

WAKE COUNTY

2022-2023 ANNUAL ACTION PLAN



Prepared By:
**Department of Housing Affordability &
Community Revitalization**



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Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

Wake County Housing Affordability and Community Revitalization (HACR) Department's 2022-2023 Annual Action Plan will address HACR's goals including increasing and preserving affordable housing, addressing policy barriers to housing affordability and supporting vulnerable populations and communities. The Priority populations were determined through our extensive Citizen Participation process, conducted as part of our 2020-2025 Consolidated Plan, and are as follows:

Priority One

- Households earning 50% or less of the area median income
- Vulnerable populations experiencing homelessness or at-risk of homelessness

Priority Two

- Households earning 51-60% of the area median income
- Vulnerable populations not experiencing homelessness

Priority Three

- Households earning 61-80% of the area median income

Grants from the U.S. Department of Housing and Urban Development (HUD) include the HOME Investment Partnerships Grant (HOME), the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons with AIDS grant (HOPWA).

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Over the course of this fiscal year, there are three main objectives in the Plan. The first is to increase and preserve affordable housing; the second is to reduce barriers to affordable housing, and the third is to provide support for vulnerable populations and communities.

Outcomes for the first goals are affordable housing development and preservation including programs to assist low-to-moderate income households or developers targeting those households with home construction, rehabilitation, and purchase activities. It also includes programs to create new or preserve existing affordable housing.

Outcomes for the second goal are addressing policy, regulatory, and market barriers to housing affordability through providing technical assistance to local municipalities and the broader community to understand the effect on affordability, especially as a result of COVID-19. This includes planning, administration, and fair housing activities. It may also include activities to assist special needs populations with barriers to economic opportunity or affordable housing such as employment training.

Outcomes for the third goal are to sustain and leverage support for vulnerable populations and communities through programs that prevent and assist those experiencing homelessness and provide neighborhood revitalization, and permanent supportive housing with supportive services.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Our past performance has shown success in meeting or surpassing our goals, such as creating 2,508 affordable units in three years and being able to assist many low-to-moderate income households throughout Wake County. We have chosen to maintain those goals for the next year; we will implement a combination of the same types of projects while creating new programs through CARES and County funding to address new needs.

We will continue projects such as affordable housing development, housing rehabilitation, public facilities and improvements, rental assistance, rental assistance for youth aging out of foster care, and supporting services such as job training and other services for those experiencing homelessness.

In addition, new goals and projects reflect needs that were heard throughout the community during this Consolidated Plan cycle. Needs include a preservation warning system to provide data and advance warning of units needing continued affordability; an acquisition and preservation fund for increased power to acquire property for affordable housing; and a homelessness prevention program that helps households avoid entering homelessness (WakePrevent).

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

One public hearing (in-person) and three consultation meetings were held virtually to receive feedback and concerns from citizens, community organizations, the Continuum of Care, municipal planners, and

the Wake County Board of Commissioners. At these meetings, staff presented information identifying the three priority populations that will be served with 2022 program funding allocations based on goals set in the 2020-2025 Consolidated Plan. In return, comments were sent via email and verbally communicated during the meetings. The statements revealed essential areas of focus to be addressed and directly guide the Plan. The draft plan was posted for a public comment period of 30-days for additional feedback.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The following is a summary of public comments topics:

- Resources for persons experiencing homelessness with high service needs
- A day center / drop-in center for “white-flag” months with critical support resources
- Rapid Exit Funds and Emergency Assistance Funds
- Resources towards strategies to reduce racial disparities and disproportionality in housing
- Increase affordable housing units
- Convert available office, commercial, & hotel/motel space into housing
- Focus resources on the Housing First model and in coordinated entry
- Data entry into the centralized homeless mgmt. information system
- Continue incentivizing landlords/property management
- Resources to address staff shortages and limited space.
- Continue policy work around housing preservation.
- Address affordable housing needs through a regional affordable housing plan
- Work toward the full spectrum of housing needs with municipalities that are stepping up in a substantial way to get built units on the ground.
- Many landlords and property managers do not accept housing choice vouchers (HCV). Amend the county fair housing ordinance to include source of income so it would be illegal to refuse to accept a HCV.
- Find creative ways to create more affordable housing for those making less than 30% AMI. For example, lease a large four- and five-bedroom homes and then lease the rooms to homeless clients.
- Use project-based vouchers so that the voucher is tied to the unit and not the individual
- Utilize data to show that voucher usage is limited to certain areas of the county and that it corresponds to lower income census tracts, creating concentrated pockets of poverty. There are none in the western part of the county and the majority are east of Raleigh. I believe racial discrimination plays a part in this.

Populations with high priority needs that were mentioned include:

- Families and individuals experiencing homelessness
- Households near/at-risk of homelessness

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments were accepted.

7. Summary

The 2022-2023 Action Plan is the culmination of community meetings, public participation, consultations, and the evaluation of successful past programs. As discussed in the paragraphs above, the Goals and Objectives are a combination of previous project types. Wake County Housing looks forward to addressing the needs of our low-moderate income citizens, with a housing focus on our priority populations:

Priority One

- Individual/Families at or below 50% AMI
- Vulnerable populations experiencing or at-risk of homelessness

Priority Two

- Individual/Families at or between 51-60% AMI
- Vulnerable populations not experiencing homelessness

Priority Three

- Individual/Families at or between 61-80% AMI

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Wake County	Dept. of Housing Aff. & Community Revitalization
HOPWA Administrator	Wake County	Dept. of Housing Aff. & Community Revitalization
HOME Administrator	Wake County	Dept. of Housing Aff. & Community Revitalization
ESG Administrator	Wake County	Dept. of Housing Aff. & Community Revitalization

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

Consultations were held with the Wake County Board of Commissioners, the NC-507 Continuum of Care, and the Wake Entitlement Municipalities. The consultations are identified in the checklist below and revealed data and the needs of different populations.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

Housing staff coordinates efforts and aligns resources with the City of Raleigh, the Town of Cary, and two housing authorities. The County has held meetings with the executive leadership of each housing authority.

Wake County is also partnering with the Housing Authority of the County of Wake (HACW), the Veterans Administration, and other community entities to effectively end veteran homelessness. Staff leads a veteran working group to align resources including HUD VASH, case management, rental assistance, and other community resources. The Housing Department and the Public Health Division of the Health & Human Services Department coordinate efforts to work in tandem on the HOPWA grant. Public Health Division case managers see clients that Housing assists with financial and other HOPWA eligible resources. In addition, Housing refers clients to Alliance Health, which manages care of mental health, intellectual and developmental disabilities, and substance use disorders for Wake County. These clients may receive rental assistance and supportive services through Wake County or maybe stay in subsidized units.

Housing clients also access primary healthcare at the WakeBrook Primary Care Office which provides comprehensive longitudinal outpatient primary care to patients with serious mental illness. They work in an integrated way with the patients' behavioral health teams, community resources, and sub-specialists to assure the highest quality care. They provide acute, chronic, and preventive health services to adolescents and adults and engage the patient, family, and/or significant others in treatment. Patients are referred to Wakebrook from behavioral health teams, area hospitals, and other community agencies.

In 2020, Wake County received special allocations of funds under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), to be used to prevent, prepare for, and respond to this historic public health crisis. Housing staff continues administering these through the HouseWake! Strategic Plan which focuses on addressing the various needs of households who are homeless or at-risk, could not access financial resources and faced a high risk of contracting COVID-19.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The local Continuum of Care (CoC) lead applicant holds full membership meetings bi-monthly with representatives from the County, City of Raleigh, Town of Cary, the two housing authorities, Public Schools, and over 30 agencies attending these meetings. Currently, in lieu of in-person meetings, the COC is virtual membership conference calls.

In addition, the Housing Deputy Director of Programs is on the Board of the CoC lead applicant. Both the City and the County provide operational funding to support and ensure the coordination of services to address the needs of those experiencing homelessness. The CoC implemented and manages the coordinated entry process for delivery of housing and crisis response services for people experiencing homelessness or at imminent risk of homelessness.

