



# HOME-ARP ALLOCATION PLAN

Department of Economic Development

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## Consultation

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

See Appendix A for all Stakeholder Consultation materials, including outreach materials, meeting invitees, meeting attendees and a participant comments. Stakeholder comments received throughout these various sessions and individual meetings are summarized below, in the Appendix, and are referenced appropriately throughout the Needs Assessment & Gaps Analysis.

Allegheny County engaged in an extensive stakeholder consultation process beginning in the summer 2022. During this time, the County engaged with a variety of shelter and service providers serving each of the qualifying populations, which comprise membership of the Homeless Advisory Board for the Continuum of Care. In addition, the County engaged its Department of Human Services, victim service providers, Veterans groups, the Fair Housing Partnership of Greater Pittsburgh, and the Allegheny County Housing Authority.

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

***List the organizations consulted:***

Participant Name	Agency	Type of Consultation	Type of Agency
Anderson, Nicole	AIU	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Public entity serving all qps
Benjamin, Breanna	URA	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Public entity serving all qps
Buccilli, Damian	Penn Hills	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Public entity serving all qps
Drogowski, Laura	Mayor's Office	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Public entity serving all qps
Evans, Chase Archer	Community member	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	
Fisk, Stuart	AGH	Virtual interview July 26, 2022	CoC; Homeless service providers, disability

<b>Participant Name</b>	<b>Agency</b>	<b>Type of Consultation</b>	<b>Type of Agency</b>
		September 7, 2022 September 14, 2022	
Giacalone, Pete	NLP of WPIC	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; PSH providers
Goetze, Devon	Auberle	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Homeless service providers (all QPs), disability
Halfhill, Andy	Allegheny County DHS	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Public entity serving all qps
Hudson, Knowledge Build	HACP	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	PHA
Ed Primm, Katie Stohlberg	ACHA	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	PHA
Knight, Brian	HCEF	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Homeless service providers (all QPs)
Pietryga, Christine	VLP-WPA	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Veterans Group
Progar, Kevin	UPMC	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	Homeless service providers, disability
Puskar, Susie	P4W	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	Public or private agency addressing the needs of people with disabilities
Reichenbach, Diana	Goodwill	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	Homeless service providers (all QPs)
Schwartz, Gale	Housing Alliance of PA	Virtual interview July 26, 2022	

Participant Name	Agency	Type of Consultation	Type of Agency
		September 7, 2022 September 14, 2022	
Upson, Jeffrey	Pittsburgh Bureau of Police	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	Public entity serving all QPs
Wingerson, Bethany	Center for Victims	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Homeless service providers (DV, human trafficking)
White, Kyona	Sojourner MOMS	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Homeless service providers (DV)
Yonas, Michael	Pittsburgh Foundation	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Homeless service providers (all QPs)
Sherry	Salvation Army	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	CoC; Homeless service providers (all QPs)
Sister Shelly Farabaugh	Benedictine Sisters of Pittsburgh/SA	Virtual interview July 26, 2022 September 7, 2022 September 14, 2022	Homeless service providers (all QPs)
Alicia Romano	Community Human Services	Virtual interview July 26, 2022 12/7/2022	Homeless service providers (all QPs)
Megan Confer-Hammond	Fair Housing Partnership of Greater Pittsburgh	Virtual Interview 12/14/2022	Public or private agency addressing Civil Rights/Fair Housing
Carolyn Grady	YMCA Pittsburgh	Virtual Interview 12/7/2022	Homeless service providers (all QPs)
Annette Fetchko	Bethlehem Haven	Virtual Interview 12/7/2022	Homeless service providers (homeless QP)
Shinora Grayson	Center that Cares	Virtual Interview 12/7/2022	Homeless service providers (at-risk QPs)
Lena Andrews Tom Cummings	Action Housing	Virtual Interview 12/7/2022	Affordable Housing provider (all QPs)

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

All stakeholders identified a need for more affordable rental housing units as well as permanent supportive housing units and other low-barrier housing options. Supportive services were also identified as a need.

## Shelter Gaps

- There are shelter options and other resources for individuals, but families face difficulty identifying shelter options
- Shelter options are limited for families in particular that have been placed from outreach efforts into shelter, and have been kicked out or did not comply with shelter rules, and are now back in unsheltered situations.
- There's an increase in elderly women coming to shelter; women aged 60+ coming from prison exiting to shelter needing access to housing options and support
- Shepherd's Heart for Women indicates that 50-75% of women in shelter are 60+ even into 70s; there is a need for higher level of staffing shelters-no wrong door for housing
- Length of stay in shelter is high due to inability to find units; some people take comfort in the relationships established in shelter, and don't want to leave that
- Family Links (youth shelter) is seeing a lot longer stays in the youth shelter as it is becoming more difficult to identify units. No longer have access to vouchers for moving youth to housing and this is presenting a barrier

## Housing Gaps

- There is a shortage in housing options for families.
- It is difficult to house, and keep housed, persons with SMI. SROs are not the solution for these populations due to active users, personality disorders, unmedicated, as they face difficulty sharing spaces.
- The transition from shelter into independent scattered site living space is challenging:
  1. Lack of support that is available
  2. Shortage in front line staff connecting households to resources
  3. Sense of community in shelter and on street-moving to independent living removes household from their community (increasingly concerning are DV victims, and substance misuse disorders).
- Changes in inventory-local landlords are selling properties to larger entities who are no longer willing to accept assistance or lease to special needs populations; these populations are receiving quick notices to vacate
- Rental assistance is a need, but there are too few landlords that will accept it
- There is a shortage of one-bedroom units; landlords unwilling to accept HCVs, criminal background is a barrier, ACHA increased payment standards, but still is insufficient to "keep up" with market rents-LL don't want to comply with HQS

## Service Gaps

- Childcare and transportation are barriers—areas where housing options are available and landlords are willing to rent to these populations are not on bus routes or bus routes/access is scarce in order to access employment and even grocery stores.
- Single-parent homes-difficult to start employment and make enough to pay for housing and childcare without jeopardizing the other
- More PSH opportunities are needed-low turnover in PSH units
- Many VA clients can't complete ADLs and need more in-home resources for assisted living/assistance completing ADLs that are affordable
- Access to behavioral health/mental health services, services on site at emergency shelter to help people move out and on-financial literacy, job training/placement, case management, navigation (housing locator); childcare, adult education, parenting/life skills, transportation

- AHN provides community based outreach/psych services; connecting and maintaining is challenging for mh services. Current model provides stopgap, and traditional services-how they receive services requires them to go somewhere.
- Expanding mobile MH services would be useful, particularly where there are childcare and transportation barriers. There is a need for clinicians providing direct MH care and treatment: how to identify when in crisis, coping skills with living in moments of stress that.
- Folks at risk of homelessness are generally not eligible for services/assistance until they are actually homeless. This includes those with eviction orders, exiting prison/institution—services not tied to housing assistance to help encourage stabilization are a need.
- Households that transitioned to HCV have faced eviction now due to nonpayment of rent and job loss. Face returns to homelessness; Require ongoing services to continue stability.
- Gap in LGBTQ+ services for homelessness
- Technology gap is a barrier-people have difficult time to identify employment-cellphone provisions to assist in connecting to employment opportunities and supports
- Assessment process-placing someone into appropriate solution that will best meet needs. By the time providers get folks, 4-5 intakes/assessments have been completed. An initial comprehensive assessment done once up front will go a long way in avoiding frustration and noncompliance for consumers

### Fair Housing Partnership of Pittsburgh

- 2021 litigation successfully included DV survivors as a protected class under the basis of sex and that women are disproportionately affected by DV
- DV survivors typically owe back rent as they flee, and it impacts ability to identify new housing
- Evictions for high police calls are a FH issue for DV fleers, as well as disabled (chronic users of ambulance/emergency services)
- Increases in tenant on tenant harassment, which LL is managing as other lease violations
- Protections for disability as it relates to SMI; LL pivoting to non-renewals rather than evictions; particular focus on SMI treatment/medication delays
- Owners of larger units would rather rent to four individuals (students) who each pay individually rather than a household/family with children. Some testing in this area
- Prioritization for LEP access going beyond Title VI-need LEP services in subsidy housing-no meaningful concentration of LEP services; Households lose housing because they can't read the recert notice in English.
- Shelter & TH should be allowing individuals to use housing based on gender identity

### Allegheny County Housing Authority

- Experience challenges trying to keep people in their units; drop off of LL who are choosing not to renew leases in favor of higher market rents. ACHA has increased payment standards to 120% and used a lot of COVID funding for landlord incentives
- 3-4 br units are most in demand
- There is some capacity to PBV-can be 100% PBV for some special needs populations; in some cases only 25% of total units can be PBV. There are 800-1000 PBV available; ACHA RFPs for PBV favor areas of opportunity.

