

A large, light orange silhouette of a house with a gabled roof. Inside the house, there are various white line-art icons of kitchen items like pots, pans, spoons, and food items.

WAKE COUNTY

2023-2024 ANNUAL ACTION PLAN

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



Wake.gov



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Executive Summary

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

Introduction

Wake County Housing Affordability and Community Revitalization (Housing) Department's 2023-2024 Annual Action Plan will utilize County funds, community partnerships, and grants from the U.S. Department of Housing and Urban Development (HUD) to serve priority populations and complete identified objectives.

The grants included in this Annual Action Plan are 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). The priority populations were determined through our extensive Citizen Participation process, conducted as part of our 2020-2025 Consolidated Plan, and are as follows. There were not recommendations during this year's planning process to change the priority populations.

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

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county. The metropolitan area used by Wake County is the Raleigh, NC MSA which contains Franklin County, NC; Johnston County, NC; and Wake County, NC. To learn more about area median income calculations and methodology, please visit <https://www.huduser.gov/portal/datasets/il.html>.

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.

To increase affordable housing development and preservation, we will track programs which financial assist low-to-moderate income households or developers with home construction, rehabilitation, and purchase activities. The development or preservation of multifamily housing will also be tracked toward the outcomes of the first goal.

To address policy, regulatory, and market barriers to housing affordability, we will educate and provide technical assistance to local municipalities and the broader community on ways to reduce barriers to affordability. This includes funding to support planning, administration, and fair housing activities. It may also include activities to assist special needs populations with other systemic barriers to economic opportunity such as employment training.

To sustain and leverage support for vulnerable populations and communities, we will offer or fund programs that prevent and assist those experiencing homelessness. We will also provide invest in community development opportunities and provide permanent supportive housing complimented by 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 is demonstrated by meeting or surpassing our goals. We set a goal to create or preserve 2,500 affordable homes in five years and were able to accomplish that goal two years early. We are ahead or on schedule to meet many of our outcomes identified in our 2020-2025 Consolidated Plan as demonstrated in our most recent Consolidated Annual Performance Evaluation Report (CAPER). We will continue striving to exceed our projected outcomes for affordable housing development, housing rehabilitation, public facilities and improvements, rental assistance, and individuals served through public services including job training and services for those experiencing homelessness.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Over the course of this planning process, we have conducted one public hearing and three consultation meetings to engage citizens, community organizations, the Continuum of Care, municipal planners, and the Wake County Board of Commissioners. At these meetings, staff presented information identifying the priority populations, estimated funding allocations, and plan goals. Comments were received via email or verbally. The feedback received supports the prioritization of affordable housing development and preservation, as well as the continued support for highly vulnerable or historically disenfranchised populations. 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.

One comment supported the focus on extremely low-income households. Another requested additional information be added to explain the methodology behind Area Median Income. The last comment supported the plan broadly and appreciated the Town of Garner's adoption of the plan.

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

All comments were accepted.

7. Summary

The 2023-2024 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 based upon eligible activities which respond to the most critical needs of the community.

R-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

Alicia Arnold
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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, municipalities within the county, and the Affordable Housing Advisory Work Group. The consultations are identified in the checklist below and reveal the data and needs of different populations. Housing staff coordinates efforts and aligns resources with the City of Raleigh, the Town of Cary, entitlement municipalities, the two housing authorities, and the Continuum of Care agencies. Each partnership is focused on aligning resources effectively to meet the complex need of citizens within the county.

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 partners with the Housing Authority of the County of Wake (HACW), the Veterans Administration, and SSVF providers to effectively end veteran homelessness. Housing works with the Public Health Division of the Health & Human Services Department to coordinate housing and medical care for those with HIV or AIDS. 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. Housing administers rental assistance and supportive services and leverages community healthcare, employment training, food assistance, etc. for successful client outcomes

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 House Wake! Strategic Plan which focuses on addressing the various needs of households who are experiencing or at-risk of experiencing homelessness and are impacted by 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 membership meetings attended by representatives from the County, City of Raleigh, Town of Cary, the two housing authorities, Public Schools, and over 30 agencies. Housing staff are on the Board of the CoC lead applicant, as well as the CoC Governance Board. Both the City and the County have provided operational funding to support and ensure the coordination of services to address the needs of those experiencing homelessness. The CoC lead applicant 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. The County has access to the HMIS database where it reviews outcomes and recommends innovative

approaches or best practices toward the shared goal of ending homelessness. County programs and funded agencies are required to adhere to CoC policies.

To reduce veteran homelessness, the County, the City of Raleigh, and the CoC joined the Mayors Challenge 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 veteran preference at the South Wilmington Street Center (SWSC) and uses one dormitory specifically for veterans; adopted an intensive care service model supporting each veterans' individual needs; established a Veteran Services Officer to provide leadership for community-wide initiatives; and funded ten rental assistance vouchers for veteran specific permanent supportive housing.

Housing participates in local implementation of HMIS and Coordinated Entry. This past year the CoC transitioned to a new HMIS platform through Bitfocus. Housing staff partner with the CoC lead applicant, who also acts as the HMIS lead, to implement improved functionality through the new platform.

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

Wake County and City of Raleigh housing staff convened a special meeting to consult Continuum of Care (CoC) agencies regarding the 2023-2024 Annual Action Plan including Emergency Solutions Grant (ESG) funds. The group was consulted on the continued usage of Wake County ESG funds for the Wake Prevent! prevention program which targets citizens who are at imminent risk of homelessness.

The City of Raleigh allocates its ESG funds through a partnership 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.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Raleigh/Wake Partnership to End and Prevent Homelessness
	Agency/Group/Organization Type	Services-homeless Planning Organization
	What section of the Plan was addressed by Consultation?	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 on February 1, 2023. Specific topics discussed were better communication of housing resources and opportunities; concerns regarding private development, displacement, and gentrification; funding for families utilizing hotels for permanent housing or emergency shelter; increased housing cost; and funding for those in need who are above 80% of the Area Median Income
2	Agency/Group/Organization	Wake County
	Agency/Group/Organization Type	Other government - County Other government - Local Planning organization
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of	The municipal Planning Directors were consulted on January 20, 2023. A presentation summarizing the Action Plan purpose and process were

	the consultation or areas for improved coordination?	discussed. Anticipated outcomes include increased knowledge of funding and programs available, as well as support for affordable housing and homeless services.
3	Agency/Group/Organization	Affordable Housing Advisory Work Group
	Agency/Group/Organization Type	Housing Other government - Federal Other government - County Other government - Local Business Leaders Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Wake County Affordable Housing Advisory Work Group was consulted on January 17, 2023. A presentation summarizing the Action Plan purpose and process were discussed. Anticipated outcomes include increased knowledge of funding and programs available, as well as support for affordable housing and homeless services.

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	Raleigh/Wake 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	The 2020-2025 Consolidated Plan guided the development of this Action 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	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.
Analysis of Impediments to Fair Housing Choice	Wake County, City of Raleigh, Town of Cary, and PHA's	The goals of the Analysis of Impediments to Fair Housing Choice overlap with the Action's Plan's goals of providing/preserving affordable housing in communities of high opportunity, encouraging municipal zoning regulations to support affordable housing, and including housing for people with disabilities in our housing programs.

Table 3 – Other local / regional / federal planning efforts

Narrative

The 2023-2024 plan will follow input received from consultations from all organizations participating in the consultation process, as well as input provided during the robust 2020-2025 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, as well as for the 30-day public comment period. The public comment period was also advertised on local radio stations.
- Online Public Comments – Citizens had the opportunity to submit comments through the Wake County webpage or via email
- Public Hearing – Agencies and citizens could provide feedback in-person during the Public Hearing or virtually through the County webpage
- Three Consultation Meetings – Community groups were consulted for focused input on homelessness and other barriers to affordable housing

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

Public comments affirmed the plan priorities and goals which emphasize the importance of affordable housing units, serving those in need, and focusing on reducing barriers to housing affordability. 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, and other county buildings
- Wake County Housing Department webpage - <https://www.wake.gov/departments-government/housing-affordability-community-revitalization>
- Mailed to citizens upon request
- Speech or hearing-impaired persons were encouraged to contact 1-800-735-2962 (TT) or 1-800-735-8262 (voice).

