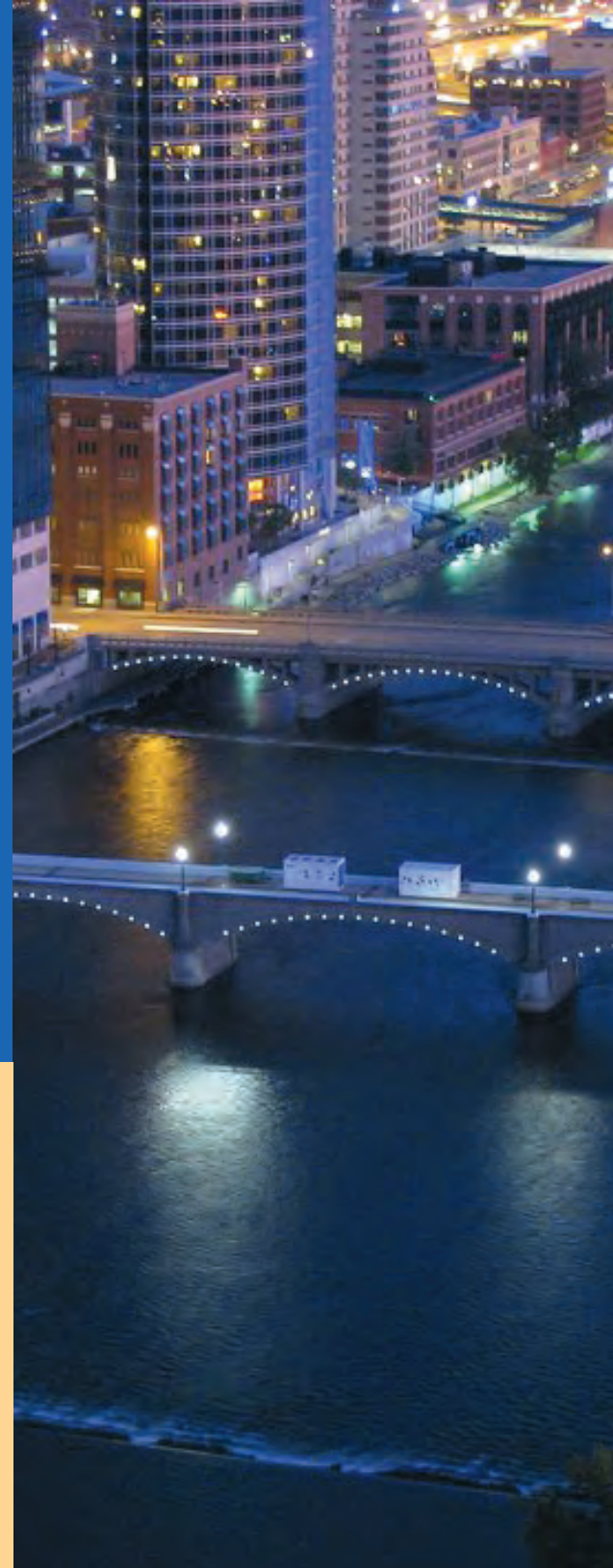


# HOME-ARP Allocation Plan

March 2023

Participating Jurisdiction:  
CNSRT-Kent County

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**Contact for questions and public comments:**

Chad Coffman, Community Development  
Program Manager  
Kent County – Community Action  
121 Martin Luther King Jr. Street, Suite 110,  
Grand Rapids, MI 49507

Email: [chad.coffman@kentcountyMI.gov](mailto:chad.coffman@kentcountyMI.gov)  
Phone: (616) 632-7967

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## Introduction

As a part of the American Rescue Plan Act of 2021 (“ARP”), the Department of Housing and Urban Development (“HUD”) allocated \$4.925 billion in supplemental ARP funds through the HOME Investment Partnership Program (“HOME”) to support communities throughout the country to address homelessness. This newly created funding source is called the HOME-ARP program. Eligible recipients included the 651 states and local participating jurisdictions (“PJs”) that qualified for an annual HOME Program Allocation in FY 2021.

The Kent County Consortium (“the County”) was awarded \$3,352,764 in HOME-ARP funds to assist the following populations:

- Homeless
- At-risk of homelessness
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, human trafficking
- Other populations where providing supportive services or assistance would prevent the family's homelessness or would serve those at greater risk of homelessness
- Veterans and families that include a veteran that meets one of the preceding criteria

HOME-ARP funds can be used towards funding the following eligible activities to reduce homelessness and increase housing stability across the country:

- Production or Preservation of Affordable Housing
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services, including services defined at 24 CFR 578.53(e), homeless prevention services, and housing counseling
- Purchase and Development of Non-Congregate Shelter

All PJs eligible to receive HOME-ARP funding are required to submit a HOME-ARP Allocation Plan to HUD for review. The HOME-ARP Allocation Plan provides a description of how the PJ intends to utilize its funding on proposed activities, and how it will address the needs of qualifying populations. In accordance with [Section V](#) of the Final HOME-ARP Implementation Notice, PJs must:

- Consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems
- Provide for and encourage citizen participation in the development of the HOME-ARP Allocation Plan

To complete a HOME-ARP Allocation Plan, a PJ must also:

- Conduct a needs assessment and gap analysis

- Describe proposed HOME-ARP activities
- Describe the PJs production housing goals
- Identify whether the PJ intends to give preferences to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project
- Identify if the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, and state its HOME-ARP refinancing guidelines (if applicable)
- Implement a public comment period of at least 15 calendar days
- Hold at least one public hearing during the development of the HOME-ARP Allocation Plan and before submission

Upon the culmination of the County’s consultation and public participation processes, along with the completion of its needs assessment and gap analysis, the County has prepared the following HOME-ARP Allocation Plan for review, consideration, and acceptance by HUD.

## Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and 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, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### ***Summary of the consultation process:***

Through a competitive solicitation process, the County awarded Baker Tilly US, LLP (“Baker Tilly”) a contract to complete HOME-ARP Allocation Plan consulting services on behalf of the County. The project scope included:

- Developing and facilitating a community engagement strategy across a broad range of community stakeholders, advocacy groups, residents, and City staff
- Completing a needs assessment and gap analysis
- Conducting community engagement and consultation among agencies, service providers, and the public
- Facilitating a public hearing among residents of the community
- Assessing housing needs and priorities given current market conditions and projected growth trends for qualifying populations
- Prioritizing identified needs for qualifying populations
- Identifying and describing proposed eligible HOME-ARP activities to be completed by the County
- Preparing the County’s HOME-ARP Allocation Plan
- Preparing a HOME-ARP standard operating procedures manual

Prior to beginning the consultation process, Baker Tilly facilitated meetings with the County to review the goals and objectives of conducting community and stakeholder outreach and engagement. During these meetings, it was determined that the Grand Rapids/Wyoming/Kent County Continuum of Care (CoC), also known as the Grand Rapids Area Coalition to End Homelessness, in addition to local public housing authorities (PHAs), community-based organizations (i.e. providers of various supportive services, veteran-based groups, domestic violence service providers, public/private agencies that address qualifying populations, etc.) would be consulted with to facilitate conversations focusing on unmet needs, gaps in affordable housing options and service delivery systems for the County's most vulnerable citizens. Additionally, the County and Baker Tilly identified engagement methods that would be used to engage agencies and residents which: included three virtual focus groups with agencies, one public hearing for residents, the distribution of an agency-focused Stakeholder Needs Assessment Survey, and the distribution of a Citizen Participation Survey in English, Spanish, and Haitian Creole geared towards County residents.

To prepare for the execution of the stakeholder focus groups, agencies were invited to register via Microsoft Forms to attend any of the three virtual focus groups being offered to provide their input. Focus groups were scheduled across a one-week timeframe for the following dates and times:

- Focus Group 1: Monday, September 12, 2022, 12:00 P.M. EDT – 1:30 P.M. EDT
- Focus Group 2: Tuesday, September 13, 2022, 2:00 P.M. EDT – 3:30 P.M. EDT
- Focus Group 3: Thursday, September 15, 2022, 1:30 P.M. EDT – 3:00 P.M. EDT

A total of 118 agencies were invited to participate in the virtual focus group sessions; 17 individuals representing 25 agencies participated in at least one focus group. Additionally, separate meetings were held with the Kent County Veterans Services and Disability Advocates of Kent County to discuss their current programs and to learn more about identified needs that impact their respective client populations. During the focus group and additional meetings with Kent County Veterans Services and Disability Advocates of Kent County, a variety of questions were asked to address the following topics:

- Populations most in need of assistance
- Gain a better understanding of qualifying populations
- Barriers to finding affordable housing and accessing supportive services
- Access to public transportation
- Coordinated entry process
- Greatest unmet needs and gaps in services among qualifying populations
- Potential project ideas that may be eligible under the HOME-ARP program

Participants were provided the opportunity to respond to open-ended questions throughout each session, which led to increased dialogue among the groups. Upon completion of the final focus group, agencies were also invited to complete an online Stakeholder Needs Assessment

Survey, created in Microsoft Forms, which would allow for agencies an additional opportunity to provide feedback, including those agencies that were unable to participate in a focus group. For additional reach, the County shared the Stakeholder Needs Assessment Survey with the CoC for distribution among their member agencies.

***Summary of comments and recommendations received through the consultation process:***

Responses from the stakeholder agencies identified the development and availability of more affordable rental housing as the greatest priority in Kent County. Focus group attendees mentioned a need for studio/economy housing for singles, but also multiple bedroom options for families experiencing homelessness. The need for an increase in wrap-around and supportive services was also highly discussed. Specific wrap-around and supportive services mentioned include financial planning, credit counseling, deposit assistance for rent and utilities, English as a Second Language (ESL), mental health services, and interim housing support between losing housing and gaining temporary or secondary permanent housing.

According to discussion with stakeholders, housing rental rates have increased over the past three years and the availability of housing and landlords accepting Tenant Based Rental Assistance (TBRA) vouchers has decreased. This has especially affected populations that live on a fixed income and those that can't increase their income. Housing has been especially hard to find for those with disabilities and mental health diagnoses, people coming out of incarceration with no rent or credit history, and those fleeing domestic violence who tend to lack necessary means for deposits or rent. The discussion of housing assistance included a need for funding to apply to past debts with utilities and/or landlords so future utility use or housing rentals can be approved.

Low stock of emergency shelter beds for families was also of concern. As noted in focus group discussions within the consultation process, individuals seeking emergency shelter typically do not have a problem accessing it because of the availability of resources. However, families find more difficulty locating emergency shelter because of the lack of availability of multi-room emergency accommodations. While shelter for individuals is available, the current state of congregate shelter does not fit the needs of the homeless community in Kent County. Non-congregate shelter is needed for a more hygienic, private, and safe overnight stay.

***Organizations consulted and summary of feedback***

<b><i>Organizations consulted and summary of feedback</i></b>			
<b><i>Agency/Organization Consulted</i></b>	<b><i>Type of Agency/Org</i></b>	<b><i>Method of Consultation</i></b>	<b><i>Feedback</i></b>
<b>The Salvation Army</b>	Homeless Service Provider/Children and Youth Service Provider/Domestic	Virtual Meeting	<ul style="list-style-type: none"> <li>Affordable housing is the crux- finding landlords that will accept housing choice vouchers is</li> </ul>

	<p>Violence Service Provider/Senior Service Provider</p>		<p>difficult. It's important for the community to increase stock of landlords who understand how important quality, long-term supportive housing is and are willing to provide such housing.</p> <ul style="list-style-type: none"> <li>• The community is working toward functionally zero homelessness for families, so most resource support is focused on family, but resources are also needed for non-family.</li> <li>• Focus should be put on people who can't increase their income. The largest population being seen at-risk of homelessness is underemployed. Population at 50 - 80% of AMI also has needs; this population will not be able to receive assistance after ARP funding goes away.</li> <li>• There is not enough stock of emergency shelters for families; There is adequate supply for individuals.</li> <li>• The community needs a housing-first mindset to ensure there is housing stock and services to help people afford housing in the long term.</li> </ul>
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<p><b>Genesis Non-Profit Housing Corporation</b></p>	<p>Homeless Service Provider</p>	<p>Virtual Meeting</p>	<ul style="list-style-type: none"> <li>• The greatest unmet housing need is supportive housing for very low-income individuals with abuse problems, special needs, development/intellectual disabilities, severe mental illness, substance use disorder etc.</li> <li>• There is a problem with ongoing funding for support services.</li> <li>• Genesis is currently in process of redoing permanent supportive multifamily housing units. 23 units in Kentwood (23 years old), 44 units in Walker (16 years old). Increased construction cost is an issue.</li> <li>• Rents are going up, expenses are going up, income is limited. People using social security as their sole income is a population that needs significant assistance. Even if they can get housing vouchers, it's difficult to find a landlord that will take vouchers. However, the rent is too high without the voucher, even if they have social security income- they are highly challenged. Housing needs to be made stable for the long-term- affordability and</li> </ul>
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			appropriate support services are needed.
<b>YWCA West Central Michigan</b>	Health Service Provider/Homeless Service Provider/Domestic Violence Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• The most important need is for affordable housing for people/families fleeing domestic violence. People fleeing domestic violence have significant barriers, including poor credit and no money to put down for deposits.</li> <li>• 92% of the homeless population has experienced domestic violence.</li> <li>• Even if people have a voucher, it's very hard for them to find housing. Many have significant barriers to entry, including previous eviction on their rental history, poor credit (that isn't their fault), having a large family and wanting to move for safety reasons, but can't find housing, undocumented people, and using English as a second language.</li> <li>• Does not think having more shelters is the answer; wants to find out what causing the need for shelter in first place- not enough rental assistance, supportive services, vouchers, low-income housing, etc.</li> <li>• Additional resources made available to people trying to find housing</li> </ul>

			would be helpful, including TBRA for short and long term housing assistance.
<b>ICCF Community Homes</b>	Fair Housing Service Provider/Homeless Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• The biggest housing barriers include utility fees (deposits; past late fees) and past evictions.</li> <li>• Front-end needs and services should be provided as well as wrap-around services, including agreement with landlords to allow vouchers, credit counseling, services offered to help them improve credit scores, offer general housing assistance.</li> <li>• Units available for family shelter through ICCF: three 2-bedroom units, three 3-bedroom units; average stay about 50 days. Looking into an additional three-unit project they would like to take under if ICCF could find funding.</li> </ul>
<b>Region Four Offender Success Program</b>	Fair Housing Service Provider/Homeless Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• Highest need: Landlords that will work with people coming out of incarceration.</li> <li>• Vouchers should be focused on parents that are taking custody of children the day they are released from incarceration, but do not have stable housing.</li> <li>• For people that have served significant</li> </ul>

			<p>sentences, especially the elderly population, finding housing is huge barrier. Helping people that entered incarceration as teens or young adults and didn't get out until 40 years later should be focused on- population numbers can be provided.</p> <ul style="list-style-type: none"> <li>• Affordable housing would be most important eligible activity for funding.</li> <li>• Wrap-around services are needed for families. Offender success program has people experiencing homelessness come in off the street.</li> </ul>
<b>Treetops Collective</b>	Civil Rights Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• In some communities, debt is not an option so not many possibilities for people to be homeowners.</li> <li>• Wrap around services are essential- ESL services, community meals for refugees to be offered at education events, financial planning, etc.</li> </ul>
<b>Mel Trotter Ministries</b>	Homeless Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• The greatest unmet housing needs are for those at 50% API or below; community completed needs assessment and found that 1,900 units are required to meet that population.</li> </ul>

			<ul style="list-style-type: none"> <li>• Low-income housing unit inventory needs to go up for individual permanent housing units.</li> <li>• Community needs eviction prevention.</li> <li>• People transitioning back into independent living need assistance to properly transition and stay in independent living (wrap-around services).</li> <li>• Supportive services/wrap-around services need funding.</li> <li>• Finding incentives to encourage landlords to rent to HCV participants would be great.</li> <li>• Rural areas of the county have populations that are experiencing homelessness or are at risk of homelessness but won't come to the city. Some focus should be put on those area/populations.</li> <li>• People who have mental health barriers should be focused on as a group to assist.</li> <li>• Prioritize affordable housing and production of affordable housing.</li> </ul>
<b>Habitat for Humanity of Kent County</b>	Homeless Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• People with mental illness need focus.</li> <li>• Prioritize funding for a housing network and create familial networks.</li> </ul>
<b>Women's Resource Center</b>	Domestic Violence Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• The community needs transitional/temporary</li> </ul>

			<p>housing for people coming out of jail or fleeing domestic violence. Temporary housing is a high need.</p> <ul style="list-style-type: none"> <li>• Specific populations that need housing includes women coming out of incarceration.</li> <li>• Prioritize support services to help people prepare for long-term housing.</li> </ul>
<b>Urban Core Collective</b>	Homeless Service Provider/Fair Housing Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• Supportive services should be prioritized alongside production of affordable housing</li> </ul>
<b>United Church Outreach Ministry</b>	Homeless Service Provider/Children and Youth Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• Community needs more assistance/programming for individuals that are about to become homeless but don't qualify for other housing until they are experiencing homelessness.</li> <li>• An underserved population to focus on should be LGBTQA+ youth that are homeless.</li> <li>• Prioritize production of affordable housing and supportive/wrap-around services.</li> </ul>
<b>Hispanic Center of Western Michigan</b>	Fair Housing Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• No comment provided</li> </ul>
<b>Fair Housing Center of West Michigan</b>	Fair Housing Service Provider/Persons with Disabilities Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• Kent County is facing an affordable housing crisis-people can't find an affordable housing rental rate or can't find someone that will take a voucher.</li> </ul>

			<ul style="list-style-type: none"><li>• Populations to focus on: people with disabilities (primary reported basis of discrimination); Kent County does not have enough housing for families and family shelter.</li><li>• Most pressing needs: referrals are doubling almost every month; people are consistently calling about landlord/tenant matters and housing discrimination. People could avoid homelessness by being represented in eviction courts.</li><li>• Establishing a source of income protection and funds to reimburse landlords who have damage not covered by security deposit would be great.</li><li>• "Housing Ready" staff people/advocates that investigate barriers for building lower income housing and walk people that need housing through the process is needed. Universal design when building low-income housing is important so people can age in place.</li><li>• In general, increasing the supply of low-income housing is needed. Fair housing center has seen</li></ul>
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			<p>occupancy rate complaints- families too large for units available.</p> <ul style="list-style-type: none"> <li>• Increase all types of affordable but need three- and four-bedroom units for large families; options for people where they don't have to live right next to their neighbors because of mental illness, or families with kids being too loud/running around second floor just being kids.</li> </ul>
<b>Grand Rapids Coalition to End Homelessness</b>	Homeless Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• More low-income living units for people/families is needed.</li> <li>• increase eviction prevention; data does not back-up the idea that there is a dramatic increase in homelessness- no jump due to the pandemic.</li> <li>• There is a desire for different types of shelter- congregate shelter is not appealing to stay in, even temporarily.</li> <li>• Bulk of funding should be spent on emergency shelter or low-income housing and homeless prevention programs.</li> </ul>
<b>Kent County Housing Commission</b>	Public Housing Agency	Virtual Meeting	<ul style="list-style-type: none"> <li>• Veterans get referred to housing quickly and into housing as quickly as possible, but they have issues with voucher programs and with</li> </ul>

			<p>landlords not taking vouchers. Landlords are screening for credit, criminal history, past evictions, etc.; if there is a strike against them, it's almost always an automatic "no."</p> <ul style="list-style-type: none"> <li>• Issues arise when people get into housing and then a crisis happens and the caseworker that got them into housing is not available, and the renter is not sure who to call- better case management is needed for some people/families.</li> <li>• Number 1 issue for eviction is for non-payment, but other factors are involved that could be remediated by case management.</li> </ul>
<b>Community Rebuilders</b>	Homeless Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• TBRA for low-income housing in Kent County- increasing accessibility; more affordable housing availability</li> <li>• Access to affordable childcare</li> </ul>
<b>Family Promise of Grand Rapids</b>	Homeless Service Provider/Children and Youth Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• No comment provided</li> </ul>
<b>Veteran Affairs</b>	Veteran Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• Additional resources, such as housing specialists, are needed to assist in helping people obtain housing</li> <li>• There is very little housing available, and rents are very high. More</li> </ul>



			<p>available housing is needed for veterans and their families.</p> <ul style="list-style-type: none"> <li>• Both transitional and permanent housing are needed.</li> <li>• Veteran specific programs are needed to improve the use of programs by veterans.</li> <li>• Substance abuse treatment programs are needed in Kent County.</li> </ul>
<b>Disability Advocates of Kent County</b>	Persons with Disabilities Service Provider	Virtual Meeting	<ul style="list-style-type: none"> <li>• There is a huge need for accessible housing stock.</li> <li>• Transportation services is an issue for people with disabilities and needs improvement.</li> <li>• Number of available units is very important, but more important is vouchers/TBRA to get people into housing.</li> </ul>

**Public Participation**

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.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

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

**Summary of the public participation process:**

The County recognizes the importance of collecting input and feedback from citizens residing within the community when designing programming that will ultimately impact residents the most. As such, the County conducted extensive outreach and engagement efforts to ensure broad public participation in the development and review of the HOME-ARP Allocation Plan.

To initiate its public participation process, the County created a 15-question Citizen Participation Survey designed to collect feedback from the perspective of residents within the community regarding key populations in need, unmet needs within the community, and to identify priority areas for new services and programs to reduce homelessness and increase the availability of affordable housing.

**Public comment period and public hearing**

The draft HOME-ARP Allocation Plan was made available for public comment Monday, November 28, 2022 – Monday, December 12, 2022. The County made the draft HOME-ARP Allocation Plan available to the public via the County’s website and distributed the document among the CoC and its respective member agencies.

The County’s public hearing to discuss the draft HOME-ARP Allocation Plan was held on Tuesday, December 7, 2022, from 3:00 P.M. EST – 4:00 P.M. EST. The public hearing was held in person at the Kent County Community Action Department located at 121 Franklin St SE, Grand Rapids, MI 49507.

To market the County’s public comment period and public hearing, the County published notices across the following platforms:

- MLive: Michigan Local News (newspaper and website)

• <b>Public comment period start &amp; end date:</b>	<u><a href="#">11/28/2022 – 12/12/2022</a></u>
• <b>Public hearing date:</b>	<u><a href="#">12/7/2022</a></u>

**Summary of efforts to broaden public participation:**

The County began to execute its public participation efforts on Monday, October 3, 2022, by launching its Citizen Participation Survey across multiple platforms. Surveys were made available for three weeks, produced in English and Spanish, and were available online and in-person as a hard copy at key locations throughout the community. Distribution of the surveys included:

- Publishing on the County’s housing website ([https://www.accesskent.com/Departments/CommunityAction/community\\_development.htm](https://www.accesskent.com/Departments/CommunityAction/community_development.htm))

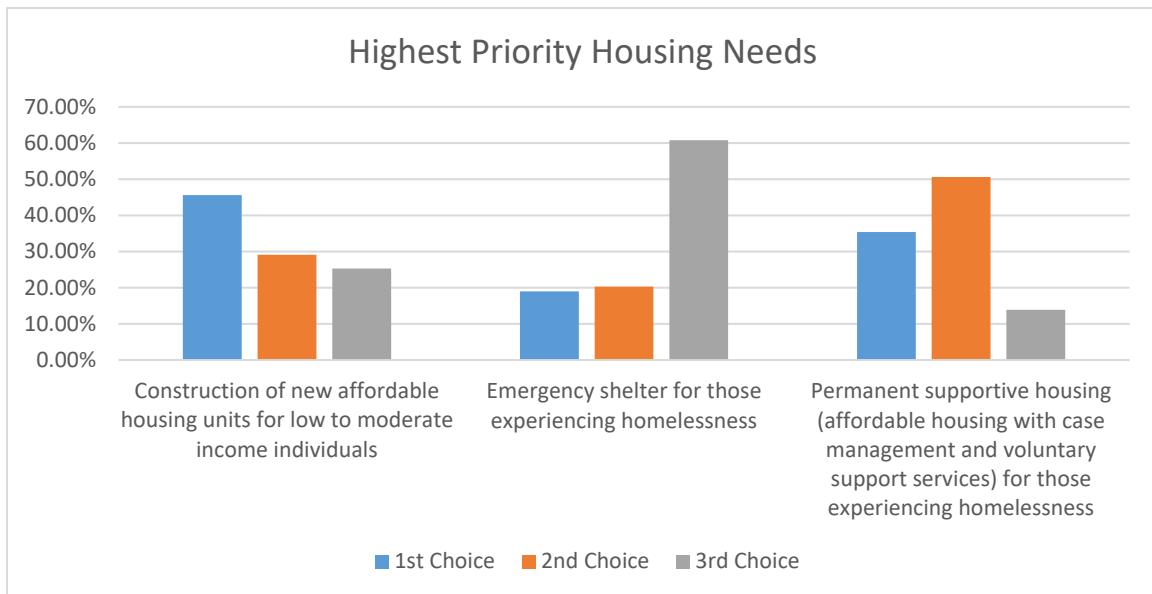
- Posts on the County’s social media platforms (<https://www.facebook.com/KentCountyMI/> and <https://www.instagram.com/kentcountymi/?hl=en> )
- Email distribution to CoC members, stakeholder organizations, and service providers
- Meetings with case managers and stakeholder organizations
- The County’s weekly Administrator's Digest via email blast

The County’s Citizen Participation Survey received a total of 89 responses (89 – English, 0 – Spanish) from a broad section of the community.

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

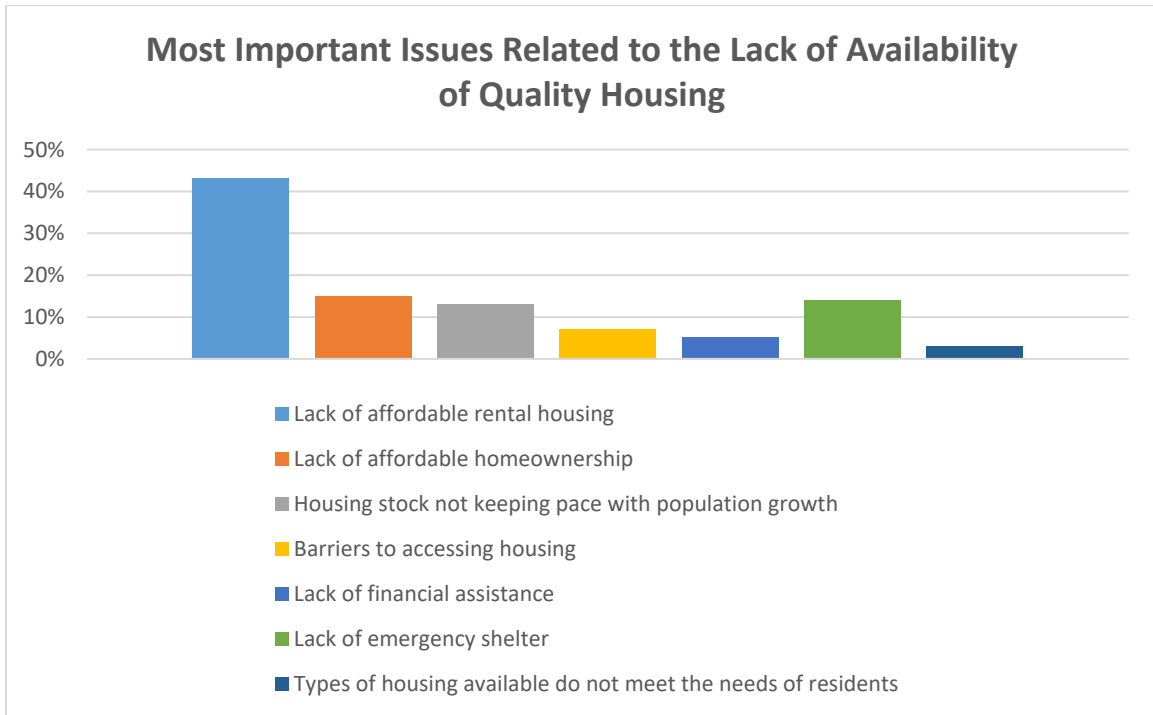
The County of Kent received feedback from 89 community residents during the public participation process. Comments and recommendations were received both from members of the public as well as stakeholder organizations and service providers. The detailed comments and recommendations from the 89 community residents are summarized below.

- Citizen Comments and Recommendations
  - Of the 89 individuals that responded to the Citizen Participation Survey:
    - 46% identified construction of new affordable housing units as their top priority housing need
    - 19% of respondents identified emergency shelter as their top priority
    - 35% of respondents selected permanent supportive housing as their top priority

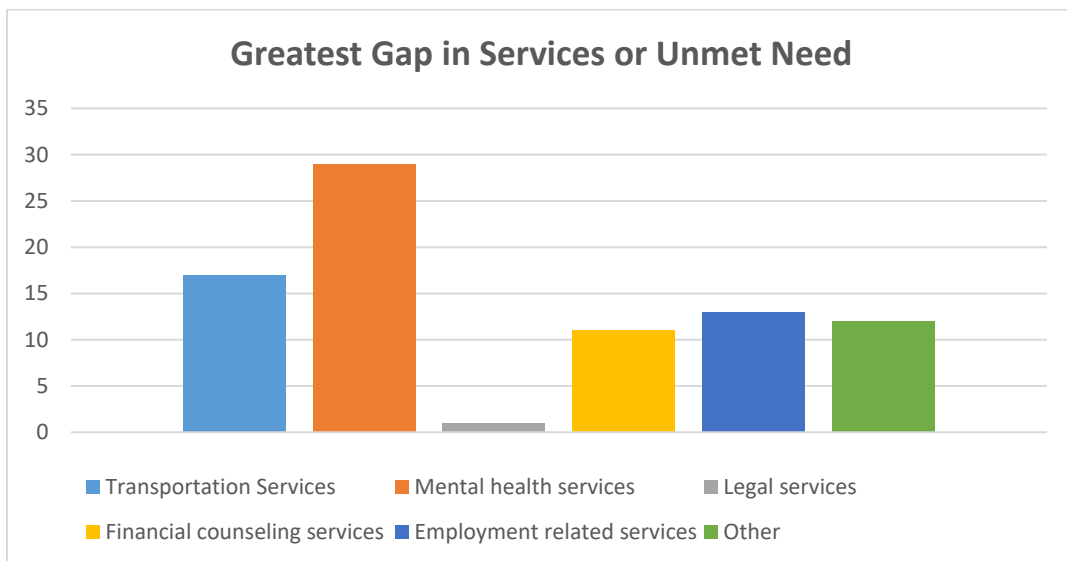


- When asked about the top three most important issues related to the lack of availability of quality housing:
  - 43% identified the lack of affordable rental housing
  - 15% identified the lack of affordable home ownership

- 14% identified lack of emergency shelter



- When asked about the greatest gap in services or unmet needs:
  - 29 respondents identified mental health services
  - 17 respondents identified transportation services
  - 13 respondents identified employment related services



The data collected from the Citizen Participation Survey indicates that the feedback from the public is in support of **constructing new affordable rental housing units**. Additionally, there is a

need for some type of **permanent supportive housing** and the community shows strong support of **increasing mental health services**.

Additional long-form comments were received that covered a range of other topics related to wrap around services, life skills coaching, accessible homes, and financial counseling services.

### **Acceptance of public comments or recommendations**

The County has reviewed and accepted all comments and recommendations that were submitted via the Citizen Participation Survey. No comments or recommendations were received during the public comment and public hearing processes. All comments and recommendations received were considered as part of the HOME-ARP Allocation Plan development process.

## **Kent County Consortium Demographic Profile**

Organized in 1836, Kent County comprises 21 townships, five villages, and nine cities. The City of Wyoming along with Kent County comprises the Kent County HOME Consortia.

The largest city within Kent County is Grand Rapids. It was founded as Furniture City in 1876. Since that time, Grand Rapids and Kent County has since diversified beyond its furniture beginnings, and is now a center for manufacturing excellence, health science discovery, and technological innovation.

### **Total Population**

Data tabulations provided by the [2020 5-year estimate of the American Community Survey](#) (ACS) estimates the total population in Kent County was 652,617. This total population represented 244,795 households.

### **Race & Ethnicity**

Kent County's White population was estimated at 510,479, or 78.2%, of the total population. Kent County's Black population was estimated at 61,191, or 9.4%. Persons indicating they were two or more races was estimated at 36,128, or 5.5%, of the total population. Kent County's Asian population was estimated at 20,064 or 3.1% of the total population. No other race made up more than 1% of the total population.

Of Kent County's 652,617 estimated persons, 70,152 were of Hispanic ethnicity. This figure constituted 10.7% of the total population, with persons of Mexican heritage estimated at 45,274 of all Hispanic persons.

### **Gender & Age**

According to the 2020 5-year estimate of the ACS, it was estimated that of Kent County's 652,617 persons 330,789, or 50.7%, were female and an estimated 321,828, or 49.3% were male.

According to the 2020 5-year estimate of the ACS the estimated number of persons over 18 years of age was 494,879, or 75.8%, of the total population. Of the estimated 494,879 persons over the age of 18, 22.7% are between 20 to 34 years of age, 34.6% are between 35 to 54 years of age, 12.4% are between 55 to 64 years of age, 8.0% are between 65 to 74 years of age, and 5.6% are over the age of 75.

### ***Educational Attainment***

Of an estimated 433,389 persons over age 25 according to the 2020 5-year estimate of the ACS, 103,846 have a bachelor's degree and 55,822 have a graduate or professional degree. Thus 36.9% of the working age population are college graduates.

### ***Workforce***

According to the [Grand Rapids Area Economic Summary of November 7, 2022](#) published by the Bureau of Labor Statistics (BLS), the number one industry in Kent County was Manufacturing employing 113,600 persons. The second ranked industry in terms of workers was Trade, Transportation, and Utilities employing 100,900 workers. Education and Health Services was the third ranked industry employing 94,600 workers. The fourth ranked industry in Kent County was Professional and business services employing 76,900 workers. Government employed 48,200 workers.

The 2020 5-year estimate of the ACS gives Management, Business, Science, and Arts as the number one ranked occupation category employing 130,213 person or 38.7% of occupied jobs. A total of 71,474, or 21.3%, of the labor force were employed in Sales and Office occupations. Production, Transportation, and Material Moving occupations employed 58,387, or 17.4%. Service occupations employed 52,799, or 15.7%.

In terms of wages, the Grand Rapids Area Economic Summary published by the BLS reports that the average weekly wage in Kent County was \$1,130. For the entire Grand Rapids Area, the average hourly wage was reported at \$25.32 as compared to \$28.01 for the U.S. as a whole. Accounts and auditors earned the highest hourly wage at \$35.64 and Registered Nurses earned \$34.60. Engine and Machine Assemblers earned \$22.59 an hour. Persons employed as Retail Salespersons earned \$15.24 an hour.

To get to work, the 2020 5-year estimate of the ACS estimated that 260,597 or 79.0% commuted alone by private automobile. Another 29,672, or 9.0%, carpooled. A total number of 22,402, or 6.8%, worked from home.

As of September 2022, the BLS calculated the unemployment rate for Kent County at 3.2% just a fraction lower than the National unemployment rate of 3.3%.

### ***Household Characteristics***

According to the ACS 2020 5-year estimate, Kent County's economy provided employment opportunities to an estimated 244,795 households. Of these households, 124,663, or 50.9%,

are married couples. A total of 16,876, or 6.9%, were reported as cohabitating couple households.

A total of 62,629, or 25.6%, of households were reported as female headed while 40,627, or 16.6%, were male headed.

The average household size was 2.62 persons while the average family household size was 3.15 persons.

A total of 35,763 households were single persons. And of these, 17,622 were single persons 65 and older.

Of all household types, 62,454, or 25.5%, had one or more persons over the age of 65.

### ***Household Tenure Type***

The 2020 5-year estimate of the ACS calculated that 172,222, or 70.4%, of housing units were Owner occupied. This compares to 72,573, or 29.6%, of Renter occupied housing units. Of housing units, it is estimated that 12,320, or 4.8%, are vacant, with the homeowner vacancy rate estimated as low as 0.5% and the rental vacancy rate estimated at just 3.5%.

### ***Household Income***

The 2020 5-year estimate of the ACS calculated the median household income for Kent County at \$65,722.00. An estimated 105,759, or 43.20%, of households had incomes above the median. The Bureau of the Census does special tabulations for the Department of Housing and Urban Development (HUD) to determine the income level of a low-income household specifically for designated metropolitan statistical areas. A low-income household is one having an annual median income for the area at 80% of the median. What constitutes median income is further adjusted for households of varying sizes. The tabulations published by HUD for the Grand Rapids-Wyoming statistical area year 2022 calculates median area income at \$62,287.50. A low-income household would have an estimated annual median income of \$50,150.00. Adjusting for a household having 4-family members, a low-income household would have an estimated annual median income of \$71,600.00

Households whose annual incomes are 30% and below the median area income are determined by HUD to be extremely low-income households. Being considered an extremely low-income household is one of the conditions for HUD's definition of at risk of homelessness. According to HUD calculations, an extremely low-income household In the Grand Rapids-Wyoming statistical area has income of \$18,800.00. Adjusting for households having 4-family members, an extremely low-income household has an annual median area income of \$26,850.00.

Elderly households and other household types who rely on some form of public economic assistance will also most likely be at risk of homelessness or at greatest risk of housing instability.

In Kent County, according to the 2020 ACS 5-year estimates, 68,567 households received social security with an average annual income of only \$21,196. Another 44,974 of households received retirement income having an average annual income of \$22,259. A total of 11,561 of households received supplemental security income with an annual income of \$10,970 on average. It was also estimated that 6,414 of households received some form of public assistance in cash averaging \$3,885. And a total of 23,768 households qualified to receive food stamps.

Finally, of an estimated 102,907 family households as computed by the ACS 2020 5-year estimate, 7.0% live below poverty. According to the poverty data, 44.6% of all households living below poverty are families with a female, having no spouse present, and with a child under the age of 5.

### ***Housing Costs***

Data from the National Association of Realtors has been utilized to present a picture of Kent County's housing market. The Local Market Report for the first quarter of 2022 indicates the median purchase price for a single-family home in Kent County was \$260,760. The median purchase price for Grand Rapids-Wyoming MSA was \$276,600. The conforming loan limit to purchase a home in the Grand Rapids-Wyoming MSA was \$647,200. The FHA loan limit is \$420,680.

The average mortgage for the typical home in Kent County for the First Quarter of 2022 was calculated at \$1,102 up from \$829 a year earlier.

The National Association of Realtors' Affordability Index for Metropolitan Areas gives an idea of homeowners' capacity to purchase units made available in the housing stock. The affordability index measures whether or not a typical family could qualify for a mortgage loan on a typical home. A typical home is defined as the national median-priced, existing single-family home as calculated by NAR. The typical family is defined as one earning the median family income for the area as reported by the U.S. Bureau of the Census. The prevailing mortgage interest rate is the effective rate on loans closed on existing homes from the Federal Housing Finance Board. To interpret the indices, a value of 100 means that a family having median income has exactly enough income to qualify for a mortgage on a median-priced home. An index above 100 signifies that families earning the median income have more than enough income to qualify for a mortgage loan on a median-priced home, assuming a 20 percent down payment. The affordability index for the Grand Rapids-Wyoming MSA was 217.3 in 2020. This means families living in Grand Rapids-Wyoming MSA earning the median family income have 217.3% of the income necessary to qualify for a conventional loan covering 80 percent of a median-priced existing single-family home. This index is down from 226.7 in 2017, a decrease of 9.4%.

Additional detailed housing data is made available by the [Harvard Joint Center for Housing Studies](#). According to this study released in April 2022, the typical home price for the Grand Rapids-Kentwood area was \$308,535, higher than the median income home price of \$260,760.



The typical mortgage payment was \$1,595 with total monthly owner costs totaling \$2,192. The annual income needed to afford the typical sale price for a house was \$84,840.

As of 2021, the Harvard Joint Center for Housing Studies calculated the ratio of the median home price for existing home sales to the median household income was at 3.9. This represented an increase of 0.4 from 2000.

In December of 2021 according to the data tabulated by the Harvard Joint Center for Housing Studies, the median value of a home was \$285,680. By the first quarter of 2022 this value increased by 6.5%. For a more historical perspective of fluctuations in home values in the Grand Rapids Metropolitan area, from 2015 to 2018 home values increased by closely 8.7% each year. From 2020 to 2021 the Harvard Joint Center for Housing Studies calculated an increase in home values of 17.0%.

### ***Affordable Housing***

Not everyone can afford the American dream of owning a home. The Harvard Joint Center for Housing Studies calculated the typical mortgage payment in the Grand Rapids-Wyoming area at \$1,595 with the annual income needed to purchase a home at \$84,840. According to ACS 2020 5-year estimate, 139,036 households had annual incomes below the \$84,840 necessary to purchase a home according to the estimate provided by the Harvard Joint Center for Housing Studies. The median income for Kent County was calculated at \$65,722, below the \$84,840 estimated as necessary to afford a home.

To assist families and households earning annual incomes below the median to afford housing, each year the federal government allocates funds towards affordable housing production. Under the Cranston-Gonzalez National Affordable Housing Act, Congress has defined affordable housing as an initial purchase price or after-rehabilitation value of homeownership units that do not exceed 95 percent of the area median purchase price for single family housing, as determined by HUD. The fiscal year 2022 unadjusted affordable housing sales limit for existing homes for metropolitan Grand Rapids-Wyoming is \$230,000. This limit increases to \$420,000 for a four-bedroom house and decreases to \$219,000 for a one-bedroom house. The unadjusted affordable sales limit for newly constructed homes in Grand Rapids-Wyoming was \$292,995.

### ***Affordable Rental Housing***

Notwithstanding efforts to make affordable homeownership a reality to all Americans, not everyone can afford homeownership. The rental market provides housing for such households.

According to the ACS 2020 5-year estimate for Kent County, 70,297 occupied units received rents. The median rent was calculated at \$928 a month. An estimated 28,893 households paid rents above the median, and a total of 26,477 paid 35% or more of their monthly income towards rent.

According to the Harvard Joint Center for Housing Studies rents increased in 2015 9.2% from 2104. The rent increase from 2020 to 2021 was 13%. This was just 3% below the national rent increase for the period.

The Department of Housing and Urban Development establishes affordable rents for units eligible to be assisted with federal housing funds. For metropolitan Grand Rapids-Wyoming, the fiscal year 2022 Fair Market Rent is \$798 for an efficiency unit; \$859 for a one-bedroom unit; \$1,041 for a two-bedroom unit; \$1,356 for a three-bedroom unit; \$1,538 for a four-bedroom unit; \$1,769 for a five-bedroom unit; and \$1,999 for a six-bedroom unit.

### ***Housing Stock***

According to the ACS 2020 5-year estimate, of 257,115 housing units, 171,207 are single unit detached. This figure constituted 66.6% of all housing units. A total number of 15,046, or 5.9%, of housing units were single attached.

Housing structures having 10-19 units were estimated at 13,535, or 5.3%, of all units, while structures having 20 or more units were estimated at 18,201, or 7.1%.

Clearly the data show that single unit structures are the primary structure type in Kent County. This data indicates that additional funds be allocated towards multi-unit structures to make rental units more affordable for lower income households.

In terms of unit size, it is estimated that 60,503, or 23.5%, of units are 2-bedrooms. The estimated total of 3-bedroom units is 98,702, the largest representation of units by bedroom size. A total of 25,382, or 9.9%, of units are 1-bedroom units. The data on bedroom size indicates a need for additional 1- to 2-bedroom units to assist persons to transition into permanent housing as such persons typically tend to be single adults.

Of Kent County's 257,115 housing structures as tabulated by the ACS 2020 5-year estimate, 148,010, or 57.6%, were constructed prior to 1979. Of these, 42,405, or 16.5%, were built prior to 1939. Only 13,441, or 5.3%, of units were constructed after 2010. An analysis of this data suggests the housing stock in Kent County is an aging housing stock. Local funds and programs may be utilized and developed to modernize the County's available housing stock.

## **Needs Assessment and Gaps Analysis**

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including the Point in Time (PIT) count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

## Homeless Needs Inventory and Gap Analysis Table

Homeless Needs													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	308	83	596	0	18								
Transitional Housing	146	46	78	0	19								
Permanent Supportive Housing	339	98	737	0	271								
Other Permanent Housing	142	43	89	0	18								
Sheltered Homeless						112	597	66	86				
Unsheltered Homeless						3	39	3	3				
<b>Current Gap</b>										0*	0*	0*	0*

Data Sources: 1. [Kent County Continuum of Care 2022 Point in Time \(PIT\) Count](#)

**Gap Analysis for Family Beds.** Consultation with Agencies.

**Gap Analysis for Adult Beds.** Consultation with Agencies.

\***Gap Analysis** – Data reflecting a current gap in family beds, family units, adult beds, and adult units was not able to be determined due to the presenting data showing that current beds and units met the capacity of the County’s shelter needs.

## Housing Needs Inventory and Gap Analysis Table

Housing Needs			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	75,000		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,016		
Rental Units Affordable to HH at 50% AMI (Other Populations)	12,331		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		5,465	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,890	
<b>Current Gaps</b>			3,581

**Data Sources:** 1. American Community Survey (ACS) 2020 5-year estimate; 2. [Comprehensive Housing Affordability Strategy \(CHAS\) 2013-2017](#); 3. [2020 Bowen National Research Housing Needs Assessment](#); 4. [2021 - 2025 Regional Consolidated Housing and Community Development Plan](#)

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

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

The PIT count for Kent County indicated that a total of 909 families were homeless. Of these families, 861 were sheltered and 48 were unsheltered. The majority of families were adults with no children, with 597 of such families being sheltered and 39 of such families being unsheltered.

Excluding families residing in housing targeted to persons fleeing domestic violence and stalking, a total of 1,044 persons were homeless. A total of 807 were in emergency shelter and 186 were in transitional housing. A total of 51 persons in 48 households were unsheltered.

The number of children under the age of 18 who had the unfortunate life experience of being homeless totaled 255 with the 3 being unsheltered. The number of persons between the ages of 18 and 24 who were homeless on the night of the PIT count reached 102 with eight being unsheltered. Persons over 25 enumerated as homeless during the PIT count totaled 687 with 40 being unsheltered.

The number of persons identified during the PIT count comprising one or more subpopulation totaled 546 persons. Of these subpopulation groups, 202 were chronically homeless; 131 were adults with severe mental illness; 89 were domestic violence victims; 69 were veterans; 45 were adults with substance abuse disorder; and 10 had HIV.

African-Americans were disproportionately represented in the homeless counts during the PIT count. A total of 496 homeless persons on the night of the PIT count were African-American. This figure constituted 47.5% of all homeless persons, while African-Americans make up only 9.4% of the total number of persons residing in Kent County.

The number of homeless persons whose race was White totaled 439, or 42.0%, while 81 persons identified as Multiple Race.

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

Persons or families who are at risk of homelessness as defined in 24 CFR 91.5 are persons or families with incomes 30% and below the median area income who lack sufficient resources or support networks to prevent them from having to move into an emergency shelter. Such persons and families who are at risk of homelessness must also meet one of several conditions, such as living in a hotel/motel without receiving any housing assistance, living in overcrowded

housing situations, received a recent notice they must move from their current housing, or who are living in the home of another due to some economic hardship.

It is difficult to estimate this population as other conditions may not be known until such persons or families seek out some form of housing assistance. However, data made available by HUD's CHAS database tabulated from ACS surveys from 2015 to 2019 indicated that Kent County had 27,930 households with incomes at 30% and below HUD's area median family income. And of these households, a total of 21,920 had a housing problem of either being overcrowded (i.e., there being more than 1.5 persons per room), cost burdened (i.e., paying more than 30% of their monthly income towards housing costs), or they lack complete plumbing or kitchen facilities.

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

During the PIT count of 2022, a total of 86 adults fleeing domestic violence, dating, or stalking resided in a shelter. A total of three children were accompanying these persons.

In the [2021-2025 Consolidated Plan](#), Kent County identified that between October 1, 2018 and September 30, 2019, the YWCA served 641 women and their children in emergency shelter and long-term supportive housing. During that same time period, the agency provided rape exams to 341 women, including 138 children.

Additionally in the Michigan State Police Criminal Justice Information Center's [2021 report](#), 2,165 were identified as victims of domestic violence in Kent County. Of these, 1,469 identified as female and 696 identified as male.

**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**

Other populations requiring services include those who are currently housed due to temporary or emergency assistance. According to the most recent PIT survey, in Kent County there were 1,596 families and persons receiving such assistance. A total of 1,347 were being assisted with permanent housing and 249 were receiving assistance to prevent homelessness.

Other households that identified as being at greatest risk of housing instability had incomes at 30% and below median income. These households also experienced being severely cost-burdened, meaning they pay more than 50% of their monthly income towards housing costs. Data made available by HUD's CHAS database tabulated from ACS surveys from 2015 to 2019 indicated that Kent County had 17,120 households with incomes at 30% and below HUD's area median family income who were severe cost burdened.

Households with incomes of 50% and below area median family income and who meet other conditions for those at risk of homelessness are also considered at greatest risk of housing instability. While there is no reliable data available to provide an estimate of how many households with incomes 50% and below area median family income have one of the conditions of at risk of homelessness, the CHAS database does estimate that there are 29,785 households with incomes between 31% and 50% of median family income residing in Kent County. Of these households, 15,010 are owners and 14,755 are renters.

Based upon these estimates, it would be reasonable to conclude that close to 50,000 households are at great risk of housing instability within Kent County.

**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**

There are currently 14 Emergency Shelter providers within the Kent County Continuum of Care. These units provide 332 family beds and 497 adults-only beds.

There are currently 11 Transitional Shelter providers within the Kent County Continuum of Care. These providers make available 132 family beds and 106 adult-only beds.

There are currently 20 Permanent Supportive Housing providers within the Kent County Continuum of Care. These providers make available 417 family beds and 666 adult-only beds.

There are currently 10 Rapid Re-Housing providers within the Kent County Continuum of Care. These providers make available 197 family beds and 29 adult-only beds.

There are also currently three providers of Other Permanent Housing within the Kent County Continuum of Care. These providers make available 37 family beds and 67 adult-only beds.

***Describe the unmet housing and service needs of qualifying populations, including but not limited to:***

- ***Homeless as defined in 24 CFR 91.5***
- ***At Risk of Homelessness as defined in 24 CFR 91.5***
- ***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***
- ***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice***

The most significant unmet housing need for homeless persons is housing vouchers, additional case management, and other supportive services to connect these individuals to housing.

Rapidly rising rental prices and limited availability of affordable housing stock is impacting persons with incomes at 30% and below median income as well as those persons whose incomes are at 50% of the median but who also meet one of the definitions of at risk of homelessness. A common situation identified during the consultation process is circumstances where a landlord increases rents by \$300-\$500 per month near the end of a current lease. This situation, combined with the limited housing availability, can force people out of a stable housing situation and into homelessness.

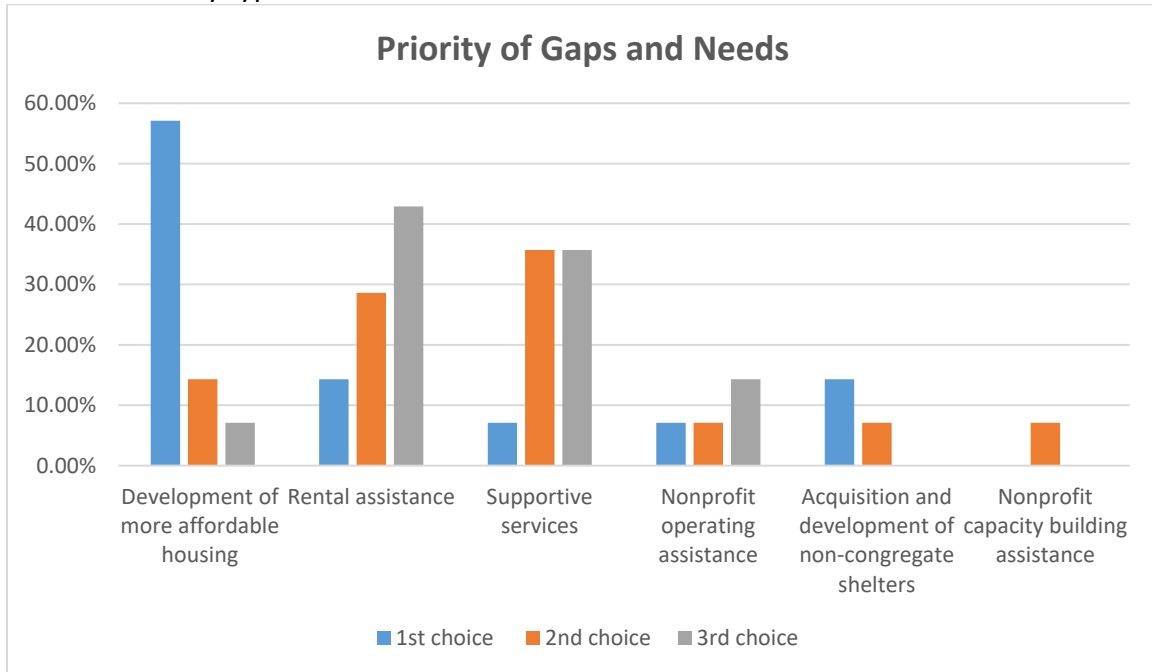
***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

As acquired from consultation efforts, public participation, and from a review of previously collected data included within the [2021 – 2025 Regional Consolidated Housing and Community Development Plan](#), several gaps within the current housing inventory and the service delivery system were identified.

Through consultation with community stakeholders and supporting data included within the 2021 – 2025 Regional Consolidated Housing and Community Development Plan, it was noted that there is a reduced number of affordable rental housing units available due to decreased number of landlords/apartment owners participating in the Housing Choice Voucher (HCV) program. As such, this results in a reduced number of affordable rental units available within the County's housing inventory. The 2021 – 2025 Regional Consolidated Housing and Community Development Plan also noted that the largest gap in housing affordability is among rental households, specifically among extremely low- and low-income households. In direct response to this identified gap, the County has elected to allocate \$2,000,000 towards Tenant Based Rental Assistance in an effort to increase housing affordability.

Regarding gaps within the service delivery system, the feedback and data collected and analyzed reflected a gap in providing equitable economic opportunities to address the wealth gap and housing affordability gap that serves as a roadblock to individuals and families that are homeless or at-risk of becoming homeless. Such opportunities include job readiness training, life skills, financial counseling, etc. Additionally, gaps in the provision of adequate supportive services was also noted from consultation and public participation efforts. Of the 89 individuals that completed the Citizen Participation Survey, mental health services was ranked as the highest supportive service needed within the County with 29 respondents selecting it as the greatest gap in service offerings. Consequently, transportation services ranked second at 17 respondents, and employment related services ranked third at 13 respondents. Supplemental to the Citizen Participation Survey, respondents to the Stakeholder Needs Assessment Survey ranked gaps in the current shelter and housing inventory, as well as the service delivery system in the following order: 1) development of more affordable housing, 2) rental assistance, 3) supportive services, 4) nonprofit operating assistance, 5) acquisition and development of non-congregate shelters, and 6) nonprofit capacity building assistance.

Concurrently with the execution of the HOME-ARP program, the County anticipates allotting approximately \$20M - \$30M of funding from its U.S. Treasury American Rescue Plan Act allocation to produce approximately 65 new affordable housing units. As such, the County has also elected to utilize funding from the HOME-ARP allocation to go towards the third highest ranked gaps and needs – Supportive Services, where the County will allocate \$849,849.40 towards this activity type.



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

In addition to the American Rescue Plan (ARP) guidelines of having incomes of less than or equal to 50% of the area median income as determined by HUD, and meeting one of the conditions established at 24 CFR 91.5, households at greatest risk of housing instability will also include those at the end of a lease period facing a 15% increase in rent in order to maintain their current housing situation.

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

The data available during the development of the allocation plan and feedback from Citizen Participation Survey’s and consultation with homeless service providers all indicated the lack of affordable rental housing to be a top priority. Given the amount of funds available to Kent County from HOME-ARP and the costs of rehabilitation and construction of rental units, it was determined that **Tenant Based Rental Assistance** would serve a greater number of persons and families.



Homeless service providers also identified that many who experience chronic homelessness suffer from some form of severe mental health illness. Therefore, it was also determined that **supportive services** is a high priority need to assist persons in maintaining their current housing.

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

The level of need and gaps in the shelter, housing inventory, and service delivery systems were determined by the following primary sources:

- City of Grand Rapids and Kent County [FY 2021-2025 Regional Consolidated Housing and Community Development Plan](#),
- Grand Rapids Coalition to End Homelessness PIT count,
- 2020 5-year estimate American Community Survey,
- 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data,
- Consultations with Kent County area homeless need providers,
- Stakeholder Needs Assessment Survey, and
- Citizen Participation Survey.

The number of unsheltered persons on the night of the PIT count did not reach into the hundreds. The number of homeless persons not able to find shelter totaled 48 persons. In the Citizen Participation Survey conducted during the development of the Allocation Plan, only 19% of respondents indicated emergency shelters as their top priority need. When asked about the top three reasons for a lack of availability of quality housing, only 14% of respondents replied emergency housing.

When looking at the data available in the FY 2021-2025 Regional Consolidated Housing and Community Development Plan, it was estimated that 3,581 units were needed for households earning 50% and below the area median family income. CHAS data revealed that 7,350 low to extremely low-income households had one or more severe housing problems.

The Citizen Participation Survey conducted during the development of the plan indicated construction of new affordable housing units to be the top priority of 43% of respondents, the most identified priority of all priorities. Additionally, 46% of respondents identified a lack of affordable rental units as the number one reason for a lack of availability of affordable housing.

## HOME-ARP Activities

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

The Kent Consortium consists of Kent County and the City of Wyoming. Kent County will be responsible for the solicitation process for all funds awarded under this HOME-ARP grant.

The County of Kent anticipates publishing a Request for Proposal (RFP) to solicit the services of a qualified organization capable of administering TBRA vouchers through funds made available from the HOME-ARP program. Additionally, the County anticipates executing Request for Proposals (RFPs) to solicit the services of a qualified organization(s) capable of administering supportive services which will be available to all qualifying populations.

The method of solicitation utilizes their county-specific Kent County Procurement System, which serves as the County's purchasing system.

The solicitation process is initiated by the County publishing a RFP in the Kent County Procurement System. Once the RFP is published, it is sent to all registered vendors that may have an interest in the solicitation. Registered vendors are included in the bidders list on file with the Purchasing Division. The RFP is also made publicly available to any potential bidder/proposer not already in the procurement system database. Solicitations remains open for a minimum of three weeks but varies by RFP. Once the solicitation period is closed, an evaluation of the submitted bids/proposals will be completed, and each bid/proposal will be scored based upon a set of criteria which are clearly identified within the RFP. The application with the highest overall score must be formally approved under [Kent County Fiscal Policy-Centralized Purchasing Contract Guidelines](#). Under 5.f.1 of this policy, "goods and services with a total annual cost of \$249,999.99 or less may be approved by the Purchasing Manager." Under 5.f.2. of this policy, "goods and services not identified in Section 7 [of the Centralized Purchasing policy] with a total annual cost of \$250,000.00 or more must be presented to the Finance and Physical Resources Committee for its consideration it's consideration and approval." Under 5.f.3. of this policy, "goods and services identified in Section 7 [of the Centralized Purchasing Policy] with a total annual cost of \$250,000.00 or more may be approved by the Purchasing Manager after consultation with the Fiscal Services Director."

The County will not undertake any project or activity which will prioritize one qualifying population over the other.

All funding awards will follow 2 CFR 200 procurement guidelines. Prior to accepting proposals for funding, the federal debarred contractor's list is referenced to determine applicants are in good standing.

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

The County has elected to not administer eligible activities directly.

***If any portion of the PJs HOME-ARP administrative funds were 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:**

The County did not provide any funds to a subrecipient or contractor that would be responsible for the administration of its entire HOME-ARP grant. Through a competitive Request for Qualifications (RFQ) process, the County awarded Baker Tilly US, LLP a contract to engage in consultation services with the overall goal of completing its HOME-ARP Allocation Plan for submission to HUD as an amendment to its Fiscal Year 2021 annual action plan for HUD review and acceptance. The services provided by Baker Tilly US, LLP are exclusive of the County's administration of the HOME-ARP program.

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

**Use of HOME-ARP Funding**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 849,849.40	25%	
Acquisition and Development of Non-Congregate Shelters	\$ 0.00	0%	
Tenant-Based Rental Assistance (TBRA)	\$2,000,000.00	60%	
Development of Affordable Rental Housing	\$ 0.00	0%	
Non-Profit Operating	\$ 0.00	0%	5%
Non-Profit Capacity Building	\$ 0.00	0%	5%
Administrative and Planning	\$502,914.60	15%	15%
<b>Total HOME-ARP Allocation</b>	<b>\$ 3,352,764.00</b>		

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

As illustrated in the chart above, the County will address the needs of qualifying households by providing Tenant Based Rental Assistance to people and families at highest risk of homelessness. The County's service delivery system currently has funds available through the American Rescue Plan of up to \$20 million dollars that will be allocated towards affordable housing production. To assist people at lower income to afford those units, it was determined Tenant Based Rental Assistance was a priority need. Consultations with service providers during the development of the HOME-ARP Allocation Plan also revealed many families would avoid becoming homeless if they could access funds on a short-term basis. These funds can be used towards past due rent due to an unexpected life crisis. Additional funds will be distributed to projects focused on expanding supportive services in Kent County, specifically to households that meet one or more of the conditions of persons homeless or at risk of homelessness.

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

The characteristics of emergency and transitional shelters within Kent County make temporary housing available to most persons seeking services. On the night of the PIT count, unsheltered families totaled 48 while sheltered families totaled 861. This data indicates the existing inventory provided beds for the majority of households in need.

During the development of Kent County's Regional Consolidated Plan, the data showed persons at risk of homelessness and who were at greatest risk of housing instability had a significantly larger housing gap than the need of homeless persons and families. The 2020 Bowen National Research Housing Needs Assessment assessed a need of 3,581 additional rental units to provide housing to persons earning annual incomes below 50% of area median income.

Through consultation with local service providers to persons and families experiencing homelessness, it was discovered that many persons struggling to obtain affordable housing were also suffering from some form of mental health disability. This discovery influenced the allocation of funds towards supportive services. In addition to mental health services, tenant landlord resolution was identified as a great area of need to prevent persons from falling into homelessness.

## HOME-ARP Production Housing Goals

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

Kent County will allocate \$2,000,000 dollars of its HOME-ARP allocation towards Tenant Based Rental Assistance. It is estimated that a minimum of 277 households will be supported through these funds based on up to \$1,000 of assistance per month per household for a period of up to 24 months.

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

Kent County did not develop an affordable housing production goal under this allocation plan. It was determined that current construction costs would not allow for a significant number of units to be produced that a significant number of households could immediately take advantage. The County's total HOME-ARP allocation amount is \$3,352,764. At current construction costs, it was calculated that if the entire HOME-ARP allocation was targeted for the production of affordable housing, only 10 units of housing might be developed. The County plans to utilize approximately \$20M - \$30M of funding from its U.S. Treasury American Rescue Plan Act allocation to produce approximately 65 new affordable housing units. Therefore, the

County will focus its HOME-ARP funding on Tenant Based Rental Assistance and Supportive Services rather than the production of new affordable housing units.

## Preferences

***Identify whether the PJ intends to give preferences to one or more qualifying populations or a sub-population within one or more qualifying populations for any eligible activity or project:***

Funds made available under this HOME-ARP Allocation Plan will not make use of preferences for any qualifying population. Tenant Based Rental Assistance and Supportive Services will be provided on a first come, first served basis.

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

The County has determined that it will not give preferences to one or more qualifying populations or a sub-population within one or more qualifying populations for any eligible activity or project within its HOME-ARP Allocation Plan.

## Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page 10).

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

The County has elected not to use a Coordinated Entry process for referrals to a HOME-ARP project or activity. HOME-ARP projects and/or activities will be provided on a first come, first served basis.

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

The County has elected not to use a Coordinated Entry process for referrals to a HOME-ARP project or activity.

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

The County has elected not to use a Coordinated Entry process for referrals to a HOME-ARP project or activity.

***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.***

The County has elected not to use a Coordinated Entry process for referrals to a HOME-ARP project or activity.

## Limitations in a HOME-ARP Rental Housing or NCS Project

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

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

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

The County has elected to not 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 Implementation Notice.

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

The County has elected to not 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 Implementation Notice.

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

The County has elected to not 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 Implementation Notice.

## HOME-ARP Refinancing Guidelines

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

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

The County has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. Consequently, the creation of refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#) is not applicable to the County's HOME-ARP Allocation Plan.

The County has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity is not applicable at this time.

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

The County has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, requiring a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period is not applicable at this time.

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

The County has elected not to use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, stating whether the new investment is being made to maintain current affordable units and/or create additional affordable units is not applicable at this time.

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

The County has elected not to use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, specifying a required compliance period is not applicable at this time.

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

The County has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, stating that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG within the refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#) is not applicable at this time.

- ***Other requirements in the PJs guidelines, if applicable:***

The County has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing.



## Appendix A

### **Public Notice: Public Hearing and Public Comment Period**



**NOTICE OF PUBLIC COMMENT PERIOD and NOTICE OF PUBLIC HEARING of the Kent County 2022 Housing and Community Development HOME-ARP Allocation Plan**

**Official Date of Publication:** November 21, 2022

**Address:** County of Kent, Community Action Department, 121 Franklin St SE, Grand Rapids, MI 49507 Phone: 616-632-7950

Kent County is receiving funding from the U.S. Department of Housing and Urban Development (HUD) for the HOME Investment Partnership American Rescue Plan Program (HOME-ARP). The program requires Kent County to develop a Draft Allocation Plan identifying the use of the funding. The Draft Allocation Plan will be submitted to HUD for review and approval before the HOME-ARP funding can be utilized.

Notice is hereby given that Kent County is accepting public comments and holding a public hearing regarding its Draft Allocation Plan that summarizes available funding resources and proposed projects related to affordable housing and homelessness in Kent County. A copy of Draft Allocation Plan is available for review throughout the Public Comment period at the address above and online at [www.AccessKent.com/Departments/CommunityAction](http://www.AccessKent.com/Departments/CommunityAction).

**PUBLIC COMMENTS** All interested parties are encouraged to provide written comments on the Draft Allocation Plan to the address provided above or by email to [Community.Development@KentCountyMI.gov](mailto:Community.Development@KentCountyMI.gov). All public comments received during the 15-day period from November 28, 2022 to December 12, 2022 will be considered by Kent County prior to final acceptance and a summary will be included in the final document submitted to the U.S. Department of Housing and Urban Development.

**PUBLIC HEARING** A public hearing will be held on December 7, 2022 from 3:00-4:00 P.M. EST to review the Draft Allocation Action Plan at the address above.

# Appendix B

## Public Notice: Public Hearing and Public Comment Period



Grand Rapids Press

LEGAL AFFIDAVIT

AD#: 0010505052

Total

\$370.64

State of Michigan,) ss  
County of Kent)

Nancy Block being duly sworn, deposes that he/she is principal clerk of MLive Media Group; that Grand Rapids Press is a public newspaper published in the city of Grand Rapids, with general circulation in Kent county, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

Grand Rapids Press 11/21/2022

*Nancy Block*

Principal Clerk of the Publisher

Sworn to and subscribed before me this 21th day of November 2022

*Teasha R Payne*

Notary Public

TEASHA R. PAYNE  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF MECOSTA  
COMMISSION EXP FEB 24 2026  
ACTING IN COUNTY OF Kent

NOTICE OF PUBLIC COMMENT PERIOD and NOTICE OF PUBLIC HEARING of the Kent County HOME-ARP Allocation Plan

Official Date of Publication: November 21, 2022

Address: County of Kent, Community Action Department, 121 Martin Luther King Jr. St SE, Grand Rapids, MI 49507 Phone: 616-632-7950

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**PUBLIC HEARING** A public hearing will be held on December 7, 2022 from 3:00-4:00 P.M. to review the Draft Allocation Action Plan at the address above.

## Appendix C

### Kent County HOME-ARP Community Resident Participation Survey

Kent County is receiving federal funds from the HOME Investment Partnership American Rescue Plan (HOME-ARP) Program to fund a variety of projects and services aimed at reducing homelessness and increasing the availability of affordable housing. This funding must focus on needs within Kent County but outside of the City of Grand Rapids. Your input will help the County determine the best uses of these funds.

For multiple choice questions, please circle to identify your answer.

1. In which city, village, or township do you live?

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2. What is your housing situation?

- a. Own your home
- b. Rent
- c. Live with others who own or rent
- d. Live in a shelter or transitional living center
- e. Live in assisted living or other group quarters
- f. Live on the street, in a car, or in a homeless encampment
- g. Other: \_\_\_\_\_

3. If you own your home, how long have you owned it?

- a. 1 year of less
- b. 1 to 2 years
- c. 3 to 5 years
- d. 5 to 9 years
- e. 9 years or more

4. If you rent your home, how long have you rented in your current location?

- a. 1 year of less
- b. 1 to 2 years
- c. 3 to 5 years
- d. 5 to 9 years
- e. 9 years or more

5. What is your age?

- a. Under 25
- b. 25-34
- c. 35-44
- d. 45-54
- e. 55-64
- f. 65+

6. What is your total household income?
  - a. Less than \$26,850
  - b. \$26,850 - \$44,749
  - c. \$44,750 - \$53,699
  - d. \$53,700 - \$71,599
  - e. \$71,600 - \$89,499
  - f. \$89,500 - \$107,399
  - g. \$107,400 or more
  
7. What is your household size?
  - a. 1
  - b. 2
  - c. 3
  - d. 4
  - e. 5+
  
8. Race (Optional Information)
  - a. Black/African American
  - b. American Indian/Alaskan Native
  - c. Asian American
  - d. Hawaiian/Pacific Islander
  - e. Multi-Racial
  - f. White
  - g. Other \_\_\_\_\_
  
9. Ethnicity (Optional Information)
  - a. Hispanic
  - b. Non-Hispanic
  
10. In your opinion, please rank the following housing needs in your community with 1 being the highest priority and 3 being the lowest priority.
  - a. Construction of new affordable rental housing units for low to moderate income individuals (Example: 1-3 Bedroom Rent Range from \$859 to \$1,356) \_\_\_\_\_
  - b. Construction of emergency shelter units for those experiencing homelessness (no cost for individuals to use these units) \_\_\_\_\_
  - c. Permanent supportive housing (affordable housing with case management and voluntary support services) for those experiencing homelessness \_\_\_\_\_
  
11. What would be the maximum amount you could pay for rental housing per month?
  - a. less than \$500
  - b. \$500-\$700
  - c. \$701-\$900
  - d. \$900-\$1,100
  - e. more than \$1,100

12. In your opinion, please rank the following most important issue concerning the lack of availability of quality housing in the County with 1 being the highest priority and 7 being the lowest priority.

- a. Housing stock not keeping pace with population growth \_\_\_\_\_
- b. Lack of affordable rental housing \_\_\_\_\_
- c. Lack of affordable homeownership \_\_\_\_\_
- d. Lack of emergency shelter \_\_\_\_\_
- e. Types of housing available do not fit the needs/desires of the residents (apartments v. single family, size of unit, etc.) \_\_\_\_\_
- f. Barriers to accessing housing (criminal background, poor credit, etc.) \_\_\_\_\_
- g. Lack of financial assistance (vouchers, down payment assistance, etc.) \_\_\_\_\_

13. What have you observed to be the greatest gap in services or unmet need in this community for individuals at risk of or currently experiencing homelessness?

- a. Transportation services (either public or personal vehicles)
- b. Mental health services
- c. Legal services
- d. Financial counselling services
- e. Employment related services
- f. Other and/or specify more detail for answers above:

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14. Have you observed significant unmet housing or service needs for specific populations (veterans, persons with disabilities, persons experiencing homeless or at-risk of homelessness, victims of domestic violence, human trafficking, etc.)? If so, please describe.

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15. Please provide any other information or feedback that would help the Kent County identify projects and services for this new federal funding.

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## Appendix D

### Encuesta sobre la participación de residentes de la comunidad en HOME-ARP del Condado de Kent

El Condado de Kent recibe fondos federales del Programa de Sociedad de Inversión en el Hogar Plan de Rescate Americano (HOME-ARP) para financiar diversos proyectos y servicios que tienen por objeto reducir la cantidad de personas sin hogar y aumentar la disponibilidad de viviendas accesibles. Dichos fondos deben centrarse en las necesidades dentro del Condado de Kent pero fuera de la Ciudad de Grand Rapids. Sus comentarios ayudarán al Condado a determinar la mejor manera de utilizar dichos fondos.

En el caso de preguntas de opción múltiple, marque con un círculo su respuesta para identificarla.

16. ¿En qué ciudad, pueblo o municipalidad (township) vive?

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17. ¿Cuál es su situación de vivienda?

- a. Propietario de su vivienda
- b. Alquila
- c. Vive con otras personas que son propietarias o alquilan
- d. Vive en un refugio o centro de vivienda de transición
- e. Vive en un centro de vivienda asistida u otras residencias grupales
- f. Vive en la calle, en un vehículo o en un campamento de personas sin hogar
- g. Otra: \_\_\_\_\_

18. Si es propietario de su hogar, ¿hace cuánto tiempo que lo es?

- a. 1 año o menos
- b. 1 a 2 años
- c. 3 a 5 años
- d. 5 a 9 años
- e. 9 años o más

19. Si alquila su hogar, ¿hace cuánto tiempo que alquila en su lugar actual?

- a. 1 año o menos
- b. 1 a 2 años
- c. 3 a 5 años
- d. 5 a 9 años
- e. 9 años o más

20. ¿Cuál es su edad?

- a. Menos de 25
- b. 25-34

- c. 35-44
- d. 45-54
- e. 55-64
- f. Más de 65

21. ¿Cuáles son los ingresos totales de su hogar?

- a. Menos de \$26,850
- b. \$26,850 - \$44,749
- c. \$44,750 - \$53,699
- d. \$53,700 - \$71,599
- e. \$71,600 - \$89,499
- f. \$89,500 - \$107,399
- g. \$107,400 o más

22. ¿Cuál es el tamaño de su hogar?

- a. 1
- b. 2
- c. 3
- d. 4
- e. Más de 5

23. Raza (información opcional)

- a. Negro/afroamericano
- b. Indio americano/nativo de Alaska
- c. Asiático americano
- d. Hawaiano/islas del Pacífico
- e. Multirracial
- f. Blanco
- g. Otra \_\_\_\_\_

24. Etnicidad (información opcional)

- a. Hispánico
- b. No hispánico

25. En su opinión, clasifique las siguientes necesidades de vivienda en su comunidad con una escala en la que 1 es la prioridad más alta y 3 es la prioridad más baja.

- a. Construcción de nuevas unidades de viviendas de alquiler accesibles para personas de ingresos bajos a moderados (ejemplo: rango de alquiler de 1-3 dormitorios de \$859 a \$1,356) \_\_\_\_\_
- b. Construcción de unidades de refugios de emergencia para personas sin hogar (sin costo para las personas que utilizan dichas unidades) \_\_\_\_\_
- c. Viviendas de apoyo permanentes (viviendas accesibles con gestión de casos y servicios de apoyo voluntarios) para personas sin hogar \_\_\_\_\_

26. ¿Cuál sería el monto máximo que podría pagar por mes por una vivienda de alquiler?

- a. Menos de \$500
- b. \$500-\$700

- c. \$701-\$900
- d. \$900-\$1,100
- e. Más de \$1,100

27. En su opinión, clasifique los siguientes problemas muy importantes en lo que se refiere a la falta de disponibilidad de viviendas de calidad en el Condado con una escala en la que 1 es la prioridad más alta y 7 es la prioridad más baja.

- a. El inventario de viviendas no crece al mismo ritmo que la población \_\_\_\_\_
- b. Falta de viviendas de alquiler accesibles \_\_\_\_\_
- c. Falta de propiedad de viviendas accesibles \_\_\_\_\_
- d. Falta de refugios de emergencia \_\_\_\_\_
- e. Los tipos de viviendas disponibles no son adecuados para las necesidades/deseos de los residentes (apartamentos en lugar de viviendas unifamiliares, tamaño de unidades, etc.) \_\_\_\_\_
- f. Los obstáculos para acceder a viviendas (antecedentes penales, crédito deficiente, etc.) \_\_\_\_\_
- g. Falta de asistencia financiera (vales, asistencia con pago inicial, etc.) \_\_\_\_\_

28. ¿Qué notó que constituye la mayor brecha de servicios o necesidad insatisfecha en esta comunidad para las personas en riesgo de quedarse sin hogar o sin hogar actualmente?

- a. Servicios de transporte (vehículos públicos o personales)
- b. Servicios de salud mental
- c. Servicios legales
- d. Servicios de asesoramiento financiero
- e. Servicios relacionados con el empleo
- f. Otra y/o especifique mayores detalles de las respuestas anteriores:

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29. ¿Notó necesidades insatisfechas significativas de vivienda o servicios de poblaciones específicas (veteranos, personas con discapacidades, personas sin hogar o en riesgo de quedarse sin hogar, víctimas de violencia doméstica, trata de personas, etc.)? De ser así, descríbalas.

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30. Incluya toda otra información o comentario que ayudaría al Condado de Kent a identificar proyectos y servicios para estos nuevos fondos federales.

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## Appendix E

# Kent County HOME-ARP Stakeholder Survey

Kent County is receiving federal funds from the HOME Investment Partnership American Rescue Plan (HOME-ARP) Program to fund a variety of projects and services aimed at reducing homelessness and increasing the availability of affordable housing. This funding must focus on needs within Kent County but outside of the City of Grand Rapids. Your input will help determine the best uses of these funds. All responses will be anonymous, and no personal names or job titles are included.

1) What type of organization do you work for? (Single choice)

- Homeless service provider
- Domestic violence service providers
- Veterans' groups
- Public housing agencies (PHAs)
- Public agencies that address the needs of the qualifying populations
- Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities

2) What is the name of your organization? (Single line text)

Enter your answer

3) What income levels does your organization serve? (Single choice)

- Extremely low income limit (30% of median)
- Very low income limit (60% of median)
- Low income limit (80% of median)
- N/A
- My organization serves all income levels.

4) Based on your experience working with various unserved and/or underserved populations in Kent County, please rank the issues you believe are the highest priority at this time, starting with the highest priority. (Ranking order)

- Housing stock not keeping pace with population growth
- Lack of affordable rental housing
- Lack of affordable homeownership
- Types of housing available do not fit the needs/desires of the residents (apartments v. single family, size of unit, etc.)
- Barriers to accessing housing (criminal background, poor credit, etc.)
- Not applicable/lack of available quality housing is not an issue

- Lack of financial assistance (vouchers, down payment assistance, etc.)

5) Please rank the following eligible uses of HOME – ARP funds in terms of priority, starting with the highest priority. (Ranking order)

- Development of more affordable housing
- Rental Assistance
- Supportive Services
- Acquisition and development of non-congregate shelters
- Nonprofit operating assistance
- Nonprofit capacity building assistance

6) What have you observed to be the greatest gap or unmet need in this community for individuals at risk of or currently experiencing homelessness? (Multi Line Text)

Enter your answer

7) Have you observed significant unmet housing or supportive service needs for specific populations? If so, please describe. (Multi Line Text)

Enter your answer

8) For permanent supportive housing service providers, what supportive services are you unable to provide or are providing at a limited capacity due to lack of funding or programmatic constraints?

Enter your answer

9) Which city, village, or township (outside of Grand Rapids) is most in need of more affordable housing? (Multi Line Text)

Enter your answer

10) What services do you believe residents need to prevent them from becoming homeless? (Multi Line Text)

Enter your answer

11) Please provide any other information or feedback that would help Kent County identify projects and services for this new federal funding? Multi Line Text.

Enter your answer

Appendix F

Public Hearing on  
 Community Housing and Development  
 2022 HOME ARP Plan  
 Kent County  
 Meeting Sign-In Sheet

3pm - 4pm

DATE: Wednesday, December 7, 2022

Name	Organization	Contact Information
Chad Coffman <i>Chscf</i>	Kent County	Chad.Coffman@kentcountymi.gov
Rachel Ahee	KCCA	rachel.ahée@kentcountymi.gov
Gustavo Perez	KCCA	gustavo.perez@kentcountymi.gov
Sherric Gillespie	KCCA	Sherric.Gillespie@kentcountymi.gov
RACHEL KUNNATH	KCCA	RACHEL.KUNNATH@kentcountymi.gov
(virtually) Monique Caston	Baker Tilly	
(virtually) Elias Mather	Baker Tilly	
(virtually) Daniel Jayroe	Baker Tilly	
(virtually) Baron Bell	Baker Tilly	
<i>No others in attendance</i>		
<i>No public comment received</i>		

*Chad Coffman*  
 4pm 12/7/22

**Application for Federal Assistance SF-424**

\* 1. Type of Submission:

- Preapplication  
 Application  
 Changed/Corrected Application

\* 2. Type of Application:

- New  
 Continuation  
 Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M21-DP260221

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

COUNTY OF KENT

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

38-6004862

\* c. UEI:

QWKTCLRW2HD4

**d. Address:**

\* Street1:

300 MONROE AVE NW

Street2:

\* City:

GRAND RAPIDS

County/Parish:

KENT

\* State:

MI: Michigan

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

49503-2287

**e. Organizational Unit:**

Department Name:

COMMUNITY ACTION

Division Name:

COMMUNITY DEVELOPMENT

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

Prefix:

\* First Name:

GUSTAVO

Middle Name:

\* Last Name:

PEREZ

Suffix:

Title:

DIRECTOR

Organizational Affiliation:

\* Telephone Number:

616-632-7961

Fax Number:

\* Email:

GUSTAVO.PEREZ@KENTCOUNTYMI.GOV

**Application for Federal Assistance SF-424**

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

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

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

CFDA Title:

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

14.239

\* Title:

HOME INVESTMENT PARTNERSHIPS PROGRAM

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

ADMINISTRATION OF HOME ARP GRANT FOR TENANT-BASED RENTAL ASSISTANCE AND SUPPORTIVE SERVICES.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="3,352,764.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="3,352,764.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)** Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

 \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

*Stan Stek*

\* Date Signed:

**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> 	<p>TITLE</p> <p>BOARD CHAIR</p>
<p>APPLICANT ORGANIZATION</p> <p>COUNTY OF KENT</p>	<p>DATE SUBMITTED</p> <p>3/14/2023   11:16 AM EDT</p>



## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

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<p>APPLICANT ORGANIZATION</p> <p>COUNTY OF KENT</p>	<p>DATE SUBMITTED</p> <p>3/14/2023   11:18 AM EDT</p>

## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

Stan Stek

Signature of Authorized Official

3/14/2023 | 11:19 AM EDT

Date

COUNTY OF KENT, BOARD CHAIR

Title