



Charter County of Wayne, Michigan  
HOME Investment Partnerships Program  
American Rescue Plan Allocation Plan  
(HOME-ARP)  
*Substantial Amendment*



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## Summary of Changes

The Charter County of Wayne completed a substantial amendment to the approved HOME-ARP Allocation Plan to include preferences for the Non-Congregate Shelter (NCS) activity. Substantial Amendments are required when preferences, limitations, and methods of prioritization are changed. Wayne County also consulted additional organizations and agencies in compliance with the HOME-ARP requirements. The agencies consulted and their feedback are listed in Table 2. Additional data was included in the Needs Assessment and Gaps Analysis to adequately justify the addition of a preference, including data on 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 and the gaps in these resources. Consistent with the County's Citizen Participation Plan and waivers under the HOME-ARP program, the County provided the public a 15-day comment period.

## Overview

The American Rescue Plan (ARP) Act of 2021 has provided \$10,288,375 to the Charter County of Wayne to provide housing, services, and shelter to individuals experiencing homelessness and other vulnerable populations. This HOME - ARP Allocation Plan outlines the consultation, public participation, needs assessment and gap analysis, proposed funding activities and production housing goals.

## Consultation

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

In keeping with the requirements listed in Notice-21-10 of the Community Planning and Development Division of the U.S. Department of Housing and Urban Development (HUD), the Charter County of Wayne consulted with the following required entities to identify unmet needs and gaps in housing or service delivery systems prior to establishing an Allocation Plan for the expenditures of HOME-ARP funds: CoC serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

Consultation efforts included thirty-four Urban County Community Development Block Grant Participating Jurisdictions; four Wayne County HOME Consortium Participating Jurisdictions; sixteen Public Housing Authorities operating in the County of Wayne; the Continuum of Care, one homeless service provider, one victims services provider, one county-wide veterans' group, one agency that addresses fair housing, one agency that addresses civil rights, one agency that addresses people with disabilities and two agencies that address the needs of the qualifying populations.

Each organization was provided with the amount of HOME - ARP funding allocated to Wayne County on April 28, 2021, a copy of Notice CPD-21-10 and a request for input as to how the funds should be spent. A listing of each agency contacted is provided along with a contact sheet of Housing Commissions and local agencies (attached) and any feedback received is summarized. Each Urban County CDBG Participating Jurisdiction received two emails - one to the chief elected official and one to the staff person listed as the primary contact for the CDBG Program. The emails included information about the HOME-ARP program and requested feedback from the agencies on the needs and gaps in the community.

In addition to the feedback identified in the below charts, additional feedback was solicited to address two specific Qualifying Populations as outlined below. Additional feedback was received via one-on-one meetings and telephone conversations from Samaritas (homeless service provider), First Step (victims service provider) and Fair Housing Center of Detroit.

- Homeless (1), (2), (3),
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

#### Homeless (1), (2), (3)

Service providers noted there is a continued need for emergency shelter services for single adults (especially men), families, and seniors (adult children are looking for housing for their elderly parents). There is a need for more affordable housing (people who are currently in a shelter can't get housing because it is not affordable (rapid re-housing) and due to COVID, families stayed in shelter longer. Providers note people exiting shelter can't find quality housing at an affordable amount and then utilities are added onto the cost of the property, it becomes more cost prohibited. Wayne County currently does a pretty good job with service provision working with community partners if nothing is available. Providers also note the need for direct wages for staff (staffing issues).

#### Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Domestic violence by its nature has many faceted needs: crisis need for immediate safe housing and long-term affordable housing for individuals and families. Wayne County has an emergency shelter with 42 beds that accept any survivor of domestic violence, sexual assault, or human trafficking at no cost to the resident, but demand is so great that it is estimated that 100-150 people are turned away each year. More than 5,000 domestic violence survivors are served annually in Wayne County by a few agencies, providing counseling and housing assistance. Local agencies have indicated that there is a shortage of qualified staff, and the availability of safe affordable housing is far short of the need. It is

estimated that domestic violence is far under reported and with an enhanced community outreach program more victims would come forward to receive assistance.

As part of the substantial amendment to this plan, additional organizations were consulted to ensure all required agencies were consulted. Additional organizations were contacted to obtain feedback that had not responded previously. Organizations that were contacted along with their comments are identified in below.

Providers noted there is not enough staff to meet the need and not enough beds. There is a huge need for safe, affordable housing, shelter beds and supportive services.

List the organizations consulted:

*Table 1 Organization Consulted, initial*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>QP Served</b>	<b>Method of Communication</b>	<b>Feedback</b>
City of Allen Park	CDBG PJ	QP2	Email	none
City of Belleville	CDBG PJ	QP2	Email	none
Township of Brownstown	CDBG PJ	QP2	Email	none
City of Ecorse	CDBG PJ	QP2	Email	none
City of Flat Rock	CDBG PJ	QP2	Email	none
City of Garden City	CDBG PJ	QP2	Email	none
City of Gibraltar	CDBG PJ	QP2	Email	none
City of Grosse Ile	CDBG PJ	QP2	Email	none
City of Grosse Pointe	CDBG PJ	QP2	Email	Build Housing for Homeless Individuals
City of Grosse Pointe Farms		QP2	Email	none
City of Grosse Pointe Park	CDBG PJ	QP2	Email	none
City of Grosse Pointe Shores	CDBG PJ	QP2	Email	none
City of Grosse Pointe Woods	CDBG PJ	QP2	Email	none
City of Hamtramck	CDBG PJ	QP2	Email	none
City of Harper Woods	CDBG PJ	QP2	Email	none
City of Highland Park	CDBG PJ	QP2	Email	none
Township of Huron	CDBG PJ	QP2	Email	none
City of Inkster	CDBG PJ	QP2	Email	none
City of Melvindale	CDBG PJ	QP2	Email	none
City of Northville	CDBG PJ	QP2	Email	none
Township of Northville	CDBG PJ	QP2	Email	none
City of Plymouth	CDBG PJ	QP2	Email	none
Township of Plymouth	CDBG PJ	QP2	Email	none

City of River Rouge	CDBG PJ	QP2	Email	Housing Rehabilitation
City of Riverview	CDBG PJ	QP2	Email	none
City of Rockwood	CDBG PJ	QP2	Email	none
City of Romulus	CDBG PJ	QP2	Email	TBRA and Supportive Services
City of Southgate	CDBG PJ	QP2	Email	none
Township of Sumpster	CDBG PJ	QP2	Email	none
City of Trenton	CDBG PJ	QP2	Email	none
Township of Van Buren	CDBG PJ	QP2	Email	none
City of Wayne	CDBG PJ	QP2	Email	none
City of Woodhaven	CDBG PJ	QP2	Email	none
City of Wyandotte	CDBG PJ	QP2	Email	none
City of Dearborn	HOME PJ	QP2	Email	none
City of Lincoln Park	HOME PJ	QP2	Email	none
City of Livonia	HOME PJ	QP2	Email	none
City of Taylor	HOME PJ	QP2	Email	none
Allen Park Housing Commission	PHA	QP2, QP4	Email	none
Dearborn Housing Commission	PHA	QP2, QP4	Email	none
Ecorse Housing Commission	PHA	QP2, QP4	Email	none
Hamtramck Housing Commission	PHA	QP2, QP4	Email	none
Highland Park Housing Commission	PHA	QP2, QP4	Email	none
Inkster Housing Commission	PHA	QP2, QP4	Email	none
Lincoln Park Housing Commission	PHA	QP2, QP4	Email	none
Livonia Housing Commission	PHA	QP2, QP4	Email	none
Plymouth Housing Commission	PHA	QP2, QP4	Email	none
River Rouge Housing Commission	PHA	QP2, QP4	Email	none
Rockwood Housing Commission	PHA	QP2, QP4	Email	none
Romulus Housing Commission	PHA	QP2, QP4	Email	none
Taylor Housing Commission	PHA	QP2, QP4	Email	none
Wayne Housing Commission	PHA	QP2, QP4	Email	none
Westland Housing	PHA	QP2,	Email	Capital Improvements at

