

# *Draft 3rd SUBSTANTIAL AMENDMENT*

to the 2021 Annual Action Plan  
For Housing & Community Development for  
Suburban Monroe County Home Investment  
Partnership (HOME) American Rescue Plan  
(ARP) Act



**Adam J. Bello**  
*County Executive*

## **Acquisition Rehabilitation Resale Project**



**Before**



**After**

## **Affordable Housing Project**



**Durand Senior Apartments, Irondequoit**

**Public Comment: September 2—October 3, 2025**

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### **3<sup>rd</sup> SUBSTANTIAL AMENDMENT TO THE 2021-22 ANNUAL ACTION PLAN HOME INVESTMENT PARTNERSHIPS (HOME) AMERICAN RESCUE PLAN (ARP) SUMMARY August 2025**

The United States Department of Housing and Urban Development (HUD) requires that the County of Monroe formally amends the HOME-ARP Allocation Plan (Allocation Plan) when it proposes a change in the method of distributing funds; to carry out an activity not previously described in the Allocation Plan; or to change the purpose, scope, location, or beneficiaries of an activity, including new preferences not previously described in the Allocation Plan. In accordance with the federal regulations at 24 CFR § 91.320, and Monroe County Planning and Development, Community Development's Citizen Participation Plan, the County is amending its 2021-22 Annual Action Plan that guides its use of funds from the U.S. Department of Housing and Urban Development Community Development and Planning Program. The Consolidated Planning process is a requirement for direct financial assistance under certain HUD formula grant programs including HOME Investment Partnerships (HOME) American Rescue Plan (ARP) program (HOME-ARP) Allocation Plan.

Monroe County proposes to amend the 2021-22 Annual Action Plan by modifying the Monroe County HOME-ARP Allocation Plan (Allocation Plan). The Allocation Plan was adopted by the Monroe County Legislature on September 6, 2022 and submitted to HUD on September 9, 2022. This amendment is found on pages: 18-20 and is highlighted in red text noting the specific change.

At the time of the HOME-ARP Allocation Plan, Monroe County did not give preferences to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

The proposed amendment to the Allocation Plan will modify giving preference for homeless youth (age 18-25) and youth aging out of foster care as a priority qualifying population to be housed in an affordable rental housing development project. This will address an unmet need or gap in benefits and services not currently available to homeless youth in Monroe County.

Adopting this preference would not qualify anyone who would not have already qualified prior to adoption, nor would it exclude any Qualifying Populations from Monroe County's overall HOME-ARP program.

In addition, Monroe County is proposing to fund Fine Arts Building (FAB) Lofts located at 41-45 Chestnut Street, City of Rochester, for \$750,000 for the redevelopment of a 42-unit affordable rental housing (18-studio and 24-1 bedroom) project. FAB Lofts will have 13 supportive housing units for homeless youth (18-25). Four (4) units will be set-aside for homeless youth/youth aging out of foster care.

The amendment is being proposed with updated information available since the 2022 adoption of the Allocation Plan, including additional market analysis data, point in time data, and data provided by local youth and community service providers that support the prioritization of homeless youth. The proposed amendments reflect Monroe County's continued commitment to addressing housing challenges and ensuring HOME-ARP funds are used effectively to create housing opportunities for those most in need. All other aspects of the Monroe County HOME-ARP Allocation Plan remain unchanged.

Monroe County has published a public notice with the Daily Record on September 2, 2025. A copy of the proposed amendment can be found on the Community Development page of the Monroe County website or <https://www.monroecounty.gov/planning-community> for review. Written comments will be accepted by the County during the public comment period from September 2, 2025 – October 3, 2025. The County will consider comments received during the

public comment period in preparing the 3<sup>rd</sup> Substantial Amendment to the 2021-22 Annual Action Plan Home Investment Partnership-American Rescue Plan. Written comments are being accepted by email ([CDGrants@monroecounty.gov](mailto:CDGrants@monroecounty.gov)) and by mail at Monroe County Department of Planning and Development, Community Development Division, 50 West Main Street, 1150 City Place, Rochester, NY 14614.