CoC policies directly guide several County programs which directly serve households experiencing homelessness. The County, City, and CoC partner to share data and best practices toward ending homelessness. For example, the CoC guides permanent supportive housing programs to provide safe, affordable permanent housing that meets participants' needs in accordance with Coordinated Entry Policies and Procedures. Programs will pair permanent housing with intensive case management services for participants to ensure long-term housing stability. Programs will prioritize turnover beds for higher needs clients as described below:

- Agencies will hold turnover beds open for a period of 15 days while receiving a referral from the Coordinated Entry By-Name List
- Search methods can include consulting existing waiting lists and coordinated assessment information, polling community partners, and/or any other methods currently in practice. Agencies will make efforts to help clients who are chronically homeless address program barriers that might otherwise exclude them from qualifying
- If chronically homeless cannot be found within the 15-day time period, the turnover bed will be filled by the normal agency process. Agencies are encouraged to document how PSH beds will be filled in compliance with HUD Notice CPD-14-012 on Prioritizing Persons Experiencing Chronic Homelessness

To reduce veteran homelessness, the County, the City of Raleigh, and the CoC joined the Mayors Challenge effort to end veteran homelessness. The task force aligns with a national movement to ensure there are no veterans sleeping on our streets, every veteran has access to permanent housing, and our community has the capacity to connect veterans, should they experience homelessness. Toward this effort, Wake County has:

- Established a preference for veterans at the South Wilmington Street Center (SWSC) and use one of the dormitories to house all veterans;
- Adopted a service model that provides intensive case management services assigning staff at a 1:20 ratio, moving away from the group/class instruction model currently used at SWSC;
- Established and funded a Veteran Services Officer position assigned to provide leadership in the community-wide initiative as well as provide case management services in the SWSC Veterans dormitory; and
- Established 10 Rental Assistance Vouchers to provide permanent supportive housing for veterans.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Housing staff consulted with the Continuum of Care (CoC) at one of its semi-monthly calls to receive input for all Consortium funding including the Emergency Solutions Grant (ESG). The CoC lead applicant, local homeless service agencies, and the City of Raleigh were consulted on the continued usage of ESG funds for the comprehensive prevention program, targeting citizens who are at imminent risk of losing their housing and becoming homeless.

In addition, ESG funds also come to the region through an allocation to the City of Raleigh. The City of Raleigh partnered with Wake County to issue a joint request for proposals for Housing and Homeless Assistance funds. Both the City and the County work collaboratively to allocate funding based on agreed-upon community priorities that have been endorsed by the CoC including Rapid Rehousing, Street Outreach, and Emergency Shelter. Agencies of the COC can also apply directly for ESG funds allocated to the State of North Carolina.

Wake County actively participated in the taskforce that developed performance standards for the CoC. Wake County participates in North Carolina's statewide implementation of HMIS and the local implementation of Coordinated Entry. The CoC adopted the System Performance Measures outlined by HUD. The CoC is transitioning from its current HMIS platform, Wellsky, to Bitfocus which will go into effect on July 1, 2022. Housing's Leadership Team member serves as the Chair of the Data Advisory Committee (DAC) responsible for advising the transition. The DAC is a committee designated by the CoC Governance Board. The DAC served as the Scoring and Selection Committee during the RFP process and reviewed six (6) HMIS platform demos before selecting Bitfocus.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Continuum of Care
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Continuum of Care was consulted during its standing monthly meeting in February. Specific areas for improvement emerged from the consultation including the need for a day center / drop-in center, especially during white-flag months. Need for Rapid Exit Funds and Emergency Assistance Funds. Allocating resources to reduce racial disparities and eliminate racial disproportionality and increase affordable housing units.
2	Agency/Group/Organization	Wake County
	Agency/Group/Organization Type	Other government - Local Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Planning Directors were consulted during a virtual meeting, where a presentation summarizing the Action Plan purpose and process were discussed. Affordable housing development plan needs were discussed by municipal planners. Anticipated outcomes include support for projects and activities, additional plans for affordable housing development, and related infrastructure improvements.

Identify any Agency Types not consulted and provide rationale for not consulting

N/A

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Partnership to End Homelessness	Our goals for ending homelessness were developed in conjunction with the Continuum of Care (CoC).
Wake County 2020 - 2025 Consolidated Plan	Wake County Government and Housing Affordability and Community Revitalization Department	The Strategic Plan is the 2nd year plan of the 2020-2025 Consolidated Plan. The strategic plan goals are consistent with the Consolidated Plan goals which address increasing and preserving affordable housing, addressing policy barriers to housing affordability, and supporting vulnerable populations and communities.
Wake County Affordable Housing Plan	Wake County Government and Affordable Housing Plan Steering Committee	The goals of the Strategic Plan are consistent with the goals of the Wake County Affordable Housing Plan. These goals include developing and preserving affordable housing, assisting individuals and families experiencing homelessness and prevention of homelessness, creating more permanent supportive housing, and working with our partner municipalities to further affordable housing development and community revitalization.

Table 3 – Other local / regional / federal planning efforts

Narrative

The 2022 plan will follow input received from consultations from all organizations participating in the 2022 consultation process, as well as input provided during the robust 2020 Consolidated Plan consultation process.

AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Citizen Participation included:

- Public Notices – Three newspaper notifications were published with details on the Public Hearing 15-days prior to the hearing
- Webpage Public Comments – Citizens had the opportunity to submit comments through the Wake County webpage
- Public Hearing – Agencies and citizens could provide feedback in-person during the Public Hearing or virtually through the County webpage
- Two Consultation Meetings - Community groups provided focused input on homelessness and other barriers to affordable housing
- Emailed comments – Feedback from stakeholders and citizens were received via email

The process included notices placed to comply with Opportunities to Participate and Publication of Notices. One Public Hearing and three consultation meetings were held virtually to receive feedback and concerns from citizens, Community Organizations, the Continuum of Care, Municipal Planners, and the Wake County Board of Commissioners.

In addition, to broaden citizen participation, we expanded outreach to include mass-email communications to increase opportunities for public comments to inform the Draft Plan. HACR presented information based on 2020-2025 Consolidated Plan highlighting relevant data to define the three priority populations that will be the focus of funding allocations for 2022.

Public comments were verbally communicated during meetings and public hearing, sent via email, and posted to County website, affirming stated priorities, and emphasizing the importance of increasing affordable housing units, addressing the unsheltered with high service needs, and focusing on strategy improvements and operational needs to achieve departmental goals. The statements revealed essential areas of focus to be addressed and directly guide the Plan. A draft of the Action Plan was available for a period of 30-days for review at the following locations:

- Department of Housing Affordability & Community Revitalization, Wake County Office Building, 336 Fayetteville Street, Suite 440, Raleigh, NC 27602
- County Regional Centers
- Municipal Town Halls
- Homeless Service Centers
- Wake County Housing Department webpage - <https://www.wakegov.com/departments-government/housing-affordability-community-revitalization/plans-and-public-notice>

- Wake County Housing locations - www.wakegov.com/housing/Pages/locations.aspx
- Wake County Human Services locations - www.wakegov.com/humanservices/locations/Pages/default.aspx
- Mailed to citizen upon request

