



## **SOUTHWESTERN NC CONSORTIUM HOME-ARP**

Allocation Plan **DRAFT**

Prepared by:

Southwestern Commission Council of Governments

## **Introduction**

In September 2021, the U.S. Department of Housing and Urban Development (HUD) allocated \$1,965,737 in Home Investment Partnerships Program (HOME) American Rescue Plan (ARP) funding to the Southwestern NC HOME Consortium, which consists of Haywood, Jackson, Macon, Swain, Clay, and Graham counties. This supplemental funding (HOME-ARP) is part of The American Rescue Plan Act of 2021, that appropriated funding to HOME entitlement communities to provide housing and services to vulnerable populations experiencing homelessness or housing insecurity.

The Southwestern Commission Council of Governments (the Southwestern Commission), developed the following draft Allocation Plan to submit to HUD that details the communities' priorities for use of the region's HOME-ARP allocation. Eligible activities include, development, acquisition and/or rehabilitation of affordable rental housing or non-congregate shelter, tenant based rental assistance, supportive services, and capacity building. Funding must assist people in HOME-ARP "qualifying populations" delineated in CPD 21-10, which include:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking; and
- Other families requiring services or housing assistance or to prevent homelessness or those at greatest risk of housing instability or in unstable housing situations, meaning:
  - Families requiring services or housing assistance to prevent homelessness, as defined:
    - Households who have previously met HUD's definition of Homeless (24 CFR 91.5) and are currently housed who need additional housing assistance or supportive services to avoid a return to homelessness.
  - Those at greatest risk of housing instability or in unstable housing situations, as defined:
    - Households that have an annual income that is less than or equal to 30% of the area median income, as determined by HUD, and is experiencing severe cost burden; or
    - Households that have an annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets HUD's definition of "At risk of homelessness" (24 CFR 91.5(1)).

The development of the HOME-ARP draft Allocation Plan is informed through stakeholder consultation and community engagement. The community engagement and consultation process enabled the Southwestern Commission to identify housing and supportive service gaps in the region, address the needs of the qualifying populations above, and identify community priorities that may be supported with HOME-ARP funds.

## Consultation

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

The Southwestern Commission Council of Governments (Southwestern Commission), on behalf of the Southwestern NC HOME Consortium, provided HOME-ARP information to the region and began community engagement and the consultation process on November 28, 2022, and continued consultation through February 10, 2023. The consultation process included four (4) phases that were intentional, community-driven, individualized, and included outreach to a broad spectrum of housing and service organizations serving the qualifying populations, and community members.

On November 28, 2022, community members and stakeholders were provided initial information on the upcoming Southwestern Commission HOME-ARP consultation process which included a community meeting, web-based survey, and stakeholder interviews. The funding amount, a link to the Southwestern NC Consortium's HOME-ARP information webpage, a notice on the ability to provide technical assistance and/or review any or all parts of the details of the consultation process in a manner effective for persons with disabilities or persons with Limited English Proficiency (LEP), and an invitation to the community meeting and HOME-ARP presentation was included in the notice.

Stakeholders and community members were asked to provide input on both the region and identified community needs, service gaps, and input on potential uses of HOME-ARP funds. The Southwestern Commission's engagement and consultation process in the development of the draft Allocation Plan included:

- Community Meeting
  - December 14, 2022;
  - Invitation to the meeting was distributed via email to over 91 persons via the Southwestern NC HOME Consortium listserv;
  - Meeting information was posted to Southwestern Commission's HOME-ARP information webpage;
  - A total of 23 people attended, both in-person and virtual options were offered to meet community needs and maximize participation. Transcript was available.
- Southwestern NC HOME Consortium: HOME-ARP Needs and Gaps Survey
  - Available December 16, 2022 - January 13, 2023;
  - Survey was distributed to: direct emails to organizations who attended the community meeting via email December 16, 2022, posted on the Southwestern NC HOME Consortium HOME-ARP information webpage December 19, 2022, emailed directly to 111 individuals representing stakeholder organizations on December 21, 2022, a reminder email on January 9, 2023, and to over 91 persons on the Southwestern NC HOME Consortium listserv on January 5, 2023;

- HOME-ARP informational PowerPoint was attached to the email that detailed amount of funding, eligible activities, and the qualifying populations to be served;
  - Survey link was posted to Southwestern NC HOME Consortium HOME-ARP information webpage including being highlighted on the home page “News and Update” section;
  - A total of 87 individual persons responded to the survey representing: homelessness service, shelter, and housing providers, funders, victim service organizations, Veterans’ programs, community members, local government, PHAs, CoC members and leadership, mental health, substance use treatment, and health care providers, developers, legal service providers, and disability, education, and employment assistance organizations.
- Stakeholder Interviews
    - December 8, 2022 - February 10, 2023;
    - Individual emails and phone calls to request interviews;
    - Standardized interview questions for consistency;
    - A total of 26 individual organizational interviews were completed in-person, in a virtual meeting or by telephone.
- Letter of Interest/Request for Qualifications Submittal Form
    - January 30, 2023 - February 6, 2023;
    - Request was utilized to engage the region’s interest and ability to provide supportive service activities and enable the Southwestern Commission to identify community providers of supportive services and financial assistance activities that may be supported with HOME-ARP funds in the full geographic area.
    - A total of 27 submittals were received by the Southwestern Commission.

**Organizations consulted:**

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
VAYA Health, Local Management Entity/Managed Care Organization (LME/MCO)	Public agency that addresses the health and housing needs of all qualifying populations in region	Community meeting; stakeholder interview; survey responses	Expressed need for one (1) bedroom affordable units across the region at or below Fair Market Rent, homelessness prevention funding, including, ongoing rental assistance and supportive services, including financial assistance for those that are unstably housed and/or cost burdened, and for households at risk of homelessness; Address gaps in general population shelter available in the region. With limited funding, prioritize: Supportive Services, including Financial Assistance to address regional demand for housing assistance.
Appalachian Mountain Community Health Centers, Federally Qualified Health Centers	Public agency that addresses the mental, primary health and substance use needs of all qualifying populations	Stakeholder interview; survey responses	Need affordable housing for low and very-low income individuals and families; Funding to support mental health, substance use, and primary care; Expressed gaps in availability of low barrier general population shelter, especially for families, homelessness prevention for at risk population, ongoing financial assistance and services, costs of assisting households to obtain, and retain housing, including application costs, utility payments, rental arrears, and case management services; Funding for child care; Need rental assistance support for Kinship caregivers to assist in stabilizing displaced youth.

Mountain Housing Opportunities, Inc.	Community Housing Development Organization (CHDO) that meets the housing needs of all qualifying populations	Community meeting; stakeholder interview; survey response	Expressed need to address issues related to affordable housing gap and retention of existing units in the region before intractable, Supportive Services (holistic case management) to assist households that obtain a unit to maintain housing stability and financial assistance for those at risk of homelessness. Unit development for the region must be planned to address population growth to meet housing demand both now and in the future.
Western NC Housing Partnership	Affordable Housing Developer that meets the housing needs of all qualifying populations	Community meeting; stakeholder interview, survey responses	Identified need for affordable one (1) bedroom units for very-low and low-income wage earners; ongoing need for affordable housing to allow households to build equity/improve lives; financial assistance for payment of rental arrears; Need for Supportive Services including housing search, mediation, and landlord/tenant services, case management for housing retention, employment assistance and job training. Need to address gap in childcare across region that impacts stability of all qualifying populations, especially single parent households.
NC Works Career Centers (NC Department of Labor)	State agency providing employment assistance for qualifying populations in Haywood, Jackson, Swain, Macon, and the Tri-County area	Survey responses	Need for affordable housing and supportive services to include, mental health and substance use treatment, life skills training, employment assistance, and job training, ongoing rental/utility assistance and security deposit assistance; Additional need for family and domestic violence emergency shelter in the region; Identified gap in affordable 2–3 bedroom units; Gap and critical need for mental health support for the elderly within qualifying populations.