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

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

Monroe County, in partnership with the City of Rochester and the Continuum of Care, locally known as Partners Ending Homelessness (the “CoC”), developed two key components for its consultation process, both of which involve collecting feedback from community members. The first component was to design and disseminate a survey to help identify gaps and unmet needs in housing and service delivery systems and prioritize eligible activities including the development and support of affordable rental housing, tenant-based rental assistance, supportive services, acquisition and development of non-congregate shelters, and non-profit operating and capacity building assistance. The on-line survey was widely distributed electronically through a variety of community outlets, at the Homeless Services Network (HSN), which is a conglomerate comprised of over 80 community-care and human services providers, including those that serve the homeless, domestic violence victims, veterans, and persons with disabilities. The HSN also includes public housing agencies that address the needs of fair housing and enforcement of civil rights. The survey was available from December 2021-March 2022. It was also shared via the CoC’s weekly newsletter that is distributed to over 400 community members throughout Monroe County. Recipients were also asked to share the surveys with those within their network in order to reach additional stakeholders. 84 individuals responded to the survey.

In addition, in December 2021, Monroe County and its partners announced the anticipated funding with a presentation to the Homeless Services Network monthly stakeholders meeting. The presentation identified the qualifying populations and the five qualifying activities, the total available resources for the County and City, as well as next steps, prior to the submission of the County and City’s respective Allocation Plan to HUD. The second component in the consultation process continued with several virtual meetings with key stakeholders serving Monroe County and the City of Rochester. Virtual meetings with public housing authorities, affordable housing developers, religious leaders, funders, and service providers who serve the qualifying populations eligible through the HUD HOME-ARP utilized the Discussion Guide for HOME-ARP Consultation Meetings provided by HUD and helped to further identify gaps and needs in the community that the data did not fully address. The consultation meetings were held between January, February, and March of 2022. The feedback received is summarized in the chart below. Final funding decisions for projects and programs receiving HOME-ARP funds will be determined through a Request for Proposals (RFP) or a Request for Qualifications (RFQ), as appropriate. The RFP or RFQ process will be in coordination with the City of Rochester, the CoC with input from the Monroe County Department of Human Services.

***List the organizations consulted:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
Rochester Housing Authority (RHA)	Public Housing Authority	Virtual 1/24/22	Case Management, Short-term emergency Housing, and more time for housing searches are all needed. More family/elderly housing is needed

CoC/Partners Ending Homelessness (PEH)	Local CoC/Service agency/homelessness/HMIS	Plan consultant partner/co-host/Virtual	Case management/services key to success for qualifying populations. Difficult to find appropriate, affordable housing – need support services to remain stably housed
Fairport Urban Renewal Agency (FURA)	Housing	Virtual 1/24/22	Case Management, Short-term emergency Housing, and more time for housing searches are all needed. More family/elderly housing is needed
Rochester Area Community Foundation (RACF)	Funder/Serves All Qualifying populations	Virtual 2/15/22	Continuity of systems. Renters are paying more for rent than they can afford. Are community resources adequate?
Housing Council/PathStone	Fair Housing/Civil Rights	Virtual 2/15/22	Streamline shared databases. There have been discrimination complaints related to housing quality. There is a lack of trust in sharing documentation amongst people
Rochester Monroe Anti-Poverty Initiative (RMAPI)	Multiple-Housing/Jobs/serving qualifying populations	Virtual 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities
YWCA	Domestic Violence/Homelessness	Virtual 2/15/22	Housing for people with disabilities, Mental Health and fleeing disabilities
Empire Justice	Homelessness/Fair Housing/Civil Rights	Virtual 2/15/22	Supportive Services should match appropriate housing levels per ESL Rental Housing Study
Legal Aid of Western NY	Fair Housing/Civil Rights	Virtual 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities
JustCause	Fair Housing/Civil Rights/	Virtual 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities
Regional Center for Independent Living	Service Agency – Persons w/Disabilities/Civil Rights/Homelessness	Virtual 2/15/22	Lack of safe, affordable housing for qualifying populations. Many habitability and code issues. Qualifying populations face barriers to housing opportunities
Spiritus Christi Prison Outreach	Persons exiting prison/Other	Virtual 3/4/22	Landlords less likely to rent to those with bad credit/rent history. Qualifying