## 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: 2/8/2023***
- ***Public comment period: start date – 2/10/2023 end date – 2/24/2023***
- ***Date(s) of public hearing: 2/22/2023***

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

Allegheny County published a notice in the Tribune Review informing the public of the availability of the HOME-ARP Allocation Plan, as well as the public hearing, on February 8, 2023. A copy of the notice and Plan were also made available on the Allegheny County Economic Development Website. The Plan was available for a 15 day period, and the City conducted a public hearing on February 22, 2023. The public hearing was held in person, with a virtual option. Comments on the Plan were accepted via US mail, e-mail, telephone or at the public hearing.

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

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

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

There were no comments received during the comment hearing. No members of the public attended the public hearing.

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

There were no comments received.



## Needs Assessment and Gaps Analysis

### Data Methodology and Limitations

There is no single data source which aligns with the entire definition of each HOME-ARP QP that is also within the geographic boundaries of the Allegheny County HOME Consortium. Therefore, data sources utilized within this assessment provide estimates and may not be completely representative of the size, demographics, and needs facing each of the QPs.

The following geographic limitations were identified in this analysis of needs and gaps for qualifying populations:

1. The CoC that serves the HOME participating jurisdiction is Pittsburgh, McKeesport, Penn Hills/Allegheny County CoC. However, the City of Pittsburgh is its own PJ. Thus, CoC data includes estimates that overlap with the City of Pittsburgh. Where data can be isolated to the County alone, it is so noted.
2. ACS and CHAS estimates are based on estimates for Pittsburgh subtracted from the entirety of Allegheny County.

Like many communities, Allegheny County has insufficient inventory of emergency and transitional housing options. Over 53% of those in shelter or transitional housing remain as such for more than six months. Longer lengths of stay may increase the need for beds, as there is less movement for new clients to be able to use those resources. This could also point to a need for additional housing inventory, as fewer available options lead to less turnover in shelter and transitional housing beds. Subpopulations with the longest homeless tenure include those aged 55 and older, victims of domestic violence, those with disabilities.

**OPTIONAL Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Famil y HH (at least 1 child)	Adult HH (w/o child)	Vets	Victim s 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	317	152	322	322	19								
Transitional Housing	14	4	147	147	75								
Permanent Supportive Housing	1,108	392	1,036	1,036	444								
Other Permanent Housing	0	0	40	40	0								

Sheltered Homeless						75	505	82	100				
Unsheltered Homeless						0	105	3	14				
<b>Current Gap</b>										*see narrative			

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

Allegheny County also has a need for affordable housing. The shortage of units both affordable and available for renter households at or below 30% area median income (AMI) increases housing insecurity and rent pressure on extremely low-income households.

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

<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	204,225		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	43,315		
Rental Units Affordable to HH at 50% AMI (Other Populations)	79,050		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		40,240	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		24,195	
<b>Current Gaps</b>			52,915

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

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

**Homeless as defined in 24 CFR 91.5**

The number of Allegheny County residents that meet the definition of homeless under 24 CFR 91.5 was derived from the 2022 PIT Count, conducted on February 23, 2022. The PIT Count identified a total of 880 persons experiencing homelessness in 2022, up from 692 persons (+21.4%) identified in 2021. Of the counted homeless individuals, 775 (88.1%) were sheltered and 105 (11.9%) were unsheltered. In terms of racial and ethnic demographics, 471 (53.5%) homeless individuals were Black/African American, 315 (35.8%) were White, and 38 (4.3%) were Hispanic. Black/African American individuals comprise 12.5% of Allegheny County's population and are disproportionately over-represented among the homeless.

Between January 1, 2021 and December 31, 2021, a total of 6,717 homeless persons were served by the Pittsburgh, McKeesport, Penn Hills/Allegheny County CoC.

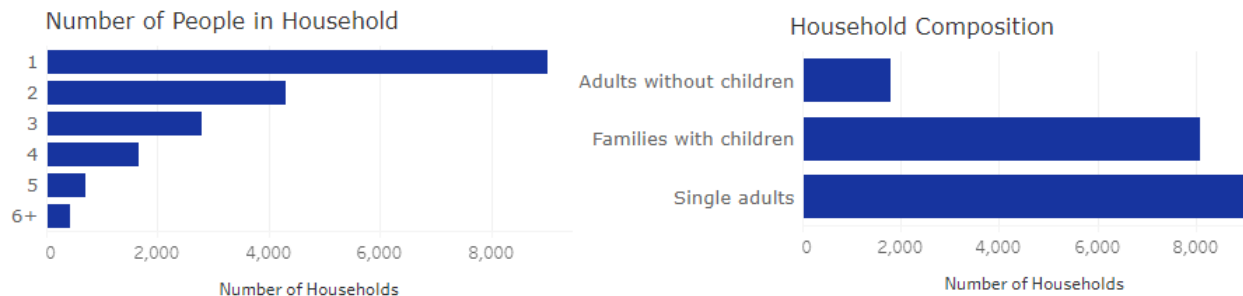
Program	Persons Served
Emergency Shelter	2,570
Permanent Supportive Housing and Supportive Housing	2,201
Rapid Re-Housing	1,229
Transitional Housing	243
Street Outreach	474
<b>Total</b>	<b>6,717</b>

According to the FY2021 Performance Measurement Module, 1,725 individuals experienced homelessness for the first time during FY2021. This is a 2.9% decrease from 2020, which had 1,777 persons experiencing homelessness for the first time. These measures took into account persons entering emergency shelter, transitional housing, safe haven, and permanent housing programs. Eviction moratoria in place during 2020 and at the beginning of 2021 may impact the number of first time homeless.

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

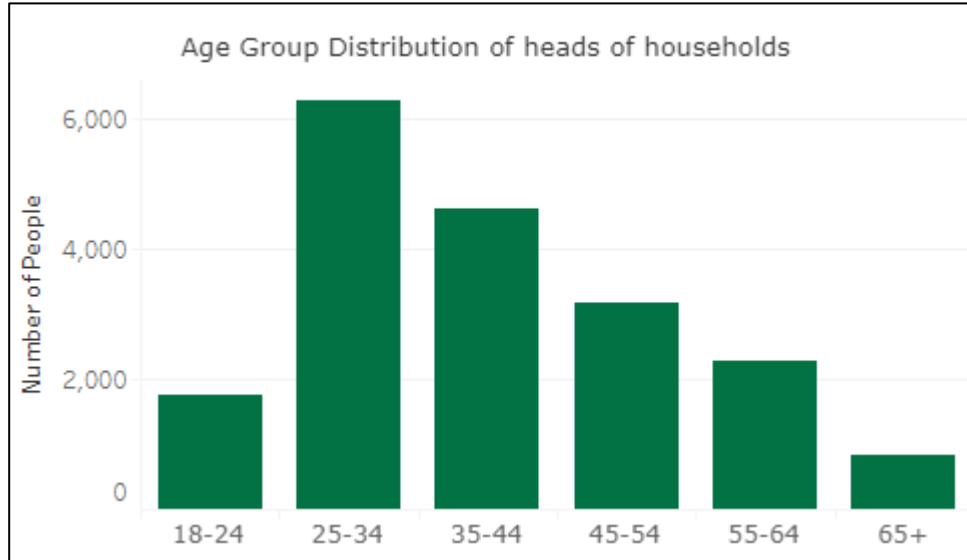
According to 2015-2019 CHAS data, there are 82,955 Allegheny County households, or 24.1% of residents, with an annual income below 30% of median family income. Renters who are considered disproportionately at-risk numbered 54,860 households or 66.1% of renter households with income at or below 30% of the median family income. Additionally, 72,210 or 37.3% of renter households in Allegheny County are considered cost burdened, spending more than 30% of their income on housing costs. Finally, there are 1,315 renter households that are living in severely overcrowded housing conditions with more than 1.5 persons per room.