The 30-day comment period provides residents the opportunity to submit their comments in writing via email or written letter to the contact listed on the public comment notice to Wake County Housing at: Department of Housing Affordability & Community Revitalization, Wake County Office Building, 336 Fayetteville Street, Suite 440, P.O. Box 550, Raleigh, NC 27602. Speech or hearing-impaired persons may contact 1-800-735-2962 (TT) or 1-800-735-8262 (voice). The comments from the meetings are summarized in the final document. All written comments are included.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/ broad community	Three comments were received during Public Hearing at the Wake County Board of Commissioners meeting on February 7, 2022	In support of the Action Plan. The inability of people to find and afford housing is the major driver of homelessness. A critical priority is to address the unsheltered with high service needs. People of color are disproportionately homeless, 7 to 1. Convert available office, commercial, & hotel/motel space to housing. Resources to address staff shortages and limited space. Continue to incentivize landlords and continue policy work around housing preservation	All comments were accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Consultation Meeting	Non-targeted/ broad community	One attendee commented during Continuum of Care meeting on February 14, 2022. Approximately 57 members attended.	A day center / drop-in center for the homeless especially during white-flag months. Need for Rapid Exit Funds and Emergency Assistance Funds. Allocation of resources to reduce racial disparities/ eliminate racial disproportionality Need for more affordable housing units.	All comments were accepted	
3	Consultation Meeting	Planning Directors	Meeting on January 21, 2022. 27 members attended.	No comments	Accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	30-day Public Comment Period	Non-targeted/ broad community	2 comments were received through email during 30-day public comment period	Work toward the full spectrum of housing needs with municipalities that are building units on the ground. Many landlords and property managers do not accept housing choice vouchers (HCV). Amend the county fair housing ordinance to include source of income so it would be illegal to refuse to accept a HCV. Create more affordable housing for those making less than 30% AMI. Use project-based vouchers. Utilize data to show that voucher usage	All comments were accepted	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

There will be a total of \$2,111,762 available in CDBG funds and \$1,067,467 in HOME funds which includes program income for both grants. There will be \$1,468,745 available in HOPWA funds, which includes program income and \$182,420 in ESG Funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,111,762	330,000	0	2,441,762	4,883,524	CDBG funds will be used for Admin and Planning, Homeownership Assistance, Public Facilities, Public Services, Housing Rehabilitation, Land Acquisition, and Infrastructure. Reallocated unexpended prior funds.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,067,467	270,000	0	1,337,467	2,674,934	HOME funds will be used for multifamily rental new construction and/or rehabilitation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,468,745	6,362	0	1,475,107	2,950,214	HOPWA funds will be used for TBRA, STRMU, permanent housing, and Supportive Services.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	182,420	0	0	182,420	364,840	ESG funds will be used for Prevention of Homelessness
Other	public - federal	Other	0	0	0	0	0	
Other	public - federal	Overnight shelter Public Services Rapid re-housing (rental assistance) Other	0	0	0	0	0	

Table 2 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Wake County significantly contributes to housing and homeless service programs through the use of local property taxes. Federal funds are used alongside County dollars to support housing development, supportive services, emergency shelter, prevention, second mortgages, land acquisition, and tenant based rental assistance.

Wake County also partners with affordable housing developers who leverage resources from Low Income Housing Tax Credits, as well as other grant or loan sources from the North Carolina Housing Finance Agency and other local governments in Wake County. Additionally, private financing is leveraged through banks where applicable.

HOME match requirements are met through loans made to developers from the County tax-funded Capital Improvement Fund.

The WakePrevent! program combines funding from the County, Emergency Solution Grant, and CDBG Public Services to prevent low-income residents from experiencing homelessness. County funds from this program meet the ESG match requirements.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

In 2019, Wake County finalized its Evaluation and Disposition of County-owned Land for Affordable Housing Policy which establishes the expectation that all County or school-owned land should be assessed for the purpose of affordable housing prior to disposition. Since the policy was established, Wake County has embarked on two disposition processes.

In 2020, Wake County selected a development team to develop a 19+ acre County property in Holly Springs, NC into a mixed-use development with 124 affordable housing units and commercial office and retail space for the community. In 2021, the County began the process to disposition of a 6+ acre parcel in Raleigh, NC acquired from Wake Technical Community College (Wake Tech) for affordable units. The formerly Wake Tech parcel is adjacent to the future Southern Corridor of the Wake BRT system.

In addition, Wake County is working with the Wake County Public School System (WCPSS) on a process for dispositioning surplus school district land for affordable housing. The County also works with its municipalities to encourage their own public land analysis and adoption of public land disposition policies that prioritize the use of publicly owned property for affordable housing.

Discussion

The grants offer numerous ways of helping low- and moderate-income citizens of Wake County. Combined together, and leveraged with other resources, Wake County is able to offer many different programs and have a positive impact on many peoples' lives.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase and preserve affordable housing	2020	2025	Affordable Housing Homeless Non-Homeless Special Needs	Countywide Target	Affordable Housing	CDBG: \$1,651,910 HOME: \$1,337,467	Rental units constructed: 6 Household Housing Unit Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Added: 5 Household Housing Unit Homeowner Housing Rehabilitated: 32 Household Housing Unit Direct Financial Assistance to Homebuyers: 10 Households Assisted
2	Reduce barriers to housing affordability	2020	2025	Affordable Housing Homeless Non-Homeless Special Needs	Countywide Target	Addressing barriers to housing affordability	CDBG: \$737,352	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 10 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Support for vulnerable populations and communities	2020	2025	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Countywide Target	Support vulnerable populations and communities	CDBG: \$367,500 HOPWA: \$1,475,107 ESG: \$182,420	Public service activities for Low/Moderate Income Housing Benefit: 10 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 55 Households Assisted Homeless Person Overnight Shelter: 2000 Persons Assisted Homelessness Prevention: 150 Persons Assisted

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Increase and preserve affordable housing
	Goal Description	<p>The activities to be funded under this goal include:</p> <ul style="list-style-type: none"> • Construction, acquisition and/or rehabilitation of homeowner units • Construction, acquisition and/or rehabilitation of rental units • Homeownership assistance
2	Goal Name	Reduce barriers to housing affordability
	Goal Description	<p>The activities to be funded under this goal include:</p> <ul style="list-style-type: none"> • Administration, planning and fair housing activities • Job training for individuals experiencing homelessness
3	Goal Name	Support for vulnerable populations and communities
	Goal Description	<p>The activities to be funded under this goal include:</p> <ul style="list-style-type: none"> • Public service activities supporting households experiencing or at-risk of homelessness • Tenant Based Rental Assistance and Short-Term Rent, Utilities and Mortgage including supportive services for individuals and families with HIV/AIDS • Homelessness Prevention • Neighborhood Revitalization Projects which may include housing, public facility, and community revitalization activities

AP-35 Projects - 91.420, 91.220(d)

Introduction

The following projects form the basis for our work for the fiscal year 2022-2023. Some projects have one activity, and others will be comprised of several activities. The information below conveys the expected grants and amounts, and their uses.

#	Project Name
1	CDBG Administration
2	CDBG Rehabilitation
3	CDBG Housing Activities
4	CDBG Public Services
5	CDBG Neighborhood Revitalization
6	HOME Administration
7	HOME Affordable Housing Development
8	2022-2025 Wake County HOPWA TBRA Program NCH20F002 (WCHW)
9	2022-2025 Wake County HOPWA STRMU Program NCH20F002 (TFS)
10	ESG Homelessness Prevention

Table 4 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Allocation priorities align the 2022 consultation process, as well as the 2020-2025 Consolidated Plan which was determined through a comprehensive citizen participation process involving more than 25 meetings and consultations. In addition, the Wake County Affordable Housing Plan, adopted in 2017, examined relevant data and trends supporting the priorities of this plan. Information about homeless needs was gathered from the Continuum of Care lead applicant through documents such as the Point in Time Count, Housing Inventory Count, and other HMIS data.

