



# HOME-ARP ALLOCATION PLAN

**Draft for Public Display**

## Consultation

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

See Appendix A for all Stakeholder Consultation materials, including a list of participants. Stakeholder comments received throughout these various sessions and individual meetings are summarized in the Feedback Chart in the next section and are referenced appropriately throughout the Needs Assessment & Gaps Analysis.

Fulton County engaged in an extensive stakeholder consultation process with a variety of shelter and service providers serving each of the qualifying populations and participating in the Continuum of Care; the County Department of Human Services; victim service providers; rental assistance providers; the Fulton County Continuum of Care; North Fulton County Coalition Interagency Council. In addition, surveys were distributed to each of the Housing Authorities service Fulton County, including the Fulton County Housing Authority; Union City/Palmetto Housing Authority; East Point/Fairburn Housing Authority; Housing Authority of the City of College Park.

During each of the consultation sessions, County staff focused on identifying the Qualifying Populations and their unmet housing and service needs. A brief Power Point presentation on the HOME-ARP program was presented followed by questions meant to engage participants in identifying unmet needs among the qualifying populations they served.

A summary of the agencies consulted and the feedback generated during the consultations sessions is outlined below.

List the organizations consulted:

<b>Agency/Org Consulted</b>	<b>Method of Consultation</b>	<b>Number of Participants</b>	<b>Type of Agency/Org</b>
<b>Fulton County Continuum of Care</b>	Virtual focus group October 19, 2022 11:00 a.m.	5	Continuum of Care Lead (includes public and private agencies serving all four of the qualifying populations); Veterans Groups; public agency serving all four qualifying populations
<b>Shelter Providers</b>	Virtual focus group August 25, 2022 2:00 p.m.	5	Veterans' groups; homeless service provider (all qualifying populations); domestic

Agency/Org Consulted	Method of Consultation	Number of Participants	Type of Agency/Org
			violence/human trafficking service provider
<b>Metro Fair Housing Services</b> <b>Southern Center for Human Rights</b>	Virtual focus group August 31, 2022 10:00 a.m.	2	Private organization that addresses fair housing, civil rights
<b>Service Providers</b>	Virtual focus group August 30, 2022 2:00 p.m.	12	Homeless service providers serving all four qualifying populations; Veterans Groups; agencies serving the needs of persons with disabilities
<b>PHAs</b> Fulton County HA Union City/Palmetto	Written Survey	2	PHAs

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

#### Continuum of Care

- There are decreasing resources available for households facing eviction, and eviction filings are increasing rapidly
- Resources for people with disabilities are limited
- There is a significant number of students in Fulton County schools experiencing homelessness
- The most cited needs of those contacting 2-1-1 include assistance making rent and/or utility payments, food pantry referrals, shelter
- Needs unable to be met by 2-1-1 (because referrals cannot be made/assistance is rejected by the caller) include assistance with hotel/motel bills and vouchers, as well as security deposit assistance
- There is limited staff and bed capacity were identified as barriers to providing shelter, housing and services

#### Shelter Providers

- Shelters have insufficient capacity, both bed and staff
- Shelter options are limited throughout the County; hotel and motel vouchers are expensive; there is no shelter in North Fulton; there is no low barrier shelter in the County
- Shelter options for single persons are limited
- Shelter options for victims of domestic violence are limited-many individuals fleeing domestic violence don't feel comfortable or safe going to a mainstream shelter
- Many individuals that exit prison, exit to emergency shelter due to the lack of affordable housing. Some stay with family, but this is not designed to be a permanent solution/placement

- Moving households out of shelter is difficult since there is limited inventory and landlords can be selective in who they agree to lease
- There is demand for units to accommodate larger families
- Many of the PSH units available in the County are not low barrier

### Service Providers

- There is a perception that more services are available in shelter than if placed in permanent housing
- There continues to be a large gap in the number of quality affordable and accessible units available for rent in the County. In addition, the number of landlords willing to accept vouchers and work with special needs populations is dwindling.
- Barriers to accessing housing include poor rental history, criminal history, utility arrears, debt owed to PHAs
- Recovery housing is a need. Services for people with co-occurring mental health and/or substance abuse are a need.
- Needed services that are not widely available include case management, system navigation, housing search and placement, financial literacy, landlord/tenant mediation, legal services
- Housing inventory is so limited, it is critical to keep people housed
- Transportation to mobilize service providers to where individuals are would be beneficial, rather than relying on individuals to come to a provider
- There are decreasing resources available for households facing eviction; landlords unwilling to accept any form of payment unless it is for full arrearage
- Elderly, LGBTQIA+ -- most impacted by homelessness
- Transitional housing for Veterans is a need

### Civil Rights

- Fair Housing providers in the County report increased calls for evictions, many that feel they've been discriminated against have untreated MH/IDD conditions
- Many HCVs are being returned because landlords are refusing to rent to households with a voucher; there is no protection for source of income
- There are significant barriers for re-entry populations; many do exit the criminal justice system to shelter. Re entry population average age is 50-60. There is a lack of inventory and landlords willing to rent to a formerly incarcerated individual.
- Shelters are inaccessible-guests in a wheelchair cannot access shelter; staff capacity to provide services to those with a variety of physical disabilities is limited
- Shelter staff lack capacity to provide ASL, LEP services

### Public Housing Authorities

#### Fulton County Housing Authority

- The habitability and HQS inspections prove rigorous and burdensome for some landlords and they are unwilling to participate or refuse to make needed repairs
- Rents have been increasing, FMR/Payment Standards cannot compete with market rents, even though Pmt Standards are raised to 110%; landlords can be selective in who they lease to given the state of the market and rents they can demand

- Barriers include payment/eviction history, poor credit history, debts owed to other housing authorities; ability to pay security deposit; landlords requiring more than 3x monthly rent in order to approve tenancy
- 800 units with affordability expiring 2022-2024
- Highest demand is for one bedroom units; 2-3 bedroom units are generally available
- There is demand for accessible units; it takes longer to find them, but generally there is sufficient inventory
- Services needed include mental health, legal services, transportation, other services to prevent returns to homelessness

#### Union City/Palmetto

- No HCV, public housing only-36 total public housing units available
- Waiting list runs 2-5 years, one bedroom units most in demand

## Public Participation

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

Date(s) of public notice: 2/8/2023

Public comment period: start date - 2/10/2023 end date - 2/24/2023

Date(s) of public hearing: 2/21/2023

Describe the public participation process:

Fulton County published a notice in the Marietta Times Journal informing the public of the availability of the HOME-ARP Allocation Plan, as well as the public hearing, on February 3, 2023. A copy of the notice and Plan were also made available on the County's Website. The Plan was available for a 15 day period, and the County conducted a public hearing on February 21, 2023. The public hearing was held in person, with a virtual option. Comments on the Plan were accepted via US mail, e-mail, telephone or at the public hearing.

Describe efforts to broaden public participation:

Fulton County offered multiple opportunities and methods for interested parties to provide comment and participate in the public participation process (such as virtually, in person, written or verbal comments). Language services for the Limited English Proficient were available upon request. Reasonable accommodations to allow broader participation by LEP persons or persons with disabilities in the hearing either in person or virtually were made available. In addition, the County consulted specifically with the Latin American Association to ensure the document was available for the populations the Association serves.

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

Enter narrative response here.

Summarize any comments or recommendations not accepted and state the reasons why:  
N/A-no comments were received.

## Needs Assessment and Gaps Analysis

This section presents the results of an analysis of needs and gaps for HOME-ARP qualifying populations (QP), drawing on public federal data sources and state or local sources as available. Where appropriate, this information is contextualized with feedback from stakeholders within Fulton County's service system.

### Regulatory Requirements

HOME-ARP grantees must complete a Needs Assessment and Gaps Analysis which evaluates the size and demographic composition of the four HOME-ARP qualifying populations<sup>1</sup> within the jurisdiction's boundaries and assesses the unmet needs of these populations. These requirements are described in Section V.C.1 of HUD Notice: CPD-21-10. Required elements include analysis of the shelter, housing, and service needs of individuals experiencing sheltered and unsheltered homelessness; those currently at risk of homelessness; individuals and households requiring services or housing assistance to prevent homelessness; and those at greatest risk of housing instability or who live in unstable housing situations. The assessment must also identify existing gaps within the jurisdiction's shelter system, housing inventory, and service delivery system.

Furthermore, the assessment must include a description of the housing characteristics that are associated with housing instability and an increased risk of homelessness if the PJ is including these conditions under the HUD definition of "Other Populations." The assessment should also identify the PJ's priority needs for each qualifying population and describe how the PJ determined these needs as well as the existing gaps in the grantee's shelter, housing, and service delivery systems.

### Data Methodology and Limitations

There is no single data source which aligns with the entire definition of each HOME-ARP QP that is also within the geographic boundaries of the Fulton County Participating Jurisdiction (PJ). Therefore, data sources utilized within this assessment provide estimates and may not be completely representative of the size, demographics, and needs facing each of the QPs.