The comments from the meetings are summarized in the attachments of the final document. All comments were accepted.

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	At the Board of Commissioner's Public Hearing there were no speakers; however, it was broadcast online, and several people attended the meeting.	No comments received	N/A	https://wake.legistar.com/Calendar.aspx#
2	Consultation Meeting	Non-targeted/ broad community	During the Continuum of Care consultation, 31 people attended and there were six speakers.	There were concerns about availability of affordable housing, residents who fell into the moderate to median income gap, and where to find data or information regarding programs.	All comments were accepted	
3	Consultation Meeting	Planning Directors	More than 20 people attended the January 20, 2023, planners meeting. No speakers offered public comments.	No comments received	N/A	

4	Consultation Meeting	Affordable Housing Advisory Work Group	The AHAWG meeting included 14 attendees with one speaker.	One comment was received regarding the availability of additional federal funding not including funds which were distributed for COVID-19.	All comments were accepted	
5	Public Comment Period	Non-targeted/broad community	Three responses were received through email during the public comment period.	One comment supported the focus on extremely low-income households. Another requested additional information be added to explain the methodology behind Area Median Income. The last comment supported the plan broadly and appreciated the Town of Garner's adoption of the plan.	All comments were accepted.	https://www.wake.gov/departments-government/housing-affordability-community-revitalization/plans-and-public-notice

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 \$2,497,946 available in CDBG funds, \$1,352,785 in HOME funds, and \$1,666,389 available in HOPWA funds which includes program income for all three grants. There will be \$185,602 in ESG Funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources	Total:		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,167,946	330,000	0	2,497,946	2,715,578	Admin and Planning, Homeownership Assistance, Public Facilities, Public Services, Housing Rehabilitation, Land Acquisition, and Infrastructure.
HOME	public - federal	Acquisition Multifamily rental New construction Multifamily rental rehab TBRA	1,082,785	270,000	0	1,352,785	1,592,149	HOME funds will be used for multifamily rental new construction and/or rehabilitation.
HOPWA	public - federal	Permanent housing in facilities	1,657,389	9,000	0	1,666,389	1,292,825	HOPWA funds will be used for TBRA, STRMU,

		Permanent housing placement STRMU Supportive services TBRA						permanent housing, and Supportive Services.
ESG	public - federal	Financial Assistance Overnight shelter Rapid re-housing (rental assistance)	185,602	0	0	185,602	182,420	ESG funds will be used for Prevention of Homelessness
Other	Public - Federal	TBRA	2,096,742					CoC funds will be used for rental assistance and supportive services
Other	public - local	Administration Homeless Services Housing Development	25,262,878	300,000	0	25,562,878	25,562,878	County funds are used to match or fill gaps in funding

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 use of local property taxes. Federal funds are used alongside County dollars to support housing development, supportive services, emergency shelter, prevention, homeownership, land acquisition, and rental assistance.

Wake County also partners with affordable housing developers who leverage 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. This past year Wake launched the Affordable Housing Preservation Fund which leverages County funds with private financing to create a \$61.6 million fund to preserve legally binding and naturally occurring affordable housing. HOME match requirements are met through loans made to developers.

The Wake Prevent! 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.

The Community Investment Partnership Program (CIPP) leverages investments from local governments and private entities in the form of grants and loans for public facilities or infrastructure.

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 generated two multifamily developments which will provide more than 200 units of affordable housing when completed.

In addition, Wake County partners with Wake County Public School System on a process for dispositioning surplus school district land for affordable housing. The County encourages municipalities to analyze publicly owned land for affordable housing. The Town of Cary has combined land with Wake County Public Schools to build mixed income housing which will seek County gap financing support. In FY 2024 Wake County will disposition two county-owned homes to serve low-income households.

Discussion

Entitlement grants offer numerous ways of helping low- and moderate-income citizens of Wake County. Combined and leveraged with other resources, Wake County offers a variety of programs which generate housing affordability and create wealth building opportunities for those across the county.

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: \$1,229,357 HOME: \$1,082,785	Rental units constructed: 40 Household Housing Unit Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Added: 5 Household Housing Unit Homeowner Housing Rehabilitated: 35 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: \$453,589	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10 Households Assisted Other: 1110 Other

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: \$505,000 HOPWA: \$1,657,389 ESG: \$185,602	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 4 Households Assisted Public service activities for Low/Moderate Income Housing Benefit: 40 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 55 Households Assisted Homeless Person Overnight Shelter: 1000 Persons Assisted Homelessness Prevention: 160 Persons Assisted
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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 2023-2024. 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 Community Investment Partnership
6	HOME Administration
7	HOME Affordable Housing Development
8	2023-2026 Wake County HOPWA TBRA Program NCH23F002 (WCHW)
9	2023-2026 Wake County HOPWA STRMU Program NCH23F002 (WCHW)
10	ESG Homelessness Prevention

Table 4 – Project Information

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

Allocation priorities reflect the consultation process and the 2020-2025 Consolidated Plan which was determined through a comprehensive citizen participation process involving more than 25 meetings and consultations.

In addition, staff regularly examine relevant data and trends. Community data supports shows growth continues to outpace the speed of development creating an expensive market. The cost of living has increased faster than wages. Due to the attractive real-estate market, acquisition and redevelopment of previously affordable housing has led to displacement. Landlords willing to accept subsidized rental assistance have declined and many have increased their rent beyond what is affordable to low- and moderate-income households. There is a shortage of public, private, and philanthropic resources to build or rehabilitate affordable housing to meet the need of the community, especially considering interest rate and construction cost increases.

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: \$433,589
	Description	Administration and planning activities to support low- and moderate-income households.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The CDBG grant is estimated to serve 1,110 low- and moderate-income households in total.
	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: \$1,009,357
	Description	Rental and Homeowner rehabilitation grants or loans.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 40 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: \$550,000
	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	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 20 households. Proposed activities will benefit low- and 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	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 1,000 men experiencing homelessness, 10 persons through job training, and 40 households through street outreach or emergency assistance. Proposed activities will benefit low-income households experiencing homelessness.
	Location Description	Countywide

	Planned Activities	Job training, homeless prevention through rental assistance, street outreach, and shelter operations
5	Project Name	CDBG Community Investment Partnership
	Target Area	Countywide Target
	Goals Supported	Support for vulnerable populations and communities
	Needs Addressed	Support vulnerable populations and communities
	Funding	CDBG: \$190,000
	Description	Community Revitalization, Housing and Public Facility activities will focus on revitalization of specific neighborhoods or public facilities in Wake County.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This activity will create four additional non-congregate family shelter units serving families experiencing homelessness.
	Location Description	Countywide
	Planned Activities	May include Community Revitalization, Housing and/or Public Facility activities depending upon the needs of the neighborhoods nominated.
6	Project Name	HOME Administration
	Target Area	Countywide Target
	Goals Supported	Increase and preserve affordable housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$108,278
	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	6/30/2024
	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	Administration of activities to 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: \$1,244,507
	Description	Development through new construction or rehabilitation of affordable housing.
	Target Date	6/30/2024
	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	2023-2026 Wake County HOPWA TBRA Program NCH23F002 (WCHW)
	Target Area	Countywide Target
	Goals Supported	Support for vulnerable populations and communities
	Needs Addressed	Support vulnerable populations and communities
	Funding	HOPWA: \$1,201,691
	Description	Administration, Tenant Based Rental Assistance, and Supportive Services for individuals with HIV/AIDS.
	Target Date	6/30/2024
	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	2023-2026 Wake County HOPWA STRMU Program NCH23F002 (WCHW)
	Target Area	Countywide Target
	Goals Supported	Support for vulnerable populations and communities
	Needs Addressed	Support vulnerable populations and communities

	Funding	HOPWA: \$464,698
	Description	Short-term rent, utility and mortgage assistance to prevent homelessness for households containing an individual living with HIV/AIDS
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Estimated number: 60 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: \$185,602
	Description	Services for Persons who are at-risk of homelessness
	Target Date	6/30/2024
	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

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

Grant funds support the entire Wake County entitlement jurisdiction. CDBG funded homeownership rehabilitation, community development, and homeownership assistance will be used outside of Raleigh and Cary who have CDBG entitlement funds. CDBG multi-family rental rehabilitation, housing activities, and public services may be used countywide if the funding supports residents in the entitlement area. HOME funds used for the development of affordable housing countywide. Affordable housing development is prioritized in areas of economic opportunity to avoid concentration of poverty. 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.

