the HNPC that are providing direct services to the homeless population.

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

The Camden County CoC, Clementon Housing Authority, Pennsauken Housing Authority and some social service agencies manage rental assistance vouchers that support those at-risk of homelessness with a way to remain housed. There are a number of agencies that are working to prevent homelessness by providing social services, housing counseling and other support services. Through consultation we heard that there is a need for more vouchers, more units and security/utility deposit assistance to support the transition to long-term housing.

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

This population is particularly hard to engage. There are multiple social service agencies in the County that engage this population intentionally through shelter and services. Service providers expressed frustration given that many DV victims need to become homeless before they can access rental assistance and have advocated for a DV vouchers in order to maintain housing.

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

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

The COVID-19 pandemic had a notable impact on the homeless population as well as the services available to them. In Camden County the Rapid Rehousing and Other Permanent Housing were reduced and converted to serve a broader array of homeless individuals. There was minimal re-structuring in Emergency Shelter, Transitional Housing, and Permanent Supportive Housing program as well; but the change was minimal in comparison to the aforementioned. All of the services at the Rapid Re-housing program were cut. However, this was offset by a surge in services offered through the Permanent Supportive Housing program.

From 2019 to 2021 there was an 11.3% reduction in total HMIS year-round beds across programs as well as a 4.8% reduction in dedicated youth beds offered. The total amount of dedicated veteran beds available was doubled due to a drastic increase in veteran-specific services via the Permanent Supportive Housing Program. That same program also doubled its services for the chronically homeless in the same time period. There was an overall increase in services for total non-DV year-round beds, total units and beds for households with children as well as for households without children.

The Point-In-Time Count of 2022 reported a total of 625 homeless individuals in Camden County, 211 of which were “*chronically homeless*”. Just a few months prior in 2021, the Home Inventory Count for Camden County reported a year-round bed inventory of 741 total year-round beds. Of these, some beds are reserved for specific populations such as veterans or victims of domestic abuse.

The most notable gap in the data provided by the Point-In-Time and Housing Inventory Counts are in services for homeless households without children and dedicated beds for the chronically homeless. There is also some need for dedicated veteran beds at emergency shelter programs.

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

Cost burden serves as an indicator of housing need, and the need for reduced rental costs. Renter households who spend more than 30% of their income in rent and utilities are considered “cost burdened” and are at risk of homelessness, especially those that do not have resources or family, friend, or faith-based support networks to prevent homelessness. Renter households who spend more than 50% of their income on the same are considered “severely cost burdened” and are at imminent risk of becoming homeless.

According to the American Community Survey 2020 annual estimates, approximately 523,485 people live in Camden County, and 11.77% (61,612 people) of Camden County residents are living below the poverty line.

According to CHAS, out of 62,155 renters in Camden County, it is estimated that 32,745 (52.7%) have a housing problem. Of those with a housing problem, 16,540 (50.5%) fall under the 30% HAMFI threshold, and 9,465 (28.9%) fall under the 50% HAMI threshold. Out of 33,446 affordable rental housing units available in Camden County, 13,884 units are available for households that fall under the 30% and 50% Area Median Income. Of these, 4,633 units are available for households at 30% AMI and 9,251 units are available for households at 50% AMI.

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

Out of the 625 individuals who identified as homeless on January 25, 2022, 46 (7.4%) were victims of domestic violence; they were fleeing, or attempting to flee other dangerous or life-threatening conditions that relate to violence against the themselves or a family member. The majority of DV victims were in emergency shelter (31; 67.4%) on the night of the count, and the rest were unsheltered (15; 32.6%).

Those individuals who fall under this qualifying population, require the assistance of intervention services such as counseling, human resources, employment assistance programs and other workplace support services. When access to these services is readily available, DV victims are proven to have a more positive outlook on life and a greater drive to achieve their goals.

***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***

**VETERANS:**

According to the 2022 PIT count, 5 homeless veterans were taking shelter at emergency shelters in Camden County that had no dedicated beds for veterans. While there is increased availability of programming at Permanent Supportive Housing, Rapid Rehousing, and Transitional Housing programs for homeless veterans there is also a need for more dedicated beds at emergency shelters with a specific dedication to homeless veterans.

**CHRONICALLY HOMELESS, UNSHELTERED, AND PEOPLE WITH DISABILITIES**

Out of those individuals whom identified as homeless (625) during the PIT count in January of 2022, 211 were “chronically homeless” and 136 were “unsheltered”. Additionally, 62.2% reported having some type of disability The most common form of disability identified was substance abuse disorder, followed closely by chronic health conditions. Currently, there are no safe haven programs available in Camden County. The Safe Haven model prioritizes harm reduction and takes a housing-first approach to addressing the needs of the homeless populations. Safe havens serve hard-reach homeless persons who reside on the streets or places not meant for human habitation who have severe and persistent mental illness. Typically, these individuals are unable or unwilling to participate in housing or supportive services and thus little to no precondition on established sobriety and documentation is required.

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

While there is increased availability of programming at Permanent Supportive Housing and Rapid Rehousing programs for households without children, there is a visible gap for more temporary and immediate beds at emergency shelters and transitional housing. As noted throughout this assessment, the chronically homeless are quite underserved. There is no dedicated programming for the chronically

homeless population while the majority of the homeless population in Camden County is either chronically homeless and/or unsheltered chronically homeless.