The following geographic limitations were identified in this analysis of needs and gaps for qualifying populations:

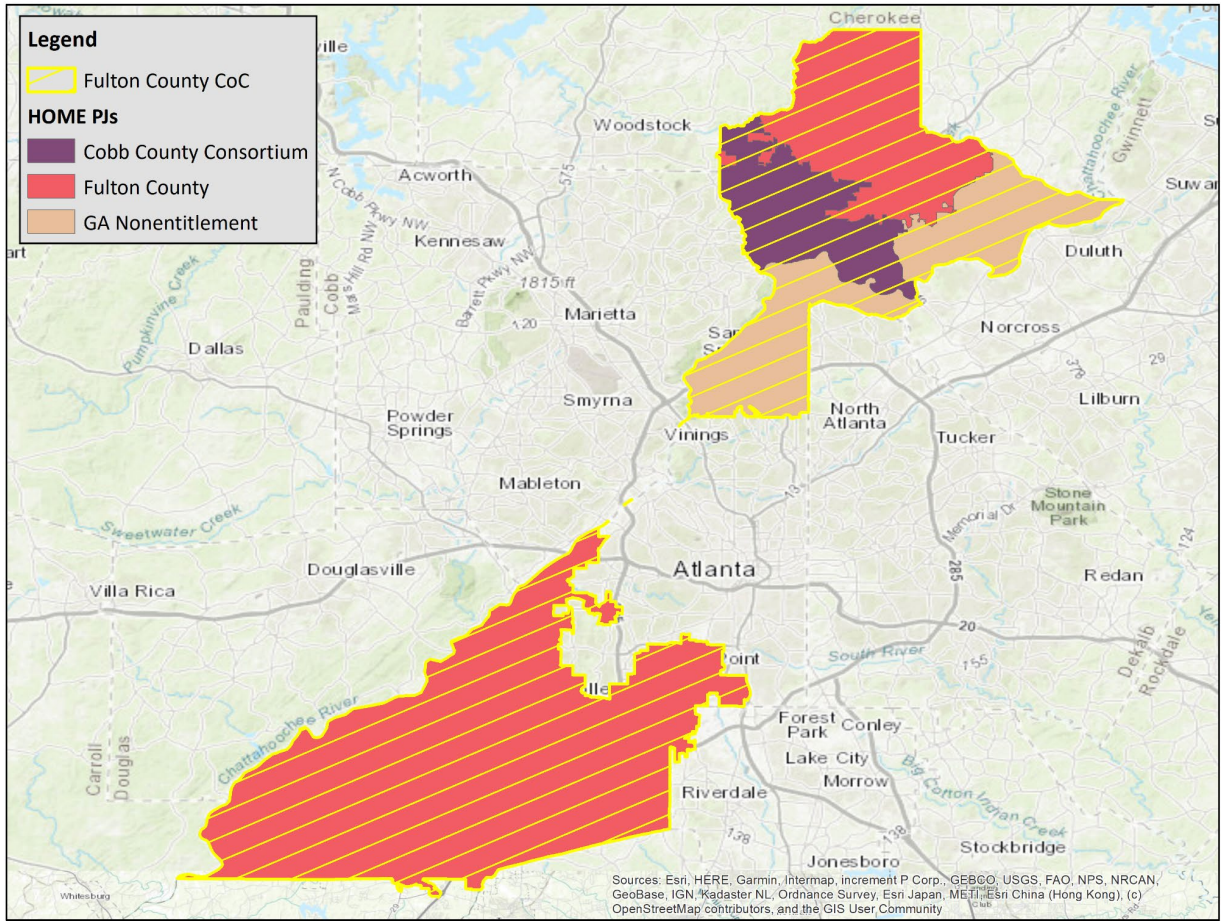
1. The CoC that serves the HOME participating jurisdiction is Fulton County CoC (GA-502). However, the geographic boundaries of the CoC's service area extend beyond the boundaries of the HOME Fulton County PJ (see Figure 1). Thus, CoC data includes estimates that overlap with the following additional PJs:
  - a. GA Non-Entitlement Communities
  - b. Cobb County Consortium
2. ACS and CHAS estimates are based on estimates for Atlanta subtracted from the entirety of Fulton County. However, some estimates still include estimates for the Roswell region or other areas that are not part of the Fulton County PJ.

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<sup>1</sup> QPs include 1) people experiencing homelessness, 2) people at risk of homelessness, 3) survivors of domestic violence, human trafficking, and sexual assault, and 4) other populations



**Figure 1: Comparison of Participating Jurisdiction and CoC Boundaries**



Although there are significant limitations with existing data sources, available data can still provide useful information to better understand the needs facing the four qualifying populations. **Table 1** outlines the primary quantitative data sources used to analyze the needs of each of the qualifying populations.

**Table 1: Primary Quantitative Data Sources by Qualifying Population**

HOME-ARP Qualifying Population	Primary Quantitative Data Source
Individuals experiencing homelessness	<ul style="list-style-type: none"> <li>● HMIS Data, 2021 for Fulton County CoC</li> <li>● Point in Time Count, 2020 for Fulton County CoC</li> <li>● Housing Inventory Count, 2020 for Fulton County CoC</li> <li>● Department of Education Data, 2019-2020</li> </ul>
Individuals at risk of homelessness	<ul style="list-style-type: none"> <li>● Comprehensive Housing Affordability Strategy (CHAS), 2014-2018</li> <li>● American Community Survey (ACS), 2016-2020</li> <li>● Data published by the Prison Policy Initiative</li> </ul>



HOME-ARP Qualifying Population	Primary Quantitative Data Source
<p><b>Persons fleeing/attempting to flee domestic violence, sexual assault, dating violence, stalking, or human trafficking</b></p>	<ul style="list-style-type: none"> <li>● National Human Trafficking Hotline</li> <li>● Georgia Commission on Family Violence</li> <li>● Center for Disease Control’s National Intimate Partner and Sexual Violence Survey State Report, 2017</li> <li>● 2021 Domestic Violence data provided by the Partnership Against Domestic Violence</li> </ul>
<p><b>Other populations at risk of housing instability and homelessness</b></p>	<ul style="list-style-type: none"> <li>● Comprehensive Housing Affordability Strategy (CHAS), 2014-2018</li> <li>● Homeless Student Enrollment Data from Local Educational Agency, SY 2019-20</li> <li>● Emergency Rental Application Program data published by the Fulton County Government</li> </ul>

## Housing Inventory

**Table 2: Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	53	19	14	N/A	0								
Transitional Housing	151	51	29	N/A	34								
Permanent Supportive Housing	224	86	152	N/A	249								
Other Permanent Housing	0	0	0	N/A	0								
Sheltered Homeless						57	29	6	0				
Unsheltered Homeless						1	74	3	0				
Current Gap										* see narrative			

**Data Sources:** 1. Continuum of Care Point in Time Count, (PIT) 2020; 2. Continuum of Care Housing Inventory Count (HIC), 2020; 3. Consultations

**Table 3: Housing Needs Inventory and Gap Analysis Table**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	80,975		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,760		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,125		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		8,995	

30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		7,330	
Current Gaps			5,400

**Data Sources\*:** Comprehensive Housing Affordability Strategy (CHAS), 2014-2018

\* Estimates are based on the difference between Atlanta CHAS data, subtracted from the entirety of Fulton County Data

### Size and Demographic of Qualifying Populations

An analysis of Fulton County Homeless Management Information Systems (HMIS) data for calendar year 2021 was conducted to identify the size and demographic composition of qualifying populations. However, the Fulton County CoC includes some projects that are located outside of the participating jurisdiction boundaries, and as a result, may not accurately reflect the size and demographics of the HOME-ARP PJ qualifying populations. HMIS data was also supplemented with other reports as appropriate for each qualifying population. Supplemental data sources include 2014-2018 CHAS data, domestic violence reports provided by the state of Georgia, local domestic violence housing partners, and Department of Education data.

### Homeless as defined in 24 CFR 91.5

According to HMIS data for the Fulton County CoC, 3,829 people accessed homeless services in 2021. The majority of people experiencing homelessness reported in HMIS identify as Black, African American, or African (80%) and female (73%). Only 5% of people experiencing homelessness recorded in HMIS were youth (i.e., under the age of 25 years old).

People experiencing homelessness in Fulton County in 2021 reported having a disability at a higher rate than the overall population. HMIS reported that the number of people with a disability under the age of 65 is approximately twice as much (15.8%) as the American Community Survey’s 1-year estimate for Fulton County’s overall population in 2021 (7.3%). According to data recorded in HMIS, types of disability were approximately equally distributed among clients in Fulton County in 2021. Specifically, 114 people identified as having a developmental disability, 96 people identified as having a drug use disorder, and 112 people identified as having a physical disability.

According to the 2021 Fulton County CoC HMIS data, veterans report having a disability at a higher rate than the overall homeless population. Specifically, 227 of clients reported in HMIS were veterans (6%). Of these 227 veterans, 85 (38%) identified as having a disabling condition and 15 (7%) veterans that accessed homeless services in 2021 exited back into homelessness or a temporary living situation.

Racial Category	Count	Percentage
American Indian, Alaska Native, or Indigenous	13	<1%
Asian or Asian American	23	1%
Black, African American, or African	2928	80%
More Than One Race	75	2%
Native Hawaiian or Pacific Islander	6	<1%
White	617	17%
<b>Grand Total</b>	<b>3662</b>	<b>100%</b>

Source: Fulton County CoC HMIS Data, 2021

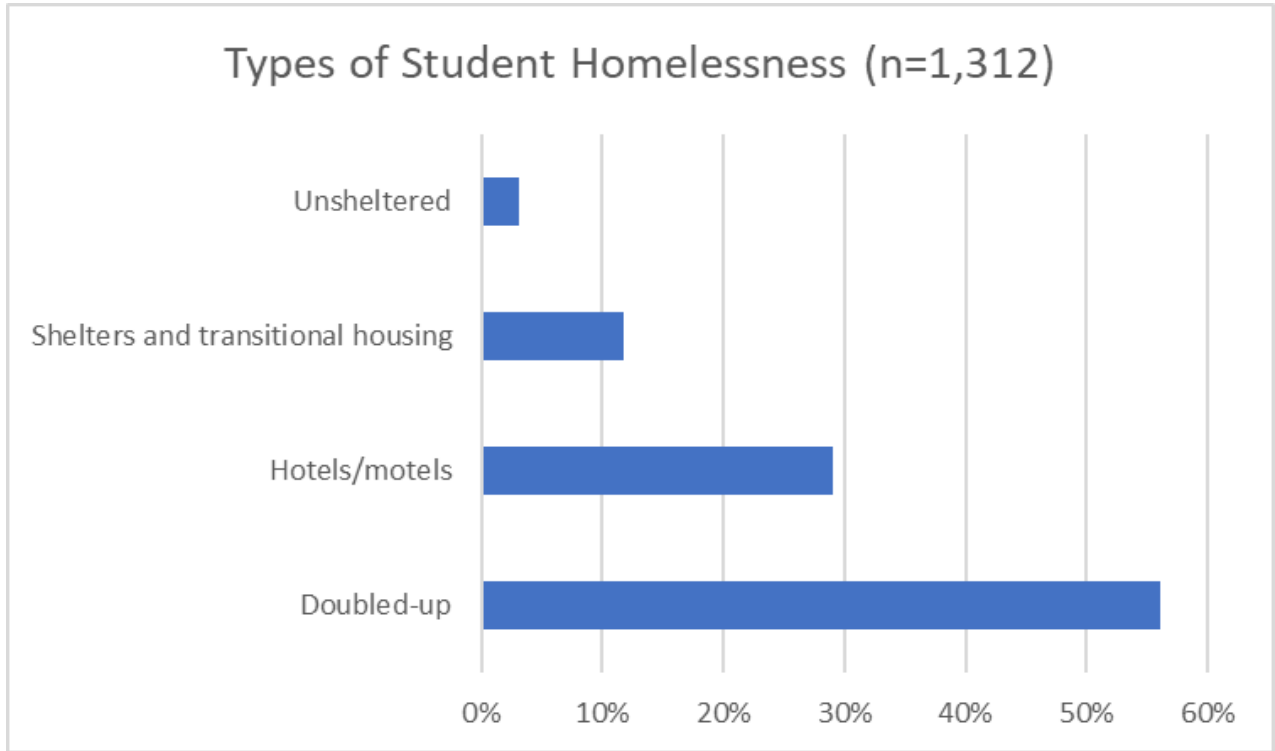
While the HMIS data provide an overview of people experiencing homelessness in 2021 that access services, the PIT Count provides a snapshot of homelessness in Fulton County on a given night. According to the 2020 PIT Count<sup>2</sup> conducted for Fulton County CoC, there were 78 people and 76 households that were sleeping in a place not meant for human habitation on the night of the count. One person that was unsheltered during the night of the count was under the age of 18 and 4 people were adult youths experiencing homelessness. Five of the people sleeping in a place not meant for human habitation on the night of PIT Count had a severe mental illness, 2 had a chronic substance use disorder, and 3 identified as veterans.