Obstacles to addressing underserved needs include:

- Population growth versus speed of development has created a tight and increasingly expensive market
- Acquisition and redevelopment of legally binding and naturally occurring affordable housing has led to significant displacement including the lack of landlords willing to accept subsidized rental assistance
- The cost of living has increased faster than wages
- A shortage of public, private, and philanthropic resources to build or rehabilitate affordable housing to meet the need of the community
- "NIMBYism" (community opposition to the location of affordable housing in their

neighborhoods)

- High cost of land in Wake County, particularly in Communities of Opportunity, which would be good locations for affordable housing.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Administration
	Target Area	Countywide Target
	Goals Supported	Reduce barriers to housing affordability
	Needs Addressed	Addressing barriers to housing affordability
	Funding	CDBG: \$422,352
	Description	No more than 20% of entitlement funds and 20% of annual program income will be used to administer the CDBG activities.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 2,040 persons and 69 Households. Proposed activities will benefit low-moderate income families.
	Location Description	Countywide
	Planned Activities	Administration and Planning
2	Project Name	CDBG Rehabilitation
	Target Area	Countywide Target
	Goals Supported	Increase and preserve affordable housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$1,081,148
	Description	Funds will be used for housing rehabilitation activities for people who are below 50% AMI and are elderly, disabled, or experiencing emergent needs. Funds may also be used for rehabilitation of multifamily rental properties serving households at or below 80% AMI. Program administration costs are included.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 37 households. Proposed activities will benefit low-moderate income families.
	Location Description	Countywide

	Planned Activities	Elderly & Disabled, Emergency and Multifamily Rehabilitation
3	Project Name	CDBG Housing Activities
	Target Area	Countywide Target
	Goals Supported	Increase and preserve affordable housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$570,762
	Description	Funds will be used for the purpose of creating affordable housing through various CDBG eligible activities such as acquisition, site improvements, and homeownership assistance.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 21 households. Proposed activities will benefit low-moderate income families.
	Location Description	Countywide
	Planned Activities	Homeownership Assistance, Acquisition and Site Improvements
4	Project Name	CDBG Public Services
	Target Area	Countywide Target
	Goals Supported	Reduce barriers to housing affordability Support for vulnerable populations and communities
	Needs Addressed	Addressing barriers to housing affordability Support vulnerable populations and communities
	Funding	CDBG: \$315,000
	Description	Public Services funds will be used for job training, short-term rental assistance, street outreach to the homeless, as well as services for individuals experiencing homelessness offered at the South Wilmington Street Center.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 2,040 persons and 10 Households. Proposed activities will benefit low-moderate income families
	Location Description	Countywide

	Planned Activities	Job training, homeless prevention through rental assistance, street outreach, and shelter operations
5	Project Name	CDBG Neighborhood Revitalization
	Target Area	Countywide Target
	Goals Supported	Support for vulnerable populations and communities
	Needs Addressed	Support vulnerable populations and communities
	Funding	CDBG: \$52,500
	Description	Community Revitalization, Housing and Public Facility activities will focus on revitalization of specific neighborhoods in the Wake County entitlement.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Countywide
6	Planned Activities	May include Community Revitalization, Housing and/or Public Facility activities depending upon the needs of the neighborhoods nominated. Includes the reallocation of unexpended prior year public facility funding.
	Project Name	HOME Administration
	Target Area	Countywide Target
	Goals Supported	Increase and preserve affordable housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$106,747
	Description	HOME funds used for administration will consist of no more than the allowable 10% of the grant award to support activities related to increasing and preserving affordable housing.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 45 Households. Proposed activities will benefit low-moderate income families.
	Location Description	N/A

	Planned Activities	Administration of activities to span newly construct or rehabilitate affordable housing.
7	Project Name	HOME Affordable Housing Development
	Target Area	Countywide Target
	Goals Supported	Increase and preserve affordable housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$1,230,720
	Description	Development through new construction or rehabilitation of affordable housing.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 45 Households. Proposed activities will benefit low-moderate income families.
	Location Description	Countywide
	Planned Activities	New construction, acquisition, or rehabilitation of affordable housing.
8	Project Name	2022-2025 Wake County HOPWA TBRA Program NCH20F002 (WCHW)
	Target Area	Countywide Target
	Goals Supported	Support for vulnerable populations and communities
	Needs Addressed	Support vulnerable populations and communities
	Funding	HOPWA: \$1,314,607
	Description	Administration, Tenant Based Rental Assistance, and Supportive Services for individuals with HIV/AIDS.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 55 Households. Proposed activities will benefit low-moderate income families.
	Location Description	Wake, Johnston, and Franklin Counties
	Planned Activities	Administration, permanent housing placement, TBRA vouchers, supportive services, housing information, and resource identification.
9	Project Name	2022-2025 Wake County HOPWA STRMU Program NCH20F002 (TFS)
	Target Area	Countywide Target

	Goals Supported	Support for vulnerable populations and communities
	Needs Addressed	Support vulnerable populations and communities
	Funding	HOPWA: \$160,500
	Description	Short-term rent, utility and mortgage assistance to prevent homelessness for households containing an individual living with HIV/AIDS
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 50 persons. Proposed activities will benefit low-moderate income families.
	Location Description	Wake, Johnston, and Franklin Counties
	Planned Activities	STRMU including supportive services
10	Project Name	ESG Homelessness Prevention
	Target Area	Countywide Target
	Goals Supported	Support for vulnerable populations and communities
	Needs Addressed	Support vulnerable populations and communities
	Funding	ESG: \$182,420
	Description	Services for Persons who are at-risk of homelessness
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 100 persons. Proposed activities will benefit low-moderate income families.
	Location Description	Countywide
	Planned Activities	Homelessness Prevention, Rapid Rehousing, Emergency Shelter & Street Outreach

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Our grant funds will cover the entire Wake County entitlement area as follows:

- CDBG homeownership rehabilitation, neighborhood revitalization, and homeownership assistance will be used outside of Raleigh and Cary
- CDBG multi-family rental rehabilitation, housing activities, and public services may be used countywide if support residents in the entitlement area
- HOME funds used for the development of affordable housing will be distributed on the basis of awarded development contracts and their locale in Wake County. Affordable housing is needed throughout the county.
- ESG funds used for homelessness prevention will be spent in the Wake County area in which the recipient is located.

HOPWA funds are available for use throughout Wake, Johnston, and Franklin Counties, and recipients of these funds may live anywhere in these three counties

Geographic Distribution

Target Area	Percentage of Funds
Countywide Target	100

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Wake County prioritizes funding to support the upward mobility of low- and moderate-income households by investing resources in areas of economic opportunity. Wake County also prioritized areas that may be historically disenfranchised through revitalization efforts that aim to minimize the displacement of residents.

Programs accessible directly by clients, such as the rehabilitation program, will be allocated throughout Wake County on a first-come, first-served basis. The County may undertake marketing or notification efforts within a specific neighborhood if requested by municipalities or partner agencies. Other programs such as the Affordable Housing Development Program (AHDP) prioritize the development or preservation of affordable housing in areas of economic opportunities as defined by proximity to job centers, transportation, schools, and other desirable amenities. Wake County uses the mapped areas of economic opportunity from the Analysis of Impediments to Fair Housing Choice (AI) to prioritize the

deployment of County resources.

We have also developed a preservation warning system that identifies affordable properties that may be lost to the market. We will work with the owners and other partners to preserve this existing housing and prevent displacements where possible. Funding for development is awarded based upon a request for the proposal process.

Discussion

The Wake County Affordable Housing Plan was completed and approved by the Board of Commissioners in late 2017. The Plan offers strategies and tools for the creation and preservation of affordable housing, use of rental assistance, and increasing the number of landlords who participate in our rental assistance program.

In addition to offering other directives, the Plan identifies areas along proposed transit corridors and near proposed transit stops as important locations for affordable housing development and preservation. Transit-oriented development is an important consideration for affordable housing funding decisions. At present, there is a bus system in Wake County, but a large-scale transit plan is in implementation and will include bus rapid transit in the short term and commuter rail transit in the longer term. Housing is involved in partnerships and initiatives to ensure that affordable housing is an integral part of transit and land use planning.

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

Our affordable housing program for the next year, FY 2022-2023 will focus on affordable housing construction and preservation, rehabilitation, acquisition, and homeownership assistance. It will also provide public services, rental assistance, and supportive services to vulnerable populations. The tables below illustrate the number of people estimated to be served by need and type of housing.

One Year Goals for the Number of Households to be Supported	
Homeless	2,040
Non-Homeless	1,115
Special-Needs	142
Total	3,297

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	205
The Production of New Units	56
Rehab of Existing Units	37
Acquisition of Existing Units	10
Total	308

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Our comprehensive approach to the provision of affordable housing allows Housing to address many different needs, work with a great variety of community partners, and offer case management services to special needs populations. In addition, we leverage significant resources through County tax-payer revenue to produce additional outcomes or increased services.