NC Emergency Solutions Grant Program, NC Department of Health and Human Services	Public agency that addresses the needs of homeless, at risk, and victims of domestic violence, sexual assault, stalking, and human trafficking populations	Stakeholder interview	Expressed need for additional financial support in region for sheltering or housing assistance as current sources are not sufficient to meet demand; Extremely limited emergency shelter resources, especially for general population shelters; Gaps in the availability of rapid rehousing assistance and homelessness prevention assistance for at-risk population in the region; Encourage the use of coordinated entry as a centralized access point for access to services and housing assistance.
NC Coalition to End Homelessness (NCCEH)	State Coalition that addresses the needs of homeless, at risk, and victims of domestic violence, sexual assault, stalking, and human trafficking populations	Stakeholder interview	Need to create opportunities for affordable housing development with small agencies in the region; Leverage/match HOME-ARP funding to increase the maximum number of units produced. Prioritize: housing development as it is a more permanent option; Ensure Supportive Services are available to households with any units that are created.
NC 503 Continuum of Care: NC Balance of State- NC Coalition to End Homelessness	CoC serving the geographic area that addresses the needs of homeless, at risk, and victims of domestic violence, sexual assault, stalking, and human trafficking populations	Stakeholder interview; survey response	Need to increase the number of year-round, low barrier shelter beds in the region; Increase support available for service providers; Ensure Supportive Services are available. Prioritize: housing development; Establish preference for literal homeless in rental development and include low-barrier entry requirements; Utilize Coordinated Entry (CE) as referral method for literally homeless.
NC 503 Continuum of Care, Region 1 Lead	Region 1, Balance of State serving the participating jurisdiction's geographic area that addresses the needs of the qualifying homeless, at risk,	Stakeholder interview; survey response	Expressed need for Supportive Services, especially in rural communities to meet need, transportation to support access to available services and funding for repairs to substandard units to retain existing housing stock in the region.

	and victims of domestic violence, sexual assault, stalking, and human trafficking populations		Prioritize: development of affordable housing, and alternatively, supportive services targeting transportation, homelessness prevention assistance, and ongoing utility/rental assistance to help stabilize and maintain housing for assisted households.
Veterans Administration Medical Center (VAMC) Healthcare for Homeless Veterans, WNC VA Health Care System	Veterans' services, health care, and housing provider that addresses the needs of Veterans within the qualifying populations in the participating jurisdiction's geographic area	Stakeholder interview	<p>Need homelessness prevention funding for those at risk of homelessness to divert households from entering the shelter system; Assist cost burdened/at risk households with arrears, utilities, ongoing services, and financial assistance to help stabilize and maintain current housing; Address gap in services for Veterans experiencing domestic violence; Affordable housing is unavailable and market rents exceed rent reasonableness based on the AMI for each county; Expressed need for implementation of comprehensive homelessness diversion strategy; Address gap in homelessness prevention assistance and support connectivity to resources.</p> <p>Prioritize: supportive services to maximize impact with limited funding available; Limit overhead costs for providers in implementation of system response to quickly provide substance use treatment, transportation, and rental assistance to qualifying populations; Robust and comprehensive coordinated approach across providers would eliminate duplication of services, promote effectiveness, and maximize funding.</p>



Macon County Veterans Services	Veterans' services provider	Stakeholder interview; survey response	Expressed needs for ongoing rental assistance, both long and short term, funding and staff to provide transportation and homelessness prevention assistance to at-risk, transitional/bridge housing for Veterans discharged from institutions of care, need for intensive, holistic, case management services and additional PEERs to address the unique trauma needs of individuals/families; Gap in assistance available to very low-income elderly and youth exiting institutional care; Gap in accessible, general population emergency shelter and ADA compliant housing units in the region; Address service and coverage gap in crisis response system.
Legal Aid of North Carolina	Public organization that addresses fair housing, civil rights, and the needs of persons with disabilities of all qualifying populations	Community meeting; stakeholder interview; survey responses	Need immediate funding for financial assistance (rental arrears, deposit assistance, and initial move-in costs); Housing navigators to help identify available affordable units; Long-term need: creation of subsidized housing (new supply); Expressed Gap in lack of landlords that accept Housing Choice Vouchers (Section 8) and quality affordable units and financial assistance for senior homeowners who need home repairs to maintain housing. Prioritize: Supportive Services as it incorporates multiple financial assistance options to meet unique needs of each household; Consider systemic barriers to fairly accessing services and resources across subpopulations when developing referral and prioritization; Build provider capacity and support effective training in Fair Housing, ADA compliance, and non-discrimination; Affirmatively and effectively outreach to historically

			marginalized subpopulations and communities.
Western North Carolina Aids Project (WNCAP)	Public agency that addresses the housing and service needs of persons and family members with HIV and AIDS in all qualifying populations	Stakeholder interview; survey response	Expressed need for affordable housing units for very-low income and financial support for cost burdened households and resources to prevent homelessness and maintain housing for very low income/cost burdened households; Need to meet the basic needs of cost burdened households and those at risk of homelessness (food, medical care, medication) to promote housing stability. Due to limited funding- prioritize: Supportive Services, including financial assistance to maintain current housing, address transportation gaps, and support positive exits from shelter; Expand outreach efforts across the rural areas to connect isolated households in need of services and financial resources.
The Ernestine Walkingstick Domestic Violence Shelter	Victim Service Organization serving Domestic Violence, sexual assault, stalking, and human trafficking that provides services, shelter, and housing	Stakeholder interview	Need mental health, substance use and primary health care support across the region; legal assistance but focused on child custody and divorce for survivors and funding for ongoing rental assistance and homelessness prevention assistance; Address limited emergency shelter availability for general population who are not fleeing/attempting to flee domestic violence, sexual assault, stalking or human trafficking; Build capacity within victim service organizations to address human trafficking.
REACH of Clay	Victim Service Organization serving Domestic violence, dating abuse, sexual assault, human trafficking, and/or elder abuse	Stakeholder interview; survey responses	Expressed gap in affordable housing for all qualifying populations; Support low/-very low-income tenants and work to preserve existing rental housing inventory; Need support and financial resources for persons discharged to homelessness from institutions of care; Funding needed

			for transportation, child care, ongoing rental assistance and payment of arrears to keep survivors in a safe unit; Capacity building for the region's providers to ensure coordinated system of care.
REACH of Macon	Victim Service Organization serving Domestic violence, dating abuse, sexual assault, human trafficking, and/or elder abuse	Community meeting; stakeholder interview; survey response	Need additional affordable housing in the region and intense need for substance use and mental health treatment that is trauma informed; Substance use services need to be age appropriate for elderly population, especially in persons with cognitive impairment. Address gap in OBGYN healthcare and accessibility to forensic exam for survivors; Funding is needed for homelessness prevention, transportation costs, including repairs to personal vehicles for assisted households and financial assistance for child-care to support households achieve independence.
Area Agency on Aging	Public agency that addresses the needs of the elderly subpopulation within the qualifying populations in the participating jurisdiction	Stakeholder interview	Expressed gap in affordable housing to meet the needs of the aging population in the region; Gaps in mental health, transportation, and primary health care tailored to meet the needs of the rural elderly which is 30% or more of the total population in each county of the region. Telehealth options are often not accessible due to digital literacy and/or lack of broadband access.

Mountain Projects, Inc.	Public Housing Agency	Stakeholder interview; survey response	Need identified for affordable housing for all population types; Have voucher assistance available but cannot locate units. Need for Supportive Services targeting housing search, landlord/tenant mediation services, and case management to support stabilization and housing retention; Need funding in the region for security/utility deposit and ongoing utility assistance to qualifying populations to obtain and maintain housing as COVID response financial assistance funding is no longer available/limited but demand is not decreasing. Need social workers who could help manage tenant/landlord relationships, and help connect tenants to vital mental health and social services, to help avoid evictions; Transit costs for persons needing to access critical care, especially for services out of area.
Waynesville Housing Authority	Public Housing Agency	Stakeholder interview	Address gaps and needs with limited funding available in mental health services, life skills and supportive services, security and utility deposit assistance, and intensive case management for the qualifying populations; Address immediate service and housing needs of the unsheltered and sheltered homeless population as most counties in the region have limited or no access to general population emergency shelter.
Four Square Community Action	Public Housing Agency	Stakeholder interview; survey responses	Gap identified in affordable housing in the region- vouchers are difficult to use because of gap in affordable housing; Need for rental assistance greater than 12 months. Gap and need for outpatient health services, housing search/mediation and landlord/tenant services; Case

			<p>Management for housing retention-need qualified and informed social workers following holistic approach that address the individual's unique needs and coordinate care; Outreach and engagement services, Child care assistance needed for program participants; Transit assistance for rural areas in region also needed. Noted that data from various sources to better understand the needs of Cherokee, Clay, Graham and Swain Counties where health, housing, and social needs rank high; Intentional engagement of plans with those that provide the services and those to receive services should be factored into all decisions. Healthcare and housing resources and information need to be communicated to the community they are intending to serve.</p>
Macon Program for Progress	Public Housing Agency	Stakeholder interview; survey response	<p>Gap identified in affordable housing; Need for rental assistance greater than 12 months and deposit and utility assistance; Supportive Services targeting housing search, landlord/tenant mediation services, case management to support stabilization and housing retention; Need for employment assistance and job training; Gap noted in availability of mental health and primary care, especially with specialists; Need to support qualifying populations to maintain housing, as programs funded with other COVID sources that did provided safety net, are no longer available; Need to create both financial stability and supportive services to help people maintain housing and comprehensively address generational poverty.</p>