The Department of Education reports that 1,312 students enrolled in school during the 2019-2020 school year lacked a fixed, regular, and adequate nighttime residence in Fulton County.<sup>3</sup> Of the 1,167 students who disclosed their race, 91% identified as Black or African American, 3% identified as White, and 6% identified as two or more races. 15% of students experiencing homelessness in Fulton County had one or more disabilities (IDEA) and 5% were English learners. Types of homelessness include doubling up with friends or family members, staying in motels or hotels, staying in shelters or transitional housing, and sleeping in places not meant for human habitation (see Figure 2).

<sup>2</sup> [https://files.hudexchange.info/reports/published/CoC\\_PopSub\\_CoC\\_GA-502-2020\\_GA\\_2020.pdf](https://files.hudexchange.info/reports/published/CoC_PopSub_CoC_GA-502-2020_GA_2020.pdf)

<sup>3</sup> <https://www2.ed.gov/about/inits/ed/edfacts/index.html>

**Figure 2: Students Experiencing Homelessness**



**Table 4: Demographics in Fulton County**

	Homeless Population	General Population
Male	1,030 (27%)	205,642 (48%)
Female	2,794 (73%)	223,226 (52%)
Trans/Non-Binary/Questioning	12 (<1%)	
White	617 (17%)	203,725 (49%)
Black/African American/African	2,928 (80%)	150,728 (37%)
American Indian, Alaskan Native, or Indigenous	13 (<1%)	755 (<1%)
Asian/Asian-American	23 (1%)	47,470 (12%)
Native Hawaiian, or Other Pacific Islander	6 (<1%)	153 (<1%)
Hispanic/Latino	523 (13%)	37,470 (9%)

Under 18	3 (<1%)	113,340 (26%)
18-24	189 (5%)	31,489 (8%)
25-54	3,031 (79%)	181,243 (42%)
55 and over	599 (16%)	102,836 (24%)
Veteran	227 (6%)	17,246 (5%)
Disabling Condition	653 (17%)	37,330 (9%)
<i>of those with a disabling condition:</i>		
Physical Disability	112 (17%)	
Drug Use Disorder	96 (15%)	
Developmental Disability	114 (17%)	
Unaccompanied Youth		

**Data Sources:** 1. Fulton County CoC HMIS Data, 2021; 2. American Community Survey, 5-Year Estimates, 2020

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

To estimate the extent and demographics of people at risk of homelessness in Fulton County, this analysis takes into account prior living situations of people experiencing homelessness served by the Fulton County CoC, exit destinations of people who accessed programs and services within Fulton County CoC, and comprehensive housing affordability strategy data and definitions for Fulton County. The section identifies geographic and racial disparities that exist for people at risk of homelessness in Fulton County.

Almost a fourth of people that accessed homeless services in 2021 entered from an unstable housing situation. According to reporting in HMIS for 2021, 36 people (1%) were staying in an institutional setting before accessing services. 877 people (23%) entered the homeless system from a temporary housing situation or homelessness. Of the 877 people with a prior temporary or homeless living situation, 31% had been unstably housed for more than a year and 30% had been unstably housed more than 90 days but less than a year. In other words, the majority of people entering the homeless system from an unstable housing situation were experiencing instability for extended periods of time (i.e., three months or longer).

Almost half of clients recorded in Fulton County CoC HMIS in 2021 had an unknown exit destination or exited into a temporary or homeless living situation. HMIS reporting for 2021 in the Fulton County CoC does not indicate the exit destination of 43% (1,649) of clients. Of clients that have a known exit destination from the homeless system, 11% (229 people) of clients exited into temporary housing or homelessness. In 2021 in Fulton County, 54 clients exited into emergency shelter (including hotel or motel paid for with an emergency shelter voucher), 46 clients exited into a hotel or motel without an emergency shelter voucher, 86 people exited into a place not meant for human habitation, 17 clients exited into staying or living with friends temporarily, and 7 clients exited into staying with family temporarily. 87% of clients (199) that exited into temporary or homelessness were Black or African American and 26% (60) of clients had a disabling condition. According to 2021 HMIS data for Fulton County CoC, White clients exited into permanent housing at a higher rate (94%) than Black, African American, or African clients (87%).

**Table 5: HMIS Exits Counts and Percentages**

Exit Category	Count	Percentage
Homelessness and Temporary Settings	229	11%
Institutional Setting	6	0%
Permanent Housing	1,945	89%
<b>Grand Total</b>	<b>2,180</b>	<b>100%</b>

Comprehensive Housing Affordability Strategy (CHAS) data provides estimates on the extent of housing problems and housing needs in a community, particularly for low income households.<sup>4</sup> According to 2014-2018 CHAS data, there are 14,520 households that earn less than 30% of the Area Median Income (AMI) and are considered extremely low income. This represents 17% of all households within Fulton County. Of those households, 9,700 were renters, compared to 4,820 households who owned their place of residence. Similarly, of the 11,685 extremely low-income households that experienced one or more severe housing problems in Fulton county, 69% of households were renters. Severe housing problems are defined as:

1. Housing units lacking complete kitchen facilities;
2. Housing units lacking complete plumbing facilities;
3. Households that are severely overcrowded (defined as having more than 1.5 people per room; and

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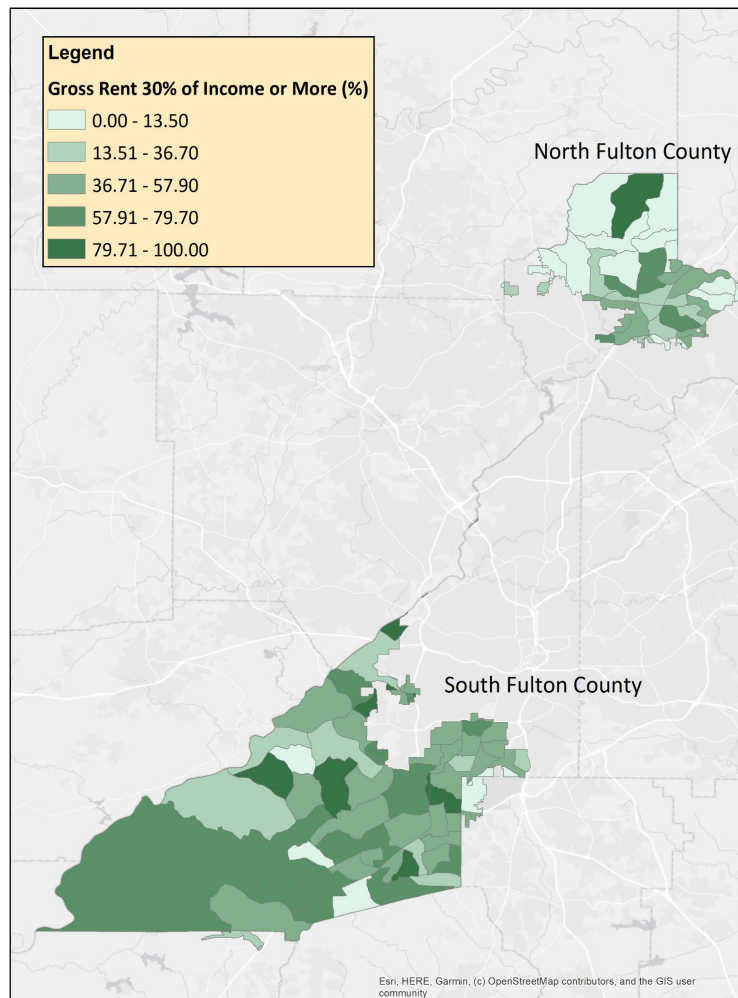
<sup>4</sup> It is also important to note that the most current CHAS data on which these estimates are based, reflect households that have not yet experienced the COVID-19 pandemic and the resulting economic impacts. Due to this fact, the data provided may be an underestimate.



- Households that are severely cost burdened (defined as spending over 50% of monthly income on housing costs).

Using the above definition, there are many census tracts in Fulton County – primarily in south Fulton County – that demonstrate a clustering of households with affordable housing needs (see Figure 3). Incorporated cities in South Fulton County as well as the remainder of unincorporated Fulton County all contain census tracts where more than 40% of households have at least one housing problem. Furthermore, several census tracts experience housing problems at an even higher rate than overall in Southern Fulton County. Census tracts extending between Camp Creek Parkway and Roosevelt Highway, and those along Old National Highway south to Burdett Road show that more than 50% of their households have at least one housing problem. Census tracts where households demonstrate one or more housing needs are generally tracts where the population is predominantly African American.

