

ORDINANCE NO. 25-1853

AN ORDINANCE OF THE CITY OF DENTON APPROVING A SUBSTANTIAL AMENDMENT TO THE CITY'S 2021-2025 ACTION PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT, THE 2021 HOME-ARP ALLOCATION PLAN AND THE 2023-2027 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT AND THE CITIZEN PARTICIPATION PLAN; AUTHORIZING THE CITY MANAGER TO SIGN AND SUBMIT THE SUBSTANTIAL AMENDMENT; AND PROVIDING AN EFFECTIVE DATE.

WHEREAS, the City of Denton aims to provide quality affordable housing, a suitable living environment, and economic opportunities, principally for persons of low-to-moderate income; and

WHEREAS, the City of Denton has an interest in expanding access to tenant-based rental assistance for persons experiencing homelessness; and

WHEREAS, the City of Denton has \$639,039.11 of unprogrammed HOME Investment Partnership (HOME) Program funds from the 2021 to 2025 Action Plans for Housing and Community Development, as shown on the draft Substantial Amendment to the 2021, 2022, 2023, 2024, and 2025 Action Plans (the "Substantial Amendment"), which is attached hereto as Exhibit "A" and incorporated herein by reference; and

WHEREAS, the City of Denton funds a Tenant Based Rental Assistance ("TBRA") Program and a Supportive Services Program with HOME Investment Partnership American Rescue Plan (HOME-ARP) Program funds through funding agreements with Giving Grace and Our Daily Bread pursuant to Ordinance Nos. 23-527 and 23-259, both approved by City Council on April 4, 2023; and

WHEREAS the City of Denton intends to amend the 2023-2027 Consolidated Plan for Housing and Community Development to document the need for TBRA and Supportive Services and establish special preference for persons experiencing literal homelessness, as provided in the Substantial Amendment; and

WHEREAS, the Substantial Amendment will amend the 2021, 2022, 2023, 2024, and 2025 Action Plans to reallocate the unprogrammed HOME funds to TBRA, will amend the 2021 Action Plan and HOME-ARP Allocation Plan to reallocate HOME-ARP funds currently programmed for TBRA and Supportive Services solely to Supportive Services, will amend the 2023-2027 Citizen Participation Plan to reflect that reallocation of funds to an existing grantee may occur, and will revise the 2023-2027 Consolidated Plan to document the need for TBRA and Supportive Services and establish the same TBRA tenant preference for HOME-funded TBRA as for HOME-ARP funded TBRA; and

WHEREAS, allocating the unprogrammed HOME funds and amending the use of the HOME-ARP funds serves the public purpose of expanding affordable housing for persons experiencing homelessness in the City of Denton and meets an urgent need; and

WHEREAS, the City of Denton, as a recipient of funding through the National Affordable Housing Act of 1990, as amended, and HOME-ARP, has developed, using a citizen participation process, the Substantial Amendment to allocate \$639,039.11 in unprogrammed HOME funds for Tenant Based Rental Assistance and to allocate \$648,991.75 in HOME-ARP funds to Supportive Services for Tenant Based Rental Assistance; and

WHEREAS, citizen participation requirements, including a 30-day comment period, have been met; NOW, THEREFORE,

THE COUNCIL OF THE CITY OF DENTON HEREBY ORDAINS;

SECTION 1. The findings and recitations contained in the preamble of this Ordinance are found to be true and incorporated herein by reference.

SECTION 2. The City Manager, or their designee, is authorized to submit the Substantial Amendment to the U.S. Department of Housing and Urban Development.

SECTION 3. The City Manager or their designee is authorized to distribute funds and undertake any administrative actions necessary to implement the substantial amendments; and

SECTION 4. This ordinance shall become effective immediately upon its passage and approval.

The motion to approve this ordinance was made by _____
and seconded by _____, the ordinance was passed and
approved by the following vote [___ - ___]:

	Aye	Nay	Abstain	Absent
Gerard Hudspeth, Mayor:	_____	_____	_____	_____
Vicki Byrd, District 1:	_____	_____	_____	_____
Brian Beck, District 2:	_____	_____	_____	_____
Suzi Rumohr, District 3:	_____	_____	_____	_____
Joe Holland, District 4:	_____	_____	_____	_____
Brandon Chase McGee, At Large Place 5:	_____	_____	_____	_____
Jill Jester, At Large Place 6:	_____	_____	_____	_____

PASSED AND APPROVED this the _____ day of _____, 2025.