Additionally, the Allegheny County COVID-19 Emergency Rental Assistance Program (ERAP), has served 18,944 households with a payment for rental assistance between March 15, 2021 and December 8, 2022 for a total of \$129,578,867. This fulfilled 57% of the 33,007 applications the program received during the same time. Most recipients earned below 50% AMI (16,346 households: 87% of recipients). The remaining recipients earned between 50% to 79% AMI (2,491 households: 13% of recipients). On average, the median monthly income of ERAP households earned \$1,250 compared to \$5,082 for the entirety of Allegheny County. On average, ERAP recipients received \$6,832 over nine months. Of ERAP



recipients, only 47% requested utility assistance at the time of the application, primarily related to electric and gas. Households requiring rental assistance may be at greater risk of experiencing homelessness if they cannot sustain ongoing rent and utility payments.

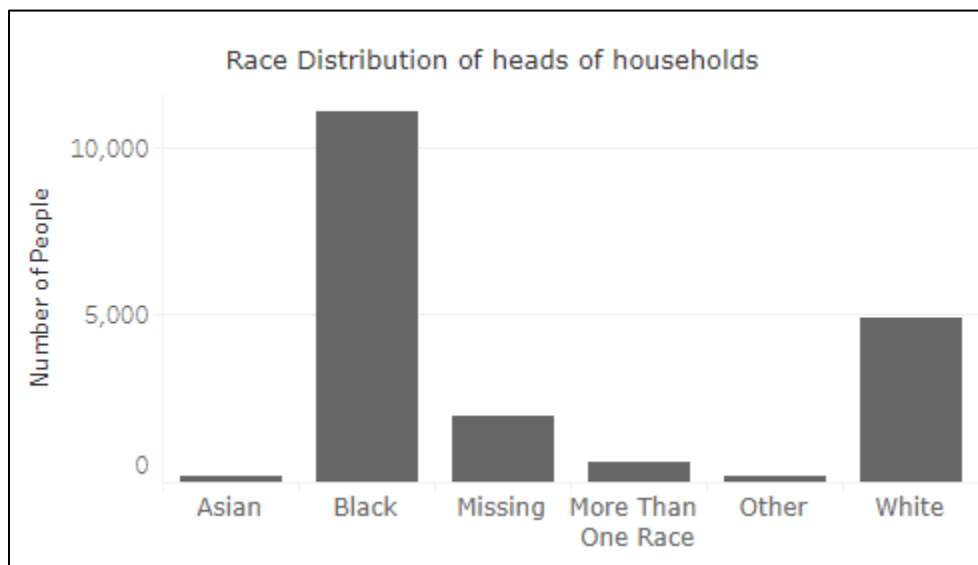
In terms of demographics 9,010 ERAP households (48%) consisted of a single adult, 8,099 households of



families with children (43%), and 1,794 households of adults without children (9%).

The largest age group of heads of households are within 25-34 years of age, consisting of 33% of all ERAP households. As head of households got older, the less likely they were to apply for ERAP.

Black/African American ERAP householders were the largest ethnic group, consisting of 11,061 or 59% of ERAP households, followed by White householders (4,937 households: 26%). Only 570 or 3% of ERAP households are Hispanic.



As of December 2022, the Allegheny County Housing Authority reported 22,555 applicants on the waiting list for its Public Housing Program, and 8,642 applicants waiting for the Housing Choice Voucher Program. Income and other demographic breakdowns for these waiting lists were not available.

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

In the 2022 PIT Count, 114 individuals in the system were identified as survivors of domestic violence. Of these individuals, 14 or 12.3% of homeless survivors of domestic violence were unsheltered. Data was not readily available on the number of victims of human trafficking.

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

Those at greatest risk of housing instability include 30,045 renter households with an annual income less than or equal to 30% AMI and experiencing severe cost burden. This represents 15.5% of all renter households in the County. In addition, 545 renter households earn less than or equal to 50% AMI and live in overcrowded housing conditions.

Other populations at greater risk of housing instability, as identified in the 2022 PIT Count include 351 persons with serious mental illness, 252 persons with a substance use disorder, 85 veterans, and 3 transgender/ gender non-conforming/ questioning individuals. The following is a breakdown of these populations’ sheltered and unsheltered status:

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Adults with a Serious Mental Illness	229	69	0	53	<b>351</b>
Adults with a Substance Use Disorder	135	47	0	70	<b>252</b>
Adults with HIV/AIDS	4	2	0	1	<b>7</b>
Veterans	34	48	0	3	<b>85</b>
Transgender/Gender Non-Conforming	3	0	0	0	<b>3</b>

According to HMIS data, 243 persons were provided assistance through transitional housing during the period January 1, 2021 through December 31, 2021. Of these individuals, 116 or 47.7% were Black, African American, or African. During the same time, 1,229 people were receiving rapid rehousing assistance. Of these, 705 or 57.3% were Black, African American, or African, again highlighting that this segment of the population is over-represented among people experiencing homelessness. Of households that exited Rapid Rehousing programs during this period, 37.4% of adult leavers had no cash income, putting these households at greater risk of returning to homelessness if unable to support ongoing housing payments.

In FY2021, 49% of persons in ES, SH, TH, and PH-RRH and 68% of persons who exit street outreach exited to permanent housing destinations. However, 19% of households exiting to permanent destinations

within the past two years in Allegheny County returned to homelessness. Based on HMIS data for FY2021, 15% of leaver households exited to temporary destinations. Households receiving temporary assistance and those exiting to temporary destinations are more likely to return to homeless or face greater risk of housing instability than those exiting to permanent destinations.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):***

The Allegheny County 2022 Housing Inventory Chart (HIC) indicated a capacity for 744 emergency shelter beds (including 47 shelter beds for persons fleeing domestic violence). In addition, the HIC identified 161 transitional housing beds; 12 Safe Haven beds; 2,144 Permanent Supportive Housing beds; 885 Rapid Rehousing beds and 40 other permanent housing beds (in the form of tenant-based or project based/SRO voucher assistance). The overall utilization rate for beds in Allegheny County during the 2022 PIT was 98.2%, indicating few vacancies to serve qualifying populations. In November 2022, Second Avenue Commons opened in the City of Pittsburgh, but serves all of Allegheny County. It offers a 95-bed low barrier shelter with dedicated personal hygiene facilities, space for pets, laundry, meals, and storage facility. Additional space is available to accommodate 40 people during winter months. 43 SRO units are available, as well as a medical/behavioral health clinic on site.

The Allegheny County Housing Authority owns 2,809 public housing units, according to PHAS inspection data current as of October 2022.

Allegheny County also provides funds to organizations that provide case management and housing navigation services to assist homeless individuals and families, including those staying in emergency shelters, make the transition to permanent housing and prevent returns to homelessness.

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

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

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

The 2021 APR indicated 6,717 individuals served by the homeless system during the period January 1, 2021 through December 31, 2021. The waitlist for 2021 showed a monthly median of 479 households. Most households on the waitlist consisted of single individuals, with a monthly median of 84% of households being single adults. The average household size for large households consisted of three individuals.

According to the 2022 HIC, Allegheny County has 2,144 permanent supportive housing beds, of which all are estimated to be occupied. The County also has 917 emergency shelter, transitional housing and safe haven beds. Almost all these beds are available year-round, with only 83 seasonal and 22 overflow beds. This available inventory is insufficient to meet the needs of the population experiencing homelessness.