Commission		QP4		the Wayne County Family Center; Supportive Services
Community Living Services	Disability Services Provider	QP2, QP4	Email	Development of Housing for Disabled Individuals
Fair Housing Center of Detroit	Fair Housing Advocate	QP2, QP4	Email	none
First Step	Domestic Violence Service Provider	QP3	Email	none
NAACP Western Wayne County	Civil Rights	QP3	Email	none
National Faith Homebuyers	Service Provider		Email	none
Samaritas	Homeless Service Provider	QP1, QP3, QP4	Email and Public Hearing Comments	Supportive Services for Homeless Placement and Assistance; Assistance for Refugees
Wayne County Veteran Services Office	Veteran Services Agency	QP4	Email	none
Wayne County Land Bank	Public Agency		Email	Increase Land Bank's Housing Rehab Program; Create Affordable Housing Units
Wayne Metropolitan Community Action Agency	Homeless Service Provider	QP1, QP2, QP3, QP4	Email	Development of Housing for Refugees; Housing Counseling Supportive Services; CHDO Capacity Building

Table 2 Organizations Consulted, Substantial Amendment

Organization Contact	Organization Type	QP served	Method of Consultation and date	Feedback
First Step	Shelter for Domestic Violence and Sexual Assault Victims	QP3	Phone Call Oct 2022	There are not enough beds to meet the need for victims of domestic violence (100-150 people are turned away annually); Need for safe, affordable housing.
Charter County of Wayne Economic Development Department	Public Agency	QP 4	In person meeting June 2023	Safe housing options are needed along with more shelter space esp. in winter months. Resources needed: Mental health, help with addictions, training for persons in QP's to eliminate barriers, short term and long-term resource assistance.
Fair Housing of Detroit	Nonprofit that supports and encourages equal housing opportunities	QP2, QP4	Phone call and follow up email Oct 2022	More affordable housing is needed along with training regarding rental rights; Individuals using Section 8 have a hard time finding rental property.
Out Wayne County Continuum of Care	CoC	QP1, QP4	Continuum of Care Out-Wayne County Gaps Analysis 2021 - Quality Performance and HMIS Committee feedback solicitation	Lack of affordable housing options which increases the length of stays within the shelters; Housing options are more limited for people with pets, high utility balances and general lack of knowledge on how to navigate the rental housing market; Shelter needs outweigh the CoC's capacity.

Samaritas	Homeless Service provider	QP1, QP2, QP3, QP4	Meeting and follow up email Oct 2022	Need housing for single men and more housing for families. Affordable housing for parents' w/children and seniors. Difficult to find quality housing w/utilities included. More rapid re-housing that's affordable.
United Way of Southeastern Michigan	Nonprofit that partners to help families become stable and ensure children have the support they need to thrive	QP1, QP2, QP3, QP4	Phone call and email	Awaiting response
Department of Veterans Affairs	Veteran service provider	All 4 QPs	Phone call	Awaiting response
Detroit Vet Center- Permanently Closed	Veteran services provider	QP4	Disconnected phone	No longer in business
The Wayne County Human Trafficking Task Force	Public Agency  (includes partners from Wayne County Executive's Office, Public Works Department, Juvenile and Youth Services, and Public Health Division and the Federal Bureau of Investigations - Detroit Office, Sanctum House	QP 3	Used data from taskforce website.	According to the Wayne County Human Trafficking Task Force, 1,000 contacts were made to the U.S Human Trafficking Hotline from Michigan, identifying more than 800 victims, 153 traffickers and 62 trafficking businesses.



Wayne County Veteran's Services	Provides financial hardship and support services to Wayne County's honorably discharged veterans and their families so they can meet their basic needs.	QP4	Phone call and email	Awaiting response.
Wayne Metropolitan Community Action Agency	CoC Lead	QP 1, QP2, QP3, QP4	Phone call Oct 2022	Need for street outreach and rapid rehousing. Utilize the coordinated entry system to prevent homelessness.

QP1 = HOMELESS;

QP2 = AT-RISK HOMELESS;

QP3 = FLEEING, OR ATTEMPTING TO FLEE, DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING, OR HUMAN TRAFFICKING; and

QP4 = OTHER POPULATIONS

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

Email feedback was received from community agencies about the unmet needs of this jurisdiction. The majority of the responses were concerns for lack of affordable housing and the need for rehabilitation of older homes. Additionally, two responses indicated a need for housing and supportive services for incoming refugees.

Additional feedback was obtained through personal conversations and email correspondence. Six local entities, serving the four QPs, resoundingly stated that affordable and safe housing is in short supply and a priority need in Wayne County. The need is for emergency shelter housing and for long-term housing for singles, small and large family units. Elderly, victims of domestic violence, and single men were specifically mentioned.

## 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:

Two public hearings were held for comment of the draft Allocation Plan as follows:

### 1st Public Hearing:

- *Date(s) of public notice: 10/29/2021*
- *Public comment period: start date - 11/15/2021 end date - 11/29/2021*

- *Date(s) of public hearing: 11/11/2021*

#### 2<sup>nd</sup> Public Hearing:

- *Date(s) of public notice: 10/13/2022*
- *Public comment period: start date - 10/18/2022 end date - 11/2/2022*
- *Date(s) of public hearing: 10/19/2022*

#### Substantial Amendment Public Comment

- *Date(s) of public notice: 10/18/2023*
- *Public comment period: start date – 10/19/2023 end date – 11/02/2023*

#### Describe the public participation process:

As required by its current Public Participation Plan adopted for the Community Development Block Grant, HOME Investment Partnerships Program and Emergency Solutions Grant Programs, Wayne County published a Public Notice regarding the availability of HOME-ARP funding in the Detroit News on October 29, 2021, and October 13, 2022. The notices identified the amount of funding available, as well as a brief description of the types of projects that could be funded. The URL for the CPDC Notice outlining the program in detail was also provided in the published notices. The notices listed a fifteen-day comment period wherein the citizens could review the proposed Allocation Plan and provide comments to Wayne County. The notices also listed a public hearing which was held on November 11, 2021, and October 19, 2022, virtually, that allowed citizens to provide comments which the County would consider in finalizing the Allocation Plan.

Notices were posted in compliance with PA 267 of 1976 as amended (Open Meetings Act), MCLA 41.71 a (2) (3) and the Americans with Disabilities Act (ADA) and provided information about available accommodations.