	populations/ Homelessness		populations have greater barriers to securing housing than typical households because of the lack of documentation
Eagle Star	Veterans/Homelessness	Virtual 3/4/22	Need help in securing documentation, searches, and continued case management. Limited supply of adequate affordable housing
Veterans Outreach Center (VOC)	Veterans/Homelessness	Virtual 3/4/22	Qualifying populations face greater barriers to finding/securing housing. Need case management, securing documentation. Limited available adequate and affordable housing
Willow Center	Domestic Violence	Virtual 3/4/22	Rent Subsidies and wrap-around services
Coordinated Care Services, Inc. (CCSI)	Service agency-serves qualifying population/homelessness, coordinated entry	Virtual 3/4/22	Needs assistance w/documentation and housing search/placement, continued case management. Landlords less likely to rent to those w/credit/rent history issues. Limited supply of adequate and affordable housing
Huther Doyle	Service agency-serves qualifying population, homelessness, addiction and mental health	Virtual 3/4/22	Qualifying population face greater barriers to finding/securing housing. Needs assistance w/securing needed documentation. Continued case management.
Reentry Association of WNY	Persons exiting prison, homelessness	Virtual 3/4/22	Qualifying population face greater barriers to finding/securing housing. Needs assistance w/securing needed documentation. Continued case management.

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

## Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:***

- ***Date(s) of public notice: April 22, 2022 and August 23, 2022***
- ***Public comment period: May 5, 2022 end date – June 13 and***
  - ☐ ***August 23, 2022 end date - September 8, 2022.***
- ***Date(s) of public hearing: May 5, 2022***

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

Community input and engagement has been the driving force in the development of Monroe County’s HOME-ARP Allocation Plan. We facilitated a hybrid in-person and virtual public hearing, which was held on May 5, 2022 at 10:00a.m., with a public comment period from May 5-June 13, 2022. Notice of the public hearing was posted with the Daily Record, the Rochester Business Journal, and on the Monroe County website, with a proposed funding breakdown of the County’s HOME-ARP Allocation Plan distribution for all eligible activities. The County delivered a PowerPoint presentation outlining all eligible activities and summarized the process of how the proposed funding was determined. The HOME-ARP Allocation Plan will be submitted as part of a Substantial Amendment to the 2021-22 Annual Action Plan at the end of the public comment period and upon Legislature approval of the Plan, which incorporates information gleaned from public surveys, data collected through consultations, and recommendations received during the consultation process and public comment period.



A second public notice was posted with the Daily Record, the Rochester Business Journal, and on the Monroe County website for an additional 15-day public comment period, beginning August 23 to September 8, 2022, which included additional gap analysis and needs assessment and updated information to reflect the 2022 Point-In-Time (PIT) and Housing Inventory Count (HIC). All comments received will be included.

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

Notice of the public hearing was posted in the local newspapers, including the Daily Record and the Rochester Business Journal in addition to the Community Development page of the Monroe County website. The public notice was mailed to all of the municipal members within the County consortium as well as service providers within the County's network for further input. The public comment period was open for 37 days to allow for more time to solicit public comments. Monroe County posted a 2<sup>nd</sup> public notice for an additional 15-day comment period from August 23-September 8, 2022. A notice was published with the Daily Record and the Rochester Business Journal and included in the Partners Ending Homelessness Newsletter, which has a database of over 400 community members/stakeholders.

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

Monroe County received one submitted public comment/inquiry during the public participation process, which was from a developer looking to develop family housing in the suburban market at 50-60% of the Area Median Income (AMI). The proposal does not fit the HOME-ARP rubric, and we therefore spoke to this developer about possible alternative funding streams, which were more consistent with the County's regular year entitlement funding (see next question for more detail). No comments were received during the 2<sup>nd</sup> public notice.