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

The Housing Authority of the County of Wake (HACW) continues to look for opportunities to improve our public housing stock, guide residents to achieve self-sufficiency, and prepare for homeownership responsibilities.

Actions planned during the next year to address the needs to public housing

HACW began a Strategic Planning process with the guidance of a strategic planning consulting group late last year. We will complete that process this year with our staff, board, residents, and community stakeholders. As part of this process, we will hire an architect and engineering firm to do a physical needs assessment of all PH properties and provide guidance for redevelopment and adding additional affordable units. We continue seeking opportunities to increase vouchers through Special Use Vouchers and VASH Vouchers offered through HUD. We anticipate that the new development in Garner known as Mitchell Park Apartments will be completed by early fall. Supply chain limitations have caused a delay in completion.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

HACW employs a full-time Family Self-Sufficiency Coordinator to promote participation in the Family Self-Sufficiency program. This program works with residents to set goals toward attaining self-sufficiency and assists with linking the resources necessary to assist the families in attaining their goals. HACW has created new partnerships to assist families with various challenges they may face. We have partnered with the North Eastern Community Coalition to host events that bring unity, diversity, and hope to families in the community. Heritage Elementary has set up a satellite office in the Wake Forest community so that they may provide convenient services to the families of Heritage Elementary. In conjunction with this partnership, we have Fundamental Reading, a 501©3, which provides tutoring for reading skills and proficiency while instilling confidence in the students. We provide referrals to several agencies that provide homeownership counseling, guidance, and opportunities to prepare families for purchasing a home.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

HACW continues to update the Public Housing units to the best of our ability and funding

limitations. We have implemented new interior design schemes to achieve a more appealing living environment. Once the strategic planning and redevelopment process is initiated, we will be able to take more major steps to provide an impact on affordable housing in Wake County. The County and HACW are looking forward to enhancing their partnership to mitigate growing housing affordability issues.

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

For the Fiscal Year 2022-2023, activities for Homeless persons and people with Special Needs mirror the projects and programs described in the 2020-2025 Consolidated Plan, Five Year Strategic Plan section Homelessness Strategy. Efforts will be made this year on all of the projects described below.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The County continues to make substantial progress in its effort to end homelessness by implementing best practices and provide leadership in the implementation of community innovations that improve the services of our citizens who are experiencing homelessness and reach out in particular to those who are living unsheltered.

The Housing Department is on track (July 2022) to occupy additional space adjacent to Oak City Cares that will be the home-base of our expanded Housing Resource Team and other Wake County homeless services providers. Oak City Cares is an innovative facility where residents experiencing homelessness can easily access all the services they need to get on the path to a stable future. This collaborative facility aims to quickly and effectively connect people at-risk of or currently experiencing homelessness with services that will help them secure housing, find employment, obtain substance abuse treatment and improve their health through partnerships with more than 20 community providers. Oak City Center offers laundry facilities, showers, computers and phones to help guests achieve the daily tasks needed to work towards a stable housing situation.

The NC-507 Continuum of Care is working to target high needs clients and has implemented and is continuing to refine a process to improve the delivery of housing and crisis response services. This process, the Coordinated Entry System, institutes consistent and uniform access, assessment, prioritization, and referral processes to determine the most appropriate response to each person's immediate housing needs. This year we partnered with NC 507 to fund the House Wake! Access Hub, a call center that is literally the "*Front Door*" to our Coordinated Entry System. The call center provides responsive, informative, and intentional services to callers who are in crisis. The Call Center assists callers experiencing homelessness in learning exactly where to go to get help, and callers are assessed in a standard and consistent way and are matched with the housing/services that best meet their needs, as available. We will be migrating to a new HMIS platform (Bitfocus) in July 2022 for improved customer service interface and improved outcome tracking functionality.

Wake County will continue to fund street outreach services to further engage with people who are living

in places not meant for human habitation. Outreach specialists provide street-based assessment, case management, referral services and emergency survival supplies. Street outreach services work collaboratively with representatives from other agencies.

Addressing the emergency shelter and transitional housing needs of homeless persons

South Wilmington Street Center (SWSC) is a men's shelter operated by Wake County. SWSC is experiencing a sustained demand for individualized services and critical time interventions. SWSC working to refocus their efforts away from classroom instruction to more enhanced individualized services in a low-barrier environment to shorten the length of homeless episodes. This year Wake County has committed additional resources to SWSC for diversion, emergency rental assistance and health care staff. Leadership is working to implement these program enhancements.

Wake County has partnered with Urban Ministries (Single Women Emergency Shelter Provider) to expand overnight bed capacity and provide operational support. Wake County also partners with Salvation Army (Family Emergency Shelter Provider) to provide operational support.

In addition, to SWSC, Urban Ministries, and Salvation Army there are six other agencies that provide shelter, four agencies that provide transitional housing and seven agencies that offer rapid re-housing assistance. Furthermore, Dorcas Ministries also provides hotel vouchers as transitional housing. Wake County the new "Bridge to Home" program, providing funding for agencies to improve low barrier practices and enhance services provided to persons experiencing homelessness.

In Wake County, there are a limited number of emergency shelter beds for families. Wake County is working to identify non-congregate family shelter to add additional capacity in the community.

The City of Raleigh and Wake County will continue to partner to issue a combined RFPs for Emergency Solutions Grant funding for emergency shelter, rapid re-housing, street outreach, and the Homeless Management Information System. This combined process simplifies the application, streamlines the contracting and reimbursement process, and enables agencies to provide consistent services to consumers.

Wake County is currently implementing a "*Back Door*" Landlord Engagement Unit focused on maintaining positive relationships with existing landlords and expanding the availability of rental units for persons at-risk of homelessness or exiting out of the homeless.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were

recently homeless from becoming homeless again

The Permanent Housing and Supportive Services Division provides housing options and wrap-around services necessary to assist the County's most vulnerable citizens. The County uses the Housing First Model which is cost effective in reducing expensive emergency interventions. To address the subpopulations, Wake County uses various funding sources including: the Continuum of Care grant, Housing Opportunities for Persons with AIDS (HOPWA) grant, and County funds. Coordinated Entry prioritizes citizens who have disabling conditions, are unsheltered or have longer lengths of homelessness. Coordinated Entry efforts have prioritized citizens who have disabling conditions, are unsheltered or have longer lengths of homelessness; therefore, more citizens experiencing chronic homelessness are gaining access to permanent supportive housing and rapid rehousing opportunities.

To reduce veteran homelessness, the City of Raleigh, Wake County, and the CoC joined the Mayor's Challenge effort to end veteran homelessness. Our County Manager reissued a challenge to end veteran's homelessness by 2021. Toward this effort, Wake County has (1) established a preference for veterans at SWSC and uses one dormitory to house all veterans; (2) adopted an intensive case management service model assigning staff at 1:20 ratio; moving away from the group/class instruction; (3) funded a second Veteran Services Manager position assigned to provide leadership in the communitywide initiative; and (4) established 10 new County funded Rental Assistance Vouchers to provide permanent supportive housing for highly vulnerable veterans.

This year Wake County is working to create and preserve affordable housing through housing construction and tenant based rental assistance. Both programs will enable greater access to housing for persons who are homeless or in rapid re-housing programs. All Requests for Proposals for tax-credit developments require units be set aside for clients with a supportive housing voucher through Wake County.

Supportive Housing – Wake County has two permanent supportive housing developments. The developments will provide housing as a platform for improving health, decreasing public system utilization, increasing economic opportunities, and preserving a diverse community with a high quality of life. By expanding the number of affordable rental units with wrap-around services available to lower income households, the number of individuals and families experiencing homelessness or at imminent risk of homelessness will be reduced.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services,

employment, education, or youth needs.