For the substantial amendment, the County published a Notice in the Detroit News. The URL for the substantial amendment was provided in the published notice. The notice listed a fifteen-day comment period wherein the citizens could review the proposed substantial amendment and provide comments to Wayne County. The notice was posted in compliance with PA 267 of 1976 as amended (Open Meetings Act), MCLA 41.71 a (2) (3) and the Americans with Disabilities Act (ADA) and provided information about available accommodations.

#### Describe efforts to broaden public participation:

In addition to publishing notices in the Detroit News, a copy of the HOME-ARP Public Notice was also listed on the County's website, as well as being posted on the meeting board in the Guardian Building, which is the site of the County's administrative offices. The County met with every municipality individually to discuss their needs. The communities were asked to provide the County with a list of their transformational projects.

In addition to publishing notices in the Detroit News, a copy of the HOME-ARP Substantial Amendment was listed on the County's website. The Notice was posted on the meeting board in the Guardian Building, which is the site of the County's administrative offices.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing and state the reasons why any recommendations were not accepted:

*EXCERPT FROM THE NOVEMBER HEARING MINUTES:*

Community Development Division Director, Terry Carroll, explained in detail the HOME-ARP HUD funds to be received by Wayne County. He pointed that one of the significant differences in administering these funds is that the County was required to reach out to over 70 organizations to solicit their views as to how these funds should be spent.

- Staff from Samaritas spoke about their needs for funding of services to support the re-settlement of Afghanistan refugees that they have undertaken. They anticipate 220 Afghanistan refugees over the period of the next year.
- Samaritas staff also voiced their opinions that a significant portion of these funds should be allocated to the provision of services for refugees.

*EXCERPT FROM THE OCTOBER HEARING MINUTES:*

*An overview of the 2021 HOME Investment Partnership Program – American Rescue Plan* was provided. The information provided included a summary of the four qualifying populations eligible for the program funds: 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 (other families not included under the other categories requiring services or housing assistance to prevent homelessness and families at risk of housing stability), entities that were consulted and funding areas for a total grant amount of \$10,288,375.

- International Gospel Center, shared information regarding a \$11 million project for a 30-unit Family Center in Inkster to help alleviate the housing gap.
- Director of Samaritas Family Center, agreed that a new congregate shelter is a great way to keep supporting larger families and keep families together.

A total of eight responses to the emails sent were received - Three from Wayne County communities; one from a Public Housing Authority; four from non-profit organizations (the exact recommendations and the entity making them are listed in the List of Organizations Consulted which is attached).

Recommendations were as follows per Qualifying Population (QP):

- The recommendation from the City of Grosse Pointe **to build housing for homeless** individuals was adopted. QP1 = Homeless
- The recommendation from the City of River Rouge for housing rehabilitation was not adopted because it was not one of the eligible activities.
- The recommendation of the City of Romulus pertaining to **supportive services** was adopted, but the recommendation for TBRA (Tenant Based Rental Assistance) was not, because the County is providing significant funding for this purpose from its Emergency Rental Assistance Program funds. QP2 and 3 = Homeless/At Risk of Homelessness/Fleeing or Attempting to Feel, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking.

- The recommendations of the Westland Housing Commission for **capital improvements at the Wayne County Family Center (shelter)** and for **supportive services** were adopted. QP1 = Homeless
- Two of the recommendations of the Wayne Metropolitan Community Action Agency were adopted with the CHDO Capacity Building but was not funded because of lack of available funds.
- The recommendation of Community Living Services was not funded because of lack of funding.
- The recommendation of Samaritas for **supportive services** was adopted, but we are unable to target Afghan refugees specifically. QP1, 2 and 4 = Homeless/At Risk of Homelessness/Other Populations
- The recommendation of Community Living Services for development of housing for disabled individuals was not adopted because this specific group does not fall into one of the qualifying populations. However, disabled individuals/households in general may benefit from identified activities.
- The recommendation of the Wayne County Land Bank for housing rehabilitation funds was not funded because it is not one of the eligible activities. The second recommendation to create affordable housing units was adopted. QP1 and 3 = Homeless/Fleeing or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking

#### Substantial Amendment Public Comment

No public comments were received during this comment period.

## Needs Assessment and Gaps Analysis

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

### **1) *Qualifying Population - Homeless, as defined by HUD in the Notice***

Wayne County is part of the MI-502 Dearborn, Dearborn Heights, Westland/Wayne County CoC (Out Wayne County CoC). In January 2022, the CoC conducted the annual Point in Time Count (PIT). This count provides a snapshot of the number of people experiencing homelessness on one night in the CoC's geographic region. In the Homeless Needs Inventory and Gap Analysis Table below, there were a total of 117 households (166 people) experiencing homelessness. Twenty-one households without children were experiencing unsheltered homelessness on the night of the count. There has been a slight decrease in the number of people experiencing homelessness since the 2020 PIT Count, but there continues to be a need to address the immediate shelter needs of those experiencing homelessness in Wayne County.