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

As stated above, we received a public comment from a developer regarding a potential housing development for families in the town of Henrietta. This request did not fit under the HOME-ARP umbrella because it did not serve the eligible qualifying populations listed under HOME-ARP and suggested the developer submit a proposal utilizing the County's reallocated 2019 HOME Entitlement funds as a potential alternative funding source, or the County's regular year entitlement funding. The developer had seen a different public notice on the Community Development page of the Monroe County website for a reallocation of the County's 2019 HOME Entitlement funds.

All comments received during the public hearing and public comment period are accepted.

## Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

**Monroe County Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	273	81	365	365	0								
Transitional Housing	24	12	149	149	70								
Permanent Supportive Housing	475	151	794	794	206								
Other Permanent Housing	61	21	37	37	0								
Sheltered Homeless						65	492	68	90				
Unsheltered Homeless						0	42	1	2				
<b>Current Gap</b>													

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

**Monroe County Housing Needs Inventory and Gap Analysis Table**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	55,767		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	12,662		
Rental Units Affordable to HH at 50% AMI (Other Populations)	12,875		

0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		7,665	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		7,605	
<i>Current Gaps</i>			

**Data Sources:** 1. 2020 American Community Survey (ACS); 2. 2018 Comprehensive Housing Affordability Strategy (CHAS)

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

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

As of the draft of the Allocation Plan, the most recent one day data in Rochester/Monroe County was from January, 2021. There were 358 persons in the emergency shelter system and 33 unsheltered persons found (additional data is included in the above referenced table.) As of the same time in 2022, there were 588 persons in the emergency shelter system and 42 persons were unsheltered. During this same period, there were 82 adult survivors of domestic violence. The difference in the data from the two years prompted Monroe County to post for a second 5-day public comment period. The Point-In-Time (PIT) survey is conducted by the CoC annually during the last week in January and is valuable data in determining and analyzing the size and demographic composition of the qualifying populations within Monroe County's service area for this Plan. The County utilized PIT, HIC, and ACS data, as well as data gathered from the on-line survey and consultation meetings in preparing the County's Allocation Plan.

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

Per the 2018 CHAS data for Monroe County, 8% of all households have an income under 30% of the HAMFI, and nearly 10% of the renter population in Monroe County moved into their housing in 2019 or later, according to the 2020 American Community Survey (ACS). Additionally, 506 (or 0.5%) of renters occupied housing units had an occupancy rate of 1.51 or more persons per room per the 2020 ACS. These statistics indicate that there exists a population at risk of homelessness as defined in 24 CFR 91.5.

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

As of the 2022 PIT, there were 82 Adult survivors of Domestic Violence in Emergency Shelters and 9 in Transitional Housing. Two were unsheltered. Compared to the 2021 PIT, there were 76 in Emergency Shelters and 7 in Transitional Housing with 4 unsheltered.

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

The average age of residents of Monroe County is going up, with over 30% of the total population being over the age of 55. Older members of the community need safe, affordable, and accessible housing options in order to avoid housing instability. Monroe County continues to provide programs aimed at preventing homelessness in the community, including rental assistance and legal assistance for persons facing eviction. Over the last two years, Monroe County and its partners have worked on several programs aimed at preventing homelessness in the community, including rental assistance and legal assistance to persons facing eviction. It is difficult to determine the

size of this population or if it has risen due to the pandemic. Data within the suburban towns and villages have been more difficult to obtain due to the individual town and village courts handling their own cases since the eviction moratorium ended and each respective town is handling their own cases.

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

Funding available in the Monroe County service area the last two years have been through Treasury, which included CARES Act and Emergency Rent Assistance Program (ERAP), including the County's HUD Entitlement funds. Although majority of these funds have been mostly spent, current resources include annual HUD funding for the County (City and CoC) and other leveraged funding for the development of affordable rental housing and supportive services, housing, housing choice vouchers, as well as local foundations.

