HOME-ARP
ALLOCATION PLAN

City of Ithaca, NY
March 23, 2023
TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Summary</td>
<td>1</td>
</tr>
<tr>
<td>Introduction</td>
<td>4</td>
</tr>
<tr>
<td>Consultation</td>
<td>8</td>
</tr>
<tr>
<td>Public Participation</td>
<td>27</td>
</tr>
<tr>
<td>Needs Assessment/Gap Analysis</td>
<td>30</td>
</tr>
<tr>
<td>Qualifying Populations</td>
<td>33</td>
</tr>
<tr>
<td>Current Resources</td>
<td>43</td>
</tr>
<tr>
<td>Unmet Housing &amp; Service Needs</td>
<td>47</td>
</tr>
<tr>
<td>Priority Needs within Qualifying Populations</td>
<td>52</td>
</tr>
<tr>
<td>Use of HOME-ARP Funds</td>
<td>55</td>
</tr>
<tr>
<td>Preferences</td>
<td>59</td>
</tr>
<tr>
<td>Referral Methods</td>
<td>61</td>
</tr>
</tbody>
</table>
The HOME-ARP Allocation Plan for Ithaca, NY

Executive Summary

Introduction
The American Rescue Plan (ARP) Act of 2021 provides a special $5 billion appropriation of the U.S. Department of Housing and Urban Development’s HOME Investment Partnership Program (HOME) funds to create a special program (“HOME-ARP”) to alleviate homelessness and housing instability in the aftermath of the COVID-19 pandemic.

The City of Ithaca has been allocated $1,211,929 in HOME-ARP funds. This is one-time funding determined by formula.

Though it draws on the HOME program, HOME-ARP is a new program whose rules and guidelines differ from traditional HOME. In order to access and deploy its HOME-ARP funds, the City must develop a framework for use of funds, called an Allocation Plan, to be submitted to HUD by March 31, 2023. The City will have until September 20, 2030 to expend HOME-ARP funds.

Consultation
The City consulted with over thirty organizations serving people experiencing homelessness or housing instability, including the seven specific types of service entities required by HOME-ARP. To broaden input and public participation from service providers, stakeholders, and community members, the City launched an online survey called “Ithaca Considers HOME-ARP,” which received 142 responses. The Allocation Plan summarizes consultations and survey responses.

Needs and Gaps Analysis
Understanding the needs and gaps in local systems serving people who are experiencing homelessness or unstably housed, as well as existing resources, is central to developing a local strategy for deploying HOME-ARP funds. The City partnered with the Tompkins County Continuum of Care to commission an analysis of needs and gaps by Horn Research. The resulting report, “Homelessness & Housing Needs Assessment for Tompkins County” was released on March 9, 2022. Additionally, the City reviewed recent data from the Tompkins County Continuum of Care, the Ithaca Eviction/Displacement Defense (IEDD) Project, NYS Office of Temporary and Disability Services (OTDA), and others in development of this Allocation Plan.
HOME-ARP Activities: Ithaca’s Strategy & Rationale for Use of Funds

Data and stakeholder input point to two overwhelming needs in the homeless response system to address with HOME-ARP funds. One is the lack of current resources to respond to persistent unsheltered homelessness. An estimated 20-25 households remain in outdoor encampments year-round. Second, 32% of households exiting homelessness return to homelessness within 24 months. Supportive services have been identified as a gap for navigating housing systems, identifying units, and providing needed assistance in sustaining housing post-placement. Therefore, the City proposes to deploy HOME-ARP funds in two primary ways:

1. To support a housing surge for people who are literally homeless, and
2. To prevent returns to homelessness for people who are currently housed and in situations of vulnerability that threaten their housing stability.

The City has determined that the special rules of HOME-ARP make its supportive services the most flexible and cost-effective means to achieving these goals. Under HOME-ARP program rules, supportive services may provide short- and medium-term rental assistance, along with other financial assistance. Supportive services have the potential to provide low-barrier navigation services on the front-end to help unsheltered people reach housing and post-placement services to households who have experienced homelessness in order to increase stability and prevent eviction. Service plans can be customized to provide rental assistance where necessary. Therefore, the City proposes to allocate the majority of its HOME-ARP funds to the Supportive Services category. The City will allocate 5% of its total HOME-ARP award— the maximum allowed— to Nonprofit Capacity-Building to put necessary infrastructure in place to carry out HOME-ARP activities. The remainder of the funds will be used for administration of the funds over the remaining seven years.

**HOME-ARP Funding**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Funding Amount</th>
<th>Percent of Grant</th>
<th>Statutory Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supportive Services</td>
<td>$ 970,279</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acquisition and Development of Non-Congregate Shelters</td>
<td>$ 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tenant Based Rental Assistance (TBRA)</td>
<td>$ 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development of Affordable Rental Housing</td>
<td>$ 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Profit Operating</td>
<td>$ 0</td>
<td>0 %</td>
<td>5%</td>
</tr>
<tr>
<td>Non-Profit Capacity Building</td>
<td>$ 60,000</td>
<td>5%</td>
<td>5%</td>
</tr>
<tr>
<td>Administration and Planning</td>
<td>$ 181,650</td>
<td>15%</td>
<td>15%</td>
</tr>
<tr>
<td><strong>Total HOME ARP Allocation</strong></td>
<td>$ 1,211,929</td>
<td></td>
<td></td>
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</tbody>
</table>
Preferences

HOME-ARP has a complex system that communities may utilize in targeting funds to households with the highest needs. In order to lower barriers to households who are literally homeless and disconnected from the homeless response system, the City will implement a preference for Qualifying Population 1, “Homeless as defined in 24 CFR 91.5” with a prioritization method of Subgroup 1 “An individual for family who lacks a fixed, regular, and adequate nighttime residence.” In order to prevent returns to homelessness, the City will implement a preference for Qualifying Population 4, “Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice,” with a prioritization method of Subgroup 1, “Households who have previously been qualified as ‘homeless’ as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.” HOME-ARP Supportive Services will be available to people in other Qualifying Populations and their subgroups after these two target populations are served.
Introduction

On March 11, 2021, President Biden signed into law The American Rescue Plan (ARP) Act of 2021. The Act provides a special $5 billion appropriation of the U.S. Department of Housing and Urban Development’s HOME Investment Partnership Program (HOME) funds to alleviate homelessness and housing instability in the aftermath of the COVID-19 Pandemic. These special, one-time funds are known as HOME-ARP funds. The federal notice outlining the specific provisions of the HOME-ARP Program is HUD CPD Notice 21-10, “Requirements for the Use of Funds in the HOME-ARP Program.”

The City of Ithaca is HUD Entitlement Community and receives annual allocations of HOME funds. HUD has allocated $1,211,929 in these special HOME-ARP funds to the City. This is one-time funding determined by formula.

To alleviate homelessness and housing instability, the special HOME-ARP funding has a different beneficiary focus and rules than traditional HOME funding. HOME-ARP funded activities must benefit specific qualifying populations, including individuals and families who are homeless; at-risk of homelessness; or in other vulnerable situations. There are four primary types of activity that are eligible for HOME-ARP funding:

- Affordable rental housing (creation of)
- Tenant-based Rental Assistance (TBRA)
- Supportive services
- Acquisition and/or development of non-congregate shelter

Additional allowed uses for HOME-ARP include the following, which are capped at specific levels.

- Non-profit assistance/capacity building (5% cap)
- Administrative and planning costs for HOME-ARP (15% cap)

The HUD CPD Notice 21-10 requires the City of Ithaca to evaluate conditions of homelessness and housing instability in our community and create an Allocation Plan for use of the HOME-ARP funds. The Allocation Plan must also include consultations with community stakeholders, a needs and gaps analysis, and a public participation process. The City will submit this Allocation Plan to HUD as a Substantial Amendment to the City’s 2021 Annual Action Plan. HUD must approve the plan before the City can begin implementation of proposed activities. Important deadlines include:

- Submission deadline: March 31, 2023
- Final expenditure of funds deadline: September 20, 2030

This Allocation Plan summarizes the following:

- The consultation process and results.
• A summary of comments received through public participation including whether or not comments were accepted and why.
• A description of the City of Ithaca’s Qualifying Populations
• An assessment of the unmet needs of the Qualifying Populations
• An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system
• The planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying population.
• An estimate of the number of housing units for Qualifying Populations the City will produce with its HOME-ARP allocation and anticipated outcomes.
• A description of preferences for individuals and families in a Qualifying Population(s) or a segment of the Qualifying Population(s).
Guide to Abbreviations

Gathered here are some of the community development acronyms and abbreviations used in this Allocation Plan. *Note: Generally, abbreviations of names of the local nonprofit agencies consulted can be found in the Table of Consultations, rather than this list.*

ADLN – Anti-Displacement Learning Network
AMI – area median income
ARP – American Rescue Plan
BIPOC – Black, Indigenous, People of color
City – City of Ithaca, the Participating Jurisdiction
CoC – Continuum of Care
CDBG – Community Development Block Grant (CDBG)
CDBG – CV – Community Development Block Grant for Covid-specific activities
DSS – Department of Social Services
DV – domestic violence
ESSHI – Empire State Supportive Housing Initiative
HCV – Housing Choice Vouchers (also known as Section 8)
HMIS – Homeless Management Information System
“Horn Report,” -- “Homeless & Housing Needs Assessment for Tompkins County: A Review Of Data, Opportunities, and Barriers, Summary Report,” prepared by Horn Research, March 9, 2022
HOME – HOME Investment Partnership Program
HSC, HSCTC – Human Services Coalition of Tompkins County
HSSP – Housing Stability Supplement Payment
HUD – U.S. Department of Housing and Urban Development
IEDD – Ithaca Eviction/Displacement Defense (Project)
IGI – Ithaca Guaranteed Income
IURA – Ithaca Urban Renewal Agency
LEP – limited English proficiency
LMI – low-to moderate-income
MH – mental health
“The Notice” – HUD CPD Notice 21-10
OMH – Office of Mental Health
PEAF – Pandemic Emergency Assistance Funds
PIT – Point-in-Time
PJ – Participating Jurisdiction, in this case, the City of Ithaca
PH – permanent housing
PHA – Public Housing Authority
PSH – permanent supportive housing
PWUD – people who use drugs
SUD(s) – substance use disorder(s)
TBRA – tenant-based rental assistance (a rental subsidy)
TC – Tompkins County
Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, Ithaca consulted 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.

Description of the consultation process including methods used and dates of consultation:
The City of Ithaca in coordination with the Tompkins County Continuum of Care (CoC) commissioned Horn Research to synthesize data and gather stakeholder input about the needs and gaps in local homelessness and housing care systems. The resulting report, “Homelessness & Housing Needs Assessment for Tompkins County: A Review of Data, Opportunities, and Barriers Summary Report,” was released on March 9, 2022. This report laid a critical foundation for the development of this Allocation Plan.

The Ithaca Urban Renewal Agency (IURA) initiated consultations with the required organizations (CoC, homeless service providers, domestic violence providers, Public Housing Authorities, affordable housing providers, agencies serving the needs of the qualifying populations, organizations working in fair housing, and other stakeholders in Fall 2021, continuing through early 2023. Over 30 individual and small group consultations were completed via Zoom, email, telephone, and in-person when pandemic conditions allowed.