The preservation warning system identifies affordable properties that may be lost to the market. Staff identify opportunities to preserve existing housing and prevent displacements where possible. Funding for preservation may be provided through the Wake Affordable Housing Preservation Fund which leverages County, municipal, and private dollars.

Affordable Housing

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

Introduction

The FY 2023-2024 Plan continues to focus on affordable housing construction, 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	1,054
Non-Homeless	1,280
Special-Needs	150
Total	2,484

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	215
The Production of New Units	65
Rehab of Existing Units	40
Acquisition of Existing Units	0
Total	320

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

Discussion

Our comprehensive approach to the provision of affordable housing allows the Housing Department to address many different needs throughout the housing continuum. Community partnerships are leveraged to ensure all geographies and populations are served. In addition, County tax revenue fills gaps where grant resources do not meet the needs.

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

Introduction

The Housing Authority of the County of Wake (HACW) was formed in 1953 with one mission – to provide safe, decent, and sanitary housing for low-income families with a priority for military families/veterans in Wake County. Since that time HACW has grown and expanded its programs to assist hundreds of families in Wake County through their public housing (345 units) and Housing Choice Voucher (HCV) (over 500 vouchers) programs.

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

HACW is focused on preserving and creating opportunities to expand the supply of quality affordable housing in Wake County. This year they are working to create a more robust communication plan to increase awareness of their goals and aspirations while taking a proactive approach to advocate for and develop affordable housing. HACW priority is to develop a strong relationship with the twelve municipalities within Wake County, as well as the Wake County Housing Affordability & Community Revitalization department. This work will involve identifying and focusing local funds in strategic neighborhoods that align with HACW priorities and the County's economic and community revitalization efforts.

A comprehensive physical needs assessment of every public housing community is being completed and will provide the data HACW needs to make long term plans for the future of the public housing stock. HACW Board of Commissioners and staff will use this information to work with an Architect/Engineering firm to analyze the various options for the public housing stock. Review of the repositioning options available for each complex will provide the detailed guidance to make decisions and move forward with revitalizing HACW units.

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

HACW employs a full-time Family Self-Sufficiency (FSS) Coordinator to promote participation in the Family Self-Sufficiency (FSS) program. HUD provided new guidance for the operation of this program in June of 2022. These new regulations provide participants greater flexibility for participating in the program and attaining their self-sufficiency goals. HACW will continue to work with residents to set attainable and measurable goals toward self-sufficiency and link them to the resources necessary to attain their goals. HACW has partnerships with many community resource providers who provide the resources and guidance participants may need.

During the coming year HACW will be reviewing their Homeownership program policies to align it with the new FSS program and provide education and guidance for guiding participants toward Homeownership.

HACW continues to schedule service providers to hold events at its complexes and also posts information on its website for any community group activities that would benefit and be of interest to

the residents. HACW continues to encourage resident participation in job fairs and distributes information on opportunities to facilitate residents' involvement in future events.

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

N/A

Discussion

HACW will be finalizing the Strategic Plan during this fiscal year and laying out tasks to guide the implementation of this plan. HACW is looking forward to enhancing their community partnerships to mitigate growing housing affordability issues.

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

Introduction

For the Fiscal Year 2023-2024, activities for Homeless persons and people with special needs continue to mirror the projects described in the 2020-2025 Consolidated Plan.

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 providing leadership to improve the services received by those experiencing homelessness, particularly those who are unsheltered.

The Housing Department homeless service staff now occupy space within the same building as Oak City Cares, a non-profit agency focused on serving those experiencing homeless by providing multiple community services. This building, renovated and owned by the County, is an innovative facility where residents experiencing homelessness can easily access services that will help secure housing, find employment, obtain substance use treatment, and improve their health. Services are provided through partnerships with more than 20 community providers. Oak City offers laundry, showers, computers, and phones to help assist with daily tasks needed to attain a stable housing situation. The colocation of County and non-profit services reduces barriers.

The NC-507 Continuum of Care continues to improve the delivery of housing and crisis response services through the Coordinated Entry System known locally as the Access Hub. This “Front Door” call center ensures consistent and uniform access, assessment, prioritization, and referral processes to determine the most appropriate response to each person’s immediate housing needs. The County continues to provide the NC-507 lead agency with funding and technical assistance to adopt best practices and policies.

In July 2022, NC-507 migrated to a new HMIS platform hosted by Bitfocus. The new platform will improve customer service and outcome tracking functionality. The Research, Data, and Systems Division of the Housing Department assisted with the migration including orienting users to the new system and providing user guides. This year we will continue to codify policies, practices and procedures to implement new functionality within the system.

Wake County will continue to fund street outreach services and provide technical assistance to contracted partners and assist them in providing more intensive services focus on encampments occupied by persons experiencing homelessness. Outreach specialists provide street-based assessment, case management, referral services, and emergency survival supplies. Street outreach services work collaboratively with representatives from other agencies to further engage with people who are living in places not meant for human habitation.

Addressing the emergency shelter and transitional housing needs of homeless persons

The County continues to operate the South Wilmington Street Center (SWSC), a men's emergency shelter. SWSC is experiencing a sustained demand for individualized services and critical time interventions, thus it has refocused efforts away from classroom instruction in favor of more enhanced individualized services in a low-barrier environment to shorten the length of homeless episodes. Wake County also provides funding for emergency shelter for single women in partnership with Urban Ministries, and for families through Salvation Army.

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's new "Bridge to Home" program is providing additional funding, through the American Rescue Plan, for agencies to improve low barrier practices and further enhance services provided to persons experiencing homelessness. Participating agencies are held to consistent, best-practice standards which are evidence-based. The goal is to create a more wholistic nonprofit environment versus gravitating toward limited expertise models or programs siloed by specific funding sources. Through Bridge to Home Wake County has committed additional resources to most homeless service organizations across the county. For example, SWSC enhanced diversion, emergency rental assistance and health care funds. Financial assistance is available to assist with rapid exits along with diversion funds to prevent previous clients from lapsing back into 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 and have engaged a consultant who is performing an unsheltered facility needs study for persons experiencing homelessness in our community.

The City of Raleigh and Wake County continues to partner on funding opportunities for emergency shelter, rapid re-housing, street outreach, and the Homeless Management Information System. This process aligns the two major funders to ensure agencies provide consistent services to consumers.

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

Wake County continues to operate the Landlord Engagement Unit (LEU) which cultivates positive relationships with existing landlords to expand the availability of rental units for persons at-risk or exiting out of the homeless. This team provides lease signing and renewal bonuses, as well as risk mitigation funds to landlords to continue to rent to program participants referred by homeless service agencies. Homeless service agencies gain additional capacity to work directly with clients by avoiding the

timely search for landlords and units that match a client's needs and barriers. The LEU makes this process simple through the utilization of a custom technology application that filters, sorts, and stores a database of properties by location, size, landlord "non-negotiables", etc. To date, the LEU has placed 79 households into Permanent Housing and added 402 units of affordable housing to the program.

The Housing Department continues to also provide housing options and wrap-around services to assist the most vulnerable citizens achieve stability through permanent supportive housing. The Access Hub prioritizes citizens who have disabling conditions, are unsheltered or have longer lengths of homelessness and refer these households for permanent supportive housing opportunities. Housing administers case management services, as well as tenant-based and project-based vouchers for supportive housing. In addition, the Cornerstone facility renovation is expected to be complete in the Fall of 2023. This facility will offer twenty bridge housing units and community-based services for those who are chronically homeless and in need of supportive housing.