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

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

Based on the results of the online survey and consultation meetings, the greatest needs identified were acquisition and development of non-congregate shelters, tenant based rental assistance (TBRA), supportive services, non-profit operating funding and capacity building, and development of affordable rental housing. Services such as housing search and placement, including gathering of needed documentation and support services including continued case management was identified as the highest need, above the need for housing. As of the 2021 Point-In-Time Count (PIT), there were 358 persons within the emergency shelter system. There were 33 unsheltered persons identified during the same PIT count, which was down from 44 in 2020. However, in 2022, there were 588 persons within the shelter system and 42 unsheltered persons. Non-congregate type shelters were established during COVID and were often used for those who had tested positive for COVID or those at highest risk of transmission. Based on the 2021 ACS data, approximately 21,658 households have incomes at or below 30% AMI.

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

There is a shortage of affordable rental housing units available to those households who are very low income. Evidence of this is found in numerous statistics, including the fact that 45% of the total rental housing units in Monroe County spend thirty percent (30%) or more of their annual income on rent (per the 2020 American Community Survey). This percentage continues a trend that has been increasing from 2018, when it was reported at 43%. Additionally, over 30% of rental households in Monroe County have an annual income at or under \$25,000. In 2020, a one-bedroom apartment in Monroe County had a median rental rate of \$806.

This rent burden impacts all races and geographies in suburban Monroe County. Many of these households also experience other housing issues but have limited options available to remedy these issues. This, combined with the fact that over 60% of the rental housing in Monroe County was built before 1979, presents major public health issues for risk to exposure to lead based paint, asbestos, and other harmful antiquated building materials.

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

As of the 2022 PIT, there were 82 Adult survivors of Domestic Violence in Emergency Shelters, and 9 in Transitional Housing. Two were unsheltered. Compared to the 2021 PIT, there were 76 in Emergency Shelters and 7 in Transitional Housing with 4 unsheltered.

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

Additional rental housing units need to be added to the market that have more bedrooms for families to avoid crowding, with over 80% of rental housing units in suburban Monroe County being at or under 2 bedrooms. By contrast, only 4% of the rental housing units in suburban Monroe County are studio units, which may present affordable and potentially accessible options.

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

In Suburban Monroe County, the gap within the current shelter, housing inventory, and service delivery system includes emergency rental assistance for homelessness prevention. The funding made available from CARES Act and Emergency Rent Assistance Program (ERAP) and HUD is largely spent, but the need for additional services for very low-income individuals remains high. The need will come in the lack of available safe and affordable rental housing since rents have increased significantly, with many cases where rents are higher than HUD's fair market rates. In addition, case management and supportive services are needed to help households manage the process of applying for housing or other services.

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME- ARP Notice. If including these characteristics, identify them here:***

A household spending more than 30% of its income on housing expenses is considered "rent burdened" and potentially at risk of homelessness. This impacts a household's ability to buy food and to support other essentials like healthcare and transportation. A higher rent burden is associated with a greater risk of eviction and risk of homelessness.

Since the eviction moratorium after the COVID-19 pandemic, rents have increased

significantly. In many cases, rents are higher than HUD's fair market rents (FMR), causing households to now spend more than 30% of their income on housing costs. In fact, many households/individuals are being denied access to housing due to their lack of ability to prove their ability to pay. Housing cost burden can therefore be viewed as a strong contributor to homelessness. Combined with low incomes, this has led to a high number of households facing rent burden and housing instability.

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

The priority needs among the qualifying populations are permanent supportive housing, supportive services including on-going case management, job readiness, and housing search and placement, non-profit capacity building and operating, and non-congregate shelters within the community. Access to safe and affordable housing, including existing housing that are more challenging to secure for qualifying populations outlined in the HOME-ARP rules.