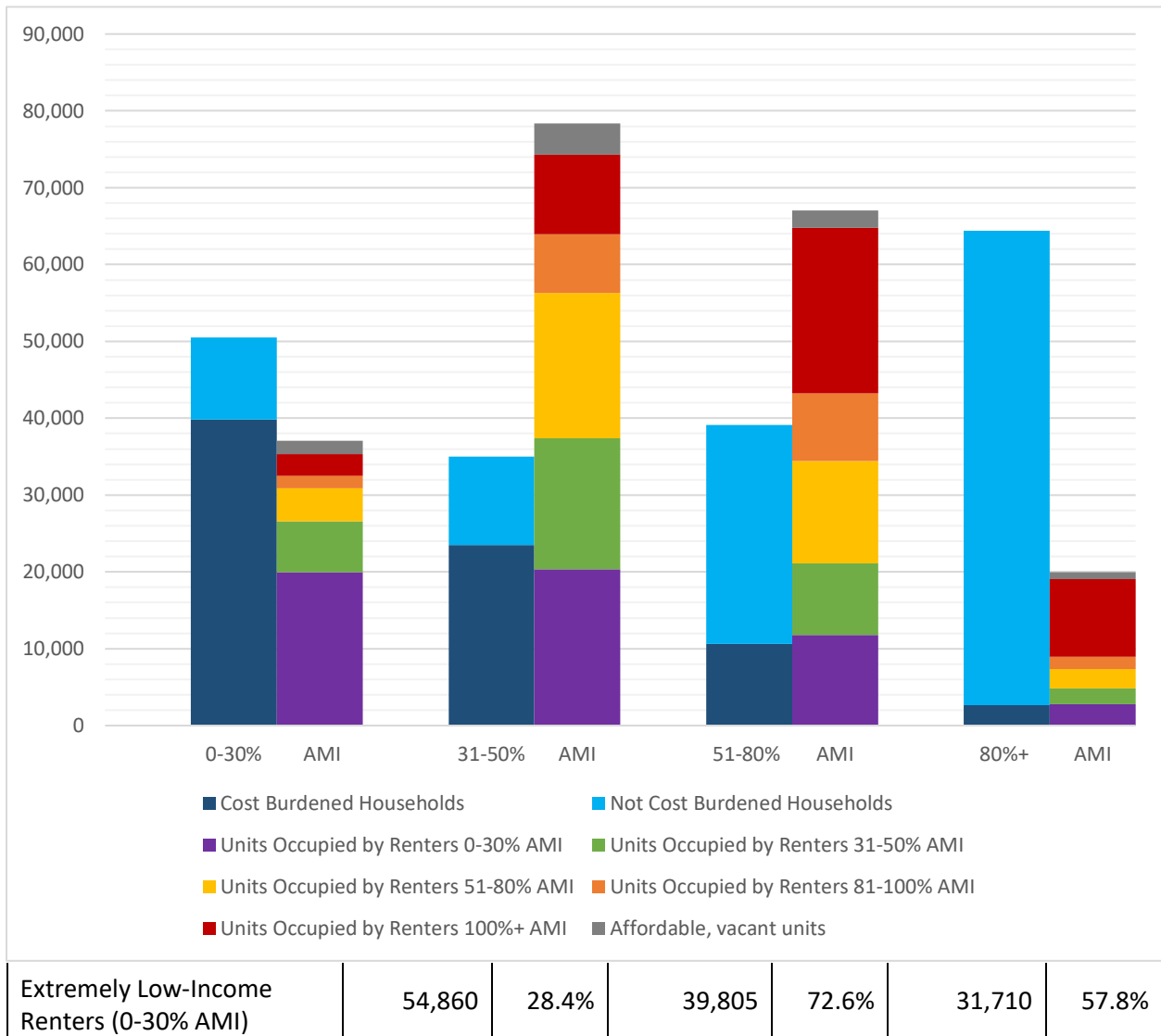
All stakeholders consulted for this process expressed an overwhelming need for affordable rental housing. The County collaborates with developers to invest its HOME funds in LIHTC rental housing to expand the inventory of affordable rental units. Already subsidized projects fill quickly and experience very little turnover and long waiting lists for affordable housing and permanent supportive housing. Many permanent supportive providers rely on scattered site privately owned units, and many providers, including the Housing Authority, indicated that landlords are no longer willing to accept assistance or have tenant selection policies that act as barriers for special needs populations.

According to stakeholders, families face difficulty identifying shelter options. Additionally, length of stay in shelter is high due to inability to find units. The transition from shelter into independent scattered site living space is challenging, particularly if there is insufficient support available. Lack of staff capacity to connect households to resources once housed exacerbates this challenge.

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

According to 2015-2019 CHAS data, the number of total rental units exceeds the number of households in Allegheny County. However, the supply of affordable housing units is insufficient for households earning 0-30% AMI. As a result, these households must reside in housing units that are more costly than what would be considered affordable to these households. Renter households earning 81%+ AMI also do not have enough available units appropriately affordable to them. This leads to many high-earning households residing in housing units that would be affordable to lower income households, including those with income below 30% AMI. The low vacancy rates of rental units affordable to these households is indicative of a strong demand for affordable housing within these ranges. Furthermore, this does not consider additional costs such as transportation, childcare, and accessibility modifications for individuals with disabilities. With 39.6% of all Allegheny County renters considered cost burdened and 21.1% of renter households considered severely cost burdened, these additional costs further exacerbate the limited access to affordable housing in the county. Among extremely low-income households, who represent 28.4% of renter households in the County, 57.8% experience severe cost burden. For very low-income renters, who represent 46.5% of all renters in the County, 43.5% are severely cost burdened. This further suggests that the supply of affordable options for housing low-income households is insufficient.

	Total		Cost burdened		Severely Cost burdened	
	#	%	#	%	#	%
Total Renters	193,410	-	76,560	39.6%	40,750	21.1%
Very Low-Income Renters (0-50% AMI)	89,890	46.5%	63,285	70.4%	38,695	43.0%
<i>30-50% AMI</i>	<i>35,030</i>	<i>18.1%</i>	<i>23,480</i>	<i>67.0%</i>	<i>6,985</i>	<i>19.9%</i>



**Housing Gap Analysis**

Source 2014-2018 CHAS

According to stakeholders, supportive services such as affordable childcare, transportation, employment training/job search and placement, financial literacy, case management, navigation (housing locator), adult education, parenting/life skills, are in great need for all qualifying populations, but especially those at-risk of homelessness. Untreated mental health/behavioral health often lead to evictions and housing instability. Access to mental/behavioral health services is a challenge- expanding mobile mental health services would be useful, particularly where there are childcare and transportation barriers.

Poor rental history and criminal background is often identified as a barrier for households accessing affordable households. The Fair Housing Partnership indicated a need for LEP services in subsidized



housing-many times, households lose housing because they can't read the recertification notice in English and are unaware of their ability to request translation services.

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

During Federal Fiscal Year 2021, 55% of households fleeing domestic violence exited the homeless system to temporary or unknown destinations. This suggests a lack of permanent, affordable options for this qualifying population. According to the 2022 HIC, there are 47 shelter beds and 180 beds through rapid rehousing dedicated for survivors of domestic violence. The Fair Housing Partnership indicated that many survivors of domestic violence owe back rent as they flee, and it impacts their ability to identify new housing. Evictions for a high number of police calls are an issue for fleers.

There are three primary organizations specifically working to combat human trafficking in Allegheny County: Pittsburgh Action Against Rape (PAAR), Blackburn Center, and Living in Liberty. These organizations provide a number of services including education, advocacy, outreach, counseling (including a 24-hour hotline), therapy, support groups, and shelter. Additionally, organizations such as Jewish Family and Community Services (JFCS) and Justice At Work provide other services such as obtaining T-visa for foreign victims of trafficking, resettlement, and legal assistance.