GERARD HUDSPETH, MAYOR

ATTEST:
INGRID REX, INTERIM CITY SECRETARY

BY: _____

APPROVED AS TO LEGAL FORM:
MACK REINWAND, CITY ATTORNEY

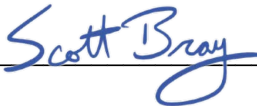
BY:  _____
Scott Bray
Deputy City Attorney

Exhibit A - Substantial Amendment

EXECUTIVE SUMMARY

This document serves as the City of Denton's Substantial Amendment for the 2021, 2022, 2023, 2024, and 2025 Action Plans for Housing and Community Development.

As a Participating Jurisdiction in the HOME Investment Partnership (HOME) Program through the U.S. Department of Housing and Urban Development, the City of Denton receives an annual allocation of HOME funds. The City releases an annual application for eligible entities to apply for HOME funds for housing projects through the Community Development Grant Program. The Community Services Advisory Committee (CSAC) considers applications and makes annual funding recommendations to City Council.

The City currently has a balance of \$648,104.79 in unallocated HOME funds and is required to commit these funds through a substantial amendment to remain in compliance with U.S. Department of Housing and Urban Development (HUD) regulations. In recent years, the City of Denton has received very few housing project applications through the annual Community Development Grant Program that are eligible for HOME funding. This has resulted in a significant amount of unallocated HOME funds for the second consecutive year. The size of City's annual allocation of HOME funding does not currently attract affordable housing developments and is unlikely to do so in the near future. The limited funds available, combined with significant federal requirements, can make it challenging for large-scale affordable housing projects to be implemented using HOME funding.

Staff evaluated eligible projects and community needs to utilize the unallocated HOME funding. Eligible activities for HOME funding include affordable rental housing, homeownership assistance, tenant-based rental assistance, land acquisition, and housing construction. Staff also evaluated community needs and any gaps in services.

1. According to the 2023-2025 City of Denton Consolidated Plan for Housing and Community Development, cost burden is a notable housing issue in Denton. Increasing the availability of affordable units could help alleviate the rent burden for many families. As identified in the housing needs assessment, households paying more than 30% or 50% of their income on housing experience one of the most common housing challenges, particularly among renters. Of the 24,423 cost-burdened households in Denton, approximately 19,808 (81.1%) are renter households, compared to 4,615 homeowners (18.9%). Cost burden remains a significant concern, especially for lower-income Denton renters. Approximately 13,118 single-person households may benefit from housing stability assistance programs such as rental assistance, affordable housing, homeownership opportunities, and income assistance programs. Additionally, Strategy 5A of the City's Affordable Housing Toolkit prioritizes eviction prevention strategies.
2. According to the 2025 Denton County Point in Time [Count](#) homeless census, 690 people are experiencing homelessness on any given night in Denton County, a 33% increase from 2024. Funding to assist people experiencing literal homelessness (living in a place not meant for human habitation, like a car, on the street, in the woods, or in a shelter) in Denton is limited or nearing full expenditure.

3. Pandemic relief funding allocated for rental assistance through the HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) program is nearing full expenditure estimated April 2026, leaving a gap in funding for rental assistance.

Allocation of Unprogrammed HOME Grant

The HOME Investment Partnerships (HOME) Program enables cities to develop flexible programs that help households afford the costs of market-rate units. These programs, known as Tenant-Based Rental Assistance (TBRA), provide payments to make up the difference between the amount a household can afford to pay for housing and the local rent standards. TBRA programs can also help tenants pay for costs associated with their housing, such as security and utility deposits.

Currently, the City has contracts with two local nonprofits allocating HOME-ARP funding for TBRA. Staff analyzed options to supplement the remaining HOME-ARP funding with HOME funding to extend the availability of TBRA in Denton and increase case management capacity to support individuals experiencing homelessness in obtaining and maintaining stable housing. To accomplish this, the City is required to amend the 2023-2027 Consolidated Plan, the 2021 through 2025 Action Plans, and the Citizen Participation Plan.