Haywood Pathways Center	Public agency that addresses the shelter, service, and housing needs of all qualifying populations	Stakeholder interview	Need additional investment as limited funding is not sufficient to address need for affordable housing across the entire region; Need affordable housing but primarily for disabled and the elderly who are disproportionately being displaced and entering the homeless system; Need for Bridge Housing/Transitional housing for persons discharged from institutions of care to maintain stability; Expand homelessness prevention financial assistance, rental assistance, and street outreach to unsheltered homeless households; Build capacity to support more robust, coordinated system to enable persons to connect to resources, especially healthcare and substance use treatment.
Hinton Center	Public agency that addresses the housing needs of income qualifying populations including Veterans, the elderly, and disabled	Community meeting; stakeholder interview	Need for Supportive Services, especially case management and housing retention support; Funding for life skills, health and literacy education; Address gap in emergency shelter for families; Need services targeted to youth/young adults to support healthy choices and financial independence; Incorporate capacity building into development of plan to support agencies engaging and serving the qualifying populations.
No Wrong Door	Public agency that addresses the mental health and/or substance use treatment needs of all qualifying populations	Stakeholder interview; survey response	Expressed need for Bridge Housing/Transitional Housing for persons exiting from institutions of care and holistic and comprehensive case management and transportation support, especially in more rural counties in the region as some resources are not available or accessible in the local community; Gap in mental health professionals to meet increasing demand; Capacity building to support smaller agencies

			that provide financial assistance and services to the qualifying populations.
Macon New Beginnings	Public agency that addresses the service needs of all qualifying populations	Stakeholder interview; survey response	Need funding for financial support of cost burdened households to address housing insecurity to ensure effective system response; Provide ongoing rental assistance and case management to meet immediate need as current voucher assistance available is not able to meet demand; Funding needed for supportive services such as mental health as some services may be accessible but not available as gap in providers is significant barrier to service delivery; Referral method should be direct from agencies to target assistance efficiently; Funding for life skills, credit/budgeting, food costs and intensive case management to meet unique needs of households and support stabilization; Fund capacity building to agencies providing essential services and financial resources.
Men's Teen Challenge of the Smokies	Substance Use recovery provider that addresses the needs of the qualifying populations	Stakeholder interview	Address gaps in Supportive Services: substance use services, including detox, outpatient care, and fund transportation assistance (both for providers and assisted households) to promote access to services and stability; general population emergency shelter is unavailable in most counties in the region. Prioritize: Security deposit and utility assistance, financial assistance (rent) for cost burdened households, including low-income wage earners in the region that provide essential services; Investment in supportive services/financial assistance is the best interim strategy to support the

			community until affordable development of can be achieved.
Full Circle Recovery Center and Smokey Mountain Harm Reduction	Substance Use recovery/Harm Reduction provider that addresses the needs of all qualifying populations	Stakeholder interview; survey response	Need affordable housing options for all qualifying populations, including financial assistance for low-income wage earners that provide essential services and are being displaced due to lack of affordable housing/loss of existing affordable housing inventory. Gaps: Intensive, effective case management, holistic approach to recovery, transportation resources, including assistance with restoration of driver's licenses as lack of transportation is a significant barrier to obtaining and maintaining housing; General population emergency shelter limited or unavailable across the region; Prioritize available funding for Supportive Services, including financial assistance, investment in street outreach, basic needs, food, and service delivery to unsheltered population.
Restoration House	Public agency that addresses the service and shelter needs of qualifying homeless and at risk of homelessness populations	Community meeting; stakeholder interview; survey responses	Expressed need for funding to support housing instability/cost burdened qualifying households, especially, generational households with children and low income elderly caring for children, transportation costs to close transit gaps, Mental health and substance use clinicians to coordinate discharges and community care, intensive case management and housing search assistance; Dedicated position to manage Coordinated Entry system if utilized as referral method; Build capacity/partnerships with PHAs and local developers to create dedicated homeless units in community.



The Salvation Army - Waynesville/WNC Mountain Mission	Public agency that addresses the needs of all qualifying populations	Stakeholder interview	Expressed need for funding to support outreach, housing search, intensive case management services, financial assistance to at-risk and cost burdened households, transportation costs, mental health and substance use to support coordination of care. Address food deserts/food insecurity, especially in more rural counties and isolated communities; Prioritize: rental assistance, homelessness prevention, security deposits, utility deposits, and ongoing utility assistance.
Agencies and Community Members within the Region	87 total responses including; homeless services, shelter, and housing providers, funders, victim service organizations, Veterans' programs, community members, local government, PHAs, mental health, substance use, and health care providers, and disability, education, and employment assistance providers.	HOME-ARP Needs and Gaps Survey: 12/16/2022 through 1/13/2023	See attached survey results and comments received.

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

Of the HOME-ARP eligible activities, the need for affordable housing across the region was noted by 88.5% of survey respondents as highest priority to meet the need across all qualifying populations and Supportive Services as second and third priority. However, over 70% of stakeholders interviewed prioritized use of funds for Supportive Services, noting the limited funding available, the large geographic area to serve, and that Supportive Services appeared to be an intentional and best use of funding to address the immediate needs of all the qualifying populations and would engender and support a coordinated, system response.

Within the Supportive Services activities, feedback received indicated the following areas of greatest need across all qualifying populations: case management, homelessness prevention (at risk) assistance, security/utility deposit assistance, ongoing financial assistance (rent and utility), mental health, and substance use treatment. Also noted, a significant need and gap in transportation assistance across all communities in the region. Child care assistance and employment readiness/training were also identified as a current need, with the goal of moving households to stability and independence. Additionally, stakeholders noted a marked increase in the elderly sub-population needing services and financial assistance across all the qualifying populations and commented on the significant inflow to the homeless response system of elderly persons, the disabled, and those households on fixed incomes that cannot afford to obtain and/or maintain housing in the current market.

Stakeholders indicated that the region lacks a dedicated homelessness prevention program to serve those at risk of homelessness, as opposed to targeted crisis response with limited funding availability, and noted that with limited general population shelter available in the area, utilizing funding to engage and support those at risk of homelessness and those households that are significantly cost burdened or experiencing housing instability, will decrease demand on the limited shelter system and allow homeless service and housing providers to actively engage literally homeless persons with housing assistance and services.

Stakeholders acknowledged that Supportive Services activities are an intermediate, yet necessary response to the issue of a lack of affordable housing for the qualifying population HOME-ARP funds are intended to support. However, it was also noted that Supportive Service programs will have a broad impact stabilizing those at risk of homelessness, promoting stability for those households that are cost burdened or experiencing housing instability, and ultimately creating a system level coordinated response to effectively assist all qualifying populations within the region obtain and/or maintain housing.

Based on the level of stated need expressed during the consultation period, and current data for the region, the state, and projected population growth of elderly persons in the Southwestern NC HOME Consortium's geographic area, the elderly subpopulation will receive preference in HOME-ARP activities.

## **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:*** 2/22/2023
- ***Public comment period:*** start date – 2/24/2023 end date – 3/10/2023
- ***Date(s) of public hearing:*** March 6, 2023

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

The public participation process and public comment period for the HOME-ARP Allocation plan began on February 24, 2023, and will conclude on March 10, 2023 (15 days). Four public notices were posted: a legal notice in the Mountaineer Newspaper, the Southwestern Commission HOME-ARP website, Haywood County's Courthouse, and Southwestern Commission's e-newsletter. The Southwestern Commission's e-newsletter has 2,207 unique subscribers. A public hearing is scheduled for March 6, 2023, at 9:30 a.m., at the Haywood County Courthouse. The public wishing to be heard at the public hearing were asked to be present. In accordance with the provisions of the Americans with Disabilities Act (ADA) persons with disabilities needing a special accommodation to participate in the hearing were asked to contact the Southwestern NC HOME Consortium staff member, Caroline LaFrienier, at least 48 hours prior to the scheduled meeting date. Translation and/or interpretation services were available upon request. An affidavit of publication for the public hearing can be found in Appendix II.

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

In addition to the four public notices listed previously, an email was distributed among all 196 stakeholders and survey respondents inviting their comments and feedback on the Southwestern NC HOME Consortium's draft Allocation Plan. Notices to the public and the Southwestern Commission's HOME-ARP page included a notice stating that arrangements would be made to provide technical assistance, review any or all parts of the Southwestern Commission HOME-ARP draft Allocation Plan, and engage in the consultation process in a manner effective for persons with disabilities or any person with Limited English Proficiency (LEP).

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

No public comments were received orally at the public hearing, but several were received in writing via email. All comments received can be found in Appendix I. Three comments (comments 2,3, and 6) received were requesting the Allocation Plan be amended to include a portion of the allocation amount for new construction of affordable rental housing. Another comment received (comment 1) requested that the preference identified in the plan be

amended to the following list: 1. Unsheltered individuals 2. Sheltered individuals/families age 62+ (including people from domestic violence shelters) 3. Sheltered individuals/families <62 years old (including people from domestic violence shelters) 4. Elderly households at imminent risk of homelessness 5. Non-elderly households at risk of imminent homelessness 6. Cost burdened elderly households 7. Cost burdened non-elderly households 8. Other qualifying populations. This comment also recommended changes to the demographic data in the plan. More specifically, the percentages of races counted in the Point in Time Count. The same comment requested a clarifying statement regarding the services that Vaya Health provides in the Southwestern NC HOME Consortium area and additional information regarding the written project/activity waitlist as the SW NC HOME Consortium's referral method. The final two comments (comments 4 and 5) received were in favor of the plan as it is written and provided support and some minor grammatical changes. Compiled comments can be found in Appendix I.