***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***

According to HMIS, during the period January 1, 2021-December 31, 2021, 3,039 individuals exited the homeless system. Of these, 15.0 % exited to temporary destinations, including transitional housing and temporarily staying with friends or family. Households without permanent housing may be more likely to experience returns to homelessness. Even among households exiting to permanent destinations, 65.9% exited to rentals without ongoing subsidy. Together, these suggest a need for both affordable housing units, as well as tenant based-rental assistance to support extremely low, and low-income households.

For formerly homeless families and individuals nearing the end of rapid re-housing or other temporary assistance, affordable permanent housing is a critical need to prevent a return to homelessness. Stakeholders reported that households that transitioned to the Housing Choice Voucher program have faced eviction due to nonpayment of rent and job loss. These populations face returns to homelessness and require ongoing services to continue stability. Other needs include increased, sustainable income (earned and unearned); access to Social Security disability and other mainstream benefits; linkages to health, mental health, and legal services; access to affordable transportation and childcare; and budget counseling, life skills, and other case management and supportive services. Without ongoing supportive services, are more likely to experience crises, unexpected financial obligations, or other obstacles that may lead to returns to homelessness.

**Veterans:** There are a total of 608 beds available for households with veterans according to the 2022 HIC. However, three veterans were determined to be unsheltered during the 2022 PIT, indicating a barrier in accessing these resources or difficulties by service providers in engaging veterans. These barriers may include co-occurring mental health and/or substance abuse disorders, lack of income or rental history, or criminal history. These services are primarily provided by four organizations: Shepherd's Heart Fellowship (TH and ES) VA Pittsburgh Healthcare System (PSH), Veterans Leadership

Program of Western Pennsylvania (RRH and PSH), and Veterans Place of Washington Boulevard (TH and SH).

**Persons with Disabilities:** During the Federal Fiscal Year 2021, over 70% of households with a disabled member exited the homeless system to temporary or unknown destinations. For people with disabilities, accessible housing is a continuing and critical need, ranging from individuals in wheelchairs to medical beds and in-home healthcare services in order to maintain housing stability. Overall, there is a severe need for permanent housing that can accommodate persons with disabilities. This typically includes bathroom equipped with grab bars, installation of handrails, walk-in showers and tubs, along with handicapped accessible doors and cabinets. Other needs of this population to maintain housing stability are the same as everyone else: access to employment and accessible public transportation.

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

According to PA 2-1-1 Counts, 161,871 requests were made for housing and shelter assistance from January 2022 through December 2022 in Allegheny County, or 12.9% of the county's population. The most common request was for rental assistance, accounting for 38.7% of housing and shelter requests. Rental assistance encompasses rent, mobile home lot fees, motel, rental deposits, homeless motel vouchers, and other home-related payments and assistance. Closely following that is requests for temporary housing solutions through shelter, consisting of 34.3% of housing requests. Finally, low-cost housing requests were the third largest request type, composing of 17.9% of housing requests. This includes moving assistance and housing for people with special needs such as the elderly or disabled. While most requests were adequately met, unmet request rates were high for those seeking temporary housing solutions through shelter (7% unmet) and home repair or maintenance needs for low-income homeowners (5% unmet). Home repair/ maintenance includes adaptations for safety and disability access, general upkeep, and weatherization. This reinforces stakeholder comments indicating a lack of affordable and accessible housing options in the County.

Stakeholders also identified the following gaps in shelter, housing and services:

- Affordable inventory (1BR units, 3-4 BR units)
- Shelter for families
- Housing options for families
- Permanent supportive housing
- Supportive services including childcare, transportation, mental health/behavioral health services (mobile), case management, employment services, financial literacy; in-home assistance with ADLs, particularly for Veterans

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

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

***Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:***

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

- American Community Survey (ACS), 2016-2020
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018
- Allegheny County/Pittsburgh CoC 2022 Point-In-Time Count
- 2022 Housing Inventory County (HIC)
- Coordinated Entry System (CES)
- Allegheny County/Pittsburgh CoC Annual Performance Report (APR)
- 2021 System Performance Measures
- United Way of Pennsylvania's 2-1-1 Counts
- Allegheny County Housing Authority waiting list data; ACOP
- Allegheny County Emergency Rental Assistance Program utilization data

To evaluate the size and demographic composition of qualifying populations within its boundaries, the County enlisted the help of the Allegheny County/Pittsburgh CoC HMIS Lead to provide data on homelessness and other qualifying populations. The County utilized CHAS, ACS and HIC data to identify the current affordable inventory in the County, as well as to determine the gap in housing availability. HMIS data on the percentage of households exiting the homeless system to unknown or temporary destinations and rates of return to homelessness were also used to determine the availability of affordable housing inventory. In addition, the County utilized stakeholder feedback to identify service needs for the County.

## 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:***

Allegheny County will issue a Request for Proposals (RFP) from developers, service providers, and/or subrecipient organizations. The RFP will, at a minimum, specify eligible applicants, eligible activities, minimum and maximum funding amounts, application thresholds, and underwriting criteria, and will provide instructions on how to submit an application for funding. Any Developer/Owner that is looking to apply for funding and/or other resources from ACED for the new construction, substantial rehabilitation, and/or preservation of affordable housing or non-congregate shelter will be invited to submit a proposal for funding. All developers, service providers or subrecipients applying for HOME-ARP must meet the minimum program eligibility and threshold requirements. Depending on the nature of the proposed activity, site inspections may be conducted by ACED staff. An evaluation of the site's feasibility, financial underwriting and developer capacity assessment will be completed and considered as part of the review process.

The County is not currently establishing preference or priority as part of its scoring criteria for HOME ARP proposals for funding. Should the County establish preference or priorities, a substantial amendment may be duly publicized and submitted to HUD for review. Applications may be evaluated according to criteria such as organizational or developer experience, capacity, demonstrated effective grant management experience, services offered, housing need, project readiness, and financial capacity to complete the project.

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

Allegheny County will not administer and oversee its eligible activities directly beyond program administration and planning. Rather, it will enter into HOME Agreements with developers of affordable rental housing projects and/or non-congregate shelter, and execute subrecipient agreements with service providers.

***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:***

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

### Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 700,000.00		
Acquisition and Development of Non-Congregate Shelters	\$ 4,500,000.00		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 4,519,691.00	80%	0
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 1,079,965	10 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 10,799,656</b>		

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

The HOME-ARP budget was driven by the priority needs identified as a result of stakeholder consultation and data analysis. Allegheny County will distribute approximately 40% of its HOME-ARP allocation for the development of affordable rental housing and 40% for the acquisition/development of noncongregate shelter. Lack of affordable rental inventory and shelter were identified as the greatest needs. Tight rental markets and high rents make it extremely difficult for housing and service providers to find units that are affordable and in decent condition for their clients. In addition, the County is allocating approximately 6% of its HOME-ARP funds for supportive services, recognizing that long term supportive services are critical to ensuring stability and success in permanent housing for vulnerable households. HOME – ARP funds will be used for individuals or families from all of the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability.

***Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:***

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

Reserving funds for services ensures the County is able to provide services to those households that will occupy units created with HOME-ARP, but also provides an opportunity for the County to connect unsheltered homeless individuals with housing and services provide by HOME-ARP.

## HOME-ARP Production Housing Goals

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

It is the County's intent to leverage HOME-ARP with other funding sources to increase the total number of units created. It is anticipated that the County's HOME ARP funds will directly support the creation of a minimum of 14 new units affordable to all four qualifying populations.

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:***

It is anticipated that the County's HOME ARP funds will be used to create 14 new units affordable to all four qualifying populations. The County's priority goal established by this Allocation Plan is to increase the number of affordable housing units in the County. Providing funds for rental housing production directly supports the advancement of that goal.

## 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:***

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

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

No preferences are established.



## 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):***

Allegheny County will use Coordinated Entry in conjunction with additional methods in identifying qualifying populations to be referred to the HOME-ARP project since the CE does not currently accept all HOME-ARP Qualifying Populations. In an effort to reach all Qualifying Populations and provide them with access to the HOME-ARP activity, Allegheny County will require the activity to use additional referrals from outside organizations. These may include 2-1-1, existing shelter providers with waiting lists, among other entities. The referral method will be finalized as part of the implementation process, including through the development of a policy and procedure manual to administer the HOME-ARP activity.