Figure 1 PIT comparison 2020, 2021, 2022

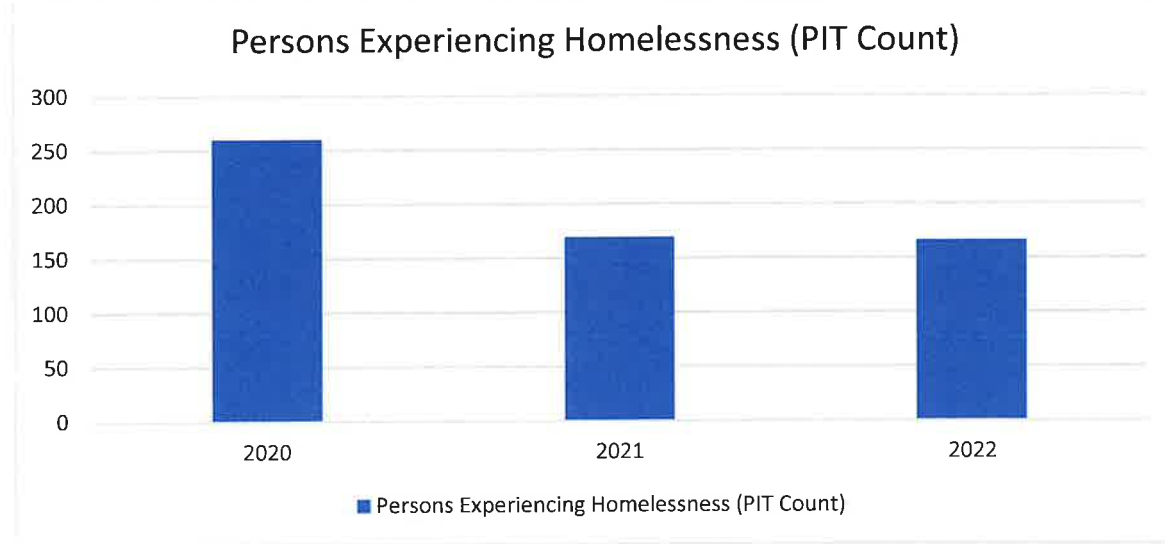


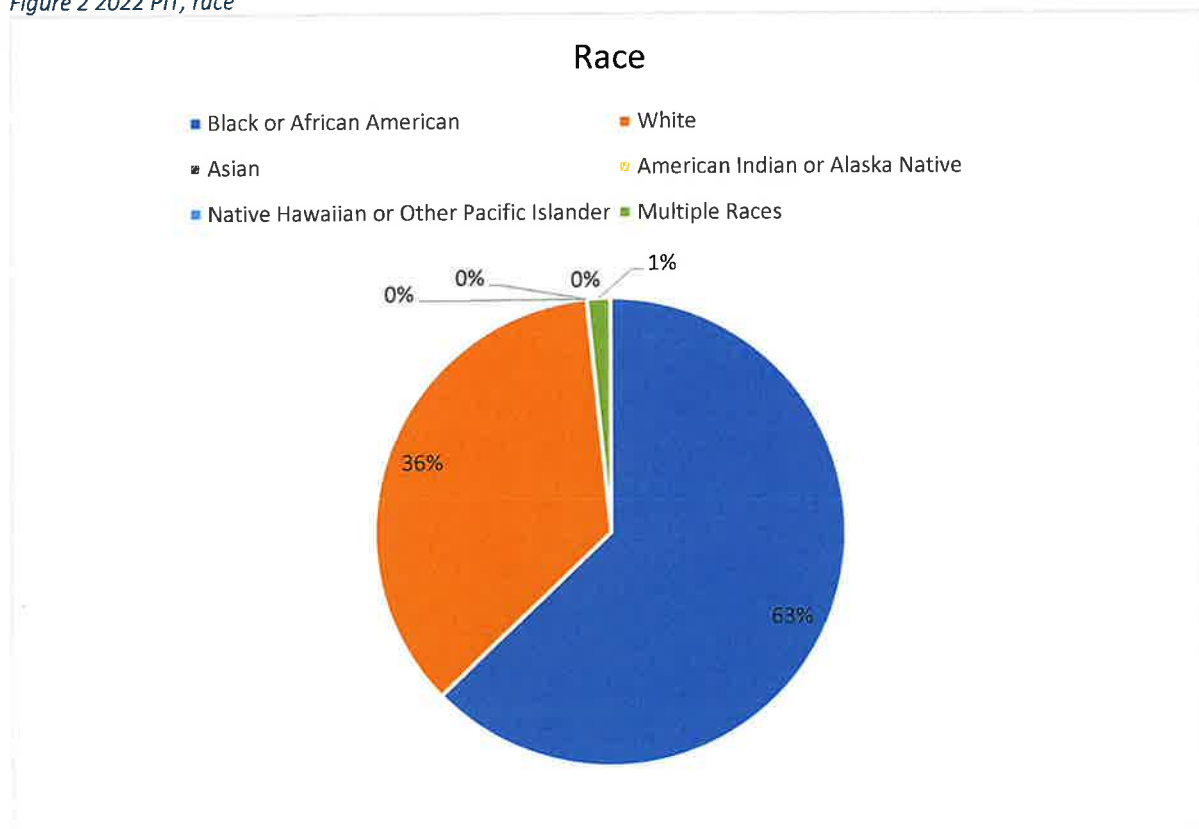
Table 3 Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	67		35		0								
Transitional Housing	15		41		20								
Permanent Supportive Housing	266		208		132								
Other Permanent Housing													
Sheltered Homeless						29	67	17					
Unsheltered Homeless						0	21	0					
Current Gap													

DATA SOURCES: 2022 POINT IN TIME COUNT (PIT); 2022 HOUSING INVENTORY COUNT (HIC): MI-502 CoC

Consistent with most CoC's across the country, Black, Indigenous, and People of Color are overrepresented in the homeless services system. According to 2020 U.S. Census data, only 13% of Out- Wayne County residents identify as Black/African American/African, compared to 58% of the people served by the CoC. Conversely, almost 80% of Out of Wayne County residents identify as White but are significantly less likely to experience housing instability or seek services from the homeless crisis response system. Black residents of Out-Wayne County remain overrepresented among those served in the CoC. During the 2022 PIT Count 63% of people experiencing homelessness identified as Black or African American. The majority of people experiencing homelessness identified as female (100 people).

Figure 2 2022 PIT, race



## 2) ***Qualifying Population - At Risk of Homelessness, as defined by HUD in the Notice***

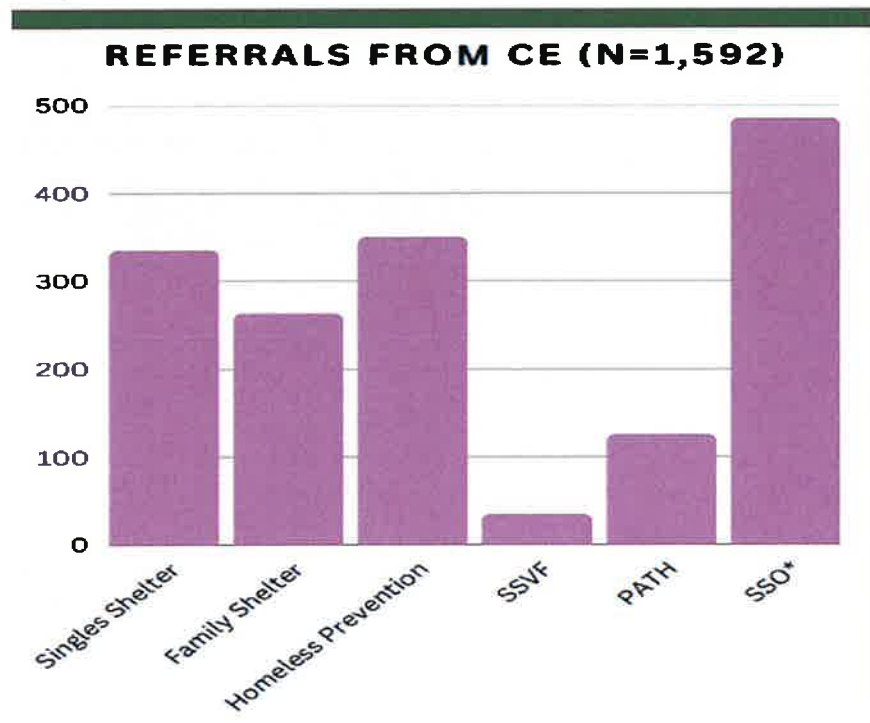
HUD defines at risk of homelessness as

1. An individual or family who (i) has an annual income below 30% AMI, (ii) who does not have immediate networks or resources to prevent them from entering an emergency homeless shelter, or becoming homeless, AND meets one of the following conditions:
  - a) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - b) Is living in the home of another because of economic hardship;

- c) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
  - d) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
  - e) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons per room, as defined by the U.S. Census Bureau;
  - f) Is exiting a publicly funded institution, or system of care (such as a healthcare facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
  - g) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
2. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
  3. A child or youth who does not qualify as "homeless" under this section but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

According to 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data, 22% (150,660) households in Wayne County had household income at or below 30% of Area Median Income. Households under this definition are eligible for services through the CoC. The Out Wayne County CoC's Coordinated Entry (CE) collects data on the number of calls received each year and for which services. In 2022, the CE line received 3,669 total calls. After assessing each call, the Coordinated Entry makes referrals to projects to address the needs identified. During 2022, the majority of referrals were for homeless prevention and Supportive Services Only (SSO). In July 2022, the CE line began referring individuals experiencing homelessness to SSO so they could be connected to services prior to/without entering a shelter.