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

The data presented in the Plan were determined by information obtained during the County's consultation process, survey responses, and from the homeless population and housing inventory serving the homeless through the Homelessness Data Exchange (HDX) provided by the CoC. The reports included data from 2019 to 2021, which were obtained during the annual Point In Time (PIT) count conducted during the last week of January and the Housing Inventory Count (HIC). Income and housing statistics were taken from various sources including the American Community Survey (ACS) and Census data from the U.S. Census Bureau and housing and household data was taken from the Community Housing Affordability Strategy (CHAS) data.

## HOME-ARP Activities

***Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:***

Monroe County intends to solicit proposals for all eligible activities via a Request for Proposals/Qualifications (RFP/Q) or a Notice of Funding Availability/Opportunity (NOFA/NOFO), which will be conducted in collaboration and coordination with the City of Rochester and the Continuum of Care with input from the Monroe County Department of Human Services.

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

At the time of the Allocation Plan draft, Monroe County does not intend to administer any eligible activities directly.

***If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:***

This is not applicable, as Monroe County has not provided any of its administrative funds to a subrecipient or contractor prior to HUD's acceptance of its HOME ARP allocation plan.

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

### Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 643,501.80		
Acquisition and Development of Non-Congregate Shelters	\$ 858,002.40		
Tenant Based Rental Assistance (TBRA)	\$ 429,001.20		
Development of Affordable Rental Housing	\$ 1,501,504.20		
Non-Profit Operating	\$ 107,250.30	2.5 %	5%
Non-Profit Capacity Building	\$ 107,250.30	2.5 %	5%
Administration and Planning	\$ 643,501.80	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 4,290,012</b>		

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

Monroe County intends to solicit proposals for all eligible activities via a Request for Proposals/Qualifications (RFP/Q) or a Notice of Funding Availability/Opportunity



(NOFA/NOFO) procurement process, which will be conducted in collaboration and coordination with the City of Rochester and the Continuum of Care with input from the Monroe County Department of Human Services.

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

The allocation funding plan was determined as a result of the responses to the on-line survey, consultation meetings, and data reviewed for the Monroe County service area. Some of the funding amounts listed above are based on statutory limits as well as the cost to deliver some of the eligible activities. These amounts may be adjusted as the County receives more information from Request for Proposals/Qualifications or Notice of Funding Availability/Opportunity.

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

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

The County has a goal of developing approximately 12 units of affordable rental housing and/or rehab of existing rental units to remove housing problems to meet the needs of the qualifying populations, including households who are Extremely Low-Income (ELI) and Very Low-Income (VLI) and include supportive services, which has been identified as a gap in our community. The County will continue its partnership with local developers, municipal partners, and other funders, including New York State to leverage funding opportunities to meet these goals. This estimate may vary based on the responses received when the County releases its RFP/Q or NOFA/NOFO and the services provided to the qualifying populations. These units will be targeted at serving the qualifying populations located in suburban Monroe County or serving residents of suburban Monroe County.

**Determining Housing Production Goals for the HOME-ARP Allocation Plan  
Housing Production Goal Calculation Worksheet and FAQ**

**HOME-ARP Housing Production Goal Calculation Worksheet**

PJs may use this worksheet to estimate the number of affordable rental housing units for qualifying populations that a PJ will produce or support with its HOME-ARP allocation. The allocation plan must also include a narrative about the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs.

To estimate the number of HOME-ARP units that will be created with HOME-ARP PJs should enter the required data in the green cells in column C of the worksheet. Using these numbers, formulas in the blue cells will calculate the number of units that can be produced.

**NOTE: This worksheet provides two columns to calculate the number of HOME-ARP units that will be created if a PJ will create two rental housing projects.** To calculate any additional HOME-ARP units that will be created for **more than two** rental housing project, the cells in columns C can be copied over for additional calculations. Select cells 6C through cells 27C. Use the mouse to right click and select "copy". Next, select the cell you want to copy the formulas into. Right click the mouse and select "paste." You will then be able to enter data into the green cells to calculate additional units.