***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):***

Allegheny County will use Coordinated Entry in conjunction with additional methods in identifying qualifying populations to be referred to the HOME-ARP project since the CE does not currently accept all HOME-ARP Qualifying Populations. In an effort to reach all Qualifying Populations and provide them with access to the HOME-ARP activity, Allegheny County will require the activity to use additional referrals from outside organizations. These may include 2-1-1, existing shelter providers with waiting lists, among other entities. The referral method will be finalized as part of the implementation process, including through the development of a policy and procedure manual to administer the HOME-ARP activity.

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

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project, and the CoC CE prioritization will not be utilized to admit qualifying populations to projects. Rather, the County's Coordinated Entry System will be used as one method of referral to HOME-ARP assisted projects. These referrals will be the result of the use of the Allegheny County Housing Assessment, which is designed to prioritize admissions to supportive housing services for individuals or families experiencing homelessness. The tool uses administrative data from Allegheny County's data warehouse to predict the likelihood of three types of events occurring in a person's life if they remain un-housed over the next 12 months: a mental health inpatient stay, a jail booking and frequent use (4 or more visits) of hospital emergency rooms. These events serve as indicators of harm if a person remains un-housed. Referrals made to HOME-ARP assisted projects from the CE will have gone through this assessment process; however, CE will not be used as the exclusive referral source for HOME-ARP assisted projects.

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

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

## 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:***

Allegheny County will not establish limitations on eligibility.

***If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Allegheny County will not establish limitations on eligibility.

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):***

Not applicable.

## HOME-ARP Refinancing Guidelines

Allegheny County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing in order to rehabilitate the units with HOME-ARP funds. If the County determines that it will use HOME ARP for refinancing, the guidelines for doing so will be in conformance with the HOME-ARP program notice and will be submitted to HUD for review.

Appendix A: Consultation Appendix

HAB 7/26/2022:

Anderson, Nicole	AIU	Public entity serving qps
Benjamin, Breanna	URA	Public entity serving qps
Buccilli, Damian	Penn Hills	Public entity serving qps
Drogowski, Laura	Mayor's Office	Public entity serving qps
Evans, Chase Archer	Community member	
Fisk, Stuart	AGH	Homeless service providers, disability
Giacalone, Pete	NLP of WPIC	PSH providers
Goetze, Devon	Auberle	Homeless service providers, disability
Halfhill, Andy	Allegheny County DHS	Public entity serving qps
Hudson, Knowledge Build	HACP	PHA
Knight, Brian	HCEF	Homeless service providers
Pietryga, Christine	VLP-WPA	Veterans Group
Progar, Kevin	UPMC	Homeless service providers, disability
Puskar, Susie	P4W	WIB
Reichenbach, Diana	Goodwill	Homeless service providers
Schwartz, Gale	Housing Alliance of PA	
Stohlberg, Katie	ACHA	PHA
Upson, Jeffrey	Pittsburgh Bureau of Police	
Wingerson, Bethany	Center for Victims	Homeless service providers
White, Kyona	Sojourner MOMS	Homeless service providers
Yonas, Michael	Pittsburgh Foundation	Homeless service providers
Sherry	Salvation Army	Homeless service providers
Sister Shelly Farabaugh	Benedictine Sisters of Pittsburgh/SA	Homeless service providers

## Allegheny County Homeless Advisory Board

Committee Descriptions	Co-Chairs	IO Representative (Administrative Organizer)	Meeting Schedule
<p><b>Continuum of Care Analysis and Planning Committee (CoCAPC).</b>                      The CoC Analysis and Planning Committee provides ongoing analysis to support the planning of the CoC, at both the provider and system level. This includes analysis of policies and performance measures in order to recommend strategies to the HAB so the PA-600 Continuum of Care's funding applications remain competitive, as well as studying changes to policy specific to project types and shifts in emphasis within the CoC related to projects and policies. In addition, the Committee regularly reviews available data, proposes data collection needs and performance metrics to the HAB, and identifies trends, gaps and needs presenting from the data. It establishes clear guidelines for data requests to the IO and annually determines the HAB's main data needs for the coming year so the IO can meet those needs in a timely fashion. In conjunction with these ongoing analysis efforts, the Committee will review and develop ranking tools and recommend housing priorities for our homeless continuum of care. The Committee establishes the Evaluation Subcommittee for the review and ranking of all applications submitted to HUD. The Evaluation Subcommittee then submits their recommended ranking to the HAB for final review and approval.</p>	Pete Giacalone Kelly Russel	Hilary Scherer <a href="mailto:Hilary.Scherer@AlleghenyCounty.US">Hilary.Scherer@AlleghenyCounty.US</a>	2 <sup>nd</sup> Wednesday, 10–11:30am  9/14/2022
<p><b>Homeless Outreach Coordinating Committee (HOCC).</b>                      The purpose of the HOCC is to address the complex issues and challenges faced by people experiencing housing crisis living in places not meant for human habitation, which includes being on the streets and under bridges or using the emergency shelter network in Pittsburgh and Allegheny County. Annually, the HOCC assists with implementation of the Point-in-Time study. The committee also ensures that street outreach agencies are notified of any targeted homeless encampments before evictions. They also help to develop strategies to education and inform law enforcement officials and other stakeholders about the needs of unsheltered population..</p>	Laura Drogowski Dan Palka	Gabe Krivosh <a href="mailto:Gabriel.Krivosh@AlleghenyCounty.US">Gabriel.Krivosh@AlleghenyCounty.US</a>	3 <sup>rd</sup> Wednesday, 9:30 am

## Allegheny County Homeless Advisory Board

Committee Descriptions	Co-Chairs	IO Representative (Administrative Organizer)	Meeting Schedule
<p><b>Communication and Education Committee</b> (formerly Advocacy). The purpose of the Communication and Education Committee is to develop and distribute messaging about the needs of homeless persons in Allegheny County. Based on the conviction that the organized, strategic, and effective engagement of stakeholders in relevant policies and funding is critical to creating an effective homeless system, this committee also coordinates advocacy efforts at the county, state and federal levels.</p>	<p>Brian Knight</p>	<p>Peter Harvey <a href="mailto:Peter.Harvey@AlleghenyCounty.US">Peter.Harvey@AlleghenyCounty.US</a></p>	<p>4th Monday</p>
<p><b>Provider Committee</b> The Provider Committee captures the experiences and perspectives of providers in order to inform CoC planning and processes. The committee provides an avenue for strengthening communication across the CoC by facilitating systematic information sharing among service providers and between providers and the HAB. Finally, this Committee will support system and service improvements by utilizing the provider lens to identify gaps/needs and recommend responses</p>	<p>Kyona White Diane Reichenbach Alyssa Sciulli</p>	<p>Rob Eamigh <a href="mailto:Robert.Eamigh@AlleghenyCounty.US">Robert.Eamigh@AlleghenyCounty.US</a></p>	<p>1<sup>st</sup> Wednesday 2:30-4:00pm  9/7/2022</p>





# HOME-AMERICAN RESCUE PLAN

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# AGENDA

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What is HOME-ARP?

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Defining the Qualifying Populations

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Eligible Activities

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Discussion: Unmet Needs of the QPs

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Next Steps

THE HOME-  
AMERICAN  
RESCUE PLAN  
(ARP)

**SEC. 3205. HOMELESSNESS  
ASSISTANCE AND SUPPORTIVE  
SERVICES PROGRAM.**

Provides \$5 billion of supplemental HOME funds to assist individuals or households who are homeless, at risk of homelessness and other vulnerable populations by providing housing, rental assistance, supportive services, and non-congregate shelter.