Figure 3 Coordinated Entry 2022 referrals



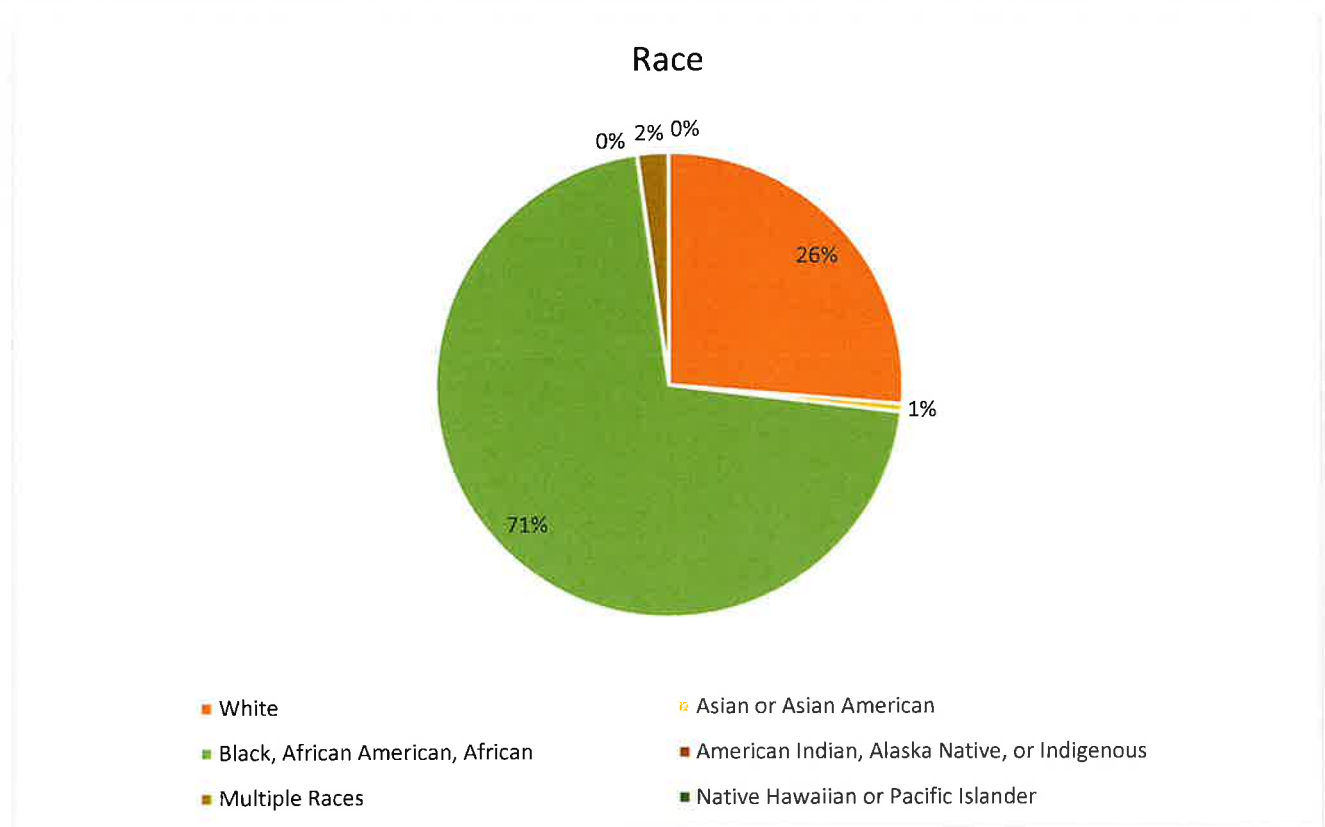
The CoC also operates an Eviction Diversion program. The goal of this program is to prevent individuals and families who have just lost their housing or are at imminent of homelessness from experiencing unsheltered homelessness or entering a shelter. According to the 2021 preliminary impact report, 2,117 households across the CoC requested assistance. The program has spent over \$4,000,000 to prevent evictions and keep households at risk of homelessness, permanently housed.

Samaritas operates an ESG funded homeless prevention program. Households must meet the at risk of homelessness definition as defined in 24 CFR 578.3 and 576.2. In 2021, 374 households were assisted, a 12% increase (331) from the year prior. Consistent with who is accessing homeless services in the County, Black, Indigenous, and People of Color are overrepresented in the homeless prevention program.

In 2021, 26% (98) of participants identified as white, while 71% (264) identified as Black/African American.



Figure 4 Homeless Prevention, race



At Risk Youth and Youth Aging-Out of Foster Care – According to the 2013-2017 ACS, 23% of Wayne County’s population is less than 18 years of age, meaning that approximately 189,000 children live in Wayne County. Of the population less than 18 years of age, approximately 35% of 66,150 children are living in poverty in the County. According to Michigan Department of Health and Human Services, there are approximately 13,000 children in foster care. In 2018, 22% of Michigan children entered foster care due to abuse while 78% of entries were due to neglect. Forty-five percent were reunified with family, 34% were adopted, 8% exited to live with family, 12% aged out, and 1% were transferred to other agencies, ran away or died. Approximately 250 children age out of foster care each year in Wayne County.

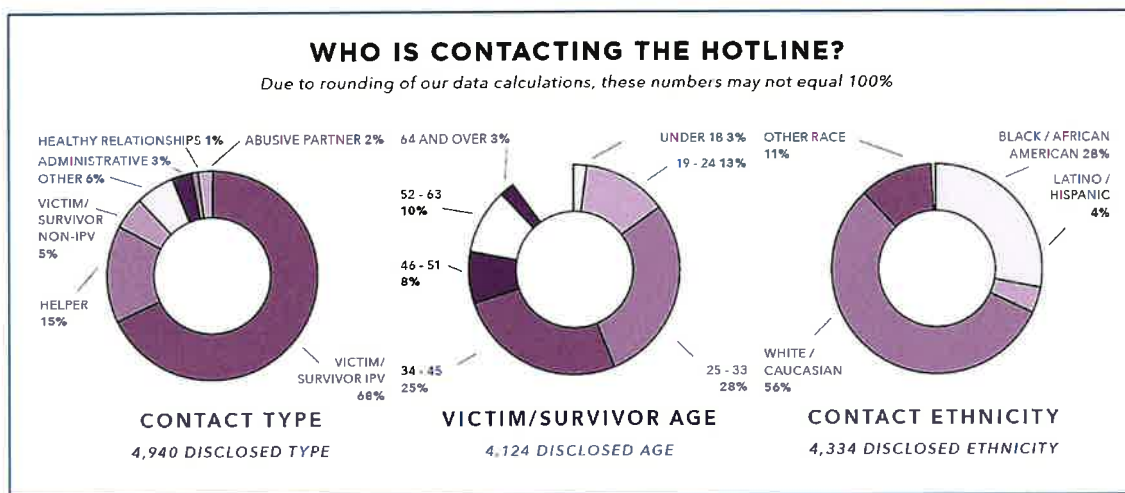
### 3) ***Qualifying Population - Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains

within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

While there is no single local data set available that illustrates the number and type of families that are in need of housing assistance who are victims of domestic violence, dating violence, sexual assault or stalking, the National Domestic Violence Hotline has state level data on the number of contacts documented from January to December 2019. During this period, the state of Michigan had 4,940 contacts to the national hotline. The majority of people contacting the hotline are white/caucasian and between the ages of 25-45.