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

All comments received were considered in the preparation of the Southwestern NC HOME Consortium HOME ARP Allocation Plan. The request (comment 4) for grammatical change was accepted. The requests (comments 2, 3, and 6) for a portion of the allocated funds to be used for new construction rental housing projects were considered, although, given the limited funds allocated and the number of individuals and households that could be assisted through supportive services, the requests were not accepted.

A comment (comment 1) received requesting a shift in the identified preference was not accepted due to the qualitative data received through stakeholder interviews. The stakeholder interviews account for the expert service providers in the Southwestern NC HOME Consortium region who know the qualifying populations the best. The same comment requested a clarifying statement regarding the services that Vaya Health provides in the Southwestern NC HOME Consortium region. After further review of the statement in question, Vaya Health provides care management in the scope of its services in the Southwestern NC HOME Consortium region. Finally, the request for additional information regarding the referral method to be included in the Allocation Plan was not accepted as the method has not been finalized.

## **Needs Assessment and Gaps Analysis**

Through data collection and input from area stakeholders, the following information was generated to illustrate the needs identified and gaps that can be served by the Southwestern NC HOME Consortium's HOME-ARP allocation. All four broad categories of qualifying populations are captured in this analysis, including (1) Homeless, (2) At risk of Homelessness, (3) Fleeing or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, and (4) Other Populations as defined more thoroughly in the section below outlining

## Priority Needs for Qualifying Populations.

**Table 1: Homeless Needs Inventory and Gap Analysis**

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	67	20	48	48	0								
Permanent Supportive Housing	44	12	39	39	2								
Rapid Re-housing	40	13	48	48	12								
Sheltered Homeless						11	58	3	14				
Unsheltered Homeless						2	161	3	1				
Current Gap										2	1	161	161

**Data Sources:** 1. 2022 Point in Time Count (PIT); 2. 2022 Continuum of Care Housing Inventory Count (HIC); 3. PSH Provider for the CoC. The PIT, HIC, and PSH data represent only the Southwestern NC HOME Consortium's geographic area covered by the NC 503 Balance of State Continuum of Care. Veterans and Victims of Domestic Violence are subpopulations of the total population represented. 4. Updated 2022 PIT and HIC (provided on 3.15.2023)

**Note:** Data included in this gap analysis is from the 2022 Point-in-Time Count and the 2022 Housing Inventory County (HIC), which reflects a snapshot of the number of people experiencing homelessness (need) and the number of both beds available to temporarily shelter and beds/units to permanently house (HIC). Shelter bed utilization is not included as part of the PIT and is not reflected in the table. Therefore, this gap analysis represents a portion of the overall gap in the community.

**Table 2: Housing Needs Inventory and Gap Analysis**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	<b># of Units</b>	<b># of Households</b>	<b># of Households</b>
Total Rental Units	19,755		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	5,125		
Rental Units Affordable to HH at 50% AMI (Other Populations)	3,905		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,585	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,645	
<b>Current Gaps</b>			2,800

**Data Sources:** 1. 2015-2019 American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

**Table 3: Victim Service Organization/Domestic Violence Hotline Calls**

<b>July 2021-June 2022</b>		<b>Domestic Violence</b>	<b>Crisis Support</b>	
<b>County</b>	<b>Agency</b>	<b>Region</b>	<b>Hotline Calls</b>	<b>Chats</b>
Clay	REACH of Clay County, Inc.	Western	337	3
Graham	REACH of Cherokee-Graham County, Inc.	Western	2,303	400
Haywood	REACH of Haywood County, Inc.	Western	431	2
Jackson	Center for Domestic Peace	Western	124	4
Macon	REACH of Macon County, Inc.	Western	482	1
Swain	Swain/Qualla SAFE, Inc.	Western	1067	5

**Data Source:** 1. July 2021- June 2022 The North Carolina Department of Administration NC Council for Women and Youth Involvement's Domestic Violence and Sexual Assault data. Reach of Cherokee-Graham serves Cherokee County which is not currently part of the Southwestern NC HOME Consortium.

**Table 4: Victim Service Organization/Sexual Assault Hotline Calls**

<b>July 2021-June 2022</b>		<b>Domestic Violence</b>	<b>Crisis Support</b>	
<b>County</b>	<b>Agency</b>	<b>Region</b>	<b>Hotline Calls</b>	<b>Chats</b>
Clay	REACH of Clay County, Inc.	Western	73	0
Haywood	REACH of Haywood County, Inc.	Western	206	0
Jackson	REACH of Macon County, Inc.	Western	62	0
Macon	REACH of Macon County, Inc.	Western	91	4
Swain	Swain/Qualla SAFE, Inc.	Western	40	2

**Data Source:** 1. July 2021- June 2022 The North Carolina Department of Administration NC Council for Women and Youth Involvement's Domestic Violence and Sexual Assault data. Graham County is not reflected in this table.

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

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

The 2022 Region 1 Point in Time (PIT) count found 259 individuals experiencing literal homelessness at the time of the PIT count for the Southwestern NC HOME Consortium's six counties within the Balance of State NC 503 Continuum of Care (CoC). Of those persons, 163 were experiencing unsheltered homelessness, meaning 'living in a place not meant for human habitation' (e.g., car, shed, or outside).

NC 503 reported the following demographic data in the 2022 PIT count for sheltered and unsheltered homelessness in Region 1 that covers eight counties, six of which are in the Southwestern NC HOME Consortium geographic area. Of the persons counted, 84.6% identified as White, 7.6% identified as Black/African American, 3.4% identified as American Indian/Alaskan Native, 1% identified as Native Hawaiian or Pacific Islander and 3.4% identified as multiple races. The 2020 US Census Bureau Population Estimates API for the same geographic area shows: 85% White, 2% Black/African American, and 13% identified as other persons of color in the area's population. The data shows a significant overrepresentation for other persons of color and Black/African Americans in the homeless response system for the area.

In 2021, NC 503 did not conduct an unsheltered PIT count of the homeless population due to the COVID-19 pandemic, so no increase or decrease is reflected within the unsheltered population from 2021 to 2022. However, in 2020, the PIT count for the Southwestern NC HOME Consortium geographic area, showed a total of 274 homeless persons, 132 of those persons were unsheltered. The 2022 PIT count showed an increase of 31 unsheltered persons from the 2020 data collected.

NC 503 Region 1 from January 1, 2022 through December 31, 2022, recorded 893 total people in 487 households between the CoC region's Coordinated Entry, Supportive Services Only, Emergency Shelter, Rapid Re-Housing, and Permanent Supportive Housing projects. In 2022, the Region 1 Coordinated Entry project alone served 253 individuals, and completed 125 crisis assessments, and 111 housing needs assessments for those persons who were literally homeless. However, Coordinated Entry calls are recorded in the Homeless Management Information System (HMIS), which prohibits Victim Service Providers (VSP) from entering information, and instead, VSPs use an HMIS comparable database for data entry and therefore, the CE project does not record VSP data but will not refuse assistance if

a person is fleeing or attempting to flee domestic violence, dating violence, sexual assault or human trafficking.

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

Characteristics attributed to increased risk of homelessness include: household income of less than 30% of the Area Median Income (AMI) and experiencing housing cost burden of more than 50% of income or a history of housing instability (more than two moves within 60 days), increase the risk of experiencing literal homelessness. For those persons who experience housing instability and are most at-risk of homelessness, barriers to maintaining housing include: lack of employment and/or underemployment, lack of transportation, life-skills, disability, criminal history, lack of child care, and connection to supportive services. The Comprehensive Housing Affordability Strategy Data identified 3,741 renters with a cost burden of greater than 30%, but less than or equal to 50%. CHAS data also shows that 4,170 renters are experiencing a cost burden greater than 50% of their income. 7,911 renters in the Southwestern Consortium area are experiencing cost burden that is resulting in the household being at risk of homelessness. 38% of the total rental households in the Southwestern NC HOME Consortium region are cost-burdened. The CHAS data does not provide demographic information on the cost burdened individuals.

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

The North Carolina Department of Administration NC Council for Women and Youth Involvement's Domestic Violence and Sexual Assault data shows 2,909 calls to Domestic Violence service provider hotlines in July 2020-June 2021 in the Southwestern Consortium region. The same data source shows victim services providers served 119 persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking and/or human trafficking from July 2020 through June 2021. Additionally, a CoC Region 1 Annual Performance Report (APR), showed 189 adults responded 'Yes' to a history of Domestic Violence, 35 of whom were actively fleeing Domestic Violence. During the 2022 single night PIT count, 15 persons identified as victims of Domestic Violence.

According to The NC Council for Women and Youth Involvement's Domestic Violence data for the six counties in the Southwestern HOME Consortium reported 1,567 victims of domestic violence were served from July 1, 2021 through June 30, 2022. Of the population served, 1,284 identified as white, 46 Black/African American, 61 American Indian, 10 as Asian, 1 Native Hawaiian/Pacific Islander, and 55 identified as two or more races. Other races were 93 and 17 refused to identify. Of the 1,567 persons assisted with domestic violence resources/support, 102 identified as Hispanic/Latino and 1,451 as non-Hispanic/Latino, and 14 did not identify an ethnicity. Gender Identity for the population served, shows 27% men and 72% women and less than 1% identified as other or did not disclose. Of the 1,567 domestic violence victims served from July 1, 2021 through June 30, 2022, 242 identified as homeless or housing insecure.