	HOME-ARP Rental Housing Project (#1)	HOME-ARP Rental Housing Project (#2)	HOME-ARP Rental Housing Project Example
<b>Housing characteristics required by the qualifying populations</b>			
Qualifying populations targeted for HOME-ARP rental housing (average household size)			Individuals/Families
Average household size			3
Unit size needed (number of bedrooms)			2
Amenities			Supportive services office
<b>HOME-ARP Funding</b>			
Total amount of HOME-ARP funding allocated to jurisdiction			\$ 4,290,012.00
Amount of HOME-ARP expected to be used for admin, NFP operating and capacity building			\$ 858,002.40
<b>Amount of HOME-ARP available for HOME-ARP eligible activities</b>	\$ -	\$ -	\$ 3,432,009.60
Amount of HOME-ARP allocated to non-rental housing eligible activities			\$ 2,788,507.80
<b>Amount of HOME-ARP available for rental housing operations and reserves</b>	\$ -	\$ -	\$ 214,500.60
Estimated amount for ongoing operating costs or operating cost assistance reserve	\$ -	\$ -	\$ 214,500.60
<b>Amount of HOME-ARP available for rental housing development</b>	\$ -	\$ -	\$ 1,501,504.20
Estimated amount from other housing development funding sources			
Total amount available for rental housing development	\$ -	\$ -	\$ 1,501,504.20
Average per unit development cost for qualifying population			\$176,000
<b>Estimated HOME-ARP Housing Production Goal</b>	#DIV/0!	#DIV/0!	9
<b>Narrative: Use the area below to document the assumptions used in this worksheet. This will assist with the development of the required narrative in the allocation plan.</b>			

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

Monroe County's goal of activating approximately 9 units will be supported by the County's collaboration with the area service providers and local developers to ensure that HUD funded affordable rental housing developments ~~serve~~ **are available to** all qualifying populations and provide safe, affordable housing with the supportive services to ensure individuals and families remain **or become** stably housed. With additional funding through partnerships and collaborations with local developers and other funders, the number of units will **likely** be higher than the estimated production goals. The need for affordable rental housing remains a priority need for Monroe County, serving those households who are ELI and VLI and for the

qualifying populations.

## Preferences

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

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).

- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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

~~At the time of the Allocation Plan, Monroe County does not intend to give preferences to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project. Should the County give preferences to a project or program at a later point, the project or program will comply with requirements listed in 24 CFR 5.105(a)~~

Monroe County will provide preferences for a sub-population of QP 1: homeless youth (between 18-25) and youth aging out of foster care in its development of affordable rental housing. At this time, no other proposed activity will contain a preference. Additional information has been made available supporting an unmet need within the community for homeless youth and youth aging out of foster care. The data identifies a gap in available housing to support this sub-population in the Rochester/Monroe County area. All projects and programs funded by Monroe County will comply with requirements listed in 24 CFR 5.105(a).

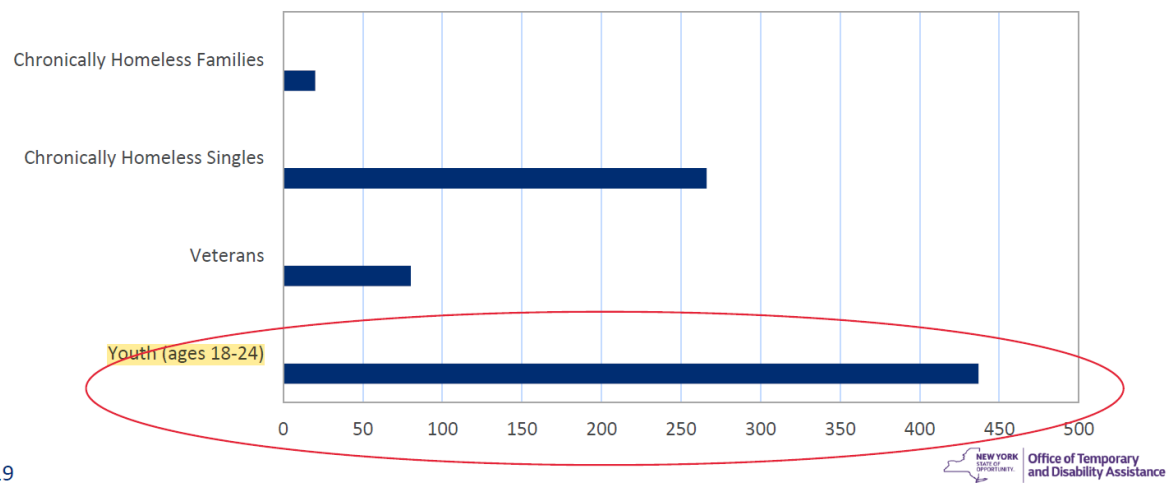
Total PIT Numbers					
	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total Number of Households	544	131	11	78	764
Total Number of persons (Adults & Children)	815	150	11	80	1056
Number of Persons (under age 18)	246	22	0	0	268
Number of Persons (18 - 24)	70	27	0	2	99