Figure 5 National Domestic Violence Hotline, 2019 MI demographics



The National Domestic Violence Hotline also reports the most common needs requested are shelter (28%), legal advocacy (26%) and Individual professional counseling (21%).

Through consultation with First Step, a domestic violence service provider located in the City of Wayne, it was determined that there is a large number of unreported victims. Over 90% of the clients that First Step provides services to are very low income. It is estimated that between 100 - 150 victims and their children requesting shelter are turned away each month due to the First Step shelter being at capacity. In the past year First Step served the following demographics: 36% African American, 5% Arabic, 19% unknown, 1% Asian, 5% Hispanic & Latino, 1% Native American, 2% bi-racial 31% white. Due to confidentiality concerns, the actual numbers were not provided.

According to the Wayne County Human Trafficking Task Force, 1,000 contacts were made to the U.S Human Trafficking Hotline from Michigan, identifying more than 800 victims, 153 traffickers and 62 trafficking businesses.

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

The Wayne County Needs Assessment Survey conducted in February 2021 showed that households are most commonly impacted by severe housing cost burden (greater than 50% of income, 36,772 households) and housing cost burden (greater than 30% of burden, 40,218 households). Additionally, overcrowding and substandard housing were major issues. Overcrowded housing defined as more than one person per room, excluding bathrooms, porches, foyers, halls, or half-rooms, are experienced by 2,439 renter households and 2,001 owner households. Approximately, 70,737 or 45% of homes in the Wayne County study area, renter or owner-occupied homes were built before 1950. Similarly, a significant portion of homes in Wayne County Service Area are similarly aged and are more than 40 years old, having been constructed prior to 1980. This points to the need for rehabilitation and redevelopment of old units.

The table below shows a clear gap in the number of available rental units affordable to households at 30% of Area Median Income. There are only 46,030 units affordable at this income level, however there are 72,630 renter households with incomes between 0-30% AMI with one or more severe housing problems. According to 2015-2019 CHAS data, 27% of renter households in Wayne County are severely cost burden or pay more than 50% of their income toward housing expenses.

*Table 4 Housing Needs Inventory and Gap Analysis Table*

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	243,532		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	46,030		
Rental Units Affordable to HH at 50% AMI (Other Populations)	106,270		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		72,630	26,600
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		36,725	N/A
<i>Current Gaps</i>			26,600 (30%AMI)

**DATA SOURCES: AMERICAN COMMUNITY SURVEY (ACS) AND COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY (CHAS)**

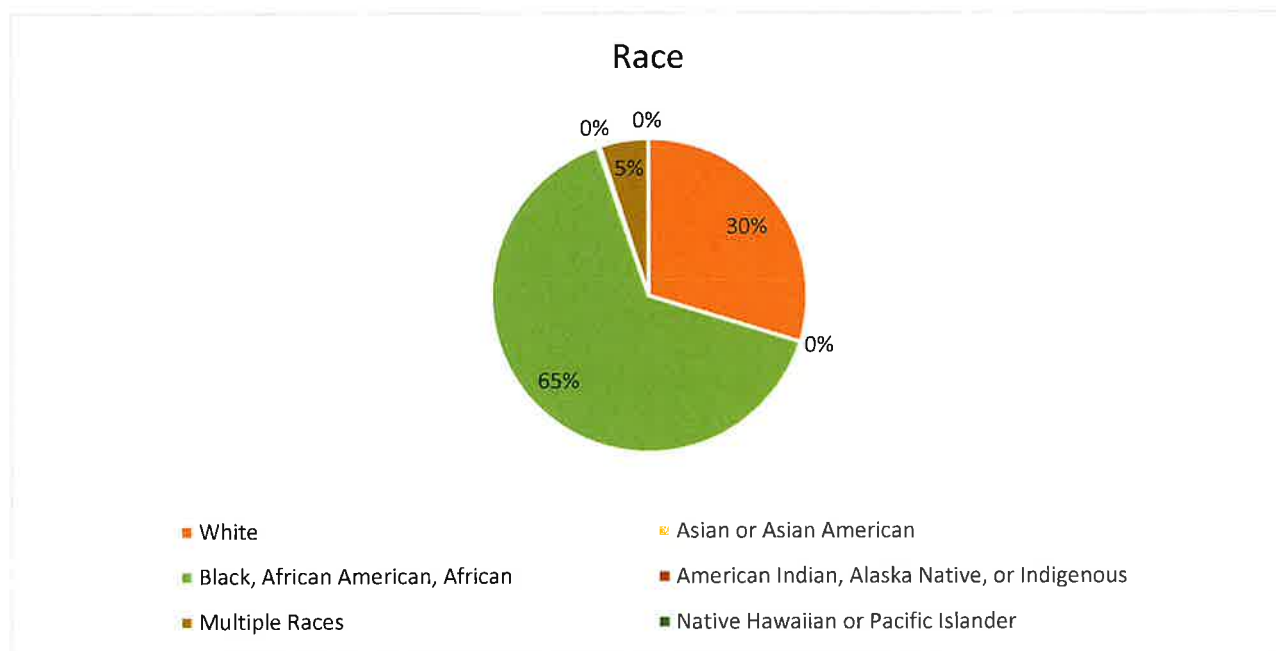
During the COVID-19 pandemic, Wayne Metro operated the COVID Emergency Rental Assistance (CERA) program. Low-income households in Wayne County who had a hardship due to the COVID-19 pandemic were eligible to apply for rental and utility assistance. There were 11,406 households assisted across the Out Wayne geographic area. Seventy-seven percent of the households assisted had incomes less than 30% of AMI and 14% had incomes between 30-50% of AMI.

Table 5 Income Level CERA 2021

Income Range Served	Number of Households	Percent
Less than 30%	8733	77%
30-50%	1550	14%
51-80%	1123	10%
TOTAL	11,406	

Wayne Metro also operates a Rapid-Re-Housing (RRH) Program. Rapid re-housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services. In 2021, there were 231 households served in the RRH program, a 23% increase (188) from the year prior. The majority of people served in this program identified as Black/African American.

Figure 6 2021 RRH, race



For those households at greatest risk of housing instability, homeless prevention and rental assistance programs such as RRH strive to reduce the number of people who experience homelessness, however households find it difficult to find affordable units in the County. Households who received temporary assistance often find that without ongoing rental assistance, they may find themselves at risk of returning to homelessness. According to the Homeless Services Systems Performance Data, in 2021 approximately 10.5% of households who left the homeless system, ultimately return to homelessness with 24 months.