Additionally, The NC Council for Women and Youth Involvement's Sexual Assault data for the five of six counties in the Southwestern HOME Consortium reported 370 victims of sexual assault were served from July 1, 2021 through June 30, 2022. Of the population served, 310 identified as white, 16 Black/African American, 2 American Indian, 1 as Asian, 1 Native Hawaiian/Pacific Islander, and 10 identified as two or more races. Other races were 25 and 5 refused to identify. The data shows of the victims who received resources/support for sexual assault, 21 identified as Hispanic/Latino and 345 as non-Hispanic/Latino, and 4 did not identify an ethnicity. Gender Identity for the population served, shows 18.3% men and 81% women and less than 1% identified as other or did not disclose. Of the 370 client's served in five counties from July 1, 2021 through June 30, 2022, 76 identified as homeless or housing insecure.

***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***

There is a large overlap between those at-risk of homelessness and households in need of assistance to prevent homelessness or at greatest risk of housing instability. Cost-burdened families pay a large share of their income towards their household expenses which includes rent, utilities, security deposits, repairs, maintenance, down payment, etc. Lack of financial assistance and supportive services is one of the primary issues highlighted in the consultations. The CHAS data shows rental households in the 0-50% AMI range make up an estimated 9,030 households who are cost burdened or severely cost burdened. The CHAS data does not provide demographic information on the cost burdened individuals.

***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):***

There are six shelters serving households experiencing homelessness or fleeing domestic violence, sexual assault, stalking and human trafficking in the region, with the majority of beds/units being congregate shelter. In the 2022 HIC, shelter bed utilization was not 100% across all providers. The lack of 100% utilization in January 2022 and the increase in unsheltered homelessness can be attributed to several factors: shelters operating under a COVID-19 safety protocol (increased social distancing), seasonally mild temperatures on the night of the PIT count, barriers to accessing shelter (sobriety, identification, e.g.), and shelter option availability in each county in the area and/or lack of transportation to an area with an appropriate shelter bed available.

Counties within the Southwestern NC HOME Consortium's geographic area that lack any general population shelter or only have individual shelter beds available, noted the need for family

shelter. The unsheltered count for the area may underrepresent the current need due to the difficulty of counting unsheltered homelessness in rural areas and the impacts of COVID-19 during the PIT count in January of 2022.

Data included in the gap analysis (Table 1) is from the 2022 Point-in-Time Count and the 2022 Housing Inventory County (HIC), which reflects a snapshot of the number of people experiencing homelessness (need) and the number of both beds available to temporarily shelter and beds/units to permanently house (HIC). Shelter bed utilization is not included as part of the PIT and is not reflected in the table. Therefore, this gap analysis represents a portion of the overall gap in the community.

Demand for supportive services, including financial assistance, was noted for the region across stakeholders. Qualified agencies exist to provide both financial assistance and supportive services needed to support households, but most agencies are operating at staff capacity and lack additional funding sources to expand outreach and services. Currently, there is not a homelessness prevention program for the region and most agencies rely on philanthropic and/or private donations to fund crisis response programs to assist households at risk of homelessness or those that are experiencing housing instability. A Haywood County agency that operates a small privately funded prevention program that is limited to Haywood County residents and could expand given additional resources to cover a larger area. An overwhelming number of providers serving the qualifying populations in the region noted the need for case management/supportive services, financial assistance (arrears, utility assistance), quality mental health and substance use care, transportation assistance, and childcare as needs to support those at risk of experiencing homelessness or those experiencing housing instability, retain and maintain existing housing. Also noted was the need to address institutional discharges within the qualifying subpopulation of at-risk, to prevent those persons from entering the shelter system.

There are two Federally Qualified Health Center's that operate in the Southwestern NC HOME Consortium region. The Appalachian Mountain Community Health Center has locations in Jackson County and Graham County. The Appalachian Mountain Community Health Center provides primary health care, behavioral health services, pediatric care and pharmacy services. Blue Ridge Health is another Federally Qualified Health Center that operates offices in Haywood, Jackson, Macon and Swain counties. Blue Ridge Health provides a range of services from family medicine, pediatrics, nutritional services, women's health, obstetrics and gynecology and behavioral health. Vaya Health provides supportive services such as care management, mental health, substance use disorder treatment and support for individuals with intellectual/development disabilities. Men's Teen Challenge of the Smokies provides substance use disorder treatment for men. The center is located in Macon County but can provide services

to individuals in the Southwestern NC HOME Consortium region and beyond. Mountain Projects, Macon Program for Progress and Four Square Community Action Inc. are community action agencies providing supportive services in the region for seniors, housing services, early childhood education and substance use treatment. Mountain Projects serves Haywood and Jackson counties providing senior services such as congregate nutrition programs, in home services, and food delivery services; Housing services such as housing rehabilitation, section 8, landlord services; Other services such as Head Start and Early Head Start for children ages birth to 5 years old, transportation and transit, Mountain Strong Prevention substance use treatment, and health insurance counseling. Macon Program for Progress serves Macon County providing: HUD rental assistance, adult and family supportive services to help individuals and families become self-sufficient through education, employment and life supports as well as Head Start early childhood education and childcare. Four Square Community Action Inc. serves Cherokee, Clay Graham and Swain Counties providing: weatherization assistance, urgent repair, essential single-family rehab, Section 8, Head Start early childhood education and childcare, and community services block grants.

***Describe the unmet housing and service needs of qualifying populations:  
Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

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

The unmet housing and service needs of the homeless population was revealed through stakeholder interviews and the Point in Time Count data. Although the Point In Time Count may not accurately represent the individuals experiencing homelessness, it still provides a snapshot of needs. The Point in Time Count and the Housing Inventory Count show a gap of 161 beds and 161 units for adults experiencing homelessness. Housing service providers mentioned un-used Section 8 vouchers due to lack of available housing stock. Stakeholder interviews also mentioned the unmet need for wrap around services. Individuals and households experiencing homelessness often require additional supportive services such as mental health treatment, assistance seeking employment, etc. to obtain and maintain housing.

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

Cost burden is the ratio of housing costs to household income. For renters- housing cost is gross rent (contract rent plus utilities). The 2015-2019 American Community Survey- Comprehensive Housing Affordability Strategy data states that 3,741 renters are experiencing cost burden of greater than 30% to less than or equal to 50% of their income. 4,170 renters are experiencing cost burden of greater than 50% of their income. With an approximate total of 20,771 renters in the Southwestern NC HOME Consortium region, 38%

are cost burdened. This data makes the overall need for more affordable housing clear. The lack of affordable housing challenges both populations recovering from homelessness and those households at-risk of homelessness or housing instability. Those at-risk of homelessness require short-term subsidies such as rental assistance to avoid eviction as well as utility or other financial assistance to maintain housing. The current coordinated entry system does not account for individuals or households at-risk of homelessness, therefore, more accurate data is not available. Several stakeholders interviewed identified unmet service needs such as supportive services funding to support mental health, substance use and primary care as well as funding for childcare, life skills training, employment assistance and transportation to access supportive services.

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

Consultations with domestic violence service providers expressed overwhelming need for mental health, substance use and primary health care support across the region; legal assistance but focused on child custody and divorce for survivors and funding for ongoing rental assistance and homelessness prevention assistance. There is a lack of service organization's capacity to address human trafficking. Domestic violence services providers expressed a need for funding for transportation, child care, and ongoing rental assistance and payment of arrears to keep survivors of domestic violence in safe units. A gap exists in OBGYN healthcare and accessibility to forensic exams for survivors of sexual assault and other acts of violence. Stakeholder consultations also revealed a need for financial assistance to repair personal vehicles of survivors and to assist survivor households in obtaining and retaining housing to achieve independence. Stakeholder interviews also identified unmet housing needs of individuals fleeing or attempting to flee violence. Some of the identified housing needs of these populations include ongoing rental assistance and homelessness prevention assistance as well as affordable housing.

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

There is a large overlap between those at-risk of homelessness and households in need of assistance to prevent homelessness or at greatest risk of housing instability. Lack of financial assistance and supportive services is one of the primary issues highlighted in the consultations. The need for mental health and substance abuse services was mentioned in many consultations. The consultations discussed the need for ongoing rental assistance and case management to meet immediate need. Funding is also needed for supportive services such as mental health as some services may be accessible but not available as gap in providers is significant barrier to service delivery. There is a need for funding for life skills, credit/budgeting, food costs and intensive case management to meet unique needs of households and support stabilization.

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

As mentioned previously, the lack of shelter opportunities is an obvious gap, but the housing inventory in our region is an issue that is causing financial distress to many individuals, especially the elderly, that may not have ever required financial assistance or supportive services before. The tourist nature of our region means that many houses are utilized for short-term rentals rather than long-term affordable housing. These homes being used for short-term rentals remove accessible housing stock from the market. As identified in the stakeholder interviews, there is a need for financial assistance to keep individuals in their homes and supportive services to care for their other needs such as mental health, access to food, access to childcare, job-seeking services, and counseling. All 30 stakeholders interviewed mentioned the need for additional supportive services to help individuals and households obtain and maintain housing.