This year our Housing Department expanded by assuming Veteran Services from another County department. The Veteran's Services Division will align all veteran benefits and staff to enhance our efforts to end veteran homelessness. To reduce veteran homelessness, the City of Raleigh, Wake County, and the CoC continues to participate in the Mayor's Challenge to end veteran homelessness.

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.

The Housing Resource Team provides prevention services through short- and/or medium-term rental assistance as necessary to prevent households from moving to an emergency shelter or a place not meant for human habitation. The team has expanded to include serving persons living with HIV/AIDS through the HOPWA grant. A new team comprised of three staff administer Short-Term Rent, Mortgage and Utility Assistance. 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 re-focused its prevention services on relocation for households not able to maintain their current housing, especially in view on the pandemic crisis. ESG-CV funds will continue to assist tenants in maintaining or finding housing.

County staff also work with clients to identify immediate alternate housing arrangements and connecting clients with services and financial assistance to help them return to permanent housing. Housing identification or navigation services are also offered.

Alliance Health assures services are provided to persons who are being discharged from mental health care facilities, and many of the rental assistance vouchers provided by Wake County are for people with behavioral health disabilities. The Capital Area Workforce Development Department and Passage Home, a community non-profit, focus efforts supporting those who have been justice involved. Capital Area

Workforce Development is the designated lead for the Reentry Council, a coalition of community stakeholders that works to reduce/eliminate barriers to successful reentry.

In addition, the County continues to fund the development of affordable and permanent supportive housing. County funded developments are required to set-aside units for vulnerable clients and encouraged to have second chance or low-barrier tenant selection processes.

Discussion

Wake County is maintaining and expanding its efforts to assist people who are experiencing homelessness, at risk of homeless, and/or have special needs. The continued support for Oak City Cares and the South Wilmington Campus, the re-development of Cornerstone facility, creation of a Veteran Services Division, development of a supportive housing project, an unsheltered facility study, and the Bridge to Home program demonstrate the Wake County's commitment to ending homelessness.

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	100
Tenant-based rental assistance	55
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	155

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

Introduction

Municipalities in Wake County have significant influence on development 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 since 2015, affecting fair housing choice and potentially increasing risk for discrimination against members of the protected classes. Restrictive zoning and land use jeopardizes affordability and the ability to affirmatively further fair housing.

State of North Carolina law heavily favors property owner rights and does not allow for inclusionary zoning. 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. In addition, recent changes to the QAP prioritize very deep affordability, which is commendable for trying to address the needs of very low-income households; however, this puts added pressure on local resources. Finally, 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 politically charged at the state level and elimination of state housing tax credit has reduced the funds available to address housing development needs statewide. In addition, projects in metropolitan counties are not eligible for the Workforce Housing Loan Program from NCHFA. At the Federal level, minimal increases in CDBG and HOME have not kept pace with the increased cost of living and development. 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. Interest rate increases to fight inflation have significantly increased the cost of borrowing, reducing the amount of bank debt that can be leveraged to support affordable development and increasing the need for additional resources.

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 2020, Wake County lost 44,540 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

The 20-Year Affordable Housing Plan recommends action to ameliorate barriers to affordability. Wake County must partner with local jurisdictions who control land use to address barriers to affordable housing. Staff provide technical assistance to help municipalities incorporate affordability into their policies and growth plans. Strategies and tools, such as the County's policy and legal research for dispositioning public land for the purpose of affordable housing, are shared to ease the administrative burden on the municipalities. Staff also track municipal progress through a crosswalk town affordable housing plans and associated actions.

The County Housing Director and elected officials 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, as well as the creation of affordable housing plans and programs.

Our programs continue to provide gap financing for affordable developments countywide. We prioritize deeper affordability and continue to use the 4% tax credits to increase unit production. 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.

In October 2022, Wake County launched the Wake Affordable Housing Preservation Fund in partnership with Self-Help Ventures Fund who administers the loan pool. The fund leverages public and private investment for loans to acquire legally binding or naturally occurring affordable housing developments, especially in strategic locations. As of March 2023, 62 naturally occurring affordable housing units have been preserved with additional preservation opportunities identified.

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

The County intends to maintain the increase production and preservation of affordable housing. This includes addressing access for vulnerable populations through a mandatory 10% set-aside for tenants receiving rental assistance through Wake County. The Landlord Engagement Unit will continue to work with landlords to increase acceptance of rental assistance and access to units for those with low- and moderate-income. Housing staff will partner with municipalities to address land use and zoning policies that affect affordability and encourage municipalities to create affordable housing plans which implement local affordable housing programs.

The Housing Department will continue to advocate for additional allocations of fund to develop affordable housing in Communities of Opportunity and enhance services offered to vulnerable populations to stabilize families and prevent homelessness. With the opening of the Cornerstone facility, bridge housing for individuals experiencing chronic homelessness and have co-occurring, acute health and mental health needs will be served.

Actions planned to foster and maintain affordable housing

Wake County will continue its programs providing housing rehabilitation, affordable housing development, and rental assistance which 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.

During the 2023-2024 program year the County will finalize the unsheltered facility study and identify funding opportunities for the recommended actions. Staff will begin exploring the creation of an acquisition fund to compliment the Preservation Fund launched this past year. As the market begins to level from the COVID pandemic, staff anticipate increased rental production and homeownership opportunities. As always, these actions will be achieved through strong partnerships and leveraging of other funding sources.

Actions planned to reduce lead-based paint hazards

Wake County reduces 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. 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 direct correlation on economic opportunity and upward mobility. Housing funded programs center around efforts to reduce poverty and increase economic mobility such as CDBG public services which fund job training for persons experiencing homelessness to increase their employability. Housing also works with Health and Human Services and Capital Area Workforce Development to implement several programs to assist low-income populations with achieving economic opportunity.

Work First is a self-sufficiency strategy to address the needs of very low-income families by providing temporary financial assistance and supportive services such as day care, transportation, training opportunities, Medicaid, and affordable housing. Supportive Employment programs assist those who are disabled with finding and maintaining employment. Additional services include on-site vocational evaluation, career counseling and skills training. Wake County Vocational 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. Workforce programming is available for adults and youth, including a special focus on justice involved populations.

Finally, Housing funds several programs operated by Wake County's designation antipoverty agency, Passage Home. As the recipient of the Community Service Block Grant, their goal is to break the cycle of poverty and create multi-generational self-sufficiency for the individuals and families of Wake County by helping them achieve housing and income security.

Actions planned to develop institutional structure

Housing remains closely connected with other Wake County departments such as Health and Human Services, Facilities, Design and Construction, and Environmental Services in order to serve clients and residents 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 staff 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 partners in close coordination with the Housing Authority of the County of Wake (HACW), the Raleigh Housing Authority, community agencies, and housing developers to comprehensively serve residents. These entities work together to increase and preserve housing and supports throughout the County. The department coordinates with municipalities regarding land use policies and barriers to affordability. Other federal agencies such as Veterans Administration or Social Security and Disability are engaged as staff coordinate benefits for residents.

In addition, the County coordinates social and housing services. 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.

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.	100.00%

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 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
- Annual Action Plan

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 Appendices.

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 currently takes place through seven access sites and a single phone number accessible 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 can 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.

There is representation on the Board of Governance of the Continuum of Care for those who are or have formerly experienced homelessness. Additionally, the Wake County Affordable Housing Advisory Work Group, which advises the Housing Department, has an established committee seat for a person currently or formerly experiencing homelessness.

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.

2023 Annual Action Plan - Public Comments

The housing need in Wake County is huge. Reading through the 45 pages I remain very concerned that residents below 50% of AMI will be assisted only minimally as we continue to loose naturally occurring affordable housing at an alarming rate.

Rebecca Burmester
2121 N Hills Dr Apt I,
Raleigh, NC 27612

The only comment I have regards clarity around the use of Area Median Income (AMI), initially introduced on page five. I am not certain how the areas used to determine AMI are drawn or how AMI changes from community to community. Is the AMI for North Hills the same as Holly Springs? If you could either list what the AMI is or provide a table listing the AMI in area communities, it would greatly aid in understanding if a house of the same value is considered affordable across each community.