## HOME-ARP ALLOCATIONS

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Allegheny County \$10,799,656

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Pittsburgh \$8,342,028

# QUALIFYING POPULATIONS

Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act

At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;

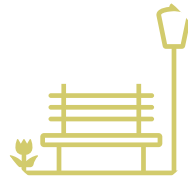
In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;

Veterans and families that include a veteran family member that meet one of the preceding criteria.

# HUD DEFINITION HOMELESS



an individual or family who lacks a fixed, regular, and adequate nighttime residence;



an individual or family with a primary nighttime residence that is a public or private place not meant for human habitation, including a car, park, abandoned building, bus or train station, airport, or camping ground;



an individual or family living in shelter designated to provide temporary living arrangements



an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;



an individual or family who will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels

# HUD DEFINITION AT RISK OF HOMELESSNESS

Income at or below 30% AMI;  
Lacks sufficient resources to attain  
housing stability; AND



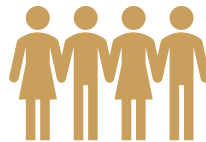
**Multiple Moves:** Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance



**Doubled Up:** Is living in the home of another because of economic hardship



**Hotel/Motel:** Lives in a hotel or motel and the cost is not paid for by charitable organizations or by federal, state, or local government programs for low-income individuals



**Overcrowded Housing:** Lives in a single room occupancy (SRO) or efficiency apartment unit where two or more persons reside or where there are more than one-and-a-half persons per room



**Exiting Institution:** Is exiting a publicly funded institution or system of care (e.g., jail, prison, psychiatric hospital, etc.);

# FIVE ELIGIBLE ACTIVITIES



PRODUCTION  
OR  
PRESERVATION  
OF AFFORDABLE  
HOUSING



TENANT-BASED  
RENTAL  
ASSISTANCE  
(TBRA)



SUPPORTIVE  
SERVICES,  
HOMELESS  
PREVENTION  
SERVICES, AND  
HOUSING  
COUNSELING



PURCHASE AND  
DEVELOPMENT  
OF NON-  
CONGREGATE  
SHELTER



NONPROFIT  
OPERATING  
AND CAPACITY  
BUILDING



# DISCUSSION TOPICS

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What do you see as the most critical gaps and needs in effective service delivery system?

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What kinds of housing resources are most in demand?

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What kinds of housing units are most in demand?

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What supportive services are currently available? What should be available/what is needed?

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What are the biggest risk factors for housing instability and maintaining permanent housing once attained?

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How are providers currently serving rural or low-capacity areas? What could be done to better support those providers?

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Are there any populations or subgroups that are underserved by the current system? What additional services would be beneficial?

# NEXT STEPS AND TIMELINE

Continue outreach with stakeholder groups



Draft Needs Assessment and Gaps Analysis



Draft Allocation Plan



Public Display



Submit to HUD

## Shelter Gaps

- There are shelter options and other resources for individuals, but families face difficulty identifying shelter options
- Shelter options are limited for families in particular that have been placed from outreach efforts into shelter, and have been kicked out or did not comply with shelter rules, and are now back in unsheltered situations.
- There's an increase in elderly women coming to shelter; women aged 60+ coming from prison exiting to shelter needing access to housing options and support
- Shepherd's Heart for Women indicates that 50-75% of women in shelter are 60+ even into 70s; there is a need for higher level of staffing shelters-no wrong door for housing
- Length of stay in shelter is high due to inability to find units; some people take comfort in the relationships established in shelter, and don't want to leave that
- Family Links (youth shelter) is seeing a lot longer stays in the youth shelter as it is becoming more difficult to identify units. No longer have access to vouchers for moving youth to housing and this is presenting a barrier

## Housing Gaps

- There is a shortage in housing options for families.
- It is difficult to house, and keep housed, persons with SMI. SROs are not the solution for these populations due to active users, personality disorders, unmedicated, as they face difficulty sharing spaces.
- The transition from shelter into independent scattered site living space is challenging:
  1. Lack of support that is available
  2. Shortage in front line staff connecting households to resources
  3. Sense of community in shelter and on street-moving to independent living removes household from their community (increasingly concerning are DV victims, and substance misuse disorders).
- Changes in inventory-local landlords are selling properties to larger entities who are no longer willing to accept assistance or lease to special needs populations; these populations are receiving quick notices to vacate
- Rental assistance is a need, but there are too few landlords that will accept it
- There is a shortage of one-bedroom units; landlords unwilling to accept HCVs, criminal background is a barrier, ACHA increased payment standards, but still is insufficient to "keep up" with market rents-LL don't want to comply with HQS

## Service Gaps

- Childcare and transportation are barriers—areas where housing options are available and landlords are willing to rent to these populations are not on bus routes or bus routes/access is scarce in order to access employment and even grocery stores.
- Single-parent homes-difficult to start employment and make enough to pay for housing and childcare without jeopardizing the other

- More PSH opportunities are needed-low turnover in PSH units
- Many VA clients can't complete ADLs and need more in-home resources for assisted living/assistance completing ADLs that are affordable
- Access to behavioral health/mental health services, services on site at emergency shelter to help people move out and on-financial literacy, job training/placement, case management, navigation (housing locator); childcare, adult education, parenting/life skills, transportation
- AHN provides community based outreach/psych services; connecting and maintaining is challenging for mh services. Current model provides stopgap, and traditional services-how they receive services requires them to go somewhere.
- Expanding mobile MH services would be useful, particularly where there are childcare and transportation barriers. There is a need for clinicians providing direct MH care and treatment: how to identify when in crisis, coping skills with living in moments of stress that.
- Folks at risk of homelessness are generally not eligible for services/assistance until they are actually homeless. This includes those with eviction orders, exiting prison/institution—services not tied to housing assistance to help encourage stabilization are a need.
- Households that transitioned to HCV have faced eviction now due to nonpayment of rent and job loss. Face returns to homelessness; Require ongoing services to continue stability.
- Gap in LGBTQ+ services for homelessness
- Technology gap is a barrier-people have difficult time to identify employment-cellphone provisions to assist in connecting to employment opportunities and supports
- Assessment process-placing someone into appropriate solution that will best meet needs. By the time providers get folks, 4-5 intakes/assessments have been completed. An initial comprehensive assessment done once up front will go a long way in avoiding frustration and noncompliance for consumers

### Fair Housing Partnership of Pittsburgh

- 2021 litigation successfully included DV survivors as a protected class under the basis of sex and that women are disproportionately affected by DV
- DV survivors typically owe back rent as they flee, and it impacts ability to identify new housing
- Evictions for high police calls are a FH issue for DV fleers, as well as disabled (chronic users of ambulance/emergency services)
- Increases in tenant on tenant harassment, which LL is managing as other lease violations
- Protections for disability as it relates to SMI; LL pivoting to non-renewals rather than evictions; particular focus on SMI treatment/medication delays
- Owners of larger units would rather rent to four individuals (students) who each pay individually rather than a household/family with children. Some testing in this area

- Prioritization for LEP access going beyond Title VI-need LEP services in subsidy housing- no meaningful concentration of LEP services; Households lose housing because they can't read the recert notice in English.
- Shelter & TH should be allowing individuals to use housing based on gender identity

### Allegheny County Housing Authority

- Experience challenges trying to keep people in their units; drop off of LL who are choosing not to renew leases in favor of higher market rents. ACHA has increased payment standards to 120% and used a lot of COVID funding for landlord incentives
- 3-4 br units are most in demand
- There is some capacity to PBV-can be 100% PBV for some special needs populations; in some cases only 25% of total units can be PBV. There are 800-1000 PBV available; ACHA RFPs for PBV favor areas of opportunity.

# Appendix B: Citizen Participation



# TRIB TOTAL MEDIA LEGAL ADVERTISING

## Proof of Publication of Notice in The Tribune-Review Under the Act of July 9, 1976, P.L. 877, No. 160

Commonwealth of Pennsylvania }  
County of Allegheny } SS:

Patty Klingensmith, Classified Advertising Manager of Trib Total Media, Inc., a corporation of the Commonwealth of Pennsylvania with place of business in Pittsburgh, Allegheny County, Pennsylvania, being duly sworn, deposes and says that the Tribune-Review is a daily newspaper in general circulation in Southwestern Pennsylvania. Said corporation was established in the year 1924. A copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions of the said daily newspaper on the following dates, viz:  
LEGAL# 274430, RE: HOME-ARP ALLOCATION PLAN; 8<sup>TH</sup> DAY OF FEBRUARY, 2023.