In Fall 2021, (former) Mayor Svante Myrick convened the Uses & Spaces 24/7 (US 24/7) Task Force to work toward addressing homelessness in downtown Ithaca, specifically on the 300 Block of W. Martin Luther King/State Street. The Task Force met twelve times over six months and heard from local subject matter experts and stakeholders. Its membership was comprised of seven individuals including elected and appointed officials, a City of Ithaca resident of the block, and directors of service providing agencies. The convenings of stakeholders and their input provided important information included in this plan.

Important information was gathered from public presentations, trainings, educational outreach, and standing meetings of service providers that have occurred from Fall 2021 to February 2023. These were environments where local practitioners discuss current conditions,
report upon progress and responses, share knowledge, and generate ideas, which often proved pertinent to the HOME-ARP planning process.

“Ithaca Considers HOME-ARP” Survey on Use of HOME-ARP Funds: Building upon consultations, IURA developed an online survey in December 2022 and distributed it to 43 organizations engaged in serving people who are unhoused, LMI, or members of the qualifying populations. To broaden participation, those who received the survey were encouraged to send it to other interested parties. The survey was posted on the IURA website for anyone to access. Announcements were posted to a local listserv active in circulating information regarding human services with a circulation of approximately 3,200 subscribers and to a Tompkins County Mutual Aid Facebook community so that any interested community member could participate. One hundred forty-two (142) responses were collected. Of those responding,

- 53% indicated they currently were providing services to vulnerable populations;
- 18% identified as concerned citizens,
- 13% worked on policy or in units of local government addressing homelessness.
- 5% were involved in development of affordable housing,
- 20% of respondents indicated present or past lived experience with homelessness.

Please note that in the discussion of the “Ithaca Considers HOME-ARP” online survey that follows, some survey questions were lightly edited to include the response options that were available.

Survey Question 1: “HOME-ARP funds focus on the following very low income “Qualifying Populations (QPs).” In your opinion, which population(s) should receive priority? Check all that apply.”

Results: Respondents could select as many of the QPs as they thought needed special attention, or priority (therefore, responses do not add up to 100%). Eighty percent (80%) of respondents indicated QP 1, Individuals and families experiencing homelessness, needed priority attention. The other three QPs were grouped very closely together in responses, with well over half of respondents indicating these groups also needed priority. No group received less than 58% of responses.

- QP 2, Individuals or families at-risk of homelessness: 59%
- QP 3, Individuals or families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking: 63%
- QP 4, Other populations requiring services or housing assistance to prevent homelessness or at greatest risk of homelessness (including people who housed and are very low-income and rent burdened; people whose housing assistance will soon expire;
people with previous experiences of homelessness; people who need supportive services; people with risk factors such as an eviction notice): 58%

**Takeaway:** Survey responses lifted up the need to provide particular attention to QP 1. Responses showed that needs of QP 2, 3, and 4 were also important to respondents, though ranked these QPs similarly in needing “priority.”

**Survey Question 2:** “What very low-income populations do you think have the highest need and most difficulty accessing housing or receiving services? Check all that apply.”

**Results:** Again, respondents were not limited in the number of groups they could select. Over 50% of respondents lifted up the following groups as those having the highest need or highest barrier to services:

- People with disabilities: 61%
- People actively using substances: 58%
- Unaccompanied youth (under age 25): 54%
Survey Question 3: Respondents were asked to rank the eligible activities of HOME-ARP funds from 1-4, in order of importance (“1” being most important). The eligible activities were listed in order below.

- Developing affordable rental housing
- Assisting tenants with rent (TBRA)
- Developing non-congregate shelter
- Housing-related supportive services

Results: Developing affordable rental housing was selected by 59% of respondents as the “1-most important.” The other activities were grouped very closely together in together behind this top priority, all hovering around second most-important.
The eligible activities of HOME-ARP funds are listed below. Please rank the importance of each activity (1 = most important, 4 = least important)

Answered: 142  Skipped: 0

Survey Question 4 & 5: HOME-ARP guidelines allow up to 5% of the total award to be directed toward Nonprofit Capacity Building. Respondents were asked if funds should be set aside for this purpose. A follow up question (Question 5) offered those who voted to set aside funds for capacity building an open-ended opportunity to describe what type of capacity building would be useful or necessary.

Results: Seventy-four percent (74%) of respondents indicated that HOME-ARP funds should be directed toward capacity building. Open-ended responses about what type of capacity building varied widely without a clear trend emerging.
Survey Question 6: “In your opinion, which is more important for the community to address? Choose one.”

- Long term housing solutions
- Short term housing crisis
- Equally important/can’t decide
- Other (specify)

Responses: The largest portion of respondents, 45%, identified long term housing solutions as being most important, followed by 39% who said long term housing solutions and short term housing crisis were equally important or couldn’t decide between the two. Six percent (6%) indicated the short-term housing crisis was most important to address, and 10% indicated via open-ended comments other ideas about how housing and shelter needed to be changed or improved.

Takeaway: Responses demonstrate the community’s awareness of the lack of affordable housing units available to meet needs, and also the complexity of allocating limited resources when needs are so severe. Nearly half of respondents (45%) indicated that long term housing solutions are most important, and over a third of respondents (39%) felt that long term housing and the short term crisis were both important or couldn’t be ranked one above the other. Few respondents (6%) indicated it was most important to address the short term housing crisis by itself.
Survey Question 7: This question presented respondents with two choices for how HOME-ARP funds could be distributed:

- Fewer projects, more funding to each
- More projects, less funding to each

Responses: Respondents indicated overwhelmingly (88%) that fewer projects should be selected with more funds available to each, rather than funding many smaller projects.
Table 1: Consultations