1. **2021-2025 Action Plans for HOME funds:** Allocate \$648,104.79 in unprogrammed HOME funds for Tenant-Based Rental Assistance (TBRA) and Supportive Services programs for individuals experiencing homelessness, including security and utility deposits. The City currently funds TBRA and Supporting Services with HOME-ARP funds.
2. **2021 Action Plan and HOME-ARP Allocation Plan:** Amend the use of an estimated \$648,991.75 in HOME-ARP funds from TBRA and Supportive Services to allocate funds solely to Supportive Services, prioritizing the case management of households transitioning to permanent housing.
3. **2023-2027 Citizen Participation Plan:** Update the 2023-2027 Citizen Participation Plan to award funds directly to a subrecipient to manage TBRA and Supportive Services programs instead of a notice of funding availability and a 30-day application period. The City of Denton currently contracts with two Denton nonprofit organizations managing the TBRA and Supportive Services programs.
4. **2023-2027 Consolidated Plan:** Revise the 2023-2027 Consolidated Plan for Housing and Community Development to document the need for TBRA and Supportive Services and establish the same TBRA tenant preference as the City's HOME-ARP funding that targets assistance to persons from four qualifying populations. Populations include people experiencing literal homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence, or other populations where services would prevent homelessness or would serve those at risk of housing instability, and include a special preference for persons experiencing literal homelessness.

Citizen Participation Process

Community engagement guidelines in the 2023-2027 Citizen Participation Plan were followed for this Substantial Amendment process. A notice on the Substantial Amendment was posted in the Denton Record Chronicle on Sunday, August 31, 2025. The affidavit of publication is included in Attachment 1. The notice provided a summary of the amendment and a 30-day comment period from September 1 through 30. A summary of the amendment was posted on the Community Development webpage. A notice was sent out via email to interested citizens, previous clients, committee members, local churches, participating lenders and realtors, neighborhood associations, and social services agencies. Staff also worked with Marketing and Communications to post information on social media.

Below are summaries of the two comments received during the 30-day comment period with staff comments:

1. Comment #1 from Kimberly Helsten
 - a. Summary: Commenter has concerns about the lack of transparency regarding the two non-profit organizations involved and requested that legal names be included in plan. The city has \$15 million in unspent funds for affordable housing, while facing a \$14 million deficit. If federal grants can support services for affordable housing, we should use the already approved bond funds. We need a clear plan for the bond funds before reallocating grant money or adopting new ordinances. Although we have exceeded our goals for affordable housing, many units are now vacant. Until these units are filled, we can't determine necessary support services. Denton should connect vacant units to residents in need rather than building more. Funding for residents receiving Tenant-Based Rental Assistance (TBRA) comes from a separate source. Using grants, TBRA funds, and general city funds for the same population takes resources away from the homeless. Grant reallocations should wait until the \$15 million is spent and the city stops using general funds for affordable housing. In the meantime, grant funds should focus on quickly housing those who are literally homeless. Support services at shelters should only be available after securing a bed. We do not need to reallocate grant funds for domestic violence services, as there are already existing resources for that purpose. Previous reallocations have reduced immediate housing support, leaving the literally homeless population without benefit from future grants when they need beds, food, and shelter urgently.
 - b. City's Response: The nonprofit agencies currently contracted to provide Tenant Based Rental Assistance (TBRA) and Supportive Services are Giving Grace and Our Daily Bread. As is standard practice with any Action Plan, entities will be named in the final plan. HOME-ARP funds are prioritized for individuals and households experiencing literal homelessness, and HOME funds allocation to TBRA will maintain the same priority. Funds provide rental assistance for families and individuals to move from homelessness into housing and receive case management support and wrap around services to maintain housing.

2. Comment #2 from Denton Affordable Housing Corporation (DAHC)
 - a. Summary: A member of DAHC staff expressed concerns about the City's decision to reallocate HOME funds to the Tenant Based Rental Assistance (TBRA) program. They highlight that the current TBRA implementation does not always lead to positive long-term outcomes, as participants can regress after being housed, resulting in repeated crises and high tenant turnover that costs landlords. DAHC stated that TBRA is inadequate for addressing chronic homelessness and suggests substantial program changes, including better assessments, stronger case management, and longer-term support. They urge the City to reconsider reallocating funds and invest in programs that combine housing with supportive services for those in need.
 - b. City's Response: The comments regarding client success and support throughout the program are appreciated and will be incorporated into adjustments to the program moving forward. Contracts with TBRA service providers will be amended to explicitly require ongoing housing stability support after people are placed in housing units. One service provider has already made changes to address program gaps, and City staff will continue to work with both vendors to ensure they have the appropriate plans and tools in place to prioritize client success in housing stability.