I appreciate the opportunity to comment on this proposal.

Regards,

Scott Buell

Scott Buell
Make Good Trouble
sbx22z@gmail.com 919-280-2539

Mayor Marshburn, Town Manager Dickerson and Town Council Members,

On behalf of the Raleigh Regional Association of Realtors we, would like to show our support for the action plan of the Town of Garner to receive funds from the U.S. Department of Housing and Urban Development (HUD) to address housing and community development needs.

Our Association works on behalf of REALTORS® in Wake and Harnett County. The Raleigh Regional Association of REALTORS® “is committed to supporting initiatives that will keep safe and quality housing available to all.” RRAR promotes and educates REALTORS® about housing affordability...for the greater benefit of the community.” There is a growing need for affordable housing, middle housing such as townhomes, duplexes, triplexes and single-family units along with the building of planned community developments.

The average household income in Garner, NC is \$70,000 and [within the Triangle Multiple Listing Service there are currently only six homes in Garner that are available for purchase under \$300,000. Similar statistics are true in larger cities such as Raleigh, NC and surrounding municipalities. These statistics reinforce the need for government officials to expedite policies to make housing accessible, attainable, affordable and yield the least amount of displacement and gentrification outcome in the area. The Association supports the comprehensive revitalization of communities and supports and applauds the adoption of the 2023-2024 Wake County Annual Action Plan

For your review, the Association has included a National Association of REALTORS® report that can be used as a resource to help understand the generational trends among buyers and sellers. This document gives insight in understanding how individuals move and the desired housing needs of a diverse and ever hanging population.

Thank you for your leadership and your commitment to bringing more affordable housing options to Garner and our leadership welcomes conversations to further discuss housing options and be a resource to The Town of Garner and Wake County.

Sincerely,
Raleigh Regional Association of Realtors



Housing Affordability & Community Revitalization Policy

Policy Title: HOME Resale and Recapture Policy			
Countywide or	Department:	x	Division: Equitable Housing and Community Development
Supersedes: n/a			Effective Date: 4/9/18
Authority:			
Originating Department: WCHS			

- I. **Purpose:** The purpose of this policy is to outline the basic requirements for resale and recapture provisions in HOME Investment Partnerships (HOME) program homebuyer projects.
- II. **Policy Statement:** Resale or 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.

In accordance with the HOME rule at CFR 92.254(a)(5)(i), Wake County Housing & Community Revitalization will ensure that when a HOME-assisted homebuyer sells his or her property either voluntarily or involuntarily, during the affordability period:

1. The property is sold to another low-income homebuyer who will use the property as his or her principal residence;
2. The original homebuyer receives a fair return on investment; and
3. The property is sold at a price that is "affordable to a reasonable range of low-income buyers," and;
4. If the property is not sold or transferred to a low-income homebuyer, all or a portion of the HOME investment will be recaptured.

Resale Provision

The HOME rule at CFR 92.254(a)(3) requires that all HOME-assisted homebuyer housing be acquired by an eligible low-income family, and the housing must be the principal residence of the family throughout the period of affordability. Wake County will apply the Resale Provision to all HOME-assisted homebuyer housing, including where the County subsidizes development or rehabilitation of housing, and where the County or a sub-recipient provides direct subsidy to the homebuyer.

If the home is transferred, voluntarily, or otherwise, during the period of affordability, it must be made available for subsequent purchase only to a buyer whose family qualifies as low-income, and will use the property as its principal residence. A reasonable range of low-income homebuyers is defined as homebuyers whose incomes are between 30% and 80% of Area Median Income, and will be paying no more than 30% of their household income for principal, interest, property taxes, and insurance. This requirement will be included in all Wake County development agreements with partners who are constructing homes for home ownership with HOME funds, and Wake County will use a declaration of deed restrictions on the property. When HOME funds are used to provide direct homebuyer subsidy, Wake County will use a declaration of deed restrictions and communicate restrictions in the loan agreement to enforce affordability.

These provisions hereby enforce the requirement that any housing assisted with HOME funds must remain affordable for the duration of the period of affordability.

Fair Return on Investment

These resale provisions ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment. Wake County will use the appraisal model, as described below, to determine fair return on investment. This information is required to be conveyed to the homebuyer at initial purchase.

The appraisal model includes an appraisal at initial purchase and an appraisal at sale. Appraisals will be conducted by an independent third-party appraiser. The difference of the initial and sale appraisal represents the increase in market appreciation. The increase in market appreciation will be multiplied by a reasonable standard appreciation factor (ex: 25-35%) to determine the fair return to the homeowner.

The subsequent sales price of the home must be based on the original purchased price plus the share of appreciation determined via the appraisals and the market appreciation factor. Since the value of any capital improvements made by the homeowner is accounted for in the appraisal, it is not necessary to undertake a separate accounting and valuation of the homeowner's capital improvements as described in CPD notice 12-003.

An example calculation is included below.

Example Calculation:

$$\begin{array}{rcl} & \$150,000 & \text{(current sale appraisal)} \\ - & \underline{\$100,000} & \text{(initial purchase appraisal)} \\ & \$50,000 & \text{(market appreciation)} \\ \\ & \$50,000 & \text{(market appreciation)} \\ \times & \underline{25\%} & \text{(PJ's reasonable standard appreciation factor)} \\ & \$12,500 & \text{(fair return to homeowner)} \end{array}$$

$$\begin{array}{r}
 \$100,000 \text{ (initial purchase price)} \\
 + \quad \$12,500 \text{ (fair return to homeowner)} \\
 \hline
 \$112,500 \text{ (subsequent sales price to new homebuyer)}
 \end{array}$$

The resale price to the new homebuyer may not exceed 95 percent of the HOME affordability limits issued by HUD annually.

Recapture Provision

Recapture provisions will apply when Wake County or a sub-recipient provides direct homebuyer subsidy and the HOME-assisted homeowner transfers ownership of the property, voluntarily or involuntarily, to a homebuyer who is not low-income. In these instances, Wake County will recapture a portion of the HOME funds invested based on time spent in the home relative to the affordability period and not to exceed the net proceeds of the transaction. Net proceeds are defined as the sales price minus superior loan repayment and any closing costs.

Direct homebuyer assistance will be forgiven at a rate of 25% every five (5) years. The example calculation below illustrates the amount of homebuyer assistance recaptured by Wake County where a homebuyer received a \$20,000 loan and stayed in the home for six (6) years.

Example Calculation:

$$\begin{array}{r}
 \$150,000 \text{ (sales price to new homebuyer)} \\
 - \quad \$87,000 \text{ (first mortgage payoff)} \\
 - \quad \$6,000 \text{ (closing costs)} \\
 \hline
 \$57,000 \text{ (net proceeds)} \\
 \\
 \$20,000 \text{ (direct homebuyer subsidy)} \\
 - \quad \$5,000 \text{ (25% forgiveness based on time in home)} \\
 \hline
 \$15,000 \text{ (amount of recapture)}
 \end{array}$$

Should a homebuyer remain in their home for less than five years, 100% of the HOME subsidy will be recaptured. Details of the recapture provision will be included in written agreements with all recipients of homebuyer subsidy.

Affordability Period

All direct subsidy to homebuyers will have a 20-year affordability period. HOME-supported development or rehabilitation of homebuyer units will have a minimum 20-year affordability period, with longer affordability required based on negotiations with sub-recipients.

Upon satisfaction of the affordability period by the homebuyer, they shall be entitled to all net proceeds for the sale of the property and will no longer be required to use the home as their primary residence.

III. Definitions:

- HOME: HOME Investment Partnerships Grant
- HUD: U.S. Department of Housing and Urban Development
- CPD: Community Planning and Development
- CFR: Code of Federal Regulations
- HCR: Housing and Community Revitalization

IV. Applicability: The Resale Provision applies to all development partners or projects for homebuyer activities through the HOME Investment Partnerships (HOME) program, as well as to all direct homeowner subsidy using HOME funds. The Recapture Provision applies only to direct homeowner subsidy using HOME funds.