***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:***

The County does not plan to formally adopt a definition of “other populations”.

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

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

Data and consultation point to the priority needs of this population to be improved shelter facilities including additional Non-Congregate Shelter, mental health services and supportive housing or rental assistance with supportive services.

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

For those at-risk of homelessness, finding affordable rental units post-quarantine has become even more challenging than the data would suggest. According to consultation, eviction processes have begun and there are not enough available affordable rental units in the area. Affordability is more of an issue now, as many landlords are coming off an extended period of lost rent and many folks are not back to work. Even those with mobile housing vouchers are having a challenging time finding rental units in the area because landlords are asking for rental rates far above the “Fair Market Rate” of the voucher. Priority needs for this population include affordable units, vouchers that are greater than FMR, and security/utility deposit assistance.

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

Those individuals who fall under this qualifying population, require the assistance of intervention services such as counseling, human resources, employment assistance programs and other workplace support services. According to the consultation process, these individuals are most in need of vouchers that are greater than FMR, security/utility deposit assistance, credit repair, mental health service and food resources.

***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***

**VETERANS:**

The data shows us the need for more dedicated beds at emergency shelters with a specific dedication to homeless veterans and consultation tells us that veterans are a high need population that need specialized delivery of the same services as the overall homeless and at-risk of homelessness populations.



## CHRONICALLY HOMELESS, UNSHELTERED, AND PEOPLE WITH DISABILITIES

Currently, there are no safe haven programs available in Camden County. There is a need for supportive services for homeless that continue through until after a person is permanently housed and stable.

### ***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:***

The level of need and gaps in shelter and housing inventory and service delivery systems was determined by a thorough analysis of the available data as well as through community outreach efforts including but not limited to an online survey, public hearings, and stakeholder interviews. The data presented and discussed in this assessment was collected from the U.S. Census, ACS, CHAS, PIT Count, HIT Counts, and the data from the existing Analysis of Impediments to Fair Housing Choice. Stakeholders consulted included the following: the public, the Continuum of Care, homeless service providers, veterans' groups, domestic violence agencies, the public housing agency, and other public or private organizations that address fair housing and the needs for persons with disabilities.

## 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:***

In order to meet the demand for affordable housing, the County will be issuing an RFP for non-profits to manage housing vouchers with wraparound services. An RFP will be released and subrecipient applications accepted.

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

The County will look to partner with subrecipients for all activities and will monitor subrecipient's ability to implement in an effective and compliant manner.

***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:***

Not applicable.

***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.***

### Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Wraparound Supportive Services	\$ 692,524		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Rental Assistance	\$ 2,800,000		
Development of Affordable Rental Housing	\$ #		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 616,328	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 4,108,852</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 County will distribute HOME-ARP funds in accordance with identified priority needs as the need for more affordable rental housing was a priority throughout the consultation and needs assessment. TBRA with supportive services allows the County to quickly deploy assistance for individuals and families that are at-risk of losing their current housing and those that are looking to transition from emergency housing to more permanent housing. The wraparound services are an important support to stabilize

families for a successful tenancy. This is especially important given the reported increase in mental health struggles that has emerged since COVID-19.

***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 provision of these supportive vouchers, which can exceed Fair Market Rent (FMR), have the ability to close the gap that currently exists between housing vouchers and the level of rent that the landlord is charging. It is possible that the higher voucher and guarantee of consistent rent will also incentivize landlords to be more flexible on other housing barriers, such as credit score. In addition, the model of combining wraparound services with TBRA will provide households with the housing stability they need so that they can focus on other social service needs – hopefully maintaining housing for those at-risk populations and special populations (such as DV) and offering supportive transitions to long-term rental assistance.

## **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:***

Not applicable.

***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:***

Not applicable.

## Preferences

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

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

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

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

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

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

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

**For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:***

There will be no preferences utilized in this project. 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. This project will operate in accordance with all fair housing, civil rights, and nondiscrimination requirements.

***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:***

There was no preference 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).

***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):***

The PJ will follow their typical management process for rental assistance.

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

All qualifying populations will be eligible for a project or activity. There will be no preferences.

***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):***

All qualifying populations will be eligible for a project or activity. There will be no preferences.

***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):***

There will be no prioritization. Clients will be served on first-come, first-served basis.

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

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

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

The PJ does not intend to limit 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:***

The PJ does not intend to implement a limitation.

***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):***

There was no limitation identified.



## 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. The PJ does not plan to use HOME-ARP funds to refinance existing debt.
- ***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. The PJ does not plan to use HOME-ARP funds to refinance existing debt.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***  
Not applicable. The PJ does not plan to use HOME-ARP funds to refinance existing debt.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***  
Not applicable. The PJ does not plan to use HOME-ARP funds to refinance existing debt.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***  
Not applicable. The PJ does not plan to use HOME-ARP funds to refinance existing debt.
- ***Other requirements in the PJ's guidelines, if applicable:***  
Not applicable. The PJ does not plan to use HOME-ARP funds to refinance existing debt.