Affiant further deposes that s/he is an officer duly Authorized by the Trib Total Media, Inc., publisher of the Tribune-Review, to verify the foregoing statement under oath and also declares that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

*Patty Klingensmith*  
Classified Advertising Manager,  
Trib Total Media, Inc.

Sworn to and subscribed before me this  
8<sup>TH</sup> day of FEBRUARY, 2023

*JoAnn M. Callahan*  
Notary Public  
Commonwealth of Pennsylvania - Notary Seal  
JoAnn M. Callahan, Notary Public  
Westmoreland County  
My commission expires July 1, 2024  
Commission number 1243230  
Member, Pennsylvania Association of Notaries

### Statement of Advertising Costs

**BRIA COOK**  
**ALLEGHENY COUNTY ECONOMIC DEVELOPMENT**  
**KOPPER'S BUILDING**  
**436 SEVENTH AVENUE, SUITE 600**  
**PITTSBURGH, PA 15219**

To Trib Total Media, Inc.  
For Publishing the notice or advertisement attached  
hereto on the above stated dates \$503.75  
Probating Same \$ 0  
Total \$ 503.75

**Publisher's Receipt for**  
The Trib Total Media, Inc., publisher of t  
acknowledges a receipt of the aforesaid advertising and  
fully paid.

Trib Total Media Inc., Publisher  
of the Tribune-Review, a Daily Newspaper.

By \_\_\_\_\_

**NOTICE OF PUBLIC HEARING**  
**ALLEGHENY COUNTY, PA**  
**HOME-ARP ALLOCATION PLAN**

Notice is hereby given that Allegheny County, PA (County) has prepared its HOME-ARP Allocation Plan. This Plan describes how the County intends to allocate \$10,799,656 in HOME-ARP funds, authorized by the American Rescue Plan in April 2021.

In order to obtain the views of citizens, public agencies, and other interested parties, the County has placed its proposed HOME-ARP Allocation Plan on public display at the Allegheny County Department of Economic Development, Koppers Building; 436 Seventh Avenue, Suite 500; Pittsburgh, PA 15219, and online at <https://www.alleghenycounty.us/economic-development/index.aspx> for 15 days beginning February 10, 2023 and ending February 24, 2023.

Notice is also given that Allegheny County will hold a public hearing on Wednesday, February 22, 2023 at 10:00 AM at the Allegheny County Department of Economic Development Koppers Building; 436 Seventh Avenue, Confluence Room; Pittsburgh, PA 15219. Persons wishing to participate virtually may join via:

**Microsoft Teams**  
<https://www.microsoft.com/en-us/microsoft-teams/join-a-meeting?rtc=1>  
Meeting ID: 232 755 383 345  
Passcode: 3eBPue

**Or call in (audio only)**  
267-368-7515  
Phone Conference ID: 105 726 688#

Instruction for how to join the public hearing may also be obtained by visiting the County's Website at:  
<https://www.alleghenycounty.us/economic-development/index.aspx>

Allegheny County will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact Mr. Jim Johnston at [Jim.Johnston@AlleghenyCounty.US](mailto:Jim.Johnston@AlleghenyCounty.US) 48 hours in advance of the hearing date and time.

Comments on the proposed HOME-ARP Allocation Plan can be submitted the following ways:

1. Written comments can be mailed or hand delivered to the Allegheny County Department of Economic Development, Koppers Building; 436 Seventh Avenue, Suite 500; Pittsburgh, PA 15219 must be received by 4:00 p.m. February 24, 2023.
2. Written comments can be e-mailed to [Jim.Johnston@AlleghenyCounty.US](mailto:Jim.Johnston@AlleghenyCounty.US) by 4:00 p.m on February 24, 2023
3. Public hearing with virtual participation option will be held on February 22, 2023, at 10:00 a.m. To participate in the hearing, join using the instructions above.

Comments received before 4:00 p.m. February 24, 2023, will be considered. The County's HOME ARP Allocation Plan will be submitted to HUD on or before March 31, 2023.  
Publication date: February 8, 2023  
274430(2-8-23)



# HOME-American Rescue Plan

**Public Hearing February 22, 2023**



# Agenda

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What is HOME-ARP?

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Allocation Plan Process to Date

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HOME-ARP Qualifying Populations

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Needs Identified by Stakeholders

---

Needs Identified by Data Analysis

---

Proposed HOME-ARP Budget

---

Next Steps



The HOME-  
American  
Rescue Plan  
(ARP)

**SEC. 3205. HOMELESSNESS ASSISTANCE AND SUPPORTIVE SERVICES PROGRAM.**

Provides \$5 billion of supplemental HOME funds to assist individuals or households who are homeless, at risk of homelessness and other vulnerable populations by providing housing, rental assistance, supportive services, and non-congregate shelter.

**Allegheny County will receive \$10,799,656**



# Qualifying populations

## Homeless

Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act

## At-risk of homelessness

At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act

## Domestic Violence

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;

## Other

In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;

# Stakeholder Identified Needs

---

Adequate housing at all price points, but especially affordable units that are accessible

---

Permanent Supportive Housing

---

Shelter Resources for all Qualifying Populations, including DV victims

---

Service Needs: Homeless/Eviction prevention services; Housing stabilization services; Mental Health/Substance Abuse services; Financial literacy; Transportation

---

Increased capacity among shelter and service providers

# Needs Identified through Data Analysis

---

Approximately 50% of Extremely Low-Income renters in the County experience severe cost burden

---

Only 50% of individuals placed on by-name list are placed in permanent housing

---

High number of people exiting shelters to temporary destinations

---

There is a high number of chronically homeless individuals compared to the rest of the BoS CoC

# Proposed Home-ARP Budget

Eligible Activities	Funding Amount
Supportive Services	\$ 700,000.00
Acquisition & Development of Non-Congregate Shelters	\$ 4,500,000.00
Tenant Based Rental Assistance	\$ 0
Development of Affordable Rental Housing	\$ 4,519,691.00
Non-Profit Operating Expenses	\$ 0
Non-Profit Capacity Building	\$ 0
Administration & Planning*	\$1,079,965.00
<b>TOTAL HOME-ARP ALLOCATION</b>	<b>\$ 10,799,656.00</b>

- \* Limited to 15% of total grant

# Questions



# Next Steps and Timeline

Public Comments  
accepted through March 3



Submit to HUD by  
March 31



Appendix C: SF424s/Certifications

**Application for Federal Assistance SF-424**

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
--	--	--

* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>
---	--

5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: M-21-DP-42-0503
--	--

**State Use Only:**

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
---	---

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="256001017"/>	* c. UEI: <input type="text" value="R5ADCHWAMSF3"/>
---	--

**d. Address:**

\* Street1:   
Street2:   
\* City:   
County/Parish:   
\* State:   
Province:   
\* Country:   
\* Zip / Postal Code:

**e. Organizational Unit:**

Department Name: <input type="text" value="Economic Development"/>	Division Name: <input type="text"/>
---	--

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

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

Title:

Organizational Affiliation:

\* Telephone Number:  Fax Number:

\* Email:

**Application for Federal Assistance SF-424**

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

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

CFDA Title:

HOME Investment Partnerships Program

**\* 12. Funding Opportunity Number:**

\* Title:

HOME-ARP Program

**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:**

HOME-ARP Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

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

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

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

* a. Federal	<input type="text" value="10,799,656.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="10,799,656.00"/>

**\* 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

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 218, 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:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## 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 NAME Allegheny County	DATE SUBMITTED 03.03.2023

## 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.
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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 NAME Allegheny County	DATE SUBMITTED 03.03.2023



## 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

02/27/2023  
Date

County Manager  
\_\_\_\_\_  
Title