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:

Wayne County receives direct grant allocations from HUD's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Programs. Of the 16 public housing authorities that administer housing programs in Wayne County, including Wayne County Consortium communities, all 16 manage public housing or low-rent units. Many of these units are specifically for income-eligible adults over the age of 62 or those who are disabled. Approximately, seven of these public housing authorities also deliver housing assistance to low- and very low-income persons through a Section 8 Housing Choice Voucher program. According to sources at each of these public housing authorities, and in combination with the Public and Indian Housing (PIH) Information Center (PIX), there is a county-wide supply of approximately 27 publicly assisted housing developments and scattered sites in the county, comprised of 2,977 public housing units, and about 5,799 tenant-based vouchers (Housing Choice Vouchers of HCCs).

The Out Wayne Continuum of Care (CoC) inventoried projects that provide beds and units dedicated to serve persons experiencing homelessness as of January 26, 2022. This housing inventory count (HIC) includes emergency shelter, permanent supportive housing, rapid rehousing, safe-haven, and transitional housing projects in the cities of Detroit, Hamtramck, and Highland Park. Each residential project was open for service on the night of January 26th or was funded and scheduled to begin service within the next year. This report provides an overview comparison of the data from the 2021 and 2022 HIC.

Table 6 OUT OF WAYNE CoC HOUSING INVENTORY COUNT

Category	Single Beds		Percent Change	Family Beds		Percent Change	Total Beds		Percent Change
	2021	2022		2021	2022		2021	2022	
Emergency Shelter	27	35	29%	49	67	37%	75	97	29%
Transitional Housing	41	41	0%	37	15	-59%	78	56	-28
Save Haven	10	8	-20%	NA	NA		10	9	-20%
PSH	270	208	-22%	381	266	-30%	267	83	-70%
RRH	81	24	-70%	186	59	-68%	267	83	-70%

Wayne Metropolitan Community Action Agency provided the following data on the increased number of calls received for services.

Table 7 Wayne Metro CAA call volumes

	FY21 10/1/20 – 9/30/21	FY22 10/1/21 – 9/30/22	Percent change
TOTAL # of Calls	4,635	15,273	228%
# of Calls: Rental Assistance	4,050	14,093	247%
# of Calls: Emergency Shelter	585	1,180	101%
Emergency Response Shelter (Singles)	354	885	150%
Family Shelter	231	295	27%
Domestic Violence	Live transfers	Live transfers	

There are currently very limited resources for congregate and non-congregate shelter units, supportive services, affordable and permanent rental housing.

Describe the unmet housing and service needs of qualifying populations:

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

There is a great unmet housing and service need for sheltered and unsheltered populations. Meeting homelessness challenges in Wayne County is a collaborative effort comprising numerous individuals, agencies, and organizations. In conjunction with the CoC, several organizations serve the homeless population within Wayne County including: ACCESS, ChristNet, Community Care Services, Community Housing Network, Detroit Wayne Integrated Health Network, First Step, Lincoln Behavioral Services, Melvindale Housing Commission, Neighborhood Legal Services Michigan, Orchards Children's Services, Rockwood Housing Commission, The Salvation Army, Samaritas, Wayne County Homeless Education Consortium, and the Wayne Metropolitan Community Action Agency.

The most recent homeless census, or annual PIT count, was conducted on January 26, 2022. The total number of homeless persons counted during the homeless census was 117 households. Of these, 96 were sheltered and 21 were unsheltered. Of the homeless households counted, 29 were in households with adults without children and 88 were in households with children.

Because of the transient nature of homelessness, it is often difficult to locate homeless persons or to follow-up with needed services and support. Of subpopulations of homeless, 43 were mentally ill or struggled with substance abuse, and 17 were veterans.

There continues to be a need to address the immediate shelter needs of people experiencing homelessness in the County. There are currently only three shelters that serve people experiencing homelessness across the whole CoC. Using HOME-ARP funds for Non-congregate Shelter will allow the County to address these needs. Supportive Services will also be provided to the households served by the HOME-ARP NCS program. These services will assist households in housing searches and move toward housing stability. In addition to needing NCS, the Out Wayne CoC's 2021 Gaps Analysis notes there is a lack of affordable housing options within the CoC's service area, which is increasing length of

stays within shelters. Using HOME-ARP funds for rental housing will allow the County to begin to address the lack of affordable housing available to all four QPs.

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

As housing costs continue to increase, the need for affordable housing, especially for households with incomes at or below 30% of AMI, has become even more critical. Several service providers have been able to provide some prevention and diversion services for households at risk of homelessness, but the need exceeds the available services. As indicated in Table 7 Wayne Metro CAA call volumes, there has been a 247% increase in the number of calls seeking rental assistance. There is a great unmet housing and service need for those currently housed and at risk of homelessness in Wayne County.

Households continue to need supportive services to assist with housing stabilization and avoid entering the homeless services system. There is also a continued need for more affordable rental housing for households with the lowest income levels.

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

The population is divided between those individuals who do not have the financial means to escape domestic violence on their own and those that do. They are mostly female, many with children. Over 90% of clients in Wayne County's First Steps domestic abuse support organization are very low income. The service provider assumes that victims with more resources often flee their situations to a motel or other family members' house and do not typically enter the system, making the county's domestic abuse count low. Currently, First Step's shelter, located in Wayne, Michigan, is often at capacity, and they must turn clients away each month. It was reported through a consultation that 100 – 150 individuals are turned away for shelter assistance monthly. Many of the First Step's clients require extensive wrap-around services including housing assistance, employment assistance, transportation, crisis intervention, mental health, and other services.

The Out Wayne CoC's 2021 Gaps Analysis notes domestic violence shelters receive calls directly from people seeking shelter stating they do not want to enter other shelters in neighboring CoCs.

There continues to be a need to address the safety and shelter needs of people fleeing or attempting to flee domestic violence, dating violence, sexual assault, staking or human trafficking in the County. There is currently only one shelter that serves this population across the whole CoC. There is also a continued need for more affordable housing for all four QPs.

***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***

As noted earlier, there is a need for affordable rental housing for households who are at greatest risk of housing instability. The number of renter households with incomes between 0-30% AMI and available rental units affordable to those households is nearly two households for every one unit. According to 2015-2019 CHAS data, 27% of renter households in Wayne County are severely cost burden or pay more than 50% of their income toward housing expenses.

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

Currently there exists only three shelters in the Out-Wayne County Area (excludes Detroit). Several faith-based organizations provided limited emergency shelter capacity on a short-term basis. As a result of recently receiving CARES Act funding, the County allocated funds to establish another overnight shelter, as well as, a day shelter with services designed to help people prevent homelessness. Even after these additional facilities come on-line, there will remain a need for additional shelter inventory. Wayne County will use HOME-ARP funds for NCS, which will serve QP1 and QP3 households, regardless of their household composition.

*Table 8 Shelter Populations Served*

<b>Agency</b>	<b>Population Served</b>
ChristNet	Single Adults
Salvation Army	Closed Shelter in order to house single men in drug rehabilitation
Samaritas	Is a Hub for Families
River Rouge Shelter	Single Adults and Families

As noted above, there continues to be a great need for affordable housing, particularly for households with incomes at or below 50% of AMI. Wayne County will utilize HOME-ARP funds to develop affordable rental units, which will be accessible to all four QPs.