**Figure 3: Housing Affordability Among Renters as Percentage by Census Tract**

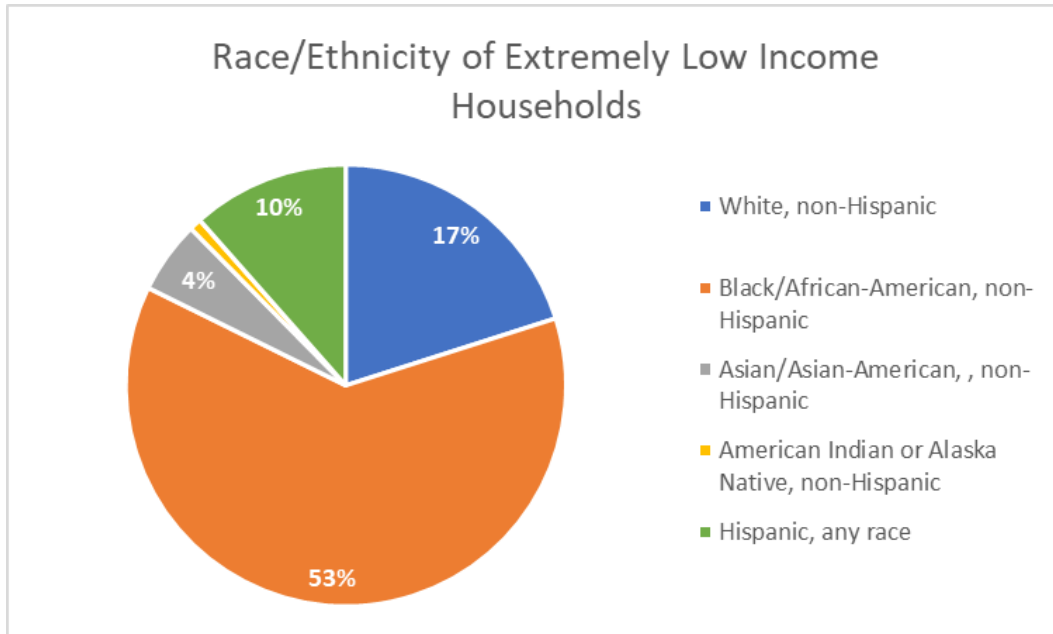


**Table 6: Income Distributions for Renters in Fulton County PJ**

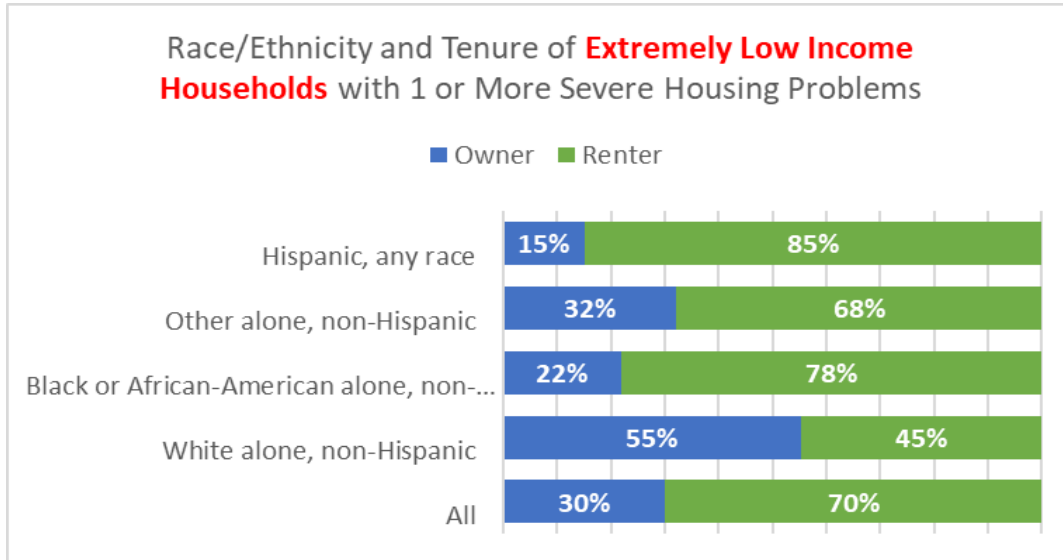
Income Distribution	Renter	% of Total Renters
Household Income <= 30% HAMFI	9,700	17%
Household Income >30% to <=50% HAMFI	9,230	16%
Household Income >50% to <=80% HAMFI	11,830	21%
Household Income >80% to <=100% HAMFI	6,510	12%
Household Income >100% HAMFI	19,145	34%
Total	54,420	100%

There are also racial disparities in who is more likely to have extremely low income, as well as which households experiencing severe housing problems are more likely to be renters or owners, as shown in Figures 4 & 5. Despite making up 37% of Fulton County residents, African-American households make up over half of those who are extremely low income. In addition, extremely low income White households are the only racial or ethnic demographic that is more likely to own their place of residence, rather than renting when experiencing severe housing problems. According to the ACS 1 year estimates for 2021, 9.6% of families live below the poverty level in Fulton County. Families with a head of household that identifies as Black or African American alone experience poverty at a higher rate (17.4%) than other racial groups.

**Figure 4: Distribution of Extremely Low Income Households by Racial and Ethnic Category**



**Figure 5: Distribution of Extremely Low Income Households with 1 or More Severe Housing Problems by Racial and Ethnic Category**



**Prison Re-entry Population**

According to the [Prison Policy Initiative](#), within the state of Georgia, prisons release about 17,200 people every year, and an estimated 404,000 residents are on probation and 21,000 are on parole. Georgia has an incarceration rate of 968 per 100,000 people (including prisons, jails, immigration detention, and juvenile justice facilities), significantly higher than the national average of 664 per 100,000 people. While

local data is not readily available, the large numbers of state residents under criminal justice supervision indicates a continuing need to address the housing and supportive service needs of this population in Fulton County. One percent (36) of clients that accessed homeless services in 2021 had been living in an institutional setting prior (jail, prison, or juvenile detention facility, long-term care facility or nursing home, substance abuse treatment facility, etc.).

[Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice](#)

A substantial portion of the population in Fulton County has encountered some form of intimate partner violence or stalking. The Centers for Disease Control estimates that 37.4% of women and 30.4% of men in Georgia have experienced any contact sexual violence, physical violence, or stalking by an intimate partner in their lifetimes. This equates to an estimated 83,487 women and 62,516 men living in Fulton County (excluding Atlanta), based on the 2020 American Community Survey 5-Year Estimate. An estimated 45.5% of women and 49.9% of men in Georgia have experienced any psychological aggression by an intimate partner, which equates to an estimated 101,568 women and 102,616 men living in Fulton County.

According to data provided by Partnership Against Domestic Violence in Fulton County, many people fleeing domestic violence and seeking housing services were young and living in a household with children. Fifty-seven households comprised of 109 individual survivors accessed the Partnership Against Domestic Violence's emergency shelter in Fulton County during 2021. Forty-seven percent (51) of clients were children and 2% (2) were grandchildren. The average size of households accessing the domestic violence shelter in 2021 was approximately two people and the average age of clients was approximately 24 years old. The vast majority of the heads of households who accessed shelter services were women (96%) and Black, African American, or African (80%). In addition, the majority of clients were Non-Hispanic/Non-Latinx and one client who accessed these services was transgender. The majority of clients who accessed the shelter in 2021 in Fulton County did not identify as having a disability.

Statistics at the state level indicate a recent rise in people accessing domestic violence intervention and crisis services. According to the [Georgia Coalition Against Domestic Violence](#), in FY2020, Georgia's 47 state-certified domestic violence programs sheltered 5,617 victims of domestic violence and their children. In 2021, there were 114,640 crisis calls to Georgia's certified family violence and sexual assault agencies, a 20% increase from 2020 crisis calls.

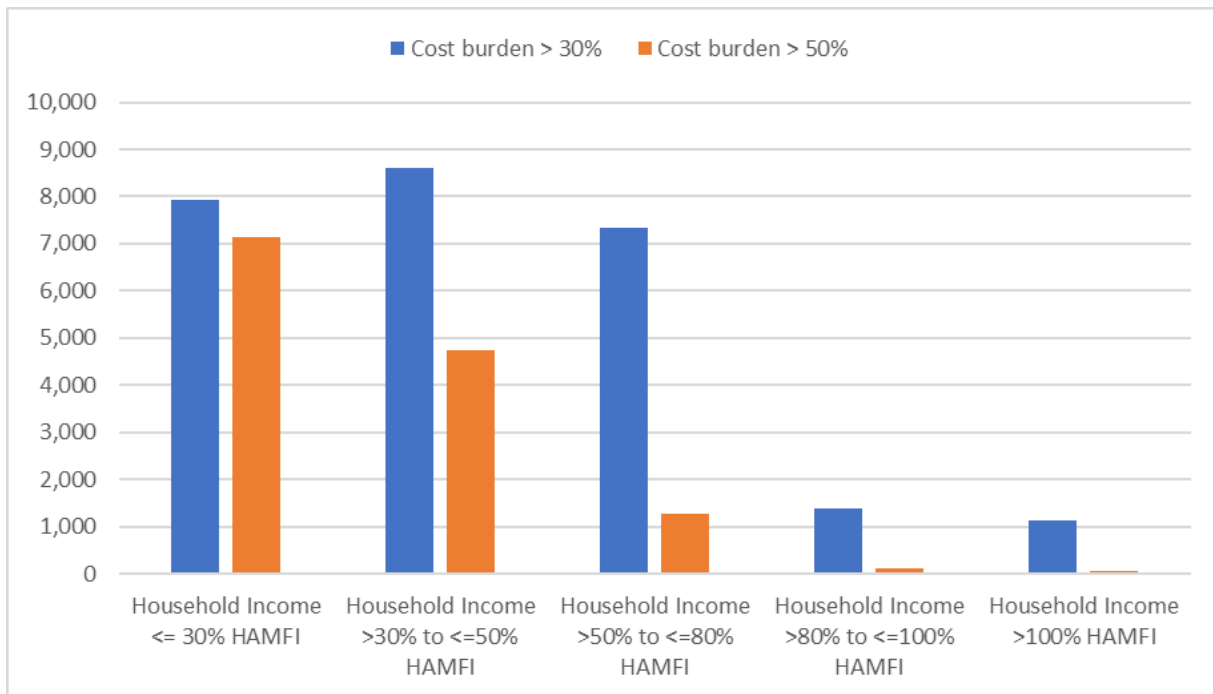
There is limited data regarding individuals fleeing or attempting to flee human trafficking within the state of Georgia or in Fulton County. However, data from the Human Trafficking Hotline indicates that there were 338 human trafficking cases reported in 2020 with 302 calls from victims and survivors within the state of Georgia. Of the 338 cases, 84% involved sex trafficking, 289 reported the survivor was female, and 75 cases involved a minor.