<table>
<thead>
<tr>
<th>Agency/Organization Consulted</th>
<th>Type of Agency/Organization</th>
<th>Method of Consultation</th>
<th>Feedback</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central New York Fair Housing (CNY Fair Housing or CNYFH)</td>
<td>Fair housing</td>
<td>Email</td>
<td>Of 17 Ithaca fair housing complaints received from 2021-early 2023, 9 were disability-related, mostly reasonable accommodation; 2 resulted in advocacy and achieved accommodation. Insufficient information for 8. Familial status and source of income discrimination are other areas of concern in Ithaca. CNYFH conducts testing and is working with Tompkins County to update County’s fair housing plan.</td>
</tr>
<tr>
<td>Tenants Legal Hotline</td>
<td>Fair housing, information and legal referral for tenants</td>
<td>Zoom; telephone; email; ADLN final report.</td>
<td>As of March 2022, the Tenants Legal Hotline had served 504 callers with brief legal advice; the hotline was averaging 1 new case per day. Local Tenants’ Rights Guide was published to its website in January 2022 and the website received 394 unique visitors that month.</td>
</tr>
<tr>
<td>The Advocacy Center</td>
<td>Domestic/Sexual Violence Response &amp; Prevention</td>
<td>Zoom; telephone; training event.</td>
<td>Safe Haven—90 days can be extended to 180 days. Inability to identify appropriate unit (price, location, safety) lengthens stay. Housing instability for survivors (rent burden, solo expenses); PEAF funds; large arrears on utilities because paying for other needs; outreach needed to housing unstable. Lack of domestic violence shelters open to clients who are currently using drugs and alcohol. Identifying trafficking—difficult, rarely done upon first contact. Prior to pandemic there was a group of providers connecting about trafficking.</td>
</tr>
<tr>
<td>Tompkins County Mental Health Services Department</td>
<td>Public agency, mental health</td>
<td>Zoom</td>
<td>Limited safety nets and ability to provide quick intervention. Multidisciplinary mobile teams model (outreach worker, mental health and physical health providers, possibly telehealth) could be valuable in filling gaps. Services require</td>
</tr>
<tr>
<td>Agency/Organization Consulted</td>
<td>Type of Agency/Organization</td>
<td>Method of Consultation</td>
<td>Feedback</td>
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<tr>
<td>a documented mental health diagnosis. People with both MH and SUDs are not well-served by system. Precious few of PSH (housing in general). Person can go through a whole journey (paperwork, entry process), be approved and still not be able to enter housing,</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>Ithaca Fire Department (IFD)</strong></td>
<td>Public agency, emergency services</td>
<td>In-person; standing meetings.</td>
<td>Difficulty providing emergency fire or medical services in encampments due to lack of roads or access for emergency vehicles. Encampments have existed a long time with no resolution for those who live there—need creative or innovative solutions that allow for faster access to decent housing.</td>
</tr>
<tr>
<td><strong>Ithaca Police Department</strong></td>
<td>Public agency, emergency services</td>
<td>US 24/7 Task Force</td>
<td>Unfilled positions (staffing shortages) constrain capacity for response to calls, jeopardize public safety. Police accompany Fire Department on calls, can further limit capacity to respond to concurrent calls. Officer discretion utilized when responding to complaints.</td>
</tr>
<tr>
<td><strong>Ithaca City Forester</strong></td>
<td>City department, parks related</td>
<td>Email; in-person site visit.</td>
<td>Conditions of W. State Street corridor including lighting enhancements. Park public restroom hours, usage patterns, staffing costs, and problem-solving in City parks.</td>
</tr>
<tr>
<td><strong>Soldier On</strong></td>
<td>Veterans’ transitional housing and supportive services</td>
<td>Email</td>
<td>Identification of affordable units in Ithaca and throughout service area a primary difficulty. Harder to house clients with criminal records.</td>
</tr>
<tr>
<td><strong>Street Outreach Team</strong></td>
<td>Interagency team coordinated by CoC</td>
<td>Zoom; email.</td>
<td>Housing scarcity. Level of process, paperwork, and requirements to access public benefits creates defeat, disengagement. Housing scarcity. Need for low-barrier shelter and services. Service gap occurs once people attain housing, need for continued or wraparound services to maintain housing and prevent eviction. Observed needs and group input regarding</td>
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<tr>
<td>Agency/Organization Consulted</td>
<td>Type of Agency/Organization</td>
<td>Method of Consultation</td>
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<tr>
<td>Opportunities, Alternatives, and Resources (OAR)</td>
<td>Reentry and homeless services</td>
<td>Telephone; Zoom.</td>
<td>Observing high incidence of vulnerable women being subject to exploitation because of lack of safe housing/shelter (particularly for women who use drugs or are in recovery).</td>
</tr>
<tr>
<td>Private developer and landlord</td>
<td>Private developer and landlord</td>
<td>Telephone</td>
<td>Observed efficacy of REACH (tenant org providing services for people with SUDS); need for shelter/housing services; need for City to allocate land or resources.</td>
</tr>
<tr>
<td>Black Hands Universal</td>
<td>Agency serving BIPOC people likely to be displaced</td>
<td>Telephone.</td>
<td>Need for services for BIPOC people on Ithaca’s West End to prevent displacement; housing instability. Workforce development with links to the trades. Job training opportunity for youth.</td>
</tr>
<tr>
<td>Samaritan Center, Catholic Charities of Tompkins-Tioga (CCTT)</td>
<td>Poverty alleviation services</td>
<td>Telephone, email</td>
<td>Need for larger security deposits due to housing costs for first-step stability; need for transitional housing for vulnerable women, including those who are actively using drugs; need for services for immigrants.</td>
</tr>
<tr>
<td>Immigrant Services Program (ISP), Catholic Charities of Tompkins-Tioga</td>
<td>Multiple services for immigrants and LEP residents</td>
<td>Telephone, email. “Round table” discussion via</td>
<td>Need for affordable housing; immigrants often working job(s) so hard to reach via traditional outreach and hard for them to participate in focus groups and other forms of consultation. A round table</td>
</tr>
<tr>
<td>Agency/Organization Consulted</td>
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<td>Method of Consultation</td>
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</table>
| **Open Doors English (ODE)** | English classes for LEP     | Email. “Round table” discussion via Zoom (2/23/2023). | IURA conducted round table needs/gaps discussion with CCTT’s ISP, ODE, and TLP. Summary of takeaways:  
Housing instability prevalent; homelessness much less so. Critical need for in-City affordable rental housing, central to services including English classes, jobs, transportation, and other family members/language group members for word-of-mouth networking. Housing shortages displace people into greater isolation-hinders ability to learn English, work, subsist. Lack of City units/landlords accepting HCV (Section 8). Need for consolidated (coordinated) method to to apply for/secure housing—navigation always needed. Suggested policy interventions: rent stabilization and right-to-renew.  
A variety of types of immigration status complicate access to services. Specialized knowledge (advocacy) needed obtain various services. Long waitlists for HCV. Safety issues in available housing; LEP are vulnerable to crime arising from lack of cultural knowledge Trust/experience/knowledge gaps prevent access to emergency and safety services or resources.  
DV issues: LEP/immigrant DV victims are isolated – language & information gaps about how to get help. Labor trafficking: Clues but evidence is scarce. People |
<table>
<thead>
<tr>
<th>Agency/Organization Consulted</th>
<th>Type of Agency/Organization</th>
<th>Method of Consultation</th>
<th>Feedback</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tompkins Learning Partners (TLP)</td>
<td>English classes for LEP</td>
<td>Email. “Round table” discussion via Zoom (2/23/2023).</td>
<td>Feedback affected may avoid or don’t know about services. Outreach: 25 language groups in Ithaca. Flyers, even if translated into 5 languages are insufficient for outreach, due to varied literacy. Language Line is paid a translation service—providers need information about what entities have Language Line and how to access.</td>
</tr>
<tr>
<td>The Learning Web</td>
<td>Service/outreach to unhoused/vulnerable youth</td>
<td>Telephone, Zoom</td>
<td>Challenges of providing housing to youth 16-24. Need for flexibly, low-barrier TBRA and transitional housing with services for youth to successfully transition to adulthood.</td>
</tr>
<tr>
<td>The Village at Ithaca</td>
<td>Service/outreach/YHDP crisis housing provider</td>
<td>Email, Zoom.</td>
<td>Need for emergency/crisis housing for youth; for transitional and permanent housing for youth. Service needs of youth. Youth stakeholders need to be involved in needs identification and service design.</td>
</tr>
<tr>
<td>Legal Assistance of Western NY (LawNY)</td>
<td>Legal services for LMI people; fair housing adjacencies</td>
<td>Zoom, telephone.</td>
<td>Eviction/displacement prevention. Pandemic-era difficulty hiring vacancies to fill/meet needs. (ERAP — landlords stating lease violations in addition to back rent.)</td>
</tr>
<tr>
<td>Community Outreach Workers at Family &amp; Children’s Service (FCS) of Ithaca</td>
<td>Outreach to people who are unhoused and/or have mental health needs</td>
<td>Zoom, telephone, US-24 Task Force Presentation</td>
<td>Need for Housing First approach; peer-led services; decent housing and shelter services. Need for low-barrier mental health services and services for SUDS. Need for available decent public restrooms.</td>
</tr>
<tr>
<td>Loaves and Fishes (L &amp; F, Loaves)</td>
<td>Meals and advocacy services for people who</td>
<td>Zoom, telephone, US-</td>
<td>Need for low-barrier services. Person-centered approaches to de-escalation</td>
</tr>
<tr>
<td>Agency/Organization Consulted</td>
<td>Type of Agency/Organization</td>
<td>Method of Consultation</td>
<td>Feedback</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-----------------------------</td>
<td>------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>are unhoused</td>
<td>24 Task Force Presentation</td>
<td>and safety are key. Importance of community space were all welcome and respected.</td>
<td></td>
</tr>
<tr>
<td>St. John’s Community Services (SJCS)</td>
<td>Homeless shelter provider and Friendship Center day services</td>
<td>Email: community meetings</td>
<td>The public-agency requirement for employed individuals to pay 50-75% of income for shelter creates a barrier to movement out of homelessness. Shelter capacity/configuration difficulties.</td>
</tr>
<tr>
<td>Tompkins Community Action (TCA, TCAction)</td>
<td>Public Housing Authority (PHA); provider of HCV; operator of permanent supportive housing sites</td>
<td>Telephone, email, Zoom.</td>
<td>Housing Stability: 30% cost burden calculation may no longer be relevant even for those with HCV. Gaps: Multiple smaller costs add up to contribute to instability. Move in: $25 application fees, move in-needs and costs (furniture, truck, storage). Costs of trash and utilities, even with Section 8 allotment, add up, cause cascading issues. Gap: Bike and cart secure storage needed. Tenants not fully understanding their rights. Large unmet needs with shelter and P(S)H inventory; bottlenecks. Supportive services more helpful if there were funds attached navigators/staff could access for individualized needs (“housing stability flexibility account”). Guests of PSH = future residents; staff provide them services, too. Evictions high for without ESSHI/housing supportive services.</td>
</tr>
<tr>
<td>Ithaca Housing Authority</td>
<td>PHA; provider of HCV, public housing, soon-to-be private affordable housing</td>
<td>Telephone; email.</td>
<td>Inability of HCV-holders to find units to rent. Housing inspections, fair market rent, waitlist for vouchers.</td>
</tr>
<tr>
<td>2-1-1 Information and Referral</td>
<td>Referring agency to human services.</td>
<td>Zoom; standing meetings</td>
<td>Needs of the housing insecure. HSSP, IGI, eviction/displacement prevention.</td>
</tr>
<tr>
<td>Ithaca Neighborhood Housing Services (INHS)</td>
<td>Affordable housing developer and provider</td>
<td>Email</td>
<td>Recent opening of 75 units of affordable rental housing; 22 have wraparound support. Preventing displacement: LMI homeowners need programs to aid rehab and prevent small repair issues from becoming big- hard to fund such</td>
</tr>
<tr>
<td>Agency/Organization Consulted</td>
<td>Type of Agency/Organization</td>
<td>Method of Consultation</td>
<td>Feedback</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-----------------------------</td>
<td>------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>Greater Ithaca Activities Center (GIAC)</td>
<td>City department-neighborhood center</td>
<td>In-person</td>
<td>LMI people/ housing insecure Ithacans are pushed outside City limits by cost; isolation and lost opportunities result. People want to stay in Ithaca community. Emergency fund for personal/household emergencies.</td>
</tr>
<tr>
<td>Historic Ithaca (HI)</td>
<td>Non-profit with workforce development program</td>
<td>Email; telephone; in-person</td>
<td>High housing instability in youth served creates transportation, attendance, job retention barriers. High need for individualized services. Preservation skills provide a good career niche for Ithaca’s housing stock.</td>
</tr>
<tr>
<td>Finger Lakes ReUse</td>
<td>Nonprofit with workforce development program</td>
<td>Zoom; standing meetings; in-person</td>
<td>Partners with community agencies to allow people moving into housing or with specific needs to “shop” for furnishings at no cost. Immediately paid apprenticeships are critical for reentry job-seekers. Housing instability creates job-training/retention barriers- flexible services essential.</td>
</tr>
<tr>
<td>Tompkins County Office of Human Rights</td>
<td>County government office providing fair housing information and education</td>
<td>Standing meetings; trainings.</td>
<td>Providing a variety of fair housing workshops with focus on a variety of stakeholder groups has proven essential.</td>
</tr>
<tr>
<td>REACH</td>
<td>Provider of medical services to people using drugs</td>
<td>Zoom; telephone; US-24 Task Force Presentation</td>
<td>Housing First need. Need for low-barrier services/shelter not requiring sobriety; low-barrier employment; public restrooms. Respectful, person-centered services work.</td>
</tr>
<tr>
<td>Tompkins County Department of Social Services</td>
<td>County agency</td>
<td>Telephone; standing meetings.</td>
<td>The homeless services system is a complicated system made even more complicated when multiple agencies and their regulations are involved (Federal, State, and local agencies). Need for true no-barrier housing to catch people when they are ready, provide housing without requirements. Current housing process includes multiple duplicative steps, any</td>
</tr>
<tr>
<td>Agency/Organization Consulted</td>
<td>Type of Agency/Organization</td>
<td>Method of Consultation</td>
<td>Feedback</td>
</tr>
<tr>
<td>------------------------------</td>
<td>----------------------------</td>
<td>------------------------</td>
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</tr>
<tr>
<td><strong>Ithaca Eviction/Displacement Defense (IEDD) Project</strong></td>
<td>Fair housing-centered project implemented by multiple service-providing partners with the Human Services Coalition (HSC) of Tompkins County the lead agency</td>
<td>Zoom; standing meetings; in-person; IEDD’s Final Report and Evaluation to Enterprise Community Partners/</td>
<td>This project was designed and implemented to fulfill fair housing goals identified by the City of Ithaca in its 2017 Assessment of Fair Housing (AFH). This project included a full spectrum of services from brief legal advice via the Tenants Legal Hotline, 2-1-1 Housing Specialists and navigation, full-scope representation, Eviction Court monitoring, two forms of direct cash assistance (IGI and HSSP). Most services are ongoing as of February 2023.</td>
</tr>
<tr>
<td><strong>Southern Tier AIDS Project (STAP)</strong></td>
<td>Harm reduction services</td>
<td>Zoom; email; telephone; US-24/7 Task Force</td>
<td>Housing First reduces harm to individuals and society. Need for low-barrier shelter that PWUD can access—a bridge to housing and/or services; basic health and respite needs. Stigmatization</td>
</tr>
<tr>
<td>Agency/Organization Consulted</td>
<td>Type of Agency/Organization</td>
<td>Method of Consultation</td>
<td>Feedback</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-----------------------------</td>
<td>------------------------</td>
<td>----------</td>
</tr>
<tr>
<td><strong>Finger Lakes Independence Center (FLIC)</strong></td>
<td>Services and advocacy for people with disabilities</td>
<td>Telephone</td>
<td>Insufficient supply of rental housing affordable at 0-30% AMI. Units available may be inaccessible. Accessibility includes more than removal of architectural barriers/depends on the disability. Crisis (such as eviction notice) creates fear and avoidance. Need for eviction prevention and benefit recertification services to prevent crises. When people lose all other forms of security, need for autonomy and dignity is even more important; when autonomy is not recognized, barriers are reinforced. Need for service providers to understand that a person’s individual requirements are not “preferences.” People want to be involved in identifying the services they need and how they are delivered, not required to go through hoops that don’t fit their needs. Examples: being required to apply for SSI or SSDI regardless of whether the applicant fit criteria or is ready to acknowledge disability. Being required to submit 5 proofs of housing search per week even though units are not available or accessible. Requirements imposed by service-providing agencies often have the effect of causing disengagement and frustration. People who need services may decide to make do with their current situation [including being homeless] rather than engage with systems that do not seem to want to help.</td>
</tr>
</tbody>
</table>

**Summary of feedback received and results of upfront consultation with these entities:**
Ithaca’s housing needs are well-known and much discussed among those providing services to people who are unhoused or unstably housed as well as by the public at large. Affordable housing is a continual need as area educational institutions, primarily Cornell University, expand student enrollment. Students, though often low-to moderate income (LMI), generally have family support that allows them to “outbid” permanent residents in rental housing market; landlords adjust rent accordingly with cascading effects for permanent residents, particularly those with low-to moderate-incomes (LMI).