Counties within the Southwestern NC HOME Consortium's geographic area that lack any general population shelter or only have individual shelter beds available, noted the need for family shelter. The unsheltered count for the area may underrepresent the current need due to the difficulty of counting unsheltered homelessness in rural areas and the impacts of COVID-19 during the PIT county in January of 2022.

***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 Southwestern NC HOME Consortium will not provide any additional characteristics associated with instability and/or increased risk of homelessness and not further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability" as established in the HOME-ARP Notice (CPD 21-10).

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

Based on the stakeholder engagement, priority needs for households experiencing homelessness, those at risk of homelessness, victims of domestic violence and/or sexual assault and other populations include additional affordable housing options as well as financial assistance. Stakeholder interviews revealed long waitlists for affordable housing options but also the need for financial assistance to keep individuals and families at risk of homelessness in their homes. Also identified was the need for mental and physical health services for all qualifying populations and additional support to improve the housing status and stability of households. Based on the funding amount allocated to the Southwestern NC HOME Consortium and the consultation results, the highest priority and best use of funds are supportive services.

Utilizing the HOME ARP funds for supportive services will help all qualifying populations obtain and maintain their housing status while increasing housing stability and overall well-being.

The North Carolina 211 service provides data for the top request categories. From February 21, 2022 to February 20<sup>th</sup>, 2023, a total of 153,789 calls were made to the service and a total of 295,392 requests for the counties in the Southwestern NC HOME Consortium area. The top request category was for housing and shelter and made up 42.6% of all requests. The second request category was for utilities and made up 19.7%. Of the individuals who called requesting information regarding housing and shelter, 38.4% were seeking assistance in finding a shelter, 25.5% were seeking assistance with low-cost housing, 22.9% were seeking assistance with their rent and 8.3% were seeking assistance to repair their home. The North Carolina 211 data identifies the priority need for qualifying populations in the Southwestern NC HOME Consortium region as the other top request categories were healthcare and COVID-19, employment and income, and government and legal. Of the individuals who called requesting information or assistance with utilities, 81.6% sought help with electric. Of the 7.7% who were seeking information or assistance with healthcare, 30.2% sought help with nursing homes and/or adult care. This data shows the priority need for supportive services for the elderly population.

***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 the gaps in the shelter, housing inventory, and service delivery systems were determined based on the Comprehensive Housing Affordability Strategy (CHAS) data and gap analysis as well as the consultations of community stakeholders, services providers, and the public. As mentioned previously, the Point in Time Count may not accurately represent the needs of the homeless and at-risk of homelessness populations, so the determination was made based on first-hand accounts of the service providers interviewed. Many shared the overwhelming needs as well as the frustrations they experience doing their best to serve the individuals in their communities. The gap analysis shows a gap of 2,800 houses to meet the current needs. The 2015-2019 American Community Survey (ACS) and the Comprehensive Housing Affordability Strategy showed a current inventory of 19,755 rental units. 5,125 rental units are affordable to households at 30% area median income (at risk of homelessness) and 3,905 rental units are affordable to households at 50% area median income (other populations). The level of need found 3,585 rental households in the 0-30% area median income range with 1 or more severe housing problems and 2,645 rental households in the 30-50% area median income range with 1 or more severe housing problems. Severe housing problems are incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room (crowding), and a cost burden greater than 50%. This data helped the Southwestern NC HOME Consortium determine the level of need and the gaps in the Participating Jurisdiction's shelter and housing inventory and service delivery systems.

## **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 Southwestern NC HOME Consortium will work with agencies, nonprofits, and other service providers that serve the qualifying populations and will be subrecipients of the HOME ARP funds. A formal application process will be established once the entire HOME ARP Allocation is received. Service providers will be notified of the opportunity to apply for funding and given an amount of time to provide an application to be reviewed by Consortium staff then the Consortium Board of Directors will make funding decisions.

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

Southwestern NC HOME Consortium will not administer HOME-ARP activities directly.

***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:***

Administrative funds will not be provided 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	\$ 1,572,591		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ #		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ 98,286	# %	5%
Administration and Planning	\$ 294,860	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,965,737</b>		

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

Southwestern NC HOME Consortium will release a Request for Applications (RFA) for service and housing assistance providers to request funding under HOME-ARP. Regional and community-based providers will be required to describe the intended use of funds, activities proposed, outcomes, and organizational capacity, to support the qualifying populations. The Southwestern NC HOME Consortium is governed by a Board of Directors with representation from each participating local government. Applications will be received by the Southwestern

Commission and presented to the Board of Directors. The Board of Directors meetings are always open to the public. The Board of Directors will review the applications and determine which organizations will receive funds based on community need/gaps identified in this plan, the organization's capacity and ability to serve the qualifying populations equitably across the Consortium region.

***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 characteristics of the shelter and housing inventory and the needs and gap analysis showed that there is a gap in services to provide financial assistance, mental health assistance, access to food, assistance with childcare expenses, and many other supportive services as well as affordable housing. While there is a significant need for new construction of affordable rental housing, there are multiple other agencies and federal funding streams addressing new construction of rental housing, and the amount of the Southwestern NC HOME Consortium allocation is not conducive to addressing the need for new construction of affordable rental housing. In order to help the greatest number of qualifying populations and address the needs identified through the analysis as well as stakeholder engagement, supportive services were the eligible activity identified as the best use of funds. The use of our allocation for supportive services was supported across the region. There is a great need for assistance to reduce housing instability, which includes mental health, job development, legal aid and other supportive services. There are needs in the service delivery system for all qualifying populations who have mental health needs and substance abuse disorders.

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

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

The Southwestern NC HOME Consortium will not produce or support the development of affordable rental housing units with its HOME-ARP allocation.

***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:***

The Southwestern NC HOME Consortium will not produce or support the development of affordable rental housing units with its HOME-ARP allocation.

## **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:***

The Southwestern NC HOME Consortium will give preference to the elderly subpopulation, individuals 62 years of age or older within all qualifying populations for all eligible activities.



The Southwestern NC HOME Consortium and its subgrantees shall comply with all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a) when applying the preference through its referral method.

***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:***

<b>Social and Economic Characteristics of Population, Age 65 and Older, 2021</b>						
<b>County in SW NC HOME Consortium Region</b>	<b>&lt;=100% Poverty</b>	<b>NC Percentage 100% Poverty</b>	<b>100-199% Poverty</b>	<b>NC Percentage 100-199% Poverty</b>	<b>With a Disability</b>	<b>NC Percentage with a Disability</b>
<b>Clay</b>	15%	9%	20%	20%	35%	34%
<b>Graham</b>	8%	9%	37%	20%	43%	34%
<b>Haywood</b>	8%	9%	22%	20%	34%	34%
<b>Jackson</b>	10%	9%	20%	20%	27%	34%
<b>Macon</b>	8%	9%	25%	20%	39%	34%
<b>Swain</b>	12%	9%	32%	20%	44%	34%

**Data Source:** 1. North Carolina Department of Health and Human Services Division of Aging and Adult Services County Profiles 2021

The North Carolina Department of Health and Human Services, Division of Aging and Adult Services provides county profiles for all counties in North Carolina each year. County profiles include demographic data for the 65 years of age and older population. By 2025, 1 in 5 North Carolinians will be over the age of 65. Macon and Clay counties are among the top five counties in North Carolina with the highest percentage of adults older than 60 years of age. The elderly population in the Southwestern NC HOME Consortium area already outnumbers the 0-17 year old population. In the next two decades in North Carolina, the population of individuals 65 years old and over will increase from 1.6 to 2.6 million.

Three counties in the Southwestern NC HOME Consortium region have more older adults living at or below the federal poverty level than the state average. All six counties in the Southwestern NC HOME Consortium region have older adults living at or near the poverty level: 10% of older adults in Jackson County, 15% in Clay County, and 12% in Swain County. Graham, Haywood, and Macon are all at 8%. In NC, the percentage of older adults statewide living with a disability is 34%. All six counties in the Southwestern NC HOME Consortium area have equal

percentages of older adults living with disabilities or greater than the statewide 34%. In Swain County, 44% of older adults are living with a disability and in Graham County, 43%. While the NC 503 PIT count data for 2022 does not identify if individuals experiencing homelessness are over the age of 62, the percentage of individuals living below, at, or near the poverty level in the region is an indication of the need for supportive services to help older adults obtain, maintain or retain housing. The percentages of individuals living below, at, or near the poverty level provides an indication of how many older adults are at-risk of homelessness and could increase housing stability with access to supportive services. From July 2021 to June 2022, Domestic Violence service providers assisted 88 individuals in the Southwestern NC HOME Consortium region that were age 60 or older, and 19 persons with sexual assault support and resources.

Stakeholder interviews also identified the elderly as a population experiencing increasing and unmet financial and supportive needs to either maintain, obtain or retain their housing status. Service providers that were interviewed as stakeholders identified supportive services such as mental health, outpatient medical services, and assistance with access to food as critical services that could increase housing stability and overall quality of life of older adults in the Southwestern NC HOME Consortium region. Based on the current data for the region, the state, and projected population growth of elderly persons, the demand for housing assistance and services will continue to increase, supporting the necessity for an elderly subpopulation preference.