Timeline

An estimated timeline of the substantial amendment activities is below.

Estimated Timeline for Substantial Amendment

Activity	Date
Complete Substantial Amendment	August 29, 2025
Substantial Amendment Notice in DRC	August 31, 2025
30-day Comment Period	September 1 to 30
Substantial Amendment Approval – City Council	November 18, 2025
Submit Substantial Amendments to HUD	November 21, 2025
HUD Review	November 2025
Agreements to City Council	December 2025

HOME SUBSTANTIAL AMENDMENT: 2021, 2022, 2023, 2024, and 2025 ACTION PLANS

The City of Denton currently has \$648,104.79 in unprogrammed HOME funds from the 2021 through 2025 Action Plans. Below is a funding summary by program year and the reason for reallocating funds.

Action Plan/ Grant Year	Funding Available	Reason for Reallocated Funds
2021	\$3,589.83	Residual funds from Home Improvement Program close-out
2022	\$125,327.25	Unprogrammed Program Income
2023	\$9,658.00	Residual funds from DAHC's Rental Rehabilitation Program close-out
2024	\$140,310.03	Unprogrammed Program Income
2025	\$369,219.68	Unprogrammed Funds from the 2025 Action Plan
Total	\$648,104.79	

The substantial amendment for the HOME grant includes amending the 2021 to 2025 Action Plans and allocating funding for Tenant-Based Rental Assistance (TBRA) for rental assistance and supportive services, including security and utility deposits. The City currently funds TBRA and supportive services with HOME-ARP funds. The HOME-ARP grant will also be amended to change the use of funds to only supportive services for the TBRA program.

The following section in each Action Plan will be amended to include the substantial amendment for the TBRA program and funding.

1. **AP-05 Executive Summary** – This section will be updated to include a summary of the substantial amendment to allocate available funding to the TBRA program.
2. **AP-12 Citizen Participation** – This section will be updated to include the citizen participation process followed for the substantial amendment.
3. **AP-20 Annual Goals and Objectives** – This section will update the funding available, the needs addressed, and the goal outcome indicator due to the substantial amendment.
4. **AP-35 Projects** – This section will be updated to include a summary of the substantial amendment that creates the TBRA program, along with the funding available from this amendment.
5. **AP-38 Project Summary** – This section will be updated to include the TBRA program, including target area, goals supported, needs addressed, funding, description, target date, estimated number and type of families that will benefit from TBRA, location, and planned activities.
6. **AP-55 Affordable Housing Goals** – This section will be updated to include one-year goals for affordable housing, broken down by homeless and non-homeless individuals, for rental assistance.

HOME-ARP SUBSTANTIAL AMENDMENT: 2021 ACTION PLAN/HOME-ARP ALLOCATION PLAN

The 2021 Action Plan, which includes the HOME-ARP Allocation Plan, will be amended to change the use of an estimated \$648,991.75 in HOME-ARP funds for TBRA from rental assistance and supportive services to only supportive services.

The following section in the HOME-ARP Allocation Plan will be amended to include the substantial amendment for the TBRA program and funding.

1. **Introduction** – This section will be updated to include a summary of the substantial amendment to allocate the available funding to the TBRA program for supportive services only.
2. **Public Participation** – This section will be updated to include the citizen participation process followed for the substantial amendment.
3. **HOME-ARP Activities** – This section will be updated to revise the allocation breakdown between rental assistance and supportive services to change the use of the balance of HOME-ARP funds for TBRA Program rental assistance and supportive services to only supportive services. HOME funds will be used for rental assistance as part of the substantial amendment.