Wake County Housing Resource Team will use additional HOPWA resources to expand its services to person living with HIV/AIDS by administering the Short-Term Rent, Mortgage and Utility Assistance Program. This team is task with helping clients identify immediate alternate housing arrangements and connecting them with services and financial assistance to help them return to permanent housing; prevention/relocation services providing short-and/or medium-term rental assistance as necessary to prevent the household from moving to an emergency shelter or a place not meant for human habitation; and housing identification/navigation services that quickly find and identify housing for citizens who are experiencing a housing crisis. Staff conduct continuous recruitment of landlords with units in the communities and neighborhoods where citizens want to live and negotiate with landlords to help citizens access housing. These services help ensure fewer citizens become homeless and citizens who need affordable housing are matched to the available affordable housing. Prevention rental assistance and case management is targeted for residents who are at or below 50% AMI and are less than 30 days to literal homelessness. The County is working to focus its prevention services on relocation for households not able to maintain their current housing, especially in view on the pandemic crisis.

Previously Wake County worked to prevent low-income individuals and families from becoming homeless by providing educational opportunities. Efforts include Wake County Housing Information Sessions; Wake County Ready to Rent Sessions as a component of prevention efforts to provide education, resources to help families and individuals with skills to break down leasing barriers and cultivate positive leasing habits, while linking them with landlords and other mainstream services; partnerships with community agencies that provide case management, budget counseling; and employment training, and financial assistance to help households who are at risk of homelessness to avoid becoming homeless. In view of the pandemic, these services had to be reformatted and abbreviated to be completed via telephone consultation and in some cases with persons where were quarantined together in some of our projects. The team will continue to envision alternative ways to provide these opportunities and return to some groupwork were appropriate.

Alliance Behavioral Healthcare assures services are provided to persons who are being discharged from mental health care facilities, and many of the vouchers provided by Wake County's Rental Assistance Housing Program are for people with behavioral health disabilities. Passage Home, one of the community non-profit agencies, works to find housing for ex-offenders. In addition, a member of the HACR staff is a liaison to the Reentry Council, a coalition of community stakeholders that works to reduce/eliminate barriers to successful reentry, in part, by providing supportive services to help overcome reentry challenges. In addition, and in partnership with DHIC, a non-profit affordable and supportive housing developer, Wake County provides two on-site housing social workers who support

the project's tenants including Second Chance program participants.

Discussion

Wake County is expanding its efforts to assist people who are experiencing homelessness, at risk of homeless, and/or have special needs through the many programs described above. These include: the opening of Oak City Cares; the creation of a Homeless Services and Prevention Division and a Permanent Housing and Supportive Services Division; development of a Supportive Housing project; additional funding for homelessness prevention and street outreach; increased community partnerships; additional efforts and funding to assist Veterans; a strong rental assistance program; and the many other programs and projects described in the sections above.

AP-70 HOPWA Goals - 91.420, 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	50
Tenant-based rental assistance	65
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	115

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

Municipalities in Wake County have significant influence on the development of affordability through zoning and land use. Requirements such as parking, setbacks, materials, vegetation coverage, and other site-specific regulations have direct influence on the cost of building housing. In addition, zoning ordinances have become more restrictive of fair housing choice since 2015, placing jurisdictions at a potentially higher risk for discrimination against members of the protected classes. Zoning ordinances for municipalities within the Urban County continue to restrict housing choice for members of the protected classes. This jeopardizes Wake County's ability to affirmatively further fair housing. Because members of the protected classes are disproportionately affected by a lack of affordable housing, zoning that effectively restricts affordable housing development can be an impediment to fair housing choice.

State of North Carolina law does not allow for inclusionary zoning although there is lobbying happening. Since North Carolina is a "Dillon Rule" state whereby cities only have the powers granted them by the state legislature, municipalities are limited in their ability to innovate in creating additional affordable units. The most common strategy is direct financial investments by counties or municipalities.

The state Qualified Allocation Plan (QAP) requirements make it difficult for jurisdictions to receive 9% low-income housing tax credit developments in proportion to the need demonstrated in large metro areas. The scoring system also discourages mixed income housing and significantly restricts the location of new developments. Additional requirements such as parking, per-unit per-project maximum costs and limit to materials and design make development of housing in urban areas difficult. In addition, the State has ruled that tax credits cannot be used to develop permanent supportive housing which is inconsistent with other QAP's nationwide.

Affordable housing is a low priority at the state level and elimination of state housing tax credit for the development of low-cost housing has reduced the funds available to address housing needs statewide. In addition, the State remains without the Workforce Housing Loan Program funding to gap finance the development of affordable housing through LIHTC.

Minimal increases in CDBG and HOME has not allowed jurisdictions to keep pace with the increased cost of living and inflation of building materials/land. This has also been exacerbated by COVID. Therefore, it is difficult to continue to serve the needs of the County with limited federal support for development initiatives.

Continued labor shortages and increased materials and construction costs add additional expense to affordable housing projects. This reduces available funds for developers to build cost-effectively and in-turn reducing affordability.

The Raleigh, NC metro area continues to be a top market for quality of living and rental investments. We

are experiencing a significant loss of naturally occurring affordable housing (NOAH) to investors who are “flipping” properties and displacing residents who are low-income. Between 2010 and 2019, Wake County lost 30,000 units with rents less than \$1,000 a month.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Strategies for changing, navigating around or working with the barriers described above were developed in 2017 in the formation of the Twenty-Year Affordable Housing Plan. Wake County only controls land in unincorporated areas; thus we work with the municipalities to address barriers to affordable housing that may exist in their policies. We provide technical assistance to address affordability planning. We also share strategies and tools, such as the County’s policy and legal research for dispositioning public land for the purpose of affordable housing.

We focus on policy mechanisms that help the municipalities, such as neighborhood strategic planning, establishment of Affordable Housing Incentive Overlays and Expanded Capacity for Accessory Dwelling Units to further affordability and housing stock. Our Housing Director and Elected officials are also beginning an effort to advocate to Municipalities regarding greater density, improved land use policy, and housing services. Staff continue to advocate for flexible dimensional standards and reduced parking requirements, reduced lot sizes, higher density and multifamily zoning, streamlined development review processes, and fee or entitlement waivers for affordable development.

Our programs continue to provide gap financing for affordable developments. We use additional funding to leverage deeper affordability and continue to use the 4% tax credits to increase unit production. The County supports changes to the NC Housing Finance Agency’s process for allocating federal LIHTC. We will continue to include a requirement that 10% of the units must be set-aside for tenants who receive rental assistance from Wake County.

To support the preservation of affordable housing we are establishing a preservation loan fund, in partnership with investors, motivated lenders and municipalities, to acquire legally binding or naturally occurring affordable housing development, especially in strategic locations. We have selected Self-Help Ventures Fund as the administrative partner to operate this Fund and look to launch this fiscal year.

We have established a unit specializing in landlord engagement that bridges the gap between partners with rental homes and Wake County residents who are seeking housing. We are also continuing to look for ways to work with PHAs to streamline voucher administration.

Discussion

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

This section references current programs and projects implemented by Wake County Housing, as well as plans that will preserve and increase affordable housing and expand access throughout the County

Actions planned to address obstacles to meeting underserved needs

- Create additional housing at higher levels than in previous years
- Address access for vulnerable populations through a mandatory 10% set-aside for tenants receiving rental assistance through Wake County
- Work with landlords to increase acceptance of rental assistance and access to units
- Work with municipalities to address land use and zoning policies that affect affordability
- Allocate additional funding to develop affordable housing in Communities of Opportunity
- Increase services offered to vulnerable populations to stabilize families and prevent homelessness
- Increase services offered to vulnerable populations in supportive housing to increase stability and improve quality of life.
- Develop a transitional housing program for individuals experiencing chronic homelessness and have cooccurring, acute health and mental health needs and frequently access expensive crisis interventions.

Actions planned to foster and maintain affordable housing

Currently, Wake County's housing rehabilitation, affordable housing development, and rental assistance programs create and preserve affordable housing. Details of these programs and projects description can be found in the AP-20 Annual Goals and Objectives Section and the AP-35 Projects Section of this Action Plan.