V. Policy Responsibility and Management:

- HCR Responsible for policy development & revision;
- Schedule of policy review: annual (at a minimum to ensure adherence with federal policies) or when new directives/guidelines are released from HUD.
- New Employees will be directed to the HCR policy manual during onboarding

VI. History:

Effective Date	Version	Section(s) Revised	Author

Written Standards

The written standards contained in this document were developed in collaboration with Wake County and participating continuum of care partners. Wake County applies these standards to our ESG Program.

In 2009, the Federal Government adopted the HEARTH (Homeless Emergency Assistance and Rapid Transition) Act. Implementation of the Act began in early 2012. The Act shifted focus from individual program outcomes to a focus on how all programs work as a system to achieve results for an entire community emphasizing quick returns to housing for people experiencing homelessness.

The Raleigh/Wake Partnership to End and Prevent Homelessness (The Partnership) serves as the NC-507 Continuum of Care for Raleigh/Wake County. In response to the HEARTH Act, The Partnership has spent the past few years learning the best ways to meet this mandate and improve the method through which our CoC serves people experiencing homelessness as a system.

The Housing First Philosophy is the belief that individuals should be assisted in accessing housing as quickly as possible with supports delivered in the community after housing. Expanding Housing First Philosophy across a CoC and as an integral part all housing programs is a key recommendation from the Department of Housing and Urban Development (HUD), the National Alliance on Ending Homelessness (NAEH), and the US Interagency Council on Homelessness (USICH). Housing First is empirically proven, consistently across multiple Continuums' of Care in the US and abroad to:

- Improve outcomes for youth, adults, and families experiencing homelessness
- Reduce costs to the homeless service system and mainstream service system
- End homelessness

The move towards expanding Housing First philosophy across the CoC is anchored in the following facts and beliefs:

- NC 507 Continuum of Care (CoC) is committed to ending homelessness.
- A myriad of factors may influence a household's ability to maintain housing, but only housing itself ends homelessness.
- The sole purpose of programs and services dedicated to the homeless population is to end homelessness
- Mandatory program participation does not result in better housing outcomes.
- Everyone is housing ready
- The homeless service delivery system should be a process, not a destination.

Wake County Continuum of Care Program Standards

The Raleigh/Wake Partnership to End and Prevent Homelessness (The Partnership) written standards provide specific guidelines for programs across the housing continuum to operate in order to have the best chance of ending homelessness as we know it. These guidelines create consistency across Wake County agencies and protect clients served by putting their needs first.

The Department of Housing and Urban Development (HUD) requires every Continuum of Care to:

- Develop policies and procedures for evaluating individuals' and families' eligibility and determining the process for prioritizing eligible households in emergency shelter, transitional housing, rapid rehousing, and permanent supportive housing programs
- For homelessness prevention and rapid re-housing programs, HUD requires program standards to define policies and procedures for prioritization of eligible households, to set the percentage or amount of financial assistance and housing stabilization services to households, and to determine the length of time the assistance will last
- Develop policies and procedures for coordination among emergency shelters, transitional housing programs, essential service providers, homelessness prevention programs, rapid rehousing programs, and permanent supportive housing programs
- Define participation in the CoC's Homeless Management Information System (or comparable database for domestic violence or victims' service programs)

The following guidelines apply to all programs within the CoC.

PERSONNEL

STANDARD: All programs shall adequately staff services with qualified personnel to ensure quality of service delivery, effective program administration, and the safety of program participants.

Benchmarks

- The organization selects employees and/or volunteers with adequate and appropriate knowledge, experience, and stability for working with individuals and families experiencing homelessness and/or other issues that place individuals and families at risk of homelessness
- The organization provides time for all employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance and best practices.
- The organization trains all employees and/or volunteers on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program
- For programs using the Homeless Management Information System (HMIS), all end users must abide by the NC HMIS User and Participation Agreements, including adherence to the strict privacy and

confidentiality policies. (See HMIS Written Standards)

- Ideally and reasonably, applicable programs should designate staff whose responsibilities include identification and recruitment of landlords, encouraging them to rent to homeless households served by the program. Staff, in turn, have the knowledge, skills, and agency resources to understand landlords' perspectives, understand landlord/tenant rights and responsibilities, and negotiate landlord supports

EVALUATION AND PLANNING

STANDARD: All programs will conduct ongoing planning and evaluation to ensure said program continues to meet community needs for individuals and families experiencing homelessness.

Benchmarks

- Agencies maintain written goals and objectives for their services to meet outcomes
- Programs review case files of clients to determine if existing services meet their needs. As appropriate, programs revise goals, objectives, and activities based on their evaluation
- Programs conduct, at a minimum, an annual evaluation of their goals, objectives, and activities, making adjustments to the program as needed to meet the needs of the community
- Programs regularly review project performance data in HMIS to ensure reliability of data. Programs should review this information, at a minimum, quarterly

CASE MANAGEMENT SERVICES

STANDARD: Case management is provided to clients by trained staff as a means of supporting, stabilizing and enhancing client experience and growth in said program. All programs and projects providing case management services shall provide access to case management services to each individual and/or family in the program.

Benchmarks (Standard available services)

- All projects must provide the client with a written copy of the program rules and the termination process before he/she begins receiving assistance.
- Staff provide regular and consistent case management to clients and residents based on the individual's or family's specific needs. Case management includes:
 - Assessing, planning, coordinating, implementing, and evaluating the services delivered to the resident(s).
 - Assisting clients to maintain their bed in a safe manner and understand how to get along with fellow residents.
 - Helping clients to create strong support networks and participate in the community as they desire.
 - Creating a path for clients to permanent housing through providing rapid rehousing or permanent supportive housing or a connection to another community program that provides these services.
 - Use of a standardized case management approach for ongoing case management and

measurement of acuity over time, determining changes needed to better serve residents.

Optional/recommended case management services

- Staff or other programs connected to the project through a formal or informal relationship assist residents with:
 - Accessing cash and non-cash income through employment, mainstream benefits, child care assistance, health insurance, and others. Ongoing assistance with basic needs.
 - Representative payee services.
 - Transportation and transportation assistance
 - Basic life skills, including housekeeping, grocery shopping, menu planning and food preparation, consumer education, bill paying/budgeting/financial management, transportation, and obtaining vital documents (social security cards, birth certificates, school records).
 - Relationship-building and decision-making skills.
 - Education services such as GED preparation, post-secondary training, and vocational education.
 - Employment services, including career counseling, job preparation, resume-building, dress and maintenance.
 - Behavioral health services such as relapse prevention, crisis intervention, medication monitoring and/or dispensing, outpatient therapy and treatment.
 - Physical health services such as routine physicals, health assessments, and family planning.
 - Mental health services such as individual/family counseling and/or therapy.
 - Legal services related to civil (rent arrears, family law, uncollected benefits) and criminal matters (warrants, minor infractions).

Emergency Shelter

Emergency Shelters play a critical role in a crisis response system. Low barrier, permanent housing-focused shelters not only ensure individuals and families have a safe place to stay, but that their experience of homelessness is as brief as possible.