Program Activity	Original Funding Amount	Revised Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$591,292.98	\$967,383.60		
Acquisition & Development of Non-Congregate Shelters	\$0	\$0		
Tenant Based Rental Assistance (TBRA)	\$1,124,309.02	\$748,218.40		
Development of Affordable Rental Housing	\$0	\$0		
Non-Profit Operating	\$0	\$0	0%	5%
Non-Profit Capacity Building	\$0	\$0	0%	5%
Administration and Planning	\$ 50,000.00	\$50,000.00	3%	15%
Total HOME ARP Allocation	\$1,765,602.00	\$1,765,602.00		

SUBSTANTIAL AMENDMENT: 2023-2027 CITIZEN PARTICIPATION PLAN

The City of Denton is amending the 2023-2027 Citizen Participation Plan to award funds directly to a current subrecipient to provide TBRA and Supportive Services programs, eliminating the need for a notice of funding availability and a 30-day application period. The City of Denton currently contracts with two Denton non-profit organizations providing TBRA and Supportive Services programs, Our Daily Bread, Inc. and Grace Like Rain, Inc. DBA Giving Grace. The two contracts were procured through a notice of funding, with funding recommendations made via advisory committee, and final contract approval by City Council.

The annual citizen participation process for the City's Action Plan and/or Consolidated Plan consists of ten (10) steps for citizen engagement. The second step includes a minimum of thirty (30) days for the receipt of applications for proposed activities related to the development of the Annual Action Plan. At the end of the application period, staff review all complete applications and prepare an analysis of the eligibility of all proposed activities for presentation to the Community Services Advisory Committee (CSAC). The substantial amendment will add to the second step to include the following:

"City contracts with local nonprofits procured based on federal procurement regulations can be amended to include additional allocated funds to provide services when an emergent need arises to provide critical needs to Denton residents as allowed by local, state and federal regulations."

Substantial Amendment for TBRA and Supportive Services Needs

The City currently has contracts with two local nonprofits, Our Daily Bread, Inc. and Grace Like Rain, Inc. DBA Giving Grace, allocating HOME-ARP funding for TBRA. Staff analyzed options to supplement the remaining HOME-ARP funding with HOME unprogrammed funding to extend the availability of TBRA in Denton and increase case management capacity to support individuals experiencing homelessness in obtaining and maintaining stable housing.

Staff also evaluated community needs and any gaps in services for rental assistance and supportive services.

1. According to the 2023-2025 City of Denton Consolidated Plan, cost burden is a notable housing issue in Denton. Increasing the availability of affordable units could help alleviate the rent burden for many families. As identified in the housing needs assessment, households paying more than 30% or 50% of their income on housing experience one of the most common housing challenges, particularly among renters. Of the 24,423 cost-burdened households in Denton, approximately 19,808 (81.1%) are renter households, compared to 4,615 homeowners (18.9%). The cost burden remains a significant concern, especially for lower-income renters in Denton. Approximately 13,118 single-person households may benefit from housing stability assistance programs, including rental assistance, affordable housing, homeownership opportunities, and income support programs. Additionally, Strategy 5A of the City's the Affordable Housing Toolkit prioritizes eviction prevention strategies.

2. According to the 2025 Denton County Point in Time [Count](#) homeless census, 690 people are experiencing homelessness on any given night in Denton County, a 33% increase from 2024. Funding to assist people experiencing literal homelessness (living in a place not meant for human habitation, like a car, on the street, in the woods, or in a shelter) in Denton is limited or nearing full expenditure.
3. Pandemic relief funding allocated for rental assistance through the HOME American Rescue Plan (HOME-ARP) program is nearing full expenditure, with an estimated completion date of April 2026, leaving a funding gap for rental assistance.
4. Additional information on the need for tenant based rental assistance and supportive housing is available in the HOME-ARP Allocation in Attachment 2.
5. The Denton Community Shelter reduced their capacity to shelter individuals experiencing homelessness overnight from 200 people to 120 beginning September 1, 2025. This change was implemented to right-size the capacity of shelter staff to adequately support shelter guests in their efforts to obtain and maintain stable housing. This impact to local emergency and temporary shelter further adds to the need for rental assistance for people experiencing literal homelessness.

Current unmet needs for rental assistance and supportive housing coupled with a reduction in federal funding that has created a service gap, and the City of Denton proposes the allocation of unprogrammed HOME funds promptly to address these emerging needs. The City can amend existing contracts with two local nonprofit partners—currently administering the HOME-ARP Tenant-Based Rental Assistance (TBRA) and Supportive Services programs—to expand their scope. These amendments will incorporate additional HOME funds to enhance rental assistance, supportive services, and case management capacity, helping individuals experiencing homelessness secure and sustain stable housing.