## **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):***

The Southwestern NC HOME Consortium intends to use a written project/activity waitlist as the referral method for serving qualifying populations. Individuals or families will be accepted in accordance with the Southwestern NC HOME Consortium's stated preference, consistent with the approved Plan, and prioritization of households within the waitlist.

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

Not Applicable.

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

Not Applicable.

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

Not Applicable.

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

***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 Southwestern NC HOME Consortium is not funding rental housing or NCS, and therefore, there is no intent to limit eligibility for rental housing or NCS.

# APPENDIX I-

## Comments

## Received

## Comment 1

### Re: HOME ARP Allocation Plan DRAFT

External

Inbox



**Brian Alexander**

Mar 9, 2023, 11:24 AM (4 days ago) Reply

to me

Good morning, Caroline.

Thank you for the opportunity for public comment on the draft Southwestern NC HOME Consortium HOME-ARP Allocation Plan. Please accept the following comments on the NC Balance of State Continuum of Care's behalf.

- On page 17, the allocation plan states "Based on the level of stated need expressed during the consultation period, and current data for the region, the state, and projected population growth of elderly persons in the Southwestern NC HOME Consortium's geographic area, the elderly subpopulation will receive preference in HOME-ARP activities." The data tables in the plan do not show a breakdown based on age. As the CoC Lead collecting data for the counties of focus, NCCEH did not provide this information and the sources indicated in this sentence seem to imply that this is based on census data that while reliable does not always overlay with vulnerable populations and/or anecdotal evidence based on the feedback received through surveys and in-person consultations. When we look at age data on these counties for people experiencing homelessness, we see people aged 62+ in the system, but they did not show a more significant presence in the system than other age categories. And this population as counted in the PIT count also is more likely to be in a sheltered situation than an unsheltered situation. Based on the unsheltered data that has been included in the allocation plan and knowing that people living in places not meant for human habitation are more at-risk than people living in temporary shelter, it seems that a preference for people living unsheltered in places meant for human habitation is more appropriate. On pages 30-32, the data provided on elderly populations focuses on housed populations and projections for elderly households in subsequent years. While definitely a vulnerable population, a preference for people 62+ means that the planned supportive services funding will likely be used for people living in housing rather than people at greater risk who live in temporary shelter and/or places meant for human habitation. NCCEH suggests a prioritization schedule to be more inclusive of vulnerable populations as a preference for funds. Based on the data provided in the allocation plan, we suggest the following preferences: 1) Unsheltered individuals; 2) Sheltered

individuals/families age 62+ (including people from DV shelters); 3) Sheltered individuals/families < 62 years (including people for DV shelters); 4) Elderly households at imminent risk of homelessness; 5) Non-elderly households at risk of imminent homelessness; 6) Cost burdened elderly households; 7) Cost burdened non-elderly households; 8) Other qualifying populations.

- On page 21, the allocation plan states "NC-503 reported the following demographic data in the 2022 PIT count for sheltered and unsheltered homelessness in Region 1 that covers eight counties, six of which are in the Southwestern NC HOME Consortium geographic area. Of the persons counted: 41% identified as White, 4% identified as Black/African American, and 55% as other persons of color." We assume that this demographic data was pulled from a point-in-time infographic on the NCCEH website for Region 1. Unfortunately, the analysis of the infographic is not correct. The 55% indicated on the infographic includes other races other than White and Black/African American including Asian, Pacific Islander/Native Hawaiian, and people identifying as multiple races. However, the 55% also includes null values (refused or data not collected), meaning people that did not indicate a race. The NCCEH Data Center has reviewed the data, taking out the null values. By doing this, the race make-up for Region 1 in the NC Balance of State CoC is 84.6% people identifying as White; 7.6% people identifying as Black/African America; 3.4% people identifying as American Indian/Alaskan Native; 1% people identifying as Native Hawaiian or Other Pacific Islander; and 3.4% identifying as multiple races. I have attached an updated copy of the infographic for your attention.
- On page 24, the allocation plan states "Vaya Health provides supportive services such as case management, mental health, substance abuse disorder treatment, and support for individuals with intellectual and developmental disabilities." Vaya Health provides minimal supportive services directly. They do provide targeted case management services for CoC-funded PSH and the Transitions to Community Living Program. However, they contract with local behavioral health providers to provide mental health, substance abuse treatment, and support for the IDD population. This statement is somewhat misleading and might need a slight tweak to make it accurate.
- On page 32, we suggest more detailed information on the "written project/activity waitlist." Who will hold and manage this waitlist? How does the community prioritize populations based on vulnerability (see suggested preference list in bullet 1 above)? How do agencies not funded through HOME-ARP refer to the waitlist? How does the Consortium offer transparency in the referral and waitlist process?

If you have any questions, please feel free to reach out to us at any time. You can reach our team at [bos@ncceh.org](mailto:bos@ncceh.org).

## Comment 2



March 9, 2023

Dear Ms. LaFrienier,

I represent Givens Affordable Communities, which is connected to Givens Estates, in Asheville. Givens Affordable Communities is focused on building low to middle income senior housing in WNC with an emphasis on housing with supportive services. The Dogwood Health Trust has partnered with us to deliver this housing. We believe stable and safe housing, coupled with social work and community nurse support, allows seniors to age in place while freeing them to pursue active and enriching lives. We own and operate Givens Great Laurels, an affordable senior rental community with 100 apartments in Waynesville and Givens Gerber Park, an affordable senior rental community with 262 apartments in Asheville. We are actively looking to expand to the western counties. We recently worked with the Town of Franklin on a feasibility study to convert the Angel Medical Center into affordable senior housing. We have partnered with Mountain Projects for 15 years at Givens Great Laurels and are actively looking to partner with them to develop affordable housing in the Southwestern NC HOME Consortium's region. I am writing to provide our comments on the Consortium's HOME-ARP Allocation Plan Draft.

We have a deep commitment to providing supportive services and believe housing is the foundation upon which deeply impactful supportive services are built. As the allocation plan highlights, the region is experiencing an affordable housing shortage. Utilizing this rare funding solely on supportive services is a short-term solution that ends when the money is spent. Allocating 100% of the funds to supportive services would be a missed opportunity to develop more affordable housing, which is the long-term solution to the current housing crisis. Simply put, how will a housing counselor or social worker support someone in a housing crisis if the lack of housing remains the root problem?

It is incredibly difficult to win awards for Low Income Housing Tax Credits (LIHTC) to develop affordable housing in the western region. Reliance on LIHTC alone will never help us close the severe housing gap we are experiencing. Federal funds to develop low-income senior housing are available through the HUD 202 program but a successful application for these funds requires a commitment of funds from local sources such as the Consortium. We had hoped to apply for funds to support a 2023 HUD 202 application for Jackson County and were disappointed to see that would not be possible under the proposed plan.

Using some of the HOME ARP funds to develop more affordable housing would address the root issue while providing the foundation to deliver robust, impactful supportive services. Please consider allocating at least half of your allocated HOME-ARP funds for developing affordable rental housing in the Consortium's region.

Thank you for your consideration. We are excited the HOME Consortium has formed and look forward to the impact it will have on the region. We are looking forward to introducing ourselves to the board and working to develop affordable housing together.

Sincerely,

A handwritten signature in dark ink, appearing to read "Teresa Stephens", is written over a horizontal line.

Teresa Stephens  
Vice President of Affordable Housing  
Givens Affordable Communities

2360 Sweeten Creek Road  
Asheville North Carolina  
28803

(828) 575-1418  
(828) 771-2232 Fax

[givenscommunities.org](http://givenscommunities.org)

## Comment 3

Hi Caroline!

I hope you are well and I know you are busy with both the consortium as well as this HOME-ARP Process. Thank you for all you do!

I wanted to reach out with some concerns we had around the Draft Allocation Plan not allotting any funds as usable for the production of new affordable units or capital projects that are going to be able to have a lasting impact on the community.

The plan itself states, "Need for affordable housing across the region was noted by 88.5% of survey respondents as the highest priority to meet the need across all qualifying populations." Furthermore, many of the supportive service areas identified as greatest areas of need such as case management and financial assistance are needs directly tied to the fact that there is a shortage of unit availability, creating these issues in the first place. It is worth recognizing the importance of possible *immediate* supportive service responses that can mitigate the unexpected and extraordinary impacts COVID had in exacerbating housing instability. However, not being able to use these funds to treat root causes seems like just kicking the can down the road while the housing shortage only grows. While the needs of the SWC region are unique, both NCHFA at the state level and the Asheville HOME consortium have recognized this and are using their HOME-ARP funds significantly for unit production.

It is our opinion that the spirit of ARPA funding is meant to be a catalytic injection for more upstream prevention rather than a finger in the wheel approach. As you know, the SWC service region is one with typically sparse resources for affordable housing, making production difficult because of financial infeasibility. I would like to remove our personal stake of Balsam Edge in this matter and mention potential other developers, both multi-family and single family. For a potential developer, access to these funds could very well be the difference between a project in this region being feasible and not being able to pursue a project in this region at all.