In a Housing First environment, Emergency Shelters are focused on ending homelessness for the households they serve and in the community. Shelters should be safe, non-judgmental environments where, from the time of admission into the shelter, all residents are made aware of the goal to have them achieve housing as quickly as possible and that emergency shelters are a truly interim housing solution. The individual or family should be encouraged to access community-based resources or their natural supports to help move them out of the shelter and into housing. **Note: Domestic Violence Shelters have certain, specific legal obligations to follow that are not enumerated in these standards.*

The Raleigh/Wake Partnership to End and Prevent Homelessness developed the following Emergency Shelter program standards to ensure:

- Program accountability to individuals and families experiencing homelessness, prioritizing

- subpopulations of homelessness according to HUD guidelines and community demographics
- Service consistency within programs
- Adequate program staff and training, specific to the target population served
- Program compliance with the Department of Housing and Urban Development

EMERGENCY SHELTER DEFINITION:

Emergency shelter is defined here as any facility whose primary purpose is to:

- Provide temporary housing for individuals or families experiencing homelessness for a period of 90 days or less
- Conduct comprehensive assessments and the VI-SPDAT to determine housing prioritization and interventions as part of the intake process
- Provide information, referral services, and light touch case management for individuals and families with low acuity according to said assessments
- Provide full complement of basic needs services (See Emergency Shelter Benchmarks)
- Provide short-term housing for individuals and families waiting for placement in a rapid rehousing or permanent supportive housing programs
- Accept high need clients without barriers, as is stated in the Housing First Philosophy

EMERGENCY SHELTER

STANDARD: Shelters will provide safe, temporary housing options that meet participant needs in accordance with guidelines set by the Department of Housing and Urban Development through a Housing First philosophy, in which individuals and families are quickly moved to permanent housing through minimized barriers.

Benchmarks

- Shelters must actively participate in their community's coordinated assessment system and fully implement VI-SPDAT use during intake process
- Shelters shall not charge money for any housing or supportive service provided.
- Programs must work to link their clients to permanent housing programs, such as rapid rehousing and permanent supportive housing, in the community
- Shelters providing shelter to families may not deny shelter to a family on the basis of the age and gender of a child under 18 years of age
- Shelters must meet state or local government safety, sanitation, and privacy standards. Shelters should be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents
- Shelters must be accessible in accordance with Section 504 of the Rehabilitation Act, the Fair Housing Act, and Title II of the Americans with Disabilities Act, where applicable.
- Shelters must comply with the Lead-Based Paint Poisoning Prevention Act¹ and the Residential Lead-

¹ (42 U.S.C. 4821- 4946)

CLIENT INTAKE PROCESS

STANDARD: Programs will actively participate in Raleigh/Wake County's coordinated assessment system, serving the most vulnerable individuals and families in need of assistance.

Benchmarks

- All adult program participants must meet the following program eligibility requirements in emergency shelter:
 - 18 years or older
 - Literally homeless, imminently at-risk of homelessness, and/or fleeing or attempting to flee domestic violence
- All shelters must document homeless status and chronically homeless status using the HUD approved preferred order. The order should be as follows:
 - Third-party documentation (including HMIS Project Entry/Exit records)
 - Intake worker observations through outreach and visual assessment
 - Self-certification of the person receiving assistance
- Programs can only turn away individuals and families experiencing homelessness from program entry for the following reasons:
 - Household makeup (provided it does not violate HUD's Fair Housing and Equal Opportunity requirements): singles-only programs can disqualify households with children; families-only programs can disqualify single individuals
 - All program beds are full
 - If the program has in residence at least one family with a child under the age of 18, the program may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the program so long as the child resides in the same housing facility³
- Programs may deny entry or terminate services for program specific violations relating to safety and security of program staff and participants
- Programs cannot disqualify an individual or family from entry because of employment status, lack of income, evictions, or poor rental history
- Programs may make services available and encourage adult household members to participate in program services, but cannot make service usage a requirement to deny initial or ongoing services
- Programs will maintain release of information (ROI), case notes, and all pertinent demographic and identifying data in HMIS as allowable by program type (See HMIS Written Standards). If applicable, paper files should be maintained in a locked cabinet behind a locked door with access strictly reserved for case managers and administrators who need said information

² (42 U.S.C. 4851- 4956)

³ 24 CFR 578.93

CLIENT AND PROGRAM FILES

STANDARD: Shelters will keep all client files up-to-date and confidential to ensure effective delivery and tracking of services.

Benchmarks

- Client and/or program files should, at a minimum, contain all information and forms required by their funder and/or grantor (service plans, case notes, referral lists, confidentiality policies and procedures, conflict of interest/ code of conduct policies, and service activity logs including services provided directly by the shelter program and indirectly by other community service providers)
- All client information should be entered into the NC HMIS in accordance with data quality, timeliness, and additional requirements found in the agency and user participation agreements. At a minimum, programs must record the date the client enters and exits the program, enter HUD required data elements, and update the client's information as changes occur. (See HMIS Standards)
- Programs must maintain the security and privacy of written client files and shall not disclose any client-level information without written permission from the client as appropriate, except to program staff and other agencies as required by law. Clients must give informed consent to release any client identifying data to be utilized for the purposes of coordinated care, research, teaching, and service delivery improvement. All programs must have a consent for release of information form for clients to use to indicate consent in sharing information with other parties

TERMINATION

STANDARD: Termination should be limited to only the most severe cases. Programs will exercise sound judgment and examine all extenuating circumstances when determining if violations warrant program termination.

Benchmarks

- In general, if a resident violates program requirements, the shelter may terminate assistance in accordance with a formal process established by the program that recognizes the rights of individuals and families affected. The program is responsible for providing evidence that it considered extenuating circumstances and made significant attempts to help the client continue in the program. Programs should have a formal, established grievance process in its policies and procedures for residents who feel the shelter wrongly terminated assistance
- Shelters must provide the client with a written copy of the program rules and the termination process before he/she begins receiving assistance and keep a copy signed by the client in the file
- Programs may carry a barred list when a client has presented a terminal risk to staff or other clients. If a barred client presents him/herself at a later date, programs should review the case periodically to determine if the debarment can be removed to give the program a chance to provide further assistance at a later date

Rapid Rehousing and Prevention

HOMELESSNESS PREVENTION AND RAPID REHOUSING

Rapid rehousing provides an immediate, permanent housing solution for vulnerable homeless individuals and families using the “lightest touch” possible.

Homelessness prevention programs must target their limited financial assistance and housing stability resources appropriately and develop methods to determine which households are at greatest risk of becoming homeless (within 72 hours) or those households who can be diverted from the shelter system with the aid of financial assistance.

No matter the focus population, all Wake CoC homelessness prevention and rapid rehousing programs should adopt a housing first philosophy by reducing eligibility requirements and housing people as quickly as possible. These programs should also participate in emerging coordinated assessment process, including housing prioritization. Agencies within the Raleigh/Wake CoC use the VI-SPDAT to prioritize individuals and families experiencing literal homelessness based on an acuity score that indicates the type of housing intervention best suited to their ongoing needs.

CLIENT INTAKE PROCESS

STANDARD: Programs will actively participate in their community’s coordinated assessment system. At a minimum, programs will perform the VI-SPDAT with all program applicants to determine their acuity score. The program will limit entry requirements to ensure that the program serves the most vulnerable individuals and families needing assistance.

Benchmarks

- All adult program participants must meet the following program eligibility requirements:
 - Rapid rehousing programs work with households who meet the definition of homelessness in the definitions section of the performance standards
 - Homelessness prevention programs work with households who meet the at-risk of homelessness definition in the definitions section of the performance standards
- Programs cannot disqualify an individual or family because of prior evictions, poor rental history, criminal history, or credit history
- Programs explain the available services, encouraging each adult household member to participate in said services, but does not make service usage a requirement or the denial of services a reason for disqualification or eviction unless service requirements are attached to funding (SSVF grants have a service requirement)
- Programs must use the standard order of priority of documenting evidence to determine homeless status and chronically homeless status per the program’s eligibility requirements. The order should be as follows:

- Third-party documentation (including HMIS Project Entry/Exit records)
- Intake worker observations through outreach and visual assessment
- Self-certification of the person receiving assistance
- Programs will maintain Release of Information (ROI), case notes, and all pertinent demographic and identifying data in HMIS as allowable by program type. If an agency maintains client records via paper files, said files should be maintained in a locked cabinet behind a locked door with access reserved for caseworkers and administrators who needs the information
- Programs can turn away individuals and families experiencing homelessness from program entry for only the following reasons:
 - Household makeup (provided it does not violate HUD's Fair Housing and Equal Opportunity requirements): singles-only programs can disqualify households with children; families-only programs can disqualify single individuals
 - Does not meet minimum VI-SPDAT score as determined and approved by the community
 - For SSVF and HOME programs only, the family or individual has household income over 50%
 -

RAPID REHOUSING

STANDARD: Programs will assist participants in locating and moving into safe, affordable housing, providing housing stabilization and case management services meant to provide long-term sustainability as defined under the specific program type. These policies should also address when and how programs use financial assistance as a bridge to housing subsidy or a permanent supportive housing program.