SUBSTANTIAL AMENDMENT: 2023-2027 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT

The City of Denton is amending the 2023-2027 Consolidated Plan for Housing and Community Development to document the need for TBRA and Supportive Services and establish the same TBRA tenant preference as the City's HOME-ARP Allocation Plan that targets assistance to persons from four qualifying populations. Populations include people experiencing literal homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence, or other populations where services would prevent homelessness or would serve those at risk of housing instability, and include a special preference for persons experiencing literal homelessness.

The following section from the 2023-2027 Consolidated Plan for Housing and Community Development Plan will be amended:

- **Executive Summary** – Provides a brief introduction and summaries evaluating past performance, citizen participation process, consultation process, and planning.
- **Process** – Communicates the consultation and citizen participation process undertaken to collect information from residents and stakeholders on community needs.
- **Needs Assessment** – Analyzes demographics, needs related to affordable housing, special needs housing, community development, and homelessness.
- **Strategic Plan** – Identifies specific goals for Denton based on the highest priority needs informed by the Needs Assessment, Market Analysis, and extensive consultation with citizens and community groups.

Executive Summary

The Executive Summary will be revised to include a summary of the substantial amendment to the 2023-2027 Consolidated Plan for Housing and Community Development to document the need for TBRA and Supportive Services and establish the same TBRA tenant preference as the City's HOME-ARP Allocation Plan that targets assistance to persons from four qualifying populations. Populations include people experiencing literal homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence, or other populations where services would prevent homelessness or would serve those at risk of housing instability, and include a special preference for persons experiencing literal homelessness.

Process

The Process Section will be revised to include the citizen participation process for the substantial amendment and include that the 2023-2027 Citizen Participation Plan was followed to complete the Substantial Amendment. A notice on the Substantial Amendment was posted in the Denton Record Chronicle on Sunday, August 31, 2025. The affidavit of publication is included in Attachment 1. The notice provided a summary of the amendment and a 30-day comment period from September 1 through 30. A summary of the amendment was posted on the Community Development webpage. A notice was sent out via email to interested citizens, previous clients, committee members, local churches, participating lenders and realtors, neighborhood associations, and social services agencies. Staff also worked with Marketing and Communications to post information on social media.

The Process Section will also be revised to include the citizen participation process followed for the 2021 HOME-ARP Allocation in Attachment 2.

Needs Assessment

The Needs Assessment Section will be revised to include the needs assessment from the 2021 HOME-ARP Allocation Plan (see attached 2021 HOME-ARP Allocation Plan). According to the Plan, to assess the unmet needs of HOME-ARP qualifying populations, the City evaluated the size and demographic composition of those populations. Additionally, the City identified gaps within its current shelter and housing inventory, as well as its service delivery system. In the needs assessment and gap analysis, the City utilized current data, including the Comprehensive Housing Affordability Survey Data (CHAS), the 2022 Point-in-Time Count (PIT Count), the 2022 Housing Inventory Count (HIC), and other available data sources. According to the HOME-ARP Allocation Plan, there is a gap of 4,760 rental units for At-Risk households (30% Area Median Income) in Denton. For renter households at 50% Area Median Income, there is a surplus of 360 units. In total, there is a gap of 5,035 units.

Strategic Plan

The Strategic Plan will be revised to include priority needs, such as rental assistance and supportive services. The goals in the Strategic Plan will also be revised to add the goals for rental assistance and supportive services. The Strategic Plan will also establish the same TBRA tenant preference as the City's HOME-ARP Allocation Plan, which targets assistance to individuals from four qualifying populations. Populations include people experiencing literal homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence, or other populations where services would prevent homelessness or would serve those at risk of housing instability, and include a special preference for persons experiencing literal homelessness.

The Strategic Plan will also be revised to update the Affordable Housing goal to include that rental assistance will be utilized to address this goal and revise the five-year goals. The City anticipates that the TBRA program will assist an estimated 500 households with HOME-ARP and HOME funds.

Attachment 1: Citizen Participation Supporting Documents

1. Denton Record