Housing is such a multi-faceted issue and for that reason I know there is no absolutely correct way to go about allocating this, however I do hope you all will consider amending this so that developers across the region can tap into this significant pool of resources. I also wanted to share comment with you directly rather than in a public setting, but let me know if some sort of public comment is helpful or appropriate without causing headache for you all.

Thanks again for how efficient and well managed you are making this process and thank you for entertaining our concerns!

Adeline



## Comment 4

Caroline,

I've read through the draft. I think it looks good. The only question I have is on page 31 (second paragraph- second and third sentence). It lists Graham, Clay and Swain in the second sentence, and then repeats Graham and Clay. Is that supposed to be Haywood and Jackson?

Mike

## Comment 5

Thank you Caroline—that is helpful information regarding the current funds.

I am very encouraged by the plan for the HOME-ARP funds. In the big picture, \$1.9M is not much money for the entire catchment area, especially for building enough low income housing to make a dent in the need. While I am glad that there are so many people voicing the immediate and overwhelming need for affordable housing, dedicating this allotment to supportive services is a wise decision in my opinion. I also appreciate the preference and focus on those who are elderly and/or disabled. Thank you for all the work you and your team put into this and for the advocacy and education efforts put forth, especially towards those who have local decision-making power.

Mandy Haithcox

Executive Director

Haywood Pathways Center

179 Hemlock Street

Waynesville, NC 28786

(828) 246-0332

[www.haywoodpathwayscenter.org](http://www.haywoodpathwayscenter.org)

## Comment 6

Hi, Caroline.

First, we want to thank you for all of the hard work that you and your team put into this draft. I know when I completed my telephone interview, Christiana was very thorough and really paid attention to my thoughts and comments.

As you know, Mountain Projects is invested in developing and providing affordable housing in Haywood and Jackson Counties. However, it is simply not possible to develop affordable housing without support, specifically in the way of gap funding. While we work with many partners and apply for as many funds as possible, we still need HOME funding to assist in the development of affordable housing.

Thank you again for your time and hard work. Your efforts and support are so appreciated!

Brooke

Brooke Smith, Assistant Director  
Mountain Projects, Inc.

2177 Asheville Rd, Waynesville, NC 28786

828.492.4106

[www.mountainprojects.org](http://www.mountainprojects.org)

I am so grateful to work for Mountain Projects, because every single day we strive to meet the needs of our community, whether it is a single individual's need or a community-wide need. Mountain Projects truly makes Haywood and Jackson Counties a better place to live.

# APPENDIX II-

## Affidavit of Publication

CLIPPING OF LEGAL  
ADVERTISEMENT  
ATTACHED HERE

NORTH CAROLINA  
HAYWOOD COUNTY

AFFIDAVIT OF PUBLICATION

Before the undersigned, a Notary Public of said County and State, duly commissioned, qualified, and authorized by law to administer oaths, personally appeared \_\_\_\_\_

Reatha King who being first  
duly sworn, deposes and says: that he (she) is

Publisher  
(Owner, partner, publisher, or other officer or employee authorized to make this affidavit)

of THE MOUNTAINEER  
engaged in the publication of a newspaper known as  
THE MOUNTAINEER published, issued, and entered as second  
class mail in the City of  
WAYNESVILLE

in said County and State; that he (she) is authorized to make  
this affidavit and sworn statement; that the notice or other legal  
advertisement, a true copy of which is attached hereto, was  
published in THE MOUNTAINEER on the following dates:

February 23, 2023

and that the said newspaper in which such notice, paper, document,  
or legal advertisement was published was, at the time of each and  
every such publication, a newspaper meeting all of the requirements  
and qualifications of Section 1-597 of the General Statutes of North  
Carolina and was a qualified newspaper within the meaning of  
Section 1-597 of the General Statutes of North Carolina.

This 23rd of February, 2023  
Jonas E. King  
Signature of person making affidavit

Sworn to and subscribed before me, this 23rd

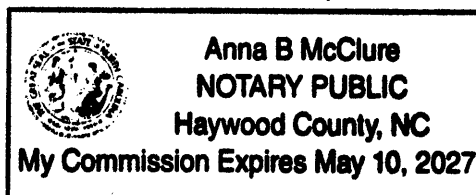
day of February, 2023

Anna B. McClure  
My Commission expires: May 10, 2027

Notary Public

AFFIDAVIT OF PUBLICATION

Issued by  
THE MOUNTAINEER  
Waynesville, NC 28786



**Notice of  
Public Hearing  
Regarding Southwestern  
NC HOME Consortium's  
HOME ARP  
Allocation Plan**

**TAKE NOTICE** that the Haywood County Board of Commissioners will hold a Public Hearing on Monday, March 6, 2023 at 9:30 a.m. during the regular meeting of the Haywood County Board of Commissioners in the Historic Courtroom of the Haywood County Historic Courthouse located at 215 North Main Street, Waynesville, NC 28786.

The hearing is regarding the Southwestern NC HOME Consortium's HOME ARP Allocation Plan developed in accordance with the U.S. Department of Housing and Urban Development requirements. The proposed Allocation Plan can be viewed on the Southwestern Commission's website at: [www.regiona.org/home-arp](http://www.regiona.org/home-arp).

The purpose of this hearing is to give the public a chance to share their opinion. Please contact Caroline LaFrienier at [caroline@regiona.org](mailto:caroline@regiona.org) or 828-586-1962 ext. 218 with any questions or comments. The public was also invited to provide comments on the Annual Action Plan during a 30-day comment period, from October 18, 2022 to November 22, 2022.

Persons wishing to be heard at the public hearing are asked to be present. The County Commissioners may adopt reasonable rules governing the conduct of the hearing including (i) fixing the maximum time allotted to each speaker, (ii) providing for the designation of spokesmen for groups of persons supporting or opposing the same position, (iii) providing for the selection of delegates from groups of persons supporting or opposing the same positions when the number of persons wishing to attend the hearing exceeds the capacity of the hall, and (iv) providing for the maintenance of order and decorum in the conduct of the hearing.

In accordance with the provisions of the Americans with Disabilities Act (ADA) persons with disabilities needing special accommodation to participate in this hearing should contact the phone number below at least 48 hours prior to the scheduled meeting date. Translation and/or interpretation services may be available upon request. If you have Limited English Proficiency (LEP), please notify Caroline LaFrienier at 828-586-1962 ext. 218.

Para obtener información adicional, visite el sitio web mencionado anteriormente. Los servicios de traducción pueden estar disponibles a pedido.

This the 22nd of February  
2023.

s/ Amy L. Stevens,  
Clerk to the Board  
Haywood County Board of  
Commissioners

No. 37004  
February 22, 2023

APPENDIX III-  
SF-424, SF-  
424B, SF-424D  
and  
Certifications

## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:


1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

  
\_\_\_\_\_  
Signature of Authorized Official

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Title



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

NC 11

\* b. Program/Project

HOME

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

09/20/2021

\* b. End Date:

09/30/2030

**18. Estimated Funding (\$):**

\* a. Federal

1,965,737.00

\* b. Applicant

\* c. State

\* d. Local

\* e. Other

\* f. Program Income

\* g. TOTAL

1,965,737.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name:

Bryant

Middle Name:

\* Last Name:

Morehead

Suffix:

\* Title:

County Manager

\* Telephone Number:

828-452-6625

Fax Number:

\* Email:

\* Signature of Authorized Representative:



\* Date Signed:

2/27/2023

## Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

02/28/2023

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Haywood County

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

56-6001524

**\* c. UEI:**

**d. Address:**

**\* Street1:**

215 N Main St

**Street2:**

**\* City:**

Waynesville

**County/Parish:**

**\* State:**

NC: North Carolina

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

28786-3869

**e. Organizational Unit:**

**Department Name:**

Community and Economic Develop

**Division Name:**

Community Development

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

**\* First Name:**

Caroline

**Middle Name:**

**\* Last Name:**

LaFrienier

**Suffix:**

**Title:**

Senior Project Manager

**Organizational Affiliation:**

Southwestern Commission Council of Governments

**\* Telephone Number:**

828-586-1962

**Fax Number:**

**\* Email:**

caroline@regiona.org

## Application for Federal Assistance SF-424

\* 9. Type of Applicant 1: Select Applicant Type:

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

\* 10. Name of Federal Agency:

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

\* 12. Funding Opportunity Number:

\* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

\* 15. Descriptive Title of Applicant's Project:

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

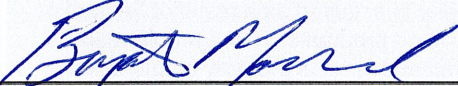
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes, regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	County Manager ✓
APPLICANT ORGANIZATION	DATE SUBMITTED
Haywood County	2/27/2023

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

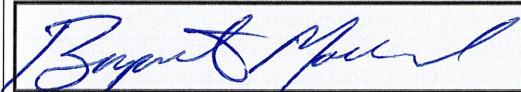
**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE County Manager ✓
APPLICANT ORGANIZATION Hayward County	DATE SUBMITTED 2/07/2023