[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](#)

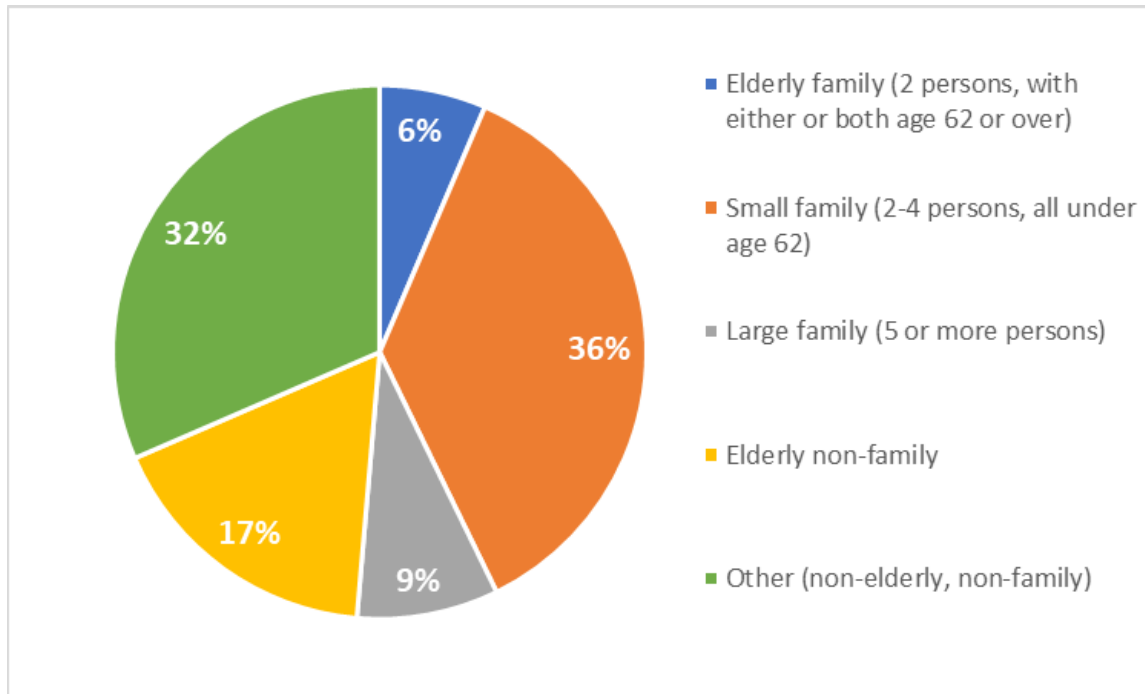
People experiencing housing cost burden and low income households in Fulton County are at risk of experiencing homelessness. According to 2014-2018 CHAS data, 46,005 households experienced a housing cost burden greater than 30%, with 57% of those households renting their place of residence.

Figure 6 shows the number of renter households that experienced a housing cost burden. 74% (8,615) of extremely low-income households and 55% of low-income households were severely cost burdened (paying more than 50% of income towards housing), within Fulton County (excluding the city of Atlanta). In addition, nearly a quarter of the extremely low income households that experienced a severe cost burden contained elderly persons, while over a third of households are small families, as shown in Figure 7. As was mentioned earlier, families in South Fulton County experience housing cost burden and poverty at a higher rate than North Fulton County.

**Figure 6: Cost Burden by Income Level for Renters**



**Figure 7: Household Type for Severely Cost Burdened Extremely Low Income Households**



**Elderly & Disabled Households**

Elderly individuals aged 70-74 are projected to be the largest growing age group in the county between the years 2016-2021 (Fulton County Government Department of Senior Services Annual Report, 2017). The largest areas of growth for the elderly, outside of Atlanta, are in north Fulton County. The 2020 Annual Homeless Assessment Report (AHAR): Part 2<sup>5</sup> confirmed an increase in the number of older adults experiencing homelessness nationwide. High costs of medical care and rising rents have contributed to an overall increase in homelessness among elderly and medically fragile populations.

**COVID-19 Emergency Rental Assistance**

Between January 2021-and October 2022, Fulton County households (consisting of 9,390 households) participated in the Emergency Rental Assistance Program (ERAP). A majority of households identified as Black/African-American and/or Female. Table 7 provides further demographic information of ERAP Utilization.

Since the pandemic, many people in Fulton County have relied on emergency rental assistance programs to maintain their housing and prevent them from becoming homeless. According to data released by the Fulton County Government, 85% (8,594) of people who applied for emergency rental assistance and/or utility assistance since March of 2021 were Black or African American.<sup>6</sup> 90% of applicants (8,737) were Non-Hispanic and 70% (7,102) of applicants were female. The average age of applicants was approximately 38 years old and the average family size of applicants was two people. The average annual

<sup>5</sup> <https://www.huduser.gov/portal/datasets/ahar/2020-ahar-part-2-pit-estimates-of-homelessness-in-the-us.html>

<sup>6</sup> <https://sharefulton.fultoncountyga.gov/stories/s/ucwd-hu4q/>

income of emergency assistance applicants was \$23,600. Without ongoing assistance, these households may be at greater risk for entering the homeless continuum.

**Table 7: ERAP Utilization Demographics in Fulton County**

Demographics	#	%
American Indian or Alaska Native	30	<1%
Asian	32	<1%
Black or African American	7326	90%
Mixed Race	449	6%
Native Hawaiian or Other Pacific Islander	12	<1%
White	339	<1%
Hispanic or Latino	365	5%
Not Hispanic or Latino	7,393	95%
Male	2,456	29%
Female	6,100	71%
Non-binary	21	<1%

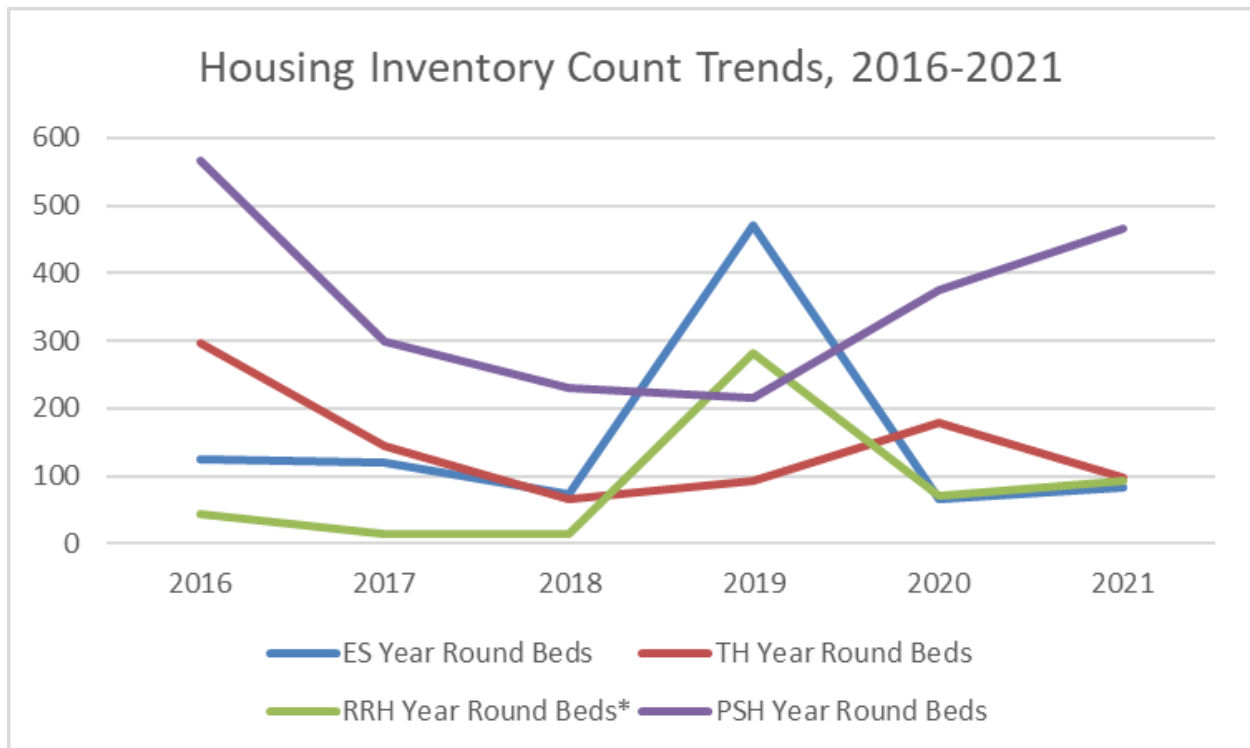


## Current Resources Available to Assist Qualifying Populations

### Housing Inventory for Homelessness

According to the 2020 Consolidated Annual Performance and Evaluation Report (CAPER), the County has ensured housing and services to address transitional housing and emergency shelter needs in Fulton County. There are approximately 1,422 total beds offered for people who are homeless by multiple agencies in Fulton County. This includes emergency shelter, transitional rapid re-housing and permanent supportive housing beds. There were hotel/motel nights provided to support 308 Shelter beds for Adults and 159 beds for families with children. There are also 4 beds for unaccompanied youth. In addition, there are 79 beds in transitional housing for families with children and 14 for Adults only plus 20 for Veterans. There are also 4 transitional housing beds for unaccompanied youth.

The Housing Inventory Count (HIC) provides a snapshot of resources available to people experiencing homelessness throughout Fulton County CoC on one night in January. According to the 2021 HIC, Fulton County CoC provided 28 Permanent Supporting Housing year-round beds for survivors of domestic violence. Since 2019, Fulton County CoC has notably increased PSH beds after experiencing a decrease in PSH beds starting in 2016 as shown below.



\*RRH include Demonstration Project (DEM) for 2016

Fulton County also provides funds to organizations that provide case management and housing navigation services to assist homeless individuals and families, including those staying in emergency shelters, make the transition to permanent housing and prevent returns to homelessness. Specifically, the County uses ESG funds for rapid rehousing. Traveler's Aid provides case management, legal representation and counseling, emergency financial assistance, and rental assistance. Fulton County Department of Community Development also partners with multiple agencies for the provision of Transitional Housing

(5 agencies) and Permanent Supportive Housing (8 agencies) in Fulton County. Services that are provided to prevent homelessness include:

- North Fulton Community Charities provides emergency financial assistance, thrift shop, food bank, government benefits screening, and rapid rehousing.
- The Community Assistance Center provides rental assistance, food, clothing and education resources for homelessness prevention.
- LIFT Community Development Corp. provides housing and shelter referrals, life and financial skills training, food and clothing giveaways, transportation assistance, education and employment referrals, and mental health and wellness assessments.
- HOPE Atlanta (Travelers Aid) provides rental and security deposit assistance, housing search assistance, one-on-one support, and rapid rehousing, as well as emergency services, crisis intervention, transitional and permanent supportive housing for persons living with HIV/AIDS. HOPE Atlanta's Supportive Services for Veterans and their Families Program funds rapid rehousing and prevention assistance to homeless veteran households.