Benchmarks

- Programs explain program rules and expectations prior to admitting the individual or family into the program. Programs have rules and expectations that ensure fairness and avoid arbitrary decisions that vary from client to client or staff to staff.
- Programs consider the needs of the household in terms of location, cost, number of bedrooms, handicap access, and other pertinent information when moving a household into housing. Programs will assess potential housing for compliance with program standards for habitability, lead-based paint, and rent reasonableness prior to the individual or family signing a lease and the program signing a rental assistance agreement with the landlord.
- Lease and Rental Assistance Agreements: The coordination and terms of leasing and Rental Assistance agreements are dependent upon program funding and agency policy and practices.
- Programs should take a progressive approach when determining the amount that households will contribute toward their monthly rent payment, remaining flexible, and taking into account the unique and changing needs of the household
- Programs should review the amount of rental assistance paid for the participating household every 3 months and, in accordance with existing written policies and procedures, determine the amount of rent participants pay towards housing costs.
- When determining the amount and length of financial assistance, programs should base their decision on the needs of the household and its long-term housing stability plan.

- Programs should have well-defined policies and procedures for determining the amount and length of time for financial assistance to program participants as well as defined and objective standards for when case management and/or financial assistance should continue or end.

HOUSING STABILIZATION/CASE MANAGEMENT SERVICES

STANDARD: Programs shall provide access to housing stabilization and/or case management services by trained staff to each individual and/or family in the program.

Benchmarks:

- Programs provide individual housing stabilization and/or case management services to program participants at least monthly, including housing identification
- Case management services, including assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for participants who have obtained and maintained permanent housing through the homelessness prevention or rapid rehousing program by developing in conjunction with the participant, an individualized housing and service plan with a path to permanent housing stability and maintain accountability of said plan.
- See additional, optional case management provisions on pages 4-5.

SERVICE COORDINATION

STANDARD: Programs will assist program participants in obtaining appropriate supportive services and other federal, state, local, and private assistance as needed and/or requested by the household. Program staff will be knowledgeable about mainstream resources and services in the community.

Benchmarks

- Programs should arrange with appropriate community agencies and individuals the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; substance abuse assessments and treatment; legal services, credit counseling services; and other assistance requested by the participant, which programs do not provide directly to clients.
- Programs coordinate with other mainstream resources for which participants may need assistance: emergency financial assistance; domestic violence shelters; local housing authorities, public housing, and Housing Choice Voucher programs; temporary labor organizations; child care resources and other public programs that subsidize child care; youth development and child welfare; WIC; Supplemental Nutrition Assistance Program (SNAP); Unemployment Insurance; Social Security benefits; Medicaid/Medicare.

TERMINATION

STANDARD: Termination should be limited to the most severe cases per program grant requirements. Programs will exercise sound judgment and examine all extenuating circumstances when determining if violations warrant program termination. All programs are required to have standard termination policies and

procedures.

Benchmarks

- Programs will meet the key elements of permanent supportive housing published by the U.S. Department of Health and Human Services Substance Abuse and Mental Health Services Administration.⁴
- While violation of a participant's lease or sublease may be cause for termination, programs should develop a termination of services policy giving participants multiple housing chances or work to move participants to a higher-level permanent supportive housing intervention, when possible (i.e. programs will move a participant two times before terminating him/her from services).
- Programs should only terminate services when clients pose a safety risk to staff or other residents of their community. o Programs' goal should be to avoid eviction by working with the landlord and participant to form an agreement allowing participants to move prior to a legal eviction, when possible.
- Programs should not immediately terminate participants who enter an institution (medical, mental health, or crisis). HUD CoC PSH grants allow grantees to maintain open units for institutionalized individuals and families for up to 90 days

HOMELESSNESS PREVENTION

STANDARD: Programs will assist participants in staying in their current housing situation, if possible, or assist households at imminent risk of homelessness to move into another suitable unit as defined under the specific program type.

Benchmarks

- Programs are encouraged to target prevention funds toward community diversion efforts. When paying financial assistance to divert households from homelessness, programs should target assistance to the households most likely to experience homelessness if not for this assistance.
- Programs explain program rules and expectations prior to admitting the individual or family into the program. Programs will have rules and expectations that ensure fairness and avoid arbitrary decisions that can vary from client to client or staff to staff.
- When moving the individual or family into a new unit, programs consider the needs of the household in terms of location, cost, number of bedrooms, handicap access, etc. Programs will assess potential housing for compliance with program standards as asserted by the grantor prior to the individual or family signing a lease and the program signing a rental assistance agreement with the landlord.
- Lease: The program participant will sign a lease directly with a landlord or property owner. Grantees may only make payments directly to the landlord or property owner.
- Rental Assistance Agreement: Programs may make rental assistance agreements according to agency and grantor policies, provisions and standards
- Programs will determine the amount that households will contribute toward their monthly rent

⁴ See SAMHSA's Key Elements of PSH: <http://store.samhsa.gov/shin/content/SMA10-4510/SMA10-4510-06BuildingYourProgram-PSH.pdf>

payment. The household's payment cannot exceed ESG, CoC, SSVF, or HOME regulations.

- Use with other subsidies: Except for one-time payment of rental arrears on the program participant's portion of the rental payment, rental assistance cannot be provided to a program participant who receives other tenant-based rental assistance or who is living in a housing unit receiving project-based rental or operating assistance through public sources. Programs can pay for security and utility payments for program participants to move into these units when other funding sources cannot be identified.

Permanent Supportive Housing and Prioritization of Chronically Homeless

Permanent supportive housing programs provide safe, stable homes through long-term rental assistance, paired with long-term intensive case management services, to highly vulnerable individuals and families with complex issues who are otherwise at risk of serious health and safety consequences from being homeless.

This model seeks to provide a stable housing option and the necessary supportive services for individuals and families who would not succeed in other permanent housing settings. Permanent supportive housing is designed for persons with disabilities, including severe mental health, physical health, HIV/AIDS, and/or substance abuse disorders, especially targeting individuals and families meeting the Department of Housing and Urban Development's definition of chronic homelessness

Successful permanent supportive housing programs use the national best practice of Housing First, the model in which programs house all persons immediately without preconditions such as sobriety, income, or behavioral requirements and pair supportive services matched to the needs of the household

PERMANENT SUPPORTIVE HOUSING

STANDARD: Programs will provide safe, affordable permanent housing that meets participants' needs in accordance with the client intake practices and within CoC established guidelines for permanent supportive housing programs. Programs will pair permanent housing with intensive case management services to participants to ensure long-term housing stability.

Wake CoC agencies agree to prioritize clients who are chronically homeless for the Permanent Supportive Housing beds not already dedicated to chronically homeless within our CoC that become available through turnover, such that:

- Agencies will hold turnover beds open for a period of 15 days while searching for clients who are chronically homeless
- 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 requirement barriers that might otherwise exclude them from qualifying

- If an individual or family who is 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 use the sample form below for documentation until coordinated assessment implementation PSH beds will be filled in compliance with HUD Notice CPD-14-012 on Prioritizing Persons Experiencing Chronic Homelessness (<https://www.hudexchange.info/resources/documents/Notice-CPD-14-012-PrioritizingPersons-Experiencing-Chronic-Homelessness-in-PSH-and-Recordkeeping-Requirements.pdf>)

Beds dedicated to serve chronically homeless in order of priority:

1. CH with longest history of homelessness and most severe service needs (please find definitions and more details in the HUD Notice linked above)
2. CH with longest history of homelessness
3. CH with most severe service needs
4. Homeless with a disability and most severe service needs
5. Homeless with a disability and long period(s) of homelessness
6. Homeless coming from all but transitional housing
7. Homeless coming from transitional housing