The need for supportive services continues to be a gap in the service delivery system. Wayne County will use HOME-ARP funds to provide housing stabilization services for all four QPs.

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 HOMEARP Notice. If including these characteristics, identify them here:

Wayne County has not identified additional characteristics associated with instability or increased risk of homelessness.

Identify priority needs for qualifying populations:

The priority needs for Wayne County are non-congregate shelter, supportive services as well as affordable rental housing.

There is a great need for affordable rental housing for all four QPs.

There is a need for emergency shelter for QP1 and QP3.

The need for supportive services is also a priority for all four QPs.



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:

To understand needs and gaps, the County utilized quantitative and qualitative data collected and analyzed during the development of the Allocation Plan to determine the level of need and gaps in the community. The County conducted over 20 consultations with stakeholders and organizations about their observations and experiences with service gaps. Additional data was gathered from the CoC's annual reports, CHAS, HIC, PIT Count, and data from Wayne Metro to inform this Allocation Plan.

## 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 County will follow the established procurement process for all goods and services. Formal Requests for Proposals (RFP's), Invitations for Bids (IFB's) and Requests for Qualifications (RFQ's) are used for the purchase of goods and services in excess of \$50,000 and construction in excess of \$100,000. The Wayne County Commission retains the authority to review and approve contracts for goods and services in excess of \$50,000 and construction in excess of \$100,000. The County utilizes a pre-qualified list of vendors/contractors, which is developed through open solicitation and is updated regularly.

Describe whether the PJ will administer eligible activities directly:

Wayne County will not administer eligible activities directly. All activities will be administered through execution of Development and Subrecipient Agreements.

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:

No HOME-ARP funds were provided to Subrecipients or Developers prior to HUD's acceptance of the Wayne County HOME-ARP Allocation Plan.

## Use of HOME-ARP Funding

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Table 9 Funding Levels and Breakdown

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 600,000	6 %	
Acquisition and Development of Non-Congregate Shelters	\$ 3,000,000	29%	
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 5,145,119	50 %	
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 1,543,256	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 10,288,375</b>		

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

To address the needs identified in this allocation plan, Wayne County will allocate HOME-ARP funds toward the development of affordable rental housing, acquisition and development of Non-Congregate Shelter, supportive services and administration and planning.

One of the greatest needs identified for all four of the qualifying populations was the need for more affordable rental housing. Wayne County will allocate 50% of its HOME-ARP allocation to the development of affordable rental housing.

Another need identified through the allocation plan process was the need for additional shelter beds. There is a lack of adequate shelter space for all household types experiencing homelessness and for households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking. Wayne County will allocate 29% of HOME-ARP funds for the acquisition and development of Non-Congregate Shelter (NCS).

Finally, to support the growing needs of households of all the qualifying populations, Wayne County will allocate 6% of HOME-ARP funds toward supportive services.

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 need for affordable rental housing, additional shelter space, and supportive services were all identified as a priority during consultations via email, during the public hearings or through direct conversations with agencies that address the needs of each of the four-qualifying population, as well as through the data analyzed in the needs assessment and gaps analysis. As a result, Acquisition of Development of Non- Congregate Shelters, Development of Affordable Rental Housing and an increase in Supportive Services was funded as part of the Allocation Plan.

The affordable rental housing inventory in Wayne County is severely limited, a challenge that existed long before and has been exacerbated by the pandemic. Shelters lack bed capacity for households experiencing homelessness and are experiencing longer stays in shelter, primarily because of the difficulty of finding safe, affordable housing units. Therefore, the County's emphasis with HOME ARP funds will be to create new units to add to the affordable housing inventory in the County, as well as create shelter capacity for households experiencing homelessness and for households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking. Utilizing funds for supportive services allows the County to meet needs of all qualifying populations by providing financial assistance and services to help households stabilize.

## 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:

Wayne County estimates producing 23 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:

It is anticipated that the HOME-ARP funds will provide for the creation of 23 new affordable housing rental units to support all four qualifying populations in Wayne County. Utilizing HOME-ARP to create new affordable rental housing for all four QPs aligns with the County's goal to rebuild in the wake of the COVID 19 pandemic. The County has been committed to using Federal dollars to assist with homeless and housing issues, which should result in a more significant and direct impact to the citizens in those distressed communities in Wayne County.

## Preferences

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

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

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

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

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

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

Wayne County will give preferences to persons experiencing homelessness (QP1) and for households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking (QP3) for the non-congregate shelter activities. All other qualifying populations will have access. This preference will be in alignment with all applicable fair housing, civil rights, and nondiscrimination requirements as outlined in the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and Americans with Disabilities Act.

Wayne County will not establish any preferences for rental housing or for the supportive services activities.

## 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.

Wayne County will use multiple referral methods for its HOME-ARP projects and activities.

**Affordable rental units** – The Wayne County HOME-ARP Program will use project specific waiting lists. The units will be affirmatively marketed to HOME-ARP qualifying populations in accordance with fair housing laws and requirements.

**Supportive Services** – Wayne County HOME-ARP program will receive referrals from sources serving HOME-ARP qualifying populations, including Continuum of Care agencies. All HOME-ARP qualifying populations will be eligible to access the program and apply for assistance. If HOME-ARP assistance becomes unavailable, qualifying populations will be referred to other community programs and resources for assistance.

**Non-Congregate Shelter** – QP1 and QP3 will receive priority. Wayne County will use the Continuum of Care Coordinated Entry System along with referrals from providers serving HOME-ARP qualifying populations. Referrals from provider agencies will help ensure that all QPs are referred to services, especially QPs that may not normally participate in the Continuum of Care Coordinated Entry System. While the Wayne County CoC currently serves households experiencing a housing crisis, which may include households receiving an eviction notice (QP2 or QP4), households currently homeless and living in places not meant for human habitation (QP1) or households who need assistance identifying affordable housing options (QP2, QP4, or QP3) the County will also utilize other referral methods to ensure all HOME-ARP QPs are able to access the program.

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

N/A. Wayne County will not use CE as a sole referral source. See prioritization described below.

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.

Wayne County will use CE plus other referral methods for the NCS Project. The NCS program utilizes Emergency Solutions Grant (ESG) funds to pay for the operations of the emergency shelter. Using the CE is a requirement under the ESG program. However, the County will allow for additional referral sources to ensure all four QPs have access the project if needed. The County seeks to give preference to QP1 and QP3 to align with the goals of emergency shelters.

The County will align the HOME-ARP NCS method of prioritization with that of the existing CE system. All QPs seeking NCS services will be assessed for eligibility using the MSHMIS HARA Screening Tool. This tool collects demographic information, current living situation, length of stay in living situation, possible resources for housing stability, and emergency contact information. This information is used to determine referral to emergency shelter, diversion, prevention or other. QP1 and QP3 households will receive priority for NCS. The County will then use the VI-SPDAT to determine a household's acuity. This approach allows the community to provide more immediate support and assistance. The Out-Wayne

Continuum of Care assesses acuity levels and relies on a dynamic prioritization framework to offer all available resources to households who have acute needs.

## Limitations

Wayne County will not establish any limitations.

## HOME-ARP Refinancing Guidelines

Wayne County will not use HOME-ARP funds to refinance existing debt.

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