### **ESG & HOME-Funded Projects**

According to Fulton County's 2020 CAPER, HOME and ESG funds have been used to further affordable housing and homeless prevention through the following programs: down payment assistance, homeless supportive services, homelessness housing and prevention, homeowner rehabilitation, and rental assistance. There were 847 persons served through all the programs funded with HOME & ESG funds in 2020 and Table 8 further describes the families assisted:

- 89 households were assisted through down payment assistance
  - 534 people were assisted through supportive services
  - 153 people experiencing homelessness were provided overnight shelter
  - 30 homeowner houses were rehabilitated
- 67 households were assisted through tenant-based rental assistance (TBRA) or Rapid Re-Housing (RRH).

**Table 8: Assistance to racial and ethnic populations by source of funds\***

Racial Category	HOME	ESG
White	0	105
Black or African American	82	590
Asian	0	6
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	0	1
Multi-Racial	5	0

In addition, as identified in the strategic plan, HOME funds have been allocated to construct or preserve 30 units of affordable housing.

**Additional Housing Assistance Programs**

Fulton County residents are served through a variety of assisted housing programs – including public housing, housing choice vouchers, project-based Section 8 units, Section 202 units, Low Income Housing Tax Credit (LIHTC) properties, and Fulton County’s home repair programs and homeownership assistance programs. Number of units and income and family type targeting are summarized below, sourced from the 2020-2024 Fulton County Consolidated Plan:

- *Public housing* – HUD reports about 680 public housing units in Fulton County, including seven apartment communities and about 60 scattered site units, targeted to residents with incomes at or below 50% AMI. Three communities with a total of 56 public housing units – Legacy at Walton Lakes, Woodbridge at Parkway Village, and Providence at Parkway Village – are targeted to seniors.
- *Housing Choice Vouchers* – HUD estimates that there are 3,695 tenant-based HCVs in use in Fulton County, targeted toward senior and family renters with incomes at or below 50% AMI. Eighteen (18) Veterans Affairs Supportive Housing vouchers are also in use. In addition to HUD

vouchers, Fulton County provides tenant-based rental assistance (TBRA) using HOME grant funds. Under the last Consolidated Plan, the County provided TBRA to about 100 households.

- *Project-Based Section 8* – There are six properties with 533 units targeted to households with incomes at or below 50% AMI with project-based Section 8 rental assistance in Fulton County. Most of these units (371) are targeted to seniors and the remaining units (162) are family properties.
- *Other multifamily housing* – Fulton County has three properties with about 122 units with Section 202 (Supportive Housing for the Elderly). These are targeted to seniors with incomes at or below 50% AMI.
- *Low Income Housing Tax Credits (LIHTC)* – According to HUD’s Affirmatively Furthering Fair Housing data and LIHTC database, there are about 28 LIHTC properties in Fulton County with about 4,000 units targeted to residents with incomes at or below 50% or 60% AMI. About 3,300 units were in family properties and 700 in senior properties.
- *Fulton County Home Repair Services* – The County offers home repair assistance through a Homeowner Rehabilitation Program funded with CDBG funds and a Minor Home Repair Program run by the Department of Senior Services. About 28 homeowners with incomes at or below 80% AMI participated in the Homeowner Rehabilitation Program under the last Consolidated Plan.
- *Fulton County Home Owner Program* – The County assists eligible households with incomes at or below 80% AMI with down payment and closing cost assistance of up to 6% of the home’s sale price up to \$10,000. The County assisted about 85 households under the last Consolidated Plan.

#### Unmet housing and service needs of qualifying populations:

Overwhelmingly, one of the biggest unmet housing and services needs of all qualifying populations is the lack of affordable housing. The following impediments were identified within Fulton County with the 2020 CAPER:

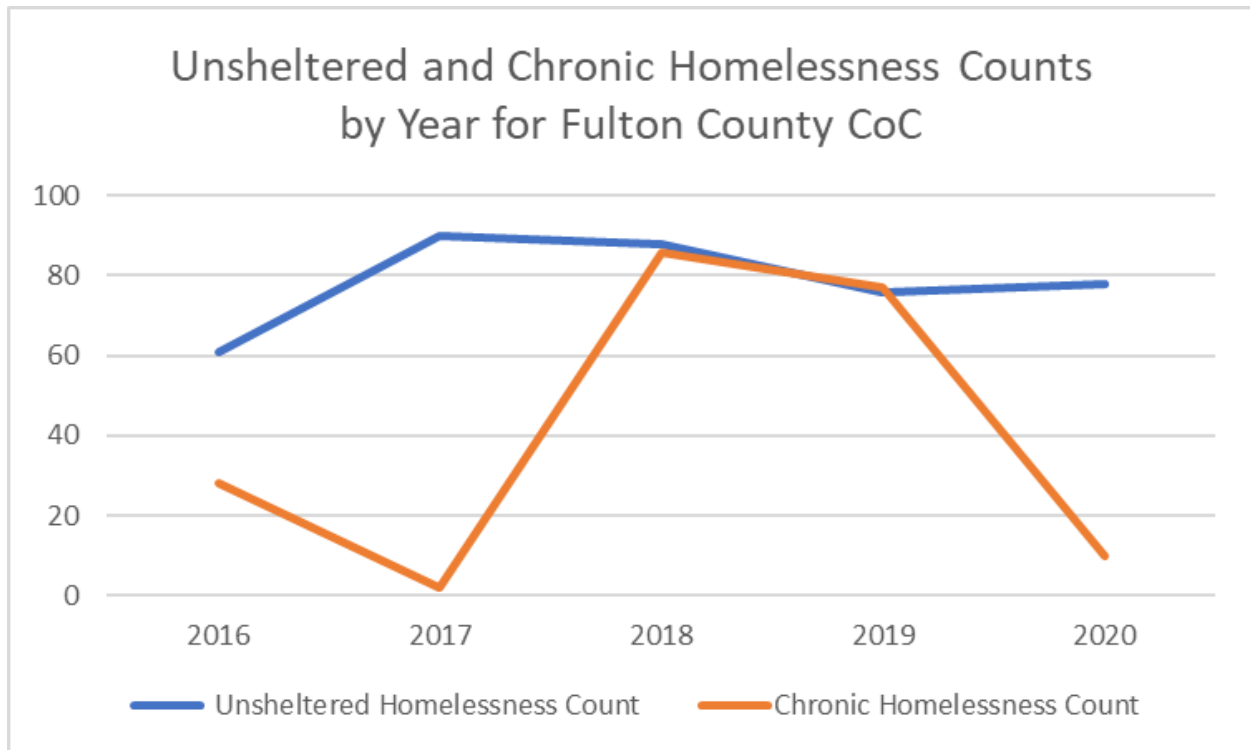
- Affordable housing options are limited in areas of opportunity
- Loss of affordable housing, lack of increase in affordable housing supply, and displacement of residence
- Continued need for investment in neighborhoods and human capital in areas with high racial and ethnic concentrations of poverty
- Insufficient housing for people with disabling conditions near transit and opportunities
- Need for programs and resources accessible to people with limited English proficiency

#### Homeless as defined in 24 CFR 91.5

In terms of disparities among the homeless population, Black, African American, or African, males, and people with a disability in 2021 exited into temporary or homeless situations at a disproportionately higher rate than enrollments. Black, African American, or African clients made up 88% of known exits into homelessness or a temporary housing situation. That means the Black or African American clients exited from homeless programs at a higher rate than they entered into the homeless system (80% of clients enrolled in homelessness programs were Black, African American, or African). 26% of clients that exited into homelessness or a temporary housing situation had a disabling condition. Compared to the rate of

enrollments into homeless programs (27%), males were exiting into homelessness or temporary housing at a higher rate (43%). These subpopulations are disproportionately not benefiting from resources targeted at people experiencing homelessness.

The number of people experiencing unsheltered homelessness during the night of the PIT Count has remained steady, with a slight uptick between the years of 2016 to 2017. According to the PIT Count, chronic homelessness has fluctuated over the past few years. Chronic homelessness peaked over the past 5 years in 2018 and 2019.



Spikes in chronic homelessness in recent years suggests a need for longer term housing and intensive supportive services to ensure housing stability. There is also a need for resources that can reach people experiencing unsheltered homelessness and open pathways to rapidly house people from places not meant for human habitation. Additional shelter capacity may be needed in order to reduce the number of unsheltered homeless. Stakeholders reported that shelter options are limited in the County, particularly in North Fulton. There is no low-barrier shelter in the County, and hotel/motel vouchers are costly. Stakeholders also confirmed the need for services for individuals once housed, particularly mental health, substance abuse and case management services. Navigation services were also identified by stakeholders as needed to assist people experiencing homelessness successfully navigate the service system and effectuate successful placement in permanent housing.

For formerly homeless families and individuals nearing the end of rapid re-housing assistance, affordable permanent housing is a critical need to prevent a return to homelessness. Other needs include increased, sustainable income (earned and unearned); access to Social Security disability and other mainstream benefits; linkages to health, mental health, and legal services; access to affordable transportation and childcare; and budget counseling, life skills, and other case management and supportive services.

At Risk of Homelessness as defined in 24 CFR 91.5

With 16,694 available rental units within the Fulton County HOME PJ, less than 5% of units are affordable to households below 30% of area median income (AMI). Based on the number of households with extremely low income and severe housing problems, this left a gap of 5,235 units needed to reduce the likelihood that these households might experience homelessness.

[The National Low Income Housing Coalition's 2021 Out of Reach](#) data examines rental housing rates relative to income levels for counties and metro areas throughout the U.S using HUD Fair Market Rents (FMR). Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40th percentile gross rent (i.e., rent plus utility costs) for typical, non-substandard rental units in the local housing market. To afford a two-bedroom rental unit at Fulton County's 2021 FMR of \$1,185 without being cost burdened would require an annual wage of \$47,400. This amount translates to a 40-hour work week at an hourly wage of \$22.79, a 137-hour work week at minimum wage, or a 39-hour work week at the county's average renter wage of \$25.52. To afford a three-bedroom unit at the FMR of \$1,491 would require an annual wage of \$59,640.