Residents with Housing Choice Vouchers (HCV) or other subsidies face great difficulty locating units that meet HUD’s Fair Market Rent Standards, and, if they do, voucher-holding households are “competing” for units with unsubsidized renters. New York State adopted an array of tenant protections in 2019 that made it illegal for landlords to deny applicants housing outright based on Source of Income (such as housing vouchers), however, given consistently high demand for rental units in Ithaca, Public Housing Authorities (PHAs) and the HCV households they serve still report difficulty obtaining housing, despite having a mechanism in hand (the voucher) with which to pay rent. Consequently, LMI residents continue to be displaced even from the edges of Ithaca into wider Tompkins County. Ithaca is a regional employment center, in addition to being the County’s population center; it is a compact, walkable city connected by public transportation. Moving or being involuntarily displaced from Ithaca due to housing cost curtails many opportunities households otherwise may have accessed. Significantly, transportation scarcity beyond Ithaca’s city limits makes economic stability difficult for people coping with housing instability or homelessness—job retention is jeopardized and access to health, mental health, and other needed services are sometimes out of reach outside of Ithaca’s high-opportunity, service-rich boundaries.

For the unhoused, multiple resources are necessary for transition to housing to become permanent. The cost of rent alone is an economic barrier to the ability to maintain housing: 54% of renters in Ithaca are cost-burdened, 40% severely so, according to the City’s 2019-2023 Consolidated Plan. (“Cost burden” is defined as a household paying more than 30% of its income to rent; “severe cost burden” is paying more than 50% of household income to rent.) Employment does not guarantee the ability to afford rent; in fact, people who employed but unhoused are required to pay 50-75% of their incomes to access shelter services. People who make 0-50% of Area Median Income (AMI) have the least housing choice, and are most likely to be precariously housed or unhoused.

Unhoused or unstably housed people remain vulnerable while on PHA waitlists for Housing Choice Vouchers (HCV, also known as Section 8). Housing instability means these “waiting” households are likely to be doubled up with friends or family, couch-surfing, and experiencing all of the vulnerabilities that come with housing insecurity. When it comes time for PHA to notify a waitlisted household of receipt of the long-awaited housing assistance, or for annual recertification so the household may remain on the waitlist, the PHA may not be able to reach
them. Households that cannot be reached for notification of voucher or the need to recertify, will eventually be required to start the process from the beginning.

There are various barriers to accessing emergency shelter. People who are employed or have an income source must pay 50-75% of income for shelter services, which in turn causes other scarcities. Those who do pay for shelter services can save very little of their income toward moving into housing.

Trusting relationships forged between unhoused people and outreach workers often cannot continue forward when someone becomes housed. This is because the outreach worker is charged with working with unhoused people—not people once they obtain housing—and demand is great. Consequently, a service gap arises for vulnerable people entering housing. Previous experiences of homelessness are a vulnerability factor to becoming homeless again. Without post-placement services, the cycle of housing instability often continues with eviction, displacement, and repeated trauma.

This cycle was observed when a major new housing development with an unprecedented 124 affordable units opened during the pandemic. The number of units and the availability of pandemic-related rental assistance resources were a tremendous opportunity for a large number of people from homelessness to housing yet lack of available post-placement supportive services to bridge the transition, creating an environment many described as unsafe or chaotic. Neighbors and members of the public have voiced their concern, fear, and displeasure. The need for ongoing supportive services for people transitioning from homelessness to housing—as well as for those with vulnerabilities that are shown to lead to homelessness or return to homelessness—has been a topic of great concern and discussion among Ithaca’s service providers. The dream of permanent housing is too often a mirage when people lack the critical support network needed not only to enter and adjust to housing, but to truly attain security in housing.

There are fair housing barriers in Ithaca. The New York Attorney General’s Office has opened a case alleging source of income discrimination a large local property management company, Ithaca Renting, who contests the allegations. The case has not been resolved as of early 2023. The majority of fair housing complaints documented by the regional fair housing testing agency involve disability and reasonable accommodation, though familial status and source of income discrimination remain top concerns. Tompkins County is updating its fair housing plan; the City of Ithaca is in the final year of its Assessment of Fair Housing.

Survivors of domestic violence, sexual violence, and stalking have difficulty finding safe living situations in this small and expensive housing market. People who are housed and experiencing violence and abuse face the knowledge that finding a comparably priced housing situation may be difficult or impossible. Moving may cause them and their children and family...
members to lose access to the many opportunities afforded by living within City boundaries. Everyone needs safety mechanisms in their housing and survivors of these types of violence have heightened housing-related safety needs, which units may not provide. These difficulties are multiplied for victims of sex and labor trafficking who are so systemically isolated by their abusers that they don’t have the opportunity to reach out for help, or even learn where help might be provided. Service providers need specialized training to be able to identify such situations; the Advocacy Center and GIAC have such competencies but data about numbers of survivors is scarce. A pre-pandemic collaboration that existed among service-providers to raise local awareness to trafficking is not currently active, according to an agency consulted.
Public Participation

Background: 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.

Public Participation Process

Important dates related to the development of this Allocation Plan included:

- Date(s) of public notice: 2/10/2023
- Public comment period:
  - Start date – 3/1/2023
  - End date – 3/17/2022, extended to 3/22/2022
- Date of public hearing: 2/23/2023

Steps in the Public Participation Process
The public participation process kicked off with a study of needs and gaps commissioned by the City of Ithaca and the Continuum of Care in Fall 2021. Interviews with people with lived experience (18) and other community stakeholders (11) constitute public participation. The report by Horn Research, “Homeless & Housing Needs Assessment for Tompkins County: A Review of Data, Opportunities, and Barriers, Summary Report” was published on March 9, 2022, and will be discussed later in this Allocation Plan.

Consultations began in Fall 2021.
Announcements, information, and discussion of HOME-ARP occurred at various public meetings, including the IURA Neighborhood Investment Committee’s November 2022 meeting and IURA Board’s January and February 2023 monthly meetings: meetings of the CoC and its Homeless & Housing Task Force on various meetings in 2022 and 2023. HOME-ARP was announced and/or discussed at the Ithaca Eviction/Displacement Defense Project quarterly meetings.

Outreach efforts included publication of legal ad, posting on Human Services Coalition listserv and TC Mutual Aid Facebook page. HOME-ARP was noted as a special funding stream in Public Input & Information Meetings of the 2023 Annual Action Plan (AAP) process held in December 2022 and January 2023.

To augment information gained through the “Homeless & Housing Needs Assessment in Tompkins County,” in December 2022 IURA developed an online survey and sent it to 43 organizations providing services to the four HOME-ARP Qualifying Populations (QPs). Stakeholders were encouraged to share the survey link with others in their networks and interested parties. To further broaden participation, announcements with the link were posted to a local listserv focusing on human services and a mutual-aid focused Facebook community. The survey was posted and available on the IURA website. Survey respondents could provide contact information for future follow-up. Those that did were invited by email to set up individual consultations. The IURA Community Development Planner added a feature to her email signature that allows community members who wish to discuss HOME-ARP (or any topic) to set their own meeting with her by linking to her calendar.

Combined public notice (legal ad) for the Public Hearing and 15+ day Public Comment Period appeared in the Ithaca Journal on Friday, February 10, 2023.

The HOME-ARP Public Hearing was held at the February 23, 2023 meeting of the IURA Board.

The 15+ Public Comment Period for the HOME-ARP Allocation Plan commenced on March 1, 2023 and continued through March 17, 2023, then was extended to March 22, 2023 to broaden participation. In all, the comment period spanned 22 days.

**Efforts to Broaden Public Participation**

An online survey titled “Ithaca Considers HOME-ARP” was sent to stakeholders from the seven consultation groups to further assess gaps and needs. The stakeholder participants were encouraged to distribute the survey to others (including members of the general public) that might have interest in homelessness and housing stability. A link to the survey was also posted on a local listserv with a human services focus and a mutual aid Facebook community that arose during the early pandemic. Twenty percent (20%) of respondents identified as having
lived experience and 18% responded as being primarily a “concerned citizen.” Respondents could indicate whether they wanted to be contacted for further discussion and were sent an email inviting to further discussion. They could make an appointment directly using the Community Development Planner’s “make an appointment” feature in her email link.

The City’s allocation of HOME-ARP and overview of the planning process was announced at various meetings of the CoC and its Homeless & Housing Task Force, at public meetings of the IURA Board and Committees and various meetings and in other public forums.

The HOME-ARP Allocation Planning process ran concurrently with other planning efforts in the community. These concurrent processes afforded additional opportunities for the Community Development Planner to discuss HOME-ARP with stakeholders voicing concerns, inquiries, or ideas about homelessness, affordable housing, or barriers experienced by vulnerable individuals.

Finally, the Community Development Planner responded to press requests for information about HOME-ARP.

**Summary of the comments and recommendations received through the public participation process**

No written or verbal comments were received at the Public Hearing held at the IURA Board Meeting on Thursday, February 23, 2023. No written and no verbal comments were received during the Public Comment Period which ran from March 1, 2023 to March 22, 2023 (22 days in total). The Public Comment Period was extended from March 17 to March 22, 2023 to create more opportunity for comments.

Comments and recommendations received from organizations contacted for consultation are contained in the Consultations Table (Table 1) on pages 15-23 of this plan. All consultation comments were accepted.

Comments solicited via online survey “Ithaca Considers HOME-ARP” (142 survey responses) were collected between December 2022 and February 2023. These have been summarized on pages 9-14 of this Allocation Plan. All survey responses and comments were accepted.

**Summary of comments or recommendations not accepted and why:**

No written or verbal comments were received during the Public Hearing held at the IURA Board Meeting. No written or verbal comments were received during the Public Comment Period. All comments received via consultation and the online survey were accepted.
Needs Assessment and Gap Analysis

**Background:** Section V.C.1 of the Notice (page 14) requires the City to take the following steps in order for its Needs Assessment and Gaps Analysis to be complete:

- 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.
- Identify any gaps within its current shelter and housing inventory as well as the service delivery system.
- Use current data—including Point-in-Time (PIT) count, Housing Inventory Count (HIC), 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.

**Local Needs Assessment Report:** As noted earlier in this Allocation Plan, one of the first steps taken by the City to fulfill the requirements of HOME-ARP was to partner with the Tompkins County CoC[^1] to commission Horn Research to produce an analysis of needs and gaps in our community. The report by Horn Research, “Homeless & Housing Needs Assessment for Tompkins County: A Review of Data, Opportunities, and Barriers, Summary Report” was published on March 9, 2022, and laid the foundation for our understanding of local needs. This needs assessment may be viewed in its entirety at [https://hsctc.org/wp-content/uploads/2022/06/Tompkins-County-Needs-Assessment-Homelessness-and-Housing-Final-Report.pdf](https://hsctc.org/wp-content/uploads/2022/06/Tompkins-County-Needs-Assessment-Homelessness-and-Housing-Final-Report.pdf)

**Local Data:** In addition to the data presented in the “Homeless & Housing Needs Assessment for Tompkins County,” the City reviewed local information and data from an array of other sources, including but not limited to:

- City of Ithaca HUD Entitlement Annual Action Plans (various years)
- City of Ithaca HUD Entitlement Action Plan Consolidated Plan 2019-2023
- Community Housing Development Fund (CHDF)
- Comprehensive Housing Affordability Strategy (CHAS)
- National Low Income Housing Coalition (for statewide data)
- National Human Trafficking Hotline (statewide data)
- NYS Office of Criminal Justice Services (OCJS)
- NYS Office of Temporary and Disability Services (OTDA)

[^1]: The Tompkins County Continuum of Care’s coverage area extends beyond Ithaca to the entirety of Tompkins County; however, the majority of service providers, including shelters and permanent supportive housing, are located inside Ithaca’s boundaries. This Allocation Plan takes this difference in coverage into account.
- Tompkins County CoC APR reports
- Tompkins County CoC “Home Together, Tompkins” proposal
- Tompkins County CoC Point-in-Time (PIT) Counts (various years)

Table 2. Homeless Needs Inventory and Gap Analysis Table

<table>
<thead>
<tr>
<th></th>
<th>Current Inventory</th>
<th>Homeless Population</th>
<th>Gap Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Family</td>
<td>Adults Only</td>
<td>Vets</td>
</tr>
<tr>
<td></td>
<td># of Beds</td>
<td># of Units</td>
<td># of Beds</td>
</tr>
<tr>
<td>Emergency Shelter ²</td>
<td>17</td>
<td>8</td>
<td>68</td>
</tr>
<tr>
<td>Transitional Housing</td>
<td>4</td>
<td>2</td>
<td>22</td>
</tr>
<tr>
<td>Permanent Supportive Housing</td>
<td>53</td>
<td>23</td>
<td>66</td>
</tr>
<tr>
<td>Other Permanent Housing (i.e. units 0-30%, RR)</td>
<td>38</td>
<td>12</td>
<td>30</td>
</tr>
<tr>
<td>Sheltered Homeless</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unsheltered Homeless</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Current Gap</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Data Sources:** Comprehensive Housing Affordability Strategy (CHAS), 2019; Housing Inventory Count (HIC), NY-510, 2021; Homeless & Housing Needs Assessment for Tompkins County, Horn Research, 2022.

² Gap analysis excludes Emergency Shelter (ES) beds; ES flexes to demand with overflow beds in local hotels and motels.
<table>
<thead>
<tr>
<th>Non-Homeless</th>
<th>Current Inventory</th>
<th>Level of Need</th>
<th>Gap Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td># of Units</td>
<td># of Households</td>
<td># of Households</td>
<td></td>
</tr>
<tr>
<td>Total Rental Units</td>
<td>7,955</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)</td>
<td>890</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rental Units Affordable to HH at 50% AMI (Other Populations)</td>
<td>1,055</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)</td>
<td></td>
<td>2,920</td>
<td></td>
</tr>
<tr>
<td>30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)</td>
<td></td>
<td>1,075</td>
<td></td>
</tr>
<tr>
<td><strong>Current Gaps</strong></td>
<td></td>
<td></td>
<td>2,050</td>
</tr>
</tbody>
</table>

**Data Source:** Comprehensive Housing Affordability Strategy (CHAS), 2019; Housing Inventory Count (HIC), NY-510, 2021; Homeless & Housing Needs Assessment for Tompkins County, Horn Research, 2022.
Qualifying Populations

Federal agencies and their regulations do not have a common understanding or definition of “homelessness” or “housing instability.” In establishing its “Qualifying Populations,” HOME-ARP draws definitions of homelessness and types/causes of housing instability from several federal sources, not just one HUD program. This section provides the HOME-ARP definition of each of the four Qualifying Populations. As required by HUD, here the City also describes the size and characteristics of each of the QPs within its boundaries, using available local data and information drawn from the Consultation Process.

Qualifying Population 1: Homeless as defined in 24 CFR 91.5

1. Homeless (1), (2), or (3):

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family,
friends, faith-based or other social networks needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:


(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Description and size of QP 1: Tompkins County has the third-highest rate of homelessness per 10,000 population of comparable/surrounding CoCs. 2020 Point-in-Time (PIT) Count data show 12.5 unhoused people per 10,000 total population. The homeless rate of all people

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3 Data for homelessness is collected at the County level. The emergency shelter and majority of transitional shelter facilities are located in the City of Ithaca (PJ). The homeless encampment is located in the City of Ithaca. The offices of the Tompkins County Department of Social Services and the majority of agencies that provide services to people who meet the definition of homelessness are located in Ithaca.

4 Horn Research, “Homelessness & Housing Needs Assessment for Tompkins County,” p. 7. PIT and HMIS data was analyzed.
served by emergency and transitional shelter throughout the year (not just a point in time) was 54.5 people per 10,000 in 2020.

In 2020, 537 households entered the local homeless response system, of which 474 were adults-only households and 53 were households with a child. In 2022, the number of households seeking help increased by 25%, with 674 households entering, of which 500 were adults-only households, and 169 were households with children.

2022 data show that households entering the homeless response system are disproportionately Black. The most recent census population estimates show 5.8% of Ithacans\(^5\) and 4.5% of Tompkins County residents\(^6\) are Black, but 25% of those entering the local sheltering system identify as Black. Of the 674 households served, a total of 42% of households identified their races as something other than White, with an additional 11% of households entering shelter categorized as White identifying their ethnicity as Hispanic/Latinx. Within Ithaca’s total population, 68% of residents and within Tompkins County’s total population 82% identify as “White, non-Hispanic.”

Of the 537 households entering the homeless response system in 2020, 101 remained homeless. This figure does not include the estimated 20-25 people who are not enrolled at all in the homeless response system. Therefore, there were an estimated 125 people who remained unsheltered in 2020.\(^7\) Though households within the homeless response system are disproportionately BIPOC, households who are unsheltered and not enrolled in the homeless response system (such as those who are living in encampments) are disproportionately White.\(^8\)

Data collected for “returns to homelessness” measure the extent to which people who have existed homelessness to a permanent destination become homeless again. In 2020, 18% of households exiting homelessness returned within 6 months. By 2022, that figure had almost doubled: one-third (32%) of those exiting homelessness in Tompkins County returned within 24 months, the highest rates of return to homelessness of all comparable CoCs.\(^9\) Households headed by Black adults were 15% more likely to return to homelessness than households headed by White adults.

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\(^5\) [https://www.census.gov/quickfacts/fact/ithacacitynewyork/PST040221](https://www.census.gov/quickfacts/fact/ithacacitynewyork/PST040221)

\(^6\) [https://www.census.gov/quickfacts/tompkinscountynewyork](https://www.census.gov/quickfacts/tompkinscountynewyork)

\(^7\) Horn Research, “Homelessness & Housing Needs Assessment for Tompkins County,” p. 10.

\(^8\) Horn Research, “Homelessness & Housing Needs Assessment for Tompkins County,” p. 13.

**Qualifying Population 2: At Risk of Homelessness as defined in 24 CFR 91.5**

This qualifying population is comprised of very-low income households without a support network and who have one or more vulnerabilities that indicate they are imminently at risk of becoming homeless.

Below is the complete HOME-ARP-definition of Qualifying Population 2:

(1) An individual or family (both are “households”) who

   (i) has an annual income below 30% AMI, as shown in the right-most column of the chart below:

   (ii) Who does not immediate networks or resources to prevent them from entering an emergency homeless shelter, or becoming homeless (as described in QP 1), **AND**

   Meets one of the following conditions:

   (A) Has moved because of economic reasons **two or more times during the 60 days immediately preceding** the application for homelessness prevention assistance;

   (B) Is **living in the home of another** because of economic hardship;

   (C) Has **been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days** after the date of application for assistance;

   (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid
by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a healthcare facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;


3. A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Description and Size of QP 2:
Waitlists for Housing Choice Vouchers and a report from the Ithaca Eviction/Displacement Defense (IEDD) project, which sprang from the City’s Assessment of Fair Housing were consulted to understand the size and needs of QP 2 and QP 4. Since income data is not available in all cases, it is reasonable to expect that there are many more people in this group than available data show.

Ithaca Eviction/Displacement Defense (IEDD) Data
Data below is from January 2021 – March 2022:
• IEDD Partner Agency LawNY represented 31 very-low income tenants facing eviction, 45% of whom where BIPOC.
  o another 30 tenants (income data unavailable), for a total 61 households, were represented by Cornell Law Students under supervision.
• 183 households with one or more of the vulnerabilities addressed in QP 2 applied for Housing Stability Supplement Payment (HSSP) assistance, of which, 62 households were assisted. Eighty-five percent (85%) of those receiving HSSP were BIPOC.

• As of June 2022, 110 LMI caregiving households are receiving Ithaca Guaranteed Income (IGI). The average household income of households receiving IGI was $15,702 at enrollment, which is well-below 30% AMI, even for one person households.

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

People in QP 3 have specific vulnerabilities resulting from experiences of sexual violence and similar forms of abuse.

As defined by HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

- Domestic violence is defined in 24 CFR 5.2003
- Sexual assault is defined in 24 CFR 5.2003
- Stalking is defined in 24 CFR 5.2003
- Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102)
- For expanded definitions of each of the elements of QP 2, please refer to the Notice https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-10cpdn.pdf

**Description and Size of QP 3:** It is difficult to obtain a complete count or demographic detail for people in this population. Domestic, dating, and sexual violence, along with stalking tend to be underreported for multiple reasons, including fear of reprisal upon reporting. Human trafficking victims tend to be thoroughly isolated and don’t report at all.
According to information from the NYS Division of Criminal Justice Services (DCJS), in 2022, Ithaca Police Department (IPD) responded to calls involving 196 victims for crimes included in QP 2. The DCJS information available did not include information for race or ethnicity, nor complete data for the gender identity of victims. According to 2022 Homeless Management Information System (HMIS) data, 159 households, including 40 households with children, reported fleeing from domestic violence. Sources we consulted did not provide sufficient demographic data to describe QP 2. Given that HMIS data show an overrepresentation of BIPOC people in the homeless response system, we anticipate the same could hold for QP 2.

As indicated throughout this plan, stakeholders identified that there is a lack of low-barrier services for people who use drugs or alcohol, and some services are not available at all to people who are actively using. It is important to recognize that people who are actively using substances are vulnerable to sexual assault or trafficking, and/or abuse partner abuse. Stigma is likely to prevent people in this situation from coming forward to seek services for said forms of abuse. Care systems may not recognize people with substance use disorder(s) as needing and deserving of help. The Advocacy Center of Tompkins County indicated knowledge of just one shelter nationally providing services to survivors of domestic/sexual/trafficking violence who are actively using substances.

Human trafficking of all kinds is a crime based on isolating its victims from contact with others. As a result, identifying the size and breadth of this group—and the demographic characteristics of its members— is extremely hard to measure even when providers and public agencies are aware of undercurrents indicating its occurrence. Individuals experiencing human trafficking are likely to be members of groups that are already marginalized, have characteristics that make them especially prone to isolation, including: limited English proficiency (LEP); lack of formal residency/immigration status in the U.S. or necessary documents; people with limited literacy in any language; people who have been separated from their families; people who have experienced past trauma and/or sexual abuse; people who have substance use disorders; people raised in or living in closed households or communities with limited access to news or interaction with outsiders, and more. In 2021 (the most recent available data), the National Human Trafficking Hotline received 1,662 signals (calls, texts, or other messages) from people in New York State with concerns about human trafficking; 671 of the signalers were victims or survivors in New York State. The local domestic violence shelter has 9 beds. Services are provided to people experiencing or fleeing or attempting to feel domestic, sexual, or dating violence, stalking or human trafficking. 

12 Human trafficking as defined by HOME-ARP includes labor trafficking. The DV shelter described in this section does not normally serve people who experienced labor trafficking “only.” However, it is likely that victims of human trafficking experience multiple forms of violence and abuse, which could include sexual abuse.
**Qualifying Population 4:** Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

QP 4 encompasses many kinds of vulnerability and is arguably the largest group. Notably, it includes households who were previously homeless. Previous experience with homelessness is a vulnerability factor for becoming homeless again. HUD defines QP 4 as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

1. Other Families Requiring Services or Housing Assistance to Prevent Homelessness is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

2. At Greatest Risk of Housing Instability is defined as household who meets either paragraph (i) or (ii) below:

   (i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

   (ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND

Meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:

(A) Has moved because of economic reasons **two or more times during the 60 days immediately preceding** the application for homelessness prevention assistance;

(B) Is **living in the home of another** because of economic hardship;

(C) Has **been notified in writing that their right to occupy their current housing**
or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

Description and Size of QP 4: According to 2019 CHAS data, 2,760 households in Ithaca have income that is 0-30% AMI and are severely cost-burdened (pay more than 50% of their income to rent). Of the City’s total 10,725 households, then, 25.7% appear to fit the criteria of QP 4. However, as discussed earlier in this Allocation Plan, Ithaca has a large population of college students, who are unlikely to have much in the way of income. Though they may be housing cost-burdened, the majority of students are unlikely to also have one of the vulnerability factors (described in bullets A-G in the definition of QP 4) that would make them susceptible to becoming homeless. Therefore, the City looked to other data to understand whether it is possible to obtain a more reliable estimate for the size of QP 4.

Next, the City looked at Housing Choice Voucher Waitlists. There are two Public Housing Authorities that serve the City of Ithaca and Tompkins County: Tompkins Community Action (TCA) and Ithaca Housing Authority (IHA). The waitlists are comparably sized, and most people applying are encouraged to apply to both. As of early 2023, there were 1019 active applicants on TCA’s waitlist, with 749 of these indicating and Ithaca address.

A third dataset consulted was from the CoC: In 2022, 99 people exiting institutions entered the homeless response system.

We looked at the number of applications to the State’s Emergency Rental Assistance Program (ERAP). 1,128 renters in Ithaca’s zip code (14850) submitted applications for NYS Emergency
Rental Assistance (ERAP). Applicants to ERAP could apply for rental arrears (697), prospective rent (likely because they were foregoing other needs in order to pay rent) (292), or utilities (139); 504 tenants were served. The data available did not indicate income levels for applicants, so, while a good guide for understanding need overall, we don’t know whether applicants had incomes of 0-30% AMI, 31-50% AMI, or another amount.

Again, Ithaca Eviction/Displacement Defense (IEDD) Project data offer insight into the needs of people who are housing insecure. From January 2021 – March 2022:

- 506 households were served with brief legal advice (not limited to eviction but the project was primarily aimed at preventing eviction).
- The local 2-1-1 service fielded 5,686 housing-related requests for assistance.
- 1,110 unique visitors to the Ithaca Tenant Resources website were recorded; and 394 unique visitors to the Tenants’ Rights Guide.
- The Tenants’ Rights Hotline opened an average of one case a day.

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13 https://otda.ny.gov/programs/emergency-rental-assistance/program-reports.asp
Current Resources

HUD asked the City of Ithaca 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:

A limited number of funding sources have been available to the City of Ithaca to support the types of activities eligible under HOME-ARP. In 2004, the City of Ithaca became a HUD Entitlement Community, enabling it to receive annual allocations of HOME Investment Partnership Program (HOME) and Community Development Block Grant (CDBG) funds.

Development of Affordable Housing: HOME-ARP allows development of affordable rental housing (only). Since becoming an Entitlement Community in 2004, Ithaca has prioritized both HOME and CDBG Entitlement resources to all eligible types of affordable housing, including development of affordable rental housing; rehabilitation of existing affordable rental housing; development of affordable for-sale housing; rehabilitation of existing homes owned by LMI residents. In the case of development of new units, the per-unit cost of construction activity means that the Entitlement funds on their own cannot create large numbers of housing units, however, allocation of funds to these types of projects leverages support from other funding sources, maximizing their value and maximizing the number of units that can be built.

As stated in the “2021 Homelessness & Housing Needs Assessment for Tompkins County” (Horn Research, p. 32), there are 1,087 housing units in Tompkins County created through the Low-Income Housing Tax Credit (LIHTC), including those in City boundaries, which leveraged HUD Entitlement Funds.

An additional local resource for the development of affordable housing is the Community Housing Development Fund, a joint of the City, County, and Cornell University. Since its inception in 2009, it has awarded $5.8 million dollars toward the production or rehabilitation of 810 units both inside and outside the City. Many of the projects inside the City were also supported with the City’s HUD Entitlement funds and other sources.

The following table shows recent rental housing projects located inside City boundaries assisted by the City’s HUD Entitlement funds, the Community Housing Development Fund (CHDF), or both.

Table 4: Rental Housing Projects in the City of Ithaca assisted with HUD Entitlement Funds and Community Housing Development Fund

<table>
<thead>
<tr>
<th>Year</th>
<th>Rental Housing Projects In the City of Ithaca – New Construction and Rehabilitation</th>
<th>Total # of Affordable Units in Project &lt;80% AMI</th>
<th>Local Funding Sources assisting Project&lt;sup&gt;15&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>City HUD Entitlement Funds</td>
</tr>
<tr>
<td>2009, 2010</td>
<td>Breckenridge Apartments</td>
<td>50</td>
<td>x</td>
</tr>
<tr>
<td>2010</td>
<td>Seven Scattered Sites</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>2012, 2013</td>
<td>Stone Quarry Apartments</td>
<td>35</td>
<td>x</td>
</tr>
<tr>
<td>2013</td>
<td>Amici House</td>
<td>23</td>
<td></td>
</tr>
<tr>
<td>2013</td>
<td>Scattered Site</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>2015</td>
<td>210 Hancock</td>
<td>53</td>
<td>x</td>
</tr>
<tr>
<td>2016</td>
<td>Endeavor House</td>
<td>2&lt;sup&gt;17&lt;/sup&gt;</td>
<td></td>
</tr>
<tr>
<td>2017</td>
<td>West End Heights</td>
<td>60</td>
<td></td>
</tr>
<tr>
<td>2017, 2018</td>
<td>Chartwell House (Rehab)</td>
<td></td>
<td>x</td>
</tr>
<tr>
<td>2018</td>
<td>327 W. Seneca St</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>2018</td>
<td>INHS Scattered Site Phase II</td>
<td>53</td>
<td></td>
</tr>
<tr>
<td>2018</td>
<td>622 W. Clinton St.</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>2019</td>
<td>Founders’ Way</td>
<td>75</td>
<td>x</td>
</tr>
<tr>
<td>2020</td>
<td>Northside Apartments</td>
<td>82</td>
<td>x</td>
</tr>
<tr>
<td>2020</td>
<td>State Street Apartments</td>
<td>58</td>
<td></td>
</tr>
<tr>
<td></td>
<td>TOTAL units, all projects</td>
<td>509</td>
<td></td>
</tr>
</tbody>
</table>

**Congregate shelter:** Ithaca’s fixed assets for emergency shelter provide services in congregate settings. The community’s emergency shelter for homeless people has **20 beds** in a congregate setting. Overflow shelter is provided via area hotels or motels. Though hotels and motels are a non-congregate settings, the “overflow” nature of these beds means they are not a fixed asset. They are mainly available during cold weather months when New York State’s Code Blue is in effect.

- **Youth:** The Tompkins County CoC was awarded HUD Youth Homeless Demonstration Program (YHDP) funds for use starting in 2022. While the City has no jurisdiction over these funds, they are being noted here because with them, crisis housing for youth has been implemented in Ithaca. Though this facility has some capacity to offer private

<sup>15</sup> These funds provided a portion of support and help leverage the total amount of funds necessary to complete the project.


<sup>17</sup> Ibid, Four SRO units footnote 5.
rooms, in other cases sleeping areas are shared. For the purposes of this report it is being considered congregate. **This facility has 9 beds**.

- Domestic Violence: The local domestic violence safe haven includes **9 beds** in a combination of private rooms with common space. Overflow space may be provided through hotels and motels or other sites.

**Non-congregate shelter (NCS):** There is no non-congregate shelter operating in Ithaca. No funds are currently directed toward NCS.

**Tenant-based Rental Assistance (TBRA):** Another important way to increase access to existing units is by providing rental assistance directly tenant rent costs; this is called tenant-based rental assistance (TBRA). The City has directed HOME and CDBG-CV\(^{18}\) Entitlement funds to TBRA, primarily in the form of Security Deposit Assistance, almost every year since becoming an entitlement community in 2004. These funds assist income-qualified people in attaining a decent housing unit (units are inspected for Housing Quality Standards). Due to the high cost of Ithaca’s housing market, in Program Year 2021, the Security Deposit allowance was increased from funding only a portion of each security deposit to the equivalent of one months’ Fair Market Rent (FMR) in order to start households off on a more stable footing. HOME funds have also been allocated to assist with payment of rent for vulnerable populations.

**Supportive Services:** Each year, Ithaca allocates the maximum allowable portion of CDBG Entitlement funds (15% of the total annual award), to supportive services. While not every funded activity has an explicit housing purpose, Project Sponsors report that their participants’ need for affordable housing and housing stability is a dominant service need. CDBG-CV did not have the spending cap (15%) of traditional CDBG, and thus provided an important infusion of funds to identified Project Sponsors.

The following table identifies which local funding sources are potentially available to assist projects targeted to assist HOME-ARP qualifying populations. Shaded boxes indicate the HOME-ARP activity is an eligible use of the local funding source.

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\(^{18}\) **Note on Special Funding (CDBG-CV):** HUD released CDBG-CV funds in 2020 pandemic to address, prevent, or mitigate the spread of the coronavirus. The City of Ithaca deployed these funds toward eligible rental assistance and supportive services. CDBG-CV funds are not represented on Table 5 because no further allocations of CDBG-CV are expected in the future.
Table 5: Funding Sources Available to Assist HOME-ARP Eligible Activities

<table>
<thead>
<tr>
<th>Funding Sources Available to Assist HOME-ARP Eligible Activities</th>
<th>HOME-ARP ELIGIBLE ACTIVITIES</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Development of Rental Housing</td>
</tr>
<tr>
<td>HOME Funds</td>
<td></td>
</tr>
<tr>
<td>Community Development Block Grant (CDBG) Funds</td>
<td></td>
</tr>
<tr>
<td>Community Housing Development Fund (CDHF)</td>
<td></td>
</tr>
</tbody>
</table>
Unmet Housing & Service Needs

HUD asked the City of Ithaca to describe the unmet housing and service needs of qualifying populations.

**QP 1: Homeless as defined in 24 CFR 91.5**

The local emergency shelter has an on-site capacity of 20 beds. The emergency shelter serves more through overflow beds at motels. At the time of the 2020 Point-in-Time (PIT) Count, only 20 of the 80 people counted were in the emergency shelter itself, the rest were assigned to overflow motels. Those who are assigned to motels are more likely to become isolated from services. The local domestic violence shelter/safe haven has a 9 bed capacity. There is a persistent population of people living in encampments; according to outreach workers with familiarity of the encampments, the population is about 25 people in cold weather and 50 or more in warmer months. People in the following groups have unmet needs:

- People have been sanctioned by the Tompkins County Department of Social Services (DSS) are not able to utilize the shelter.
- People with sex offenses
- People who are actively using drugs or alcohol

The “Ithaca Considers HOME-ARP” stakeholder survey indicated the following three groups as having the most difficulty receiving services.

- Youth (aged 16-24)
- People with disabilities, and
- People actively using drugs or alcohol.

Unmet needs of QP 1 include low-barrier housing (or supportive services to lower housing barriers); a sufficient supply of affordable rental housing, including PSH; rental assistance or HCV in order to exit homelessness and pay for rent on an ongoing basis; and post-placement supportive services to ensure housing stability. A low-barrier non-congregate shelter does not exist on a year-round basis; that too, could be a way to address service needs.

**QP 2: Qualifying Population 3: At Risk of Homelessness as defined in 24 CFR 91.5**

People in this QP have little or no income, little or no support network, and have multiple vulnerability factors that could lead them into homelessness or back into homelessness.

Housing units are generally termed “affordable” if they are available to households with incomes at or below 80% AMI (units affordable to up to 80% AMI are assisted through Low-Income Housing Tax Credit resources, not traditional HOME). Therefore, even within the “affordable housing” supply, there are units that are too expensive for very low-income households (0-30% AMI) to afford.
As stated in the City’s 2019 Consolidated Plan, Ithaca’s extremely low vacancy rate and high housing costs is the primary housing characteristic contributing to increased risk of homelessness locally. Unmet needs of QP 2 include supply of affordable rental units and the means to pay for those units, along with housing-related supportive services.

The Ithaca Eviction/Displacement Defense (IEDD) Project launched in 2021 with private funding was designed to close gaps in service for people who are unstably housed and have vulnerabilities HOME-ARP identifies QP 2 and QP 4, including households facing imminent eviction. The IEDD Project’s array of services included:

- Full-scope legal representation for 61 income-qualified households
  - Approximately 30 of the households earned 0-30% AMI
  - 31 households earned above 30% AMI.

- Two pilot programs providing direct cash assistance to LMI households likely to be at-risk for homelessness.
  - Ithaca Guaranteed Income (IG) provides 12 months of direct cash assistance to 110 individuals who are an unpaid primary caregiver. Median income of IGI recipients is below 30% AMI.
  - Housing Stability Supplement Payment (HSSP) provides 18 months of direct cash assistance to 62 households with risk factors for homelessness. Approximately three-quarters of the recipient households are below 30% AMI; with the remainder below 50% AMI.

Once formal funding for IEDD ends in June 2023, direct cash assistance pilots will end. Without additional funding, full scope legal representation for income-qualified households is expected to sunset in 2024. These supportive services have been successful in preventing eviction and in providing cost-burdened households with stabilizing supplementary income, which had been and will again become unmet needs. Other unmet needs include adequate supply of rental housing affordable to households earning below 30% AMI and rental subsidies such as HCV.

**QP 3: Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice**

Affordable rental housing is a need; without it, people in abusive relationships have choices limited to staying with their abuser in the place they jointly occupy or entering a situation of unstable housing such as entering a shelter or staying with another household (also called “doubling up”). Supportive services are critical for this group, as they are in imminent danger from their abusers. An unmet need of victims of human trafficking is sufficient targeted outreach and capacity to identify members of this group.

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

Thirty-two percent (32%) of households exiting homelessness to a permanent destination became homeless again within 24 months, pointing to a great need for eviction prevention services including post-placement services to sustain housing, legal representation for those facing eviction, and financial assistance to address rent burden, arrears, and related costs.

According to Ithaca’s 2019-2023 Consolidated Plan, 54% of Ithaca’s renters are cost-burdened, 40% of those, severely so. Prevalence of severe housing cost burden is highest for Ithacans of color: 43% of Black households, 47% of Latinx/Hispanic households; and (44%) of Asian/Asian-American/Pacific Islander renter households are severely cost-burdened, compared to 27% of white renter households. Cost burden and severe cost burden point to an unmet need in affordable rental housing suitable to serve people across the income spectrum. High demand for housing means that those with the smallest incomes are least likely to be able meet rents without some form of subsidy. However, there is a Catch-22 involved, as even with some form of subsidy, units may be priced above Fair Market Rent, the amount that HUD allows voucher-holders to pay. People with limited incomes are often if not always forced to decide between competing necessities. As a result, they may go without necessary prescriptions, medical, or mental health care; food; utilities; and enrichment activities for their children. These strains stress vulnerable households. Supportive services are needed to prevent multiple vulnerabilities from going unaddressed, which can, in turn, lead to homelessness or a return to homelessness.

Eviction prevention is a largely unmet need. Those at greatest risk of housing instability include households that are currently housed and have prior experience of homelessness, including chronic homelessness. Local data show that 32% of those exiting homelessness return to it. Currently, supportive services are crisis-oriented, they recede once households obtain housing. There is an unmet need for prevention-oriented services to accompany households out of crisis and to ensure that future difficulties don’t escalate into crises leading back to homelessness.

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

Emergency Shelter: Ithaca’s homeless shelter is small. It has 20 emergency beds and uses motels for overflow demand. People who work or have income from employment or any public benefit, such as Social Security Disability Insurance (SSDI), are required to pay 50-75% of their income for emergency homeless shelter. This prevents those with income from saving for

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20 Horn Research, “Homeless & Housing Needs Assessment for Tompkins County,” page 8.
transition out of housing (security deposits, future rent, utilities, etc.), cementing their vulnerability and potentially leading some to remain outdoors.

Ithaca’s homeless response system lacks a low-barrier emergency shelter to serve people with sanctions from DSS, people who have been convicted of sex offenses, working homeless persons unwilling to pay significant portions of their income for shelter services, and people who are actively using alcohol or drugs.

There is no permanent non-congregate shelter in Ithaca. Hotel and motel rooms that are used seasonally and for overflow capacity are not a fixed asset.

The capacity of Ithaca’s domestic violence shelter (safe haven) is limited; there 9 emergency beds for people fleeing domestic violence.

As of late 2022, there are 9 beds available to youth under 25 in a new crisis housing facility.

**Permanent Supportive Housing (PSH):** The Tompkins County CoC’s “Home Together, Tompkins” Plan discusses the value of PSH and recommends creation of 100 more units of PSH (including some units outside of Ithaca’s city limits) to address current need and prevent returns to homelessness:

*PSH, or Permanent Supportive Housing, has proven to be the most effective intervention for lowering returns to homelessness within 24 months in our continuum. PSH is housing set aside for people experiencing literal homelessness that is affordable, permanent, and offers supportive services without requiring participation in these services. Most of the PSH in our current system also includes a mechanism for residents exiting the housing after one year to exit with a section 8 voucher for securing private market housing. This form of housing is a critical intervention in our system because it increases the number of existing beds available for people experiencing homelessness in Ithaca's competitive housing market.*

**Supportive Services:** Existing supportive services tend to be crisis oriented. For people who are literally homeless, these services are provided by street outreach and shelter staff. For people in the acute stages of fleeing domestic, sexual, or related violence, services are provided by the Advocacy Center’s hotline and shelter staff. However, once people obtain permanent housing and exit the homeless response system, supportive services fade; supportive services designed to sustain housing and avert future emergencies largely do not exist, or, if they do exist, are not consistently available. There is a gap in preventative services, such as post-housing placement supportive services and eviction prevention.

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21 Tompkins County Continuum of Care, “Home Together, Tompkins (FINAL),” page 20.
Under Section IV.4.2.ii.G of the HOME-ARP Notice, a community 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:

Ithaca’s 2019 Consolidated Plan specifies that particular housing characteristics that have been linked with instability and an increased risk of homelessness include the low vacancy rate and high housing costs.\(^\text{22}\)

\(^{22}\) 2019-2023 City of Ithaca Consolidated Plan p. 51-52.  
**Priority Needs for Qualifying Populations**

**HUD asked the City of Ithaca Identify priority needs for qualifying populations:**
This Allocation Plan seeks address the persistence of unsheltered homelessness and the high proportion of households that return to homelessness within 24 months of exiting the homeless response system.

An estimated 25-50 households within the City are not connected to the homeless response system; these are households that are literally homeless, mostly living outside. Additionally, 32% of formerly homeless persons returned to homelessness after 24 months, indicating that housing stability is not assured simply by placement within house-- a gap exists post-housing placement. Supportive services are critical to housing stability.

In order to increase the ability of the 25-50 literally homeless households identified to access housing and secure stability, QP 1 “Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3)” (often termed the “literally homeless”) is set as a preference qualifying population. People in this group will be provided low-barrier supportive services (paired with rental assistance where needed) to access housing. QP 1’s subgroup 1, “An individual or family who lacks a fixed, regular, and adequate nighttime residence” is the prioritization method.

To prevent returns to homelessness by providing post-placement supportive services, QP 4 “Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability” is set as a preference qualifying population with an objective to serve QP 4’s subgroup 1, “Other Families Requiring Services or Housing Assistance to Prevent Homelessness, defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness” as the prioritization method.

Supportive services will be available to the other QPs, who all have needs, after those in QP 1 and QP 4 are served.

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23 Households in encampments may have contact with outreach workers or other service providers, however, unless they are enrolled in the CoC’s Coordinated Entry process to identify housing, they are considered to be outside of or not connected to the homeless response system.
Explain how the City determined the level of need and gaps in the City’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

To understand needs and gaps, the City with the CoC it commissioned the 2021 Tompkins County Homelessness & Housing Needs Assessment by Horn Research, which laid the foundation for this Allocation Plan. The City conducted over 30 consultations with stakeholders and practitioners about their observations and experiences with service gaps. Additional data was gathered from the CoC’s annual reports, CHAS, HIC, PIT Count, and community reports such as IEDD’s Final Report to inform this Allocation Plan.

Summary of Gaps Identified in the Tompkins County Homelessness & Housing Needs Assessment (Horn Research, 2022):

Emergency Shelter
- Local emergency shelter is insufficiently sized to serve the need. Motels and hotels are currently being used to serve the need.
- A significant portion of households exiting shelter return to homelessness.

Underserved and Unserved Populations
- There is a significant population of people living in encampments, some of whom have been disallowed from accessing certain services (e.g. due to sanction by Department of Social Service) or housing (e.g. prior history of sex offense).
- There is a sizeable population people in “couch surfing” situations. Staying in the homes of others is not considered by HUD to meet the definition of “literal homelessness”; rather, people in these situations are categorized as “at risk” of homelessness. The Horn Report found that people who are couch surfing lack knowledge of resources available to them and are “resistant” to utilizing the emergency shelter.

Transitional & Permanent Housing
- Transitional and permanent supportive housing is effective at disrupting homelessness locally, however, there is an insufficient supply.

Rapid Rehousing
- The rapid rehousing program helps households that often haven’t been eligible for supportive services. To increase the effectiveness of rapid rehousing, offer additional support finding (locating) housing and increase supply of affordable housing.

Housing Subsidies
- Housing subsidies (such as the HCV program) and public housing are in short supply.
  - Wait time for HSV or public housing is more than two years.
Quality of housing where housing subsidies are accepted tends to be poor and availability limited.

The process for accessing and keeping subsidies can be difficult for households to manage.

Summary of Opportunities Identified in the Homelessness & Housing Needs Assessment (Horn Research, 2022):

- A low-threshold shelter could provide a bridge for people living in encampments to access permanent housing.
- Accelerating creation of SRO units, in accordance with Tompkins County’s 2016 Housing Strategy, could address the needs of many currently homeless individuals.
- Outreach to young people and people of color could prevent long-term negative outcomes for those at-risk of homelessness or living in unsafe conditions.
- Fund navigator positions and pair with coordinated outreach to better serve clients. Intensive case management support and housing assistance to individuals in the emergency shelter could assist in addressing returns to homelessness.
- Increase capacity of local housing and service providers in order to increase supply of permanent supportive housing.
- Creation of additional supply of affordable housing units is vital to address homelessness.
HOME-ARP Activities: Ithaca’s Strategy & Rationale for Use of Funds

HUD asked the City of Ithaca to describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:
To efficiently distribute and manage funds, existing processes and systems will be modified as needed to meet HOME-ARP requirements to be further developed in the implementation phase. The City of Ithaca anticipates utilizing a competitive selection process, such as solicitation of a Request For Qualifications (RFQ) with non-profit service providers, to distribute the majority of funding. The City may also directly award funds to HOME-ARP eligible programs and projects that emerge and demonstrate need and viability to successfully implement Ithaca’s strategy. All applicants shall demonstrate need and capacity to effectively manage the proposed project among various other underwriting factors and processes will be aligned with HOME-ARP regulations, as well as applicable City and IURA processes.

HUD asked the City of Ithaca to determine whether it will administer eligible activities directly:
The City of Ithaca will follow the model similar to that for its HUD Entitlement Program, wherein the City and its administrator, the IURA, seek qualified project sponsors to implement eligible activities directly. Project sponsors may be solicited directly or through a competitive process. Experience with projects implemented by project sponsors who applied to and were awarded funds through the City’s HUD Entitlement Annual Action Planning shows that community partners have specialized skills and expertise in delivering services necessary to achieve success.

HUD asked whether any portion of the City’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:
Not applicable.
In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Table 6: Use of HOME-ARP Funding

<table>
<thead>
<tr>
<th>Funding Description</th>
<th>Funding Amount</th>
<th>Percent of the Grant</th>
<th>Statutory Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supportive Services</td>
<td>$ 970,140</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acquisition and Development of Non-Congregate Shelters</td>
<td>$ 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tenant Based Rental Assistance (TBRA)</td>
<td>$ 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development of Affordable Rental Housing</td>
<td>$ 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Profit Operating</td>
<td>$ 0</td>
<td>0 %</td>
<td>5%</td>
</tr>
<tr>
<td>Non-Profit Capacity Building</td>
<td>$ 60,000</td>
<td>5%</td>
<td>5%</td>
</tr>
<tr>
<td>Administration and Planning</td>
<td>$ 181,789</td>
<td>15%</td>
<td>15%</td>
</tr>
<tr>
<td><strong>Total HOME ARP Allocation</strong></td>
<td><strong>$ 1,211,929</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Rationale: How will the City of Ithaca distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis?

Our community has a great need for all of the primary four compliant uses for HOME-ARP (affordable rental housing, TBRA, non-congregate shelter, and supportive services related to housing). Moreover, service-providing agencies need operating and capacity-building funds to meet needs.

While the development of affordable rental housing was named as the community’s greatest need by respondents of the online survey about HOME-ARP uses, this one-time allocation of $1 million in HOME-ARP funds could realistically fund four (4) or fewer units of housing in Ithaca.\(^{24}\)

Potentially more impactful is New York State’s prioritization of development of affordable rental units in its HOME-ARP Allocation Plan. The State will direct $57.8 million toward the development more than 200 affordable rental units statewide. According to the National Low Income Housing Coalition (NLIHC), no state has an adequate number of units available to people who earn 0-30% AMI.\(^{25}\)

Ithaca prioritizes use of its HUD Entitlement Funds for creation of affordable housing (both development of new units and preservation of existing units, both rental and for sale). These Entitlement allocations propel necessary incremental progress in

\(^{24}\) Current estimates which assume the cost of new construction will run between $250,000- $290,000 per unit. Example: New York State’s HOME-ARP Allocation Plan: $57.8M/ 200 units = $290,000

establishing new units and preserving existing units. For these reasons, the City examined other strategies for investment of the HOME-ARP funds.

Though supportive services cannot “create” affordable housing, are valuable—even essential--in helping people sustain housing it has taken so long to attain. Supportive services have been identified as a gap for navigating housing systems and identifying units as well as for providing needed assistance in sustaining housing post-placement. When pandemic-related housing assistance enabled many people who were currently unhoused to move immediately into a just-opened affordable housing project, service-providers immediately observed the need for post-placement supportive services to help smooth the transition. Property managers, especially those at for-profit housing sites—even if affordable—are generally charged with ensuring buildings are properly maintained, that rent is collected, and that complaints are minimized. Property managers are not generally trained to recognized service needs or to provide the wraparound services necessary to help people maintain their housing. Workers who provide outreach to people who are unhoused and who built the trusting relationships necessary to navigate the hoops of systems of care cannot stay alongside individuals they’ve helped over the threshold of housing—their services are still needed by people remaining outside. Thus, formerly unhoused people must identify new support networks should they need help once they are established in housing. Support networks specific to post-placement do not necessarily exist. Similarly, navigation to identify units available to people who have received HCV or other mechanisms for payment has caused many people to languish in homelessness and housing instability. Making resources available for navigation to units and post-housing placement services for people who have exited homelessness is necessary to close the front door to homelessness for good.

The special rules of the HOME-ARP program are another important reason to allocate the majority of Ithaca’s HOME-ARP funds to the Supportive Services category. According to the HOME-ARP Notice, short-term (up to 3 months) and medium-term (4-23 months) rental assistance is an eligible activity under supportive services, as is payment of arrears and utilities. Put to these uses, supportive services could prevent return to homelessness with rental assistance for qualifying households. This method of providing tenants with rental assistance would allow Ithaca to create more flexibility in serving households by customizing rental assistance, as needed.

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:

People disconnected from the homeless service delivery system are primarily living in encampments, unsheltered, outdoors. The Tompkins County CoC has proposed a housing surge for individuals in this group. The Allocation Plan has been developed with support of the CoC’s goal in mind, and therefore, prioritizes resources for QP 1.
Other factors contributing to the City’s Allocation Plan was analysis showing that 32% of people who exited the homeless response system returned within 24 months. Given the tremendous difficulty that community members at all income levels face in accessing affordable housing units, it can seem miraculous once a household who has experienced homelessness moves into a unit. One household’s entrance to housing likely represents years of navigating public services and systems of care. To lose such hard-won housing in two years’ time indicates a gap exists for at least 32% of those served. Stakeholder input indicates that access to regular contact with a service provider dwindles once a person enters housing. Navigation of public systems, assistance recertifying for HCV, assistance in addressing issues that come up within housing that might cause conflict with property managers or neighbors is largely unavailable to people who are just getting stabilized in housing, unless they have been placed in permanent supportive housing. In order to ensure households exiting homelessness can sustain their housing, supportive services are necessary. Expanding services in these areas requires resources and expanded capacity for service providers.

HOME-ARP Production Housing Goals

**HUD asked the City of Ithaca to estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:**
None. At the time of this writing, the City intends to allocate HOME-ARP resources to activities other than development of affordable housing. The City will continue to utilize traditional Entitlement funds to support that goal.

**HUD asked the City to 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:**
The City will not allocate funds to rental housing production.
Preferences

HOME-ARP has created a system that PJs may use to target services; this system is referred to as “establishing 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.

**HUD asked whether the City of Ithaca 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:**

The City intends to implement a supportive service program with two main goals: 1) to support a housing surge for people who are literally homeless and 2) to prevent returns to homelessness for people who are currently housed and in situations of vulnerability threaten their housing stability. To support the housing surge, the City intends to give preference to QP 1, and within QP 1, will use the prioritization method of QP 1, Subgroup 1. To prevent returns to homelessness, the City will prioritize QP 4, with a method of prioritization of Subgroup 1.

**If a preference was identified, HUD asked the City to 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 City’s needs assessment and gap analysis:**

This Plan’s strategies aim to provide housing and stability for people who have experienced high barriers to housing and those who are vulnerable to returning to homelessness. Stakeholders and people with lived experience have identified that people who are literally homeless have experienced significant trauma and alienation from systems of care. The named barriers to accessing housing or services through Tompkins County DSS include the “housing search” requirement to submit weekly evidence of having contacted five landlords each week to inquire about housing (whether or not five vacant units per week are advertised) among other seemingly arbitrary or unhelpful rules, requirements, and practices. Also cited was the lack of designated PSH units specifically and affordable units in general managed by landlords willing to rent to someone with rental assistance and/or a limited rental history. People who are not fully abstinent from drugs or alcohol and people who have been sanctioned by DSS are two groups of people with unmet needs. For people who are literally homeless, the goal is to provide the lowest barrier entry into housing with services and individualized rental assistance. Creating a preference for members of QP 1 is the first step toward lowering barriers and creating a more direct pathway for people who are currently unhoused to access the rental
assistance necessary to pay for housing. Second, supportive services are frequently cited as necessary to maintaining housing stability. After a household gains placement into housing, supportive services tend to fall away. By prioritizing people in QP 4 who are vulnerable to returning to homelessness, supportive services would continue to be available after housing placement to promote stability and prevent crisis. For QP 1, the City will use the method of prioritization of serving those meeting the definitions at section QP 1, Subgroup 1. For QP 4, the City will use the prioritization method of Subgroup 1.

After people in QP 1 and QP 4 are served, services will be available to anyone in any QP.

As discussed below in “Referral Methods,” the Coordinated Entry (CE) System will be one method of referring people eligible for HOME-ARP Assistance. However, since CE only captures people who are currently in the homeless response system, it does not cover all people belonging to an eligible QP (for example, it does not capture members of QP 1 who are literally homeless but not seeking assistance from the homeless response system. It does not include people in QP 2- At Risk of Homelessness, QP 3 – Fleeing or Attempting to Flee DV and other violences and trafficking, or QP 4 – Other Populations). Subsequently, another Referral Method will be established to provide a pathway for people who are not in CE and who are members of any QP. Once people in QP 1 and QP 4 and their subgroups are served, services will be provided chronologically to all other members of any QP. HOME-ARP Supportive Services customized to each individual’s specific needs will be provided.
Referral Methods

HUD asked whether the City 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):
The Tompkins County’s CoC’s Coordinated Entry system is a well-established, well-functioning, and important referral method. However, the City will not allow projects or activities to rely solely on the Coordinated Entry system. The CE system was designed specifically to address the needs of the unhoused. It was not designed to address the needs of people who are housed unstably. As a result, the CE system alone cannot address the needs of some people eligible for HOME-ARP assistance (the HOME-ARP QPs include unstably housed). The City will only allow applicants for HOME-ARP funds to use the Tompkins County CoC’s Coordinated Entry in conjunction with other referral methods for housing and service opportunities, to ensure all the QPs have access to HOME-ARP.

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):
The City has indicated a preference for QP 1 to provide low barrier services with the option of customized rental assistance. Within QP 1, the City will implement a prioritization method so that QP 1, Subgroup 1, “Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3)” can access assistance first. Similarly, the City has indicated a preference for QP 4 to receive assistance to prevent returns to homelessness. Within QP 4, Other Families Requiring Services or Housing Assistance to Prevent Homelessness (subgroup 1) will be prioritized. Next, households in all the other QPs will be served with HOME-ARP Supportive Services.

Limitations in a HOME-ARP rental housing or NCS project

HUD asked the City to describe whether it 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:
The City does not intend to implement limitations.

HOME-ARP Refinancing Guidelines

HUD specifies that if a Participating Jurisdiction (PJ), such as the City of Ithaca, intends in 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.

The City of Ithaca does not intend to use HOME-ARP Funds to refinance existing debt, so this is not applicable.