2024 Point in Time Data for Monroe County.

Number of Persons (18 - 24)	66	28	1	1	96
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And the 2025 Point in Time Data showing a consistent number of homeless youths within Monroe County year on year.

## Monroe County Homeless Sub-populations



OTDA supporting data.

- Inclusion of ESSHI subsidy for young adults at risk of homelessness as there are few to no options in the immediate downtown core.

**NEWMARK**

The Fine Arts Building Lofts

3<sup>rd</sup> Party Market Study showing the lack of housing options for the homeless sub-population.

	2020	2021	2022	2023	2024
◆ In Care	451	417	378	403	356
■ Admissions	284	250	231	253	215
▲ Discharges	251	274	295	249	255

	Admissions			In Care			Discharges		
	N	%	Comp.	N	%	Comp.	N	%	Comp.
< 2	43	20.0	21.2	38	10.7	11.6	22	8.6	9.0
2-5	36	16.7	19.1	79	22.2	23.5	61	23.9	25.7
6-9	27	12.6	15.6	57	16.0	18.3	38	14.9	18.4
10-13	43	20.0	17.2	58	16.3	15.3	39	15.3	15.6
14-17	66	30.7	25.7	85	23.9	22.7	66	25.9	21.3
18+	0	0.0	1.1	39	11.0	8.6	29	11.4	10.0

2024 Foster Care Monitoring & Analysis Profiles for Monroe County NY – data shows an average of 10% of those being discharged from care (approx. 30 individuals per year) are youths aging out of Foster Care.

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

N/A

Homeless youth and youth aging out of foster continue to see challenges in identifying available housing. Monroe County is proposing to fund an affordable rental housing project development with a number of units to be set aside (2 units directly funded with County HOME-ARP) for those meeting the definition of homeless youth (between 18-25) and youth aging out of foster care. The project will be using a waitlist provided and maintained by a non-profit community partner who has years of experience and works directly with this sub-population. Eligibility will be determined by a community-wide vulnerability assessment screening tool. The vulnerability assessment score will determine the method of prioritization from the eligible waitlist participants, with the most vulnerable being housed first. If the non-profit partner is unsuccessful in filling a unit with a qualified tenant from the “preference” sub-population, the unit will then be opened to all QPs served on a first-come-first-served (chronological order) basis.

The greatest challenge is housing affordability for this sub-population. By providing a preference, Monroe County will be able to provide stable housing opportunities to meet the growing number of homeless youth and youth aging out of foster care in the Rochester/Monroe County community.

## Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).



***Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):***

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

***Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:***

At the time of the Allocation Plan, Monroe County does not intend to limit eligibility for a HOME-ARP or NCS project to a particular qualifying population or specific subpopulation of a qualifying population.

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

N/A.

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

N/A.

## HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

Monroe County does not intend to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

- *Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity*

N/A

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*

N/A

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

N/A

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

N/A

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

Monroe County will not use funds to refinance multi-family loans made or insured by any federal program, including CDBG.

- *Other requirements in the PJ's guidelines, if applicable:*

N/A