In addition, wait times for an affordable and accessible unit can be long for applicants on the public housing or Housing Choice Voucher wait list. HUD's Picture of Subsidized Households data shows that the average household holding an HCV administered by the Housing Authority of Fulton County waited about 2.5 years before receiving it and similar wait times were typical for public housing units. This suggests a general need for more affordable housing options for people with disabilities as well. The HAFC indicated its waiting list was closed and that a high number of vouchers are returned because there is an insufficient pool of landlords willing to accept an HCV. Rents have been increasing, and FMR/Payment Standards cannot compete with market rents, even though HAFC has increased its Payment Standards to 110% FMR. Landlords can be selective in who they lease to given the state of the market and rents they can demand. Fair Housing providers consulted for this Allocation Plan indicated there is no source of income protection in Fulton County.

Stakeholders reported a decrease in resources available for households facing eviction; further, Atlanta Legal Aid indicated that many landlords are unwilling to accept any form of payment unless it is for full arrearage. Due to a lack of affordable inventory, stakeholders expressed a need to keep people housed so as to avoid an increase in shelter census or unsheltered homelessness.

The North Fulton County Homeless Needs Assessment indicated that assistance with motel bills topped the list of unmet needs, having been cited in 235 2-1-1 contacts over the 2019-2021 period. This need is followed by the closely related need for motel vouchers to assist with housing people experiencing homelessness. The consistent presence of these two needs at or near the top of the ranked unmet needs from each of the three years studied may indicate a need for increased shelter capacity to prevent people from having to seek temporary housing in motels in the first place.

According to the stakeholders consulted during the development of this Allocation Plan, the following needs were identified:

- Affordable housing for: seniors; people with disabilities,
- Housing with supportive services for people with behavioral health issues and homeless youth
- Permanent Supportive Housing

- Case management, system navigation, housing search and placement, financial literacy, landlord/tenant mediation, legal services
- Services and housing options for re-entry population
- Expanded mental health services
- More homeless shelters located in South Fulton
- More resources for homeless prevention; it is easier to keep someone housed than to rapidly rehouse them
- Need for outreach services to people who are homeless in North Fulton County, such as showering and laundry services.

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

While there are no comprehensive estimates of the number and type of families experiencing domestic violence, dating violence, sexual assault, stalking, or human trafficking in Fulton County, input from local service providers indicate continuing need with regards to emergency shelter, supportive services, and affordable housing. Shelter options for victims of domestic violence are limited-many individuals fleeing domestic violence don't feel comfortable or safe going to a mainstream shelter.

According to the 2021 HIC, the Partnership Against Domestic Violence provides a permanent supportive housing program dedicated to providing housing to adults and children fleeing domestic violence in Fulton County CoC. This PSH program makes available approximately 28 beds and has 9 rooms for survivors. According to aggregate data provided by the Partnership Against Domestic Violence about their facility, most of the people served in 2021 in Fulton County were families and young people. Based on this data, there is a need for programs and services targeted for families and young people fleeing domestic violence in Fulton County.

#### 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 lack of affordable housing can be a significant hardship for low- and moderate-income households and prevent them from meeting other basic needs. Stakeholders and residents reported that affordable housing for families and individuals is a significant issue in Fulton County, and according to the 2016-2020 ACS, housing costs have increased substantially for renters over the last six years. The 2016-2020 Five-Year ACS estimates that there are 170,701 housing units in Fulton County (sans Atlanta), with an occupancy rate of 92%. This is an increase of 6% from the previous five-year estimate. Additionally, rent has been skyrocketing within Fulton County. Median contract rent was about \$821 according to the 2011-2015 ACS and \$1,098 in the 2016-2020 ACS, a 34% increase. American Community Survey data also shows considerable variation in rent and housing costs across Fulton County, with much higher housing costs in the North than in the South.

Affordable housing units for low-income households are geographically concentrated in South Fulton County. The Joint Analysis of Impediments to Fair Housing Choice for the City of Atlanta and Fulton County completed in conjunction with the 2020-2024 Consolidated Plan shows that most affordable housing developments (LIHTC, public housing, project-based Section 8 housing, and other assisted multifamily developments) are in South Fulton County. Housing choice vouchers are also more likely to be used in south Fulton County. Thus, there is potentially a need for more affordable housing units within North



Fulton County to ensure an equitable geographic distribution of resources and opportunities for lower income households. Stakeholders confirmed that in addition to few/no shelter options in North Fulton, there is a shortage of landlords willing to accept rental assistance.

Additionally, seniors and persons with disabilities both find their mobility services limited based on where they live. MARTA Mobility, the paratransit service serving Fulton County, requires that riders live within one mile of a bus line. This restriction can prove difficult for seniors and persons with disabilities living in suburban and rural areas of Chattahoochee Hills, South Fulton, Fairburn and Palmetto, and particularly in car-centric areas of Alpharetta, Johns Creek, Roswell and Mountain Park. Furthermore, service providers note a growing number of elderly that are aging in place that may require accessible units, accommodations for live-in aids or other supports to prevent institutionalization. In addition stakeholders reported that it is difficult to find supportive housing for individuals with behavioral health needs and developmental disabilities.

### Gaps Within the Shelter, Housing Inventory, and Service System

According to data from both the point-in-time count and stakeholder input there is a high level of need for homelessness services in North and South Fulton County. There is a recognition that homelessness in North and South Fulton is often less visible than that in the City of Atlanta, as people are living with relatives, in vehicles, or in abandoned buildings. Stakeholders emphasized that homeless individuals often have many needs, including mental health, counseling, and housing, among others, and that getting assistance for these needs is generally a cumbersome process. Participants in interviews and focus groups noted a particular need for:

- Housing that provides access to services and needs such as case management, system navigation, housing search and placement, financial literacy, landlord/tenant mediation and legal services
- Emergency shelter facilities. Providers noted a particular lack of shelter facilities and services in North Fulton.
- Supportive services and housing options for people returning from prison to reintegrate them with society and prevent them from becoming homeless.
- Expanded mental health services.
- Low Barrier Shelter
- Low Barrier Permanent supportive housing.

For the at-risk populations, although there are 80,975 rental units available within Fulton County, less than 5% are affordable to those with extremely low income even though renter households with extremely low income make up 19% of Fulton County's population.<sup>7</sup> The estimated gap in affordable housing is estimated to be at least 5,235 units. However, this estimate is based on data from 2018. Due to the impact of the COVID-19 pandemic, rising costs of rent, and inflation (both nationally and statewide), this gap is most likely an underestimate.

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<sup>7</sup> Extremely low-income renter households in proportion to the general population calculated using 2020 ACS 5-Year Estimate Table S1101 and 2014-2018 CHAS data.

Additionally, the Fulton County Housing Authority reported six Low-Income Housing Tax Credit (LIHTC) properties in Fulton County will age out of the 30-year affordability period. These are all family properties and together have about 800 units of income-restricted units. Another 16 LIHTC developments with about 2,800 income-restricted units – including a mix of family and senior properties – will enter or be in their 15-year extended use period, during which they may potentially be eligible to request regulatory relief to convert to market-rate.

#### Supportive Housing Needs for Vulnerable Populations

In FY2020, 15,694 victims and their children were turned away from domestic violence shelters due to lack of bed space in the state of Georgia. This indicates a need for additional shelter space for this qualifying population.

According to 2021 HMIS data for Fulton County CoC, people with disabilities exit into a temporary living situation or homelessness at a higher rate than their entry into the homeless system. People experiencing homelessness in Fulton County report having a higher disability than estimated for the overall population. This population would benefit from targeted federal, state, and local resources (e.g., expanded Medicaid programs, developments close to medical care, and more rental assistance and subsidized housing) to support people with disabilities get into and maintain their housing.

#### Additional Characteristics Associated with Instability and Risk of Homelessness

The scarcity of housing affordable to individuals and families with very low incomes place vulnerable households at an even greater risk of eviction or homelessness. As identified in Fulton County's Consolidated Plan, individuals and families with an imminent risk of experiencing homelessness, typically have a combination of financial factors present in their lives. These include but are not limited to: job loss or reduction in work hours; loss of Supplemental Security Income (SSI) or Social Security Disability (SSDI); increased childcare, medical, or transportation costs; and chronic physical or mental disabilities. In addition to economic factors, substance abuse and family problems (divorce or death of a family member) are contributing factors to homelessness.

#### Housing Needs Related to COVID-19 Impacts

The needs faced by Fulton County residents relating to COVID-19 have been extensive and varied as the pandemic has exacerbated affordability issues and other housing needs such as job loss, healthcare challenges, and related anxiety, stress, and mental health needs impacting Fulton County residents. For most of the pandemic, Fulton County (including Atlanta) has had the highest number of COVID-19 in the state of Georgia. A study by Georgia State University found that areas within Fulton County with higher proportions of Black residents (particularly in South Fulton County) had a higher percentages of the population test positive for COVID-19 and had a higher percentage of deaths due to COVID-19<sup>8</sup>.

The pandemic has also precipitated historically unprecedented levels of unemployment and has presented increased challenges for essential workers. Initial claims for unemployment insurance in Fulton County for the month of March 2020 numbered 44,097 compared with a figure of 1,815 for March of 2019, a 2,330% increase (Georgia Department of Labor, Statewide Unemployment Insurance Initial Claims Report, March 2020). Additionally, essential workers who continued to work during the shutdown faced

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<sup>8</sup> <https://ghpc.gsu.edu/2021/05/27/covid-19-health-disparities-exist-within-a-single-metro-county/>

childcare challenges due to schools being closed and transportation needs because of significant cuts and reorganization of public transportation service.

According to the Atlanta Legal Aid, many landlords will only accept payment toward rent arrears if it pays the arrearage in full.

### Priority Needs for Qualifying Populations

Based on the preceding information, the priority needs among the qualifying populations include, but are not limited to:

- Increased affordable housing for all qualifying populations, including increased accessible and affordable housing for people with disabilities
- A geographic distribution of housing resources that is more equitable between North and South Fulton County, including providing more affordable housing in North Fulton County
- Additional housing resources for individuals and families Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking. These housing resources should be able to accommodate family and youth.
- More housing programs suited for people with disabilities so that they do not return to homelessness.
- Overrepresented populations in Fulton County's homeless system, such as Black or African American, people with disabilities, and women, require equitable access to services to remove barriers and obtain stable housing.