In addition, plans for this year to foster and maintain affordable housing include, but are not limited to, finalization of a warning system to monitor expiring or threatened naturally occurring affordable housing; creation of a fund dedicated to the preservation of affordable housing; increasing rental production; and creating homeownership opportunities. These plans will be achieved through strong partnerships and leveraging of other funding sources.

Actions planned to reduce lead-based paint hazards

Wake County is actively involved in reducing lead-based paint hazards in all federally funded housing rehabilitation projects, pursuant to the HUD Safe Housing Rule 24 CFR 35. Wake County employs a qualified risk assessment firm to perform an inspection and risk assessment of all pre-1978 rehabilitation projects. This methodology follows guidelines for investigating dwellings, as included in

HUD's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. Recommendations are then made from the testing based on summary findings, and the level of lead hazard reduction activity is determined prior to bidding projects.

The amount of funding for each project decides which method of lead hazard reduction to pursue, which may include an interim control measure or a full abatement measure. All lead hazard abatement activities are performed by a certified abatement contractor. General Contractors bidding on housing rehabilitation projects must have completed the Lead Safe Work Practices training.

Once lead reduction work and all rehabilitation work have been completed, a lead clearance test is conducted to declare the dwelling safe for occupancy. As part of housing policy and procedure, all rehabilitation projects are evaluated for lead testing based on summary findings, and the above actions are put in effect where necessary.

Wake County's housing rehabilitation program makes up to \$10,000 available for any lead paint abatement or remediation that is necessary to declare the dwelling safe for occupancy. In addition, housing service programs provide renters with information regarding lead hazards when receiving financial assistance. This past year, several staff participated in the Lead Safe Housing Rule Webinar Series: Subparts J and K to renew and expand their knowledge related to lead-based paint requirements.

Actions planned to reduce the number of poverty-level families

Housing affordability has a strong impact on economic opportunity and upward mobility. If a household is paying more than 30% of its income on housing, it does not have the remaining resources to cover other life expenses. Thus, by providing and preserving more affordable housing, Wake County can assist households in reducing household expenses, enabling them to create more opportunities for themselves.

In addition, Wake County funds coordinated entry access services to those who require assistance to maintain independent housing. Our CDBG public services program in job training provides persons experiencing homelessness with opportunities for on-the job training, internships, and classes to learn new skills and increase their employability. Wake County HACR also works with Health and Human Services implements the following programs to assist low-income populations with achieving economic self-sufficiency:

Work First - Work First is a self-sufficiency strategy developed by Wake County Health and Human Services to address the needs of very low-income families. It provides temporary financial assistance and supportive services such as day care, transportation, training opportunities, Medicaid, and has set-asides for affordable housing units.

Supportive Employment - This program assists people who are disabled with finding and maintaining employment. Additional services include on-site vocational evaluation, career counseling and skills

training.

Wake County Vocational Services -This program of Health and Human Services empowers individuals to find, change, or maintain meaningful employment in the community. Employment services leverage external and internal partners to enable individuals to conduct career assessments and exploration, develop career goals, determine training and education options, conduct strategic job searches, and to succeed and grow in their new job.

Finally, a regional Employment Services and Workforce Development Team develops business connections through community outreach, the Wake Area Business Advisory Council (BAC), various local chambers of commerce, and job development activities. These connections enable opportunities and insights into effective job search strategies.

Actions planned to develop institutional structure

Housing remains closely connected with other Wake County departments such as Health & Human Services, Facilities, Design & Construction, and Environmental Services in order to serve clients and residents completely and holistically.

We also regularly engage with community services providers, healthcare systems, banking institutions and others to offer perspective to the interrelatedness of housing affordability and services to outcomes in their respective fields. Our director spends time in the community furthering affordable housing knowledge and leveraging partnerships to preserve and increase institutional structure for more efficient and effective services.

Actions planned to enhance coordination between public and private housing and social service agencies

Wake County is in close coordination with the Housing Authority of the County of Wake (HACW), the Raleigh Housing Authority, Town of Cary, Town of Apex and the City of Raleigh Housing staff. These entities work together to increase and preserve housing throughout the County. The department also coordinates with other municipalities regarding land use policies and barriers to affordability.

A good example of a partnership between community agencies, the Housing Authority of the County of Wake (HACW), and the Veterans Administration is the HUD VASH program. HUD VASH rental assistance is specifically for Veterans and their families. This funding is provided by the Veterans Administration (VA) and are administered by the HACW. Veterans identified for housing assistance by Coordinated Entry will be prioritized for available VASH or County vouchers and other community services.

In addition, the County benefits by coordinating social and housing services to comprehensively serve resident. Public and private housing providers, and over 30 social service agencies are members of the Continuum of Care (CoC). Together they coordinate services to end homelessness, decrease poverty and

ensure upward mobility. The Oak City Cares Center is an example of public, private, and non-profit partnerships to create a facility serving the whole person onsite and sharing data to better coordinate services.

Discussion

As described above, Housing works closely with communities to provide housing, reduce lead-based paint hazards, and provide social services and employment opportunities for low-moderate income residents. Our department and many partnerships will allow us to continue our significant progress in FY2022-2023.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- | | |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 0 |

Other CDBG Requirements

- | | |
|---|--------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 90.00% |

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Wake County uses County funds to exceed the minimum 25% matching contribution to housing that qualifies as affordable under the HOME program annually. This is accomplished by funding portions of projects that are not HOME-assisted but meet the requirements of 24 CFR 92.219(b)(2) for the

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purposes of affordable housing development for low and extremely low-income people and supportive housing development.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

In accordance with the HOME rule at CFR 92.254, resale and recapture provisions will be included in all applicable development agreements and loan documents, as well as in agreements with homebuyers. In addition, Wake County will be named as party to documents issued by partners. Further, deed restrictions will be placed on the property to enforce affordability.

Detailed resale and recapture guidelines are attached in the Grantee Unique Appendices.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

HOME-assisted housing under these provisions must remain affordable to a reasonable range of low-income homebuyers. A reasonable income range for low-income homebuyers is defined as 30%-80% of Area Median Income, where homebuyers pay no more than 30% of their household income for principal, interest, property taxes, and insurance. This requirement will be included in development agreements, loan documents, and deed restrictions when HOME investment is provided as a development subsidy.

Detailed resale and recapture guidelines are attached in the Grantee Unique Appendices.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Wake County does not use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

Emergency Solutions Grant (ESG)

1. Include written standards for providing ESG assistance (may include as attachment)

Written standards for providing ESG assistance are attached in the Administration screen.

2. If the Continuum of Care has established centralized or coordinated assessment system that

meets HUD requirements, describe that centralized or coordinated assessment system.

In compliance with the CoC Program Interim rule, the centralized/coordinated assessment system is as follows:

Coordinated Entry currently takes place through seven access sites throughout the County. Staff at the access sites assesses and directs the client to one or more agencies in Wake County, or emergency care as needed.

Through Coordinated Entry, persons experiencing homelessness are able to access housing more swiftly, reduce the length of time in shelter and to divert those with a safe alternative from entering shelters/homelessness. All agencies receive training on the VI SPDAT, review community data, determine prioritization, develop strategies to increase affordable housing inventory, review referrals and share systems change with the community at-large, those experiencing homelessness and other community partners.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Wake County does not intend to sub-award the County-received ESG funds. The funds will be provided directly to clients for homelessness prevention by staff after referral, assessment and determination of eligibility and need. City of Raleigh and State ESG funds are sub-awarded through an RFP process. These funds will be allocated to private non-profit organizations, including community and faith-based organizations through evaluation of the RFP responses, which shall convey proposed uses, objectives, outcomes of the funding and capacity of the agencies.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The men's shelter, South Wilmington Street Center, has a Guest Advisory Council composed of the homeless men residing there. The Council meets weekly and is led by a president and vice president, who run the meeting. The Council makes recommendations and suggestions to staff, which are then evaluated and considered in policies and funding decisions.

In addition, there is a homeless or formerly homeless person on the Board of Directors of the Partnership to End Homelessness, which is the collaborative applicant for the Continuum of Care.

5. Describe performance standards for evaluating ESG.

Performance standards for evaluating ESG funds are:

The number of persons who were imminently at risk of homelessness, enrolled in prevention services, and remained stably housed for one year after the financial assistance ends.

Community Development Block Grant, HOME Investment Partnerships, and Emergency Solutions Grant program requirements are described above. Wake County funds will also be utilized to support Wake County Department of Housing Affordability & Community Revitalization programs.

2022 Annual Action Plan – Citizen Participation Public Comments

Consultation Meeting

Wake County Planning Directors

Friday, January 21st, 2022

The 2022 Annual Action Plan estimated budget and priority populations were presented to Municipal and Wake County Planning Directors. A timeline of the Action Plan process and dates for the upcoming public hearing and public comment period was provided. Questions and comments were encouraged.

No comments were received.

Public Hearing

Board of Commissioners Meeting

Monday, February 7th, 2022 at 5:00pm

1. Kim Crawford, MS, MA

Executive Director

Raleigh Wake Partnership to End & Prevent Homelessness

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office: 919-443-0093 x 1033

www.partnershipwake.org

Thank you so much Chairman Hutchinson, and Commissioners for allowing me to speak today. I am Kim Crawford, Executive Director of the Raleigh Wake Partnership to End & Prevent Homelessness, the Raleigh Wake Homeless Continuum of Care Lead Agency.

Homelessness has been going up slightly every year since 2016. Due to the pandemic, we are most certainly experiencing a spike in homelessness.

Given the reduction in shelter beds, over 200 since March 2020, it is our belief that unsheltered homelessness has increased, and as a result, overall homelessness has increased. People of color are disproportionately homeless, to the tune of nearly 7 to 1.

Thanks to your work, there is a significant opportunity to make a serious dent in the problem of homelessness.

The inability of people to find and afford housing is the major driver of homelessness, and the major solution to it. Everything works better when people have safe, stable, affordable housing.

During the past two years, you have generously provided, through the CARES Act and the American Rescue Plan, the very resources that people who are experiencing homelessness need to return to housing. These resources are not going to be enough to end homelessness, but they can certainly reverse its course.

Of course, there are also many challenges to making progress.

A key challenge is to apply the resources that you have provided in the most strategic way possible. Organizations and their staff are depleted and struggling. It is easier to house people who have lower needs, who do not require services, who are more "acceptable" to property owners, or who are not yet homeless, than to house people who are literally unsheltered, and have high service needs.

But to reduce homelessness, we really need to focus on the latter group, not the former.

A critical priority is the need to address the needs of unsheltered people. Data indicate that people who are unsheltered have much more serious health problems and shorter life expectancies than people living in shelters. This group should be top priority for us.

Another challenge is staff shortages and space. Our CoC partners continue to report shortages in staff and space across the board. While our sector welcomes and appreciates added resources and initiatives, without the space & staff we struggle to implement.

Given these opportunities and challenges, there are some key solutions that the Partnership encourages our community to invest in to reduce homelessness.

We recommend the use of funds to help people with the highest needs. With these in mind we would recommend a focus on:

- A day center / drop-in center – these few past “white-flag” months have made it quite clear that there is a critical need for a place for people to go during the day – not only to get out of the elements but to connect with critical resources – focusing on ending homelessness, not simply helping the unsheltered be comfortable in their homelessness.
- Rapid Exit Funds and Emergency Assistance Funds
- Allocation of resources to strategies that are specifically designed reduce racial disparities and eliminate racial disproportionality.
- Most certainly affordable housing units

It is important to focus our resources on proven solutions, such as Housing First, active participation in coordinated entry, and data entry into the centralized homeless mgmt. information system.

We recommend that our county and its municipalities take the opportunity to investigate the possibility of converting available office, commercial, and hotel/motel space to housing.

In closing, while people experiencing homelessness have suffered tremendously the resources that Wake County has provided, has ended homelessness for hundreds of people, and we thank you for that.

2. Yolanda Winstead
President, DHIC
yolanda@dhic.org

I just wanted to appear to thank the County Commissioners for their support of our organization and our work. DHIC is 48 year-old nonprofit based in Raleigh, we currently own and operate roughly 45 apartment communities for low to moderate income families, serving approximately 4100 residents throughout Raleigh and Wake County.

It's because of the direct support that we've been able to receive through our partnership with Wake County over the years, that we've been able to serve the families and surrounding communities – Cary, Apex, Morrisville, Garner, and we're currently working on a development in Holly Springs, thanks to the foresight and vision of the County Commissioners.

So, we just wanted to appear in support of the plan, and to tell you all thank you and we look forward to continuing this work with you as partners. Thank you very much.

3. Alice Lutz, CFRE
Chief Executive Officer
Triangle Family Services
alutz@tfsnc.org
Office: 919-821-0790 x 107

We would like to thank the commissioners, Wake County leadership and staff for a comprehensive affordable housing plan. We are in support of the plan. In particular, we would like to call out the preservation part of the plan. We cannot build our way out of affordable housing units. We are losing units faster than units can be built. We appreciate and greatly respect the comprehensive nature of the plan to preserve units. We would encourage you to continue to look into benefits for landlords. In addition, continue policy work around housing preservation. We are honored to partner with Wake County for our most vulnerable. As an 85-year-old agency helping families in crisis we appreciate the thought leadership and comprehensive plan. Thank you.

Consultation Meeting
Continuum of Care
Monday, February 14th, 2022

- 1. Kim Crawford, MS, MA**
Executive Director
Raleigh Wake Partnership to End & Prevent Homelessness
kcrawford@partnershipwake.org
office: 919-443-0093 x 1033
www.partnershipwake.org

Based on the data presented from the Point-in-Time (PIT) Count, it verifies the need to address our unsheltered population needs. Things to consider for future funding:

- A day center / drop-in center – especially based on information gathered during “white-flag” months.
 - Gaps Analysis indicate a need for Rapid Exit Funds and Emergency Assistance Funds
 - Allocation of resources to reduce racial disparities and eliminate racial disproportionality
 - More affordable housing units
-

30-day Public Comment Period

- 1. Sunday, April 17th, 2022**

Audra Killingsworth
Mayor Pro Tempore, Town Councilmember
Town of Apex

Hi,

I am the Mayor Pro Tempore for Apex and elected Town Council member in Apex. We have made great strides forward in attempting to address affordable housing needs within Apex. I know other municipalities have also done the same within Wake County. I would like to suggest addressing affordable housing needs through a regional affordable housing plan working toward the full spectrum of needs with the municipalities that are stepping up in a substantial way to get built units on the ground.

Audra Killingsworth
She/Her/Hers

2. Monday, April 25th, 2022

**Frank Baldiga,
Shelter Case Manager
The Salvation Army of Wake County
1863 Capital Blvd., Raleigh, NC, 27604**

Hi,

Here are my comments:

1. A barrier to affordable housing is that many landlords and property managers do not accept housing choice vouchers (HCV). Data from the Raleigh Housing Authority shows that only 33% of families who receive a voucher actually use it rent a unit. In Charlotte 66% of families are able to use their voucher. National data is hard to come by but studies have shown that 70% of families that receive housing vouchers succeed in using them. This is a really big problem that needs to be addressed! Please amend the county fair housing ordinance to include source of income so it would be illegal to refuse to accept a HCV.
2. We need to think out of the box to find more affordable housing for families/individuals making less than 30% AMI. For example homeless services agencies can master lease large four and five bedrooms homes and then lease them to homeless clients whereby they spend no more than 30% of their income on rent. We should also use project-based vouchers so that the voucher is tied to the unit and not the individual.
3. We need to utilize data to show that voucher usage is limited to certain areas of the county and that it corresponds to lower income census tracts. For example, only 25 census tracts have at least 50 housing choice vouchers in use. 191 census tracts have no vouchers. There are none in the western part of the county! Instead most of them are east of Raleigh. I believe racial discrimination plays a part in this.

Thank you,

Frank Baldiga,