### Explain How the PJ Determined the Level of Need and Gaps

The needs and gaps assessment is informed by a variety of sources that report on homelessness, poverty, domestic violence, health, housing inventory counts, and state, local, and federal assistance for the general and special populations. To evaluate the size and demographic composition of qualifying populations within its boundaries, the HOME-ARP PJ enlisted the help of the Fulton County CoC HMIS Lead and Partners Against Domestic Violence to provide recent data on homelessness and domestic violence (respectively). The following publicly available resources were utilized to determine the level of need and gaps in services and housing resources:

- [Point in Time Count, 2020 for Fulton County CoC](#)
- [Housing Inventory Count, 2020 for Fulton County CoC](#)
- [Comprehensive Housing Affordability Strategy \(CHAS\), 2014-2018](#)
- [American Community Survey \(ACS\), 2016-2020](#)
- [Data published by the Prison Policy Initiative](#)
- [National Human Trafficking Hotline](#)
- [Georgia Commission on Family Violence](#)
- [Center for Disease Control's National Intimate Partner and Sexual Violence Survey](#)
- [Intimate Partner and Sexual Violence Survey State Report, 2017](#)
- [Homeless Student Enrollment Data from Local Educational Agency, SY 2019-20](#)
- [Emergency Rental Application Program data published by the Fulton County Government](#)
- [National Low Income Housing Coalition data, 2021](#)
- [2020-2024 Fulton County Consolidated Plan](#)

- [2020 Fulton County Consolidated Annual Performance and Evaluation Report \(CAPER\)](#)
- North Fulton County Homeless Needs Assessment

### 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:*

Fulton County will issue a Request for Proposals (RFP) from developers, service providers, and/or subrecipient organizations wishing to undertake HOME-ARP Activities. The RFP will, at a minimum, specify eligible applicants, eligible activities, minimum and maximum funding amounts, application thresholds, and underwriting criteria, and will provide instructions on how to submit an application for funding.

Applications may be evaluated according to criteria such as organizational or developer experience, capacity, demonstrated effective grant management experience, services offered, housing need, project readiness, financial capacity to provide 100% of operating expenses, leveraged resources, and whether the proposed project(s) will be maintained during the restricted use period, among other factors.

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

Fulton County will not directly administer and oversee its eligible activities beyond planning and administration. Rather, it will enter into HOME Agreements with developers of affordable rental housing projects and/or non-congregate shelter, and execute subrecipient agreements with service providers. The County will provide oversight and management of its developer and subrecipient agreements.

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

Fulton County will not be distributing any portion of its HOME – ARP administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

### Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 300,000		
Acquisition and Development of Non-Congregate Shelters	\$ 500,000		
Tenant Based Rental Assistance (TBRA)	\$ 365,000		
Development of Affordable Rental Housing	\$ 1,020,007		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%

Administration and Planning	\$ 243,581	10 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 2,428,588</b>		

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

The HOME-ARP budget was driven by the priority needs identified as a result of stakeholder consultation and data analysis. Fulton County will distribute approximately 40% of its HOME-ARP allocation for the development of affordable rental housing. An overall lack of affordable rental units was one of the most frequently identified unmet needs among stakeholders. Tight rental markets and high rents make it extremely difficult for housing and service providers to find units that are affordable and in decent condition for their clients. The County is prioritizing the creation of affordable housing units for qualified populations. In addition, the County is allocating approximately 15% of its HOME-ARP funds for Tenant Based Rental Assistance, which could support tenants occupying HOME-ARP assisted units, or could be used to assist HOME-ARP Qualifying Populations in privately owned units.

The County will reserve 12% for supportive services, recognizing that long term supportive services are critical to ensuring stability and success in permanent housing for vulnerable households. Finally, Fulton County will allocate approximately 20% of its HOME-ARP Allocation for the acquisition/development of non-congregate shelter. 10% of the allocation will be used for administration/planning activities.

HOME – ARP funds will be used for individuals or families from all of the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability.

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

The affordable rental housing inventory in Fulton County is severely limited, a challenge that existed long before, and has been exacerbated by, the pandemic. There is increased competition for fewer affordable units throughout the County. This is evidenced by the housing gap exceeding 5,000 units identified by CHAS data. Privately owned units are no longer available for affordable housing in many places as landlords are no longer willing to accept rental assistance or have tenant selection policies that act as barriers for special needs populations. Stakeholders reported that many of the PSH units available in the County are not low-barrier and therefore are not available to many of the HOME-ARP Qualifying Populations. The County will provide resources to create new affordable units for the HOME ARP Qualifying Populations. Further, stakeholders reported a lack of shelter options in the County, particularly low-barrier shelter options. This is confirmed by the relatively stable number of unsheltered individuals identified during the County’s PIT counts. Shelters lack bed capacity for households experiencing homelessness, and many families are sheltered in hotels which is costly. Due to lack of affordable inventory, it is increasingly challenging to move folks out of shelter into permanent housing. As such, the County will provide resources to create new non-congregate shelter options. Success in permanent housing is contingent on long-term services; coupled with the fact that inventory is low,

there is a local desire and emphasis on keeping people housed. Therefore, the County will focus resources on providing tenant-based rental assistance and services to households to ensure housing stability. Stakeholders reported a variety of services that were needed but not available, such as case management, system navigation, housing search and placement, financial literacy, landlord/tenant mediation, legal services, all services that will help maintain stability in housing.

In 2023, the Fulton County Board of Commissioners approved budget enhancements to increase support for non profit service providers, as well as additional funding to address affordable housing in the County. These resources are made available in addition to the County's HOME-ARP allocation, and together are intended to address the unmet housing and service needs of County.

#### **Nonprofit Support**

- **Community Services Program (CSP)** – (Funding - \$6.8M). In 2023 the Board of Commissioners (BOC) increased local general funding from \$5.3M to \$6.8M. CSP funds over 150 nonprofits annually. Grants range between \$25,000 to \$100,000. The services funded are in the areas of: Children and Youth Services, Disabilities, Economic Stability/Poverty, **Homelessness**, Senior Services and Health and Wellness. In 2022, 23 agencies were funded through CSP with grants totaling \$1,063,682. Funds are issued through an annual Request for Proposal (RFP) process.
- **Youth & Youth Homelessness Program** – In 2023 the BOC created a locally-funded Youth Homelessness Program to provide services and housing to youth experiencing homelessness. The program was funded with \$1M in local general funds. The program funds will be issued through a Request for Proposal (RFP) process.

#### **Affordable Housing**

- **Tiny Home Pilot Program** - On August 3, 2022, the Board of Commissioners approved \$1M in ARPA funds to develop and construct a tiny home community on up to 0.5 acres of County-owned property.
- **Wellspring Living** – On September 7, 2022, the Fulton County Board of Commissioners passed a resolution allocating a portion of the SLFRF Award it received under ARPA in an amount not to exceed \$500,000.00 (Five Hundred Thousand Dollars) for assistance to Wellspring for capital expenditures related to construction to expand Wellspring's Campus. Wellspring provides specialized recovery services on its 8-acre Fulton County campus (the "Campus") through residential and community-based programs for domestic sex trafficking victims and those at risk. The campus provides layers of services, including training and technical assistance, residential care, and transitional housing for women and families. Wellspring Living serves over 300 participants each year, a majority of which are from Fulton County.

## 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:*

It is anticipated that the County's HOME ARP funds will be used to create a minimum of five new units affordable to households at or below 30% AMI.

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

It is anticipated that the County's HOME ARP funds will be used to create a minimum of five new units affordable to households at or below 30% AMI. It is anticipated that the County's HOME-ARP Allocation will leverage other resources available for affordable housing for the qualifying populations, as described above. The County identified affordable housing inventory as one of its priority needs as a result of the Needs Assessment/Gap Analysis; providing funds for rental housing production directly supports the advancement of that goal.

## Preferences

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

While all four qualifying populations will be eligible to apply for housing, shelter and services assisted with HOME-ARP, Fulton County intends to establish preference for chronically homeless households, as defined by 24 CFR 91.5. Applicants that qualify for one or more preferences will be given priority admission based on length of time homeless. All other qualifying populations will be selected for services in chronological order of application.

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

The Fulton County PITs indicate a fluctuation in chronic homelessness over the last several years, reaching a peak in 2018 and 2019. The significant drop in chronic homelessness in 2020 may be a result of the pandemic. Spikes in chronic homelessness in recent years suggests a need for longer term housing and intensive supportive services to ensure housing stability. Chronically homeless individuals are often difficult to identify and engage, but are often most in need of housing and services. These populations often require intensive supportive services to achieve and maintain housing stability. These qualifying populations require assistance transitioning to housing, including permanent supportive housing, along with robust supportive services like case management, healthcare, legal services, and other supportive services. With better housing options and wrap-around services, these families will have a higher likelihood of becoming self-sustaining over time.

Establishing a preference for chronically homeless households will serve the most vulnerable among the HOME-ARP qualified populations by providing access to housing, rental assistance and services designed to ensure stability in housing.



## Referral Methods

*Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities.*

*PJ's may use multiple referral methods in its HOME-ARP program. (Optional):*

Fulton County will use the Coordinated Entry system as an indirect referral source. That is, the CE will be used for intake in order to add the eligible applicant to a HOME-ARP project waiting list, which will be selected from in accordance with the preference and prioritization (if any) described above.

Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project.

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

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be placed on the project(s) waiting list and admitted in accordance with the preference and prioritization (if any) established earlier in this Plan.

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

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project, and the CoC CE prioritization will not be utilized to prioritize admission to HOME-ARP assisted projects.

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

As indicated above Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project as it does not include all of the qualifying populations. Referrals will be accepted from other sources including emergency shelters, 2-1-1, Street Outreach programs and service providers. All referrals will be placed on the project(s) waiting list and admitted in accordance with the prioritization described earlier in this plan. Source of referral will not give one applicant preference or prioritization over another.

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

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:

**Fulton County is not establishing limitations on eligibility.**

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:

**Fulton County is not establishing limitations on eligibility.**

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):

**Not applicable.**

### HOME-ARP Refinancing Guidelines

Fulton County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing in order to rehabilitate the units with HOME-ARP funds. If the County determines that it will use HOME ARP for refinancing, the guidelines for doing so will be in conformance with the HOME-ARP program notice and will be submitted to HUD for review.

Appendix A: Consultation Materials

Appendix B: Citizen Participation

Appendix C: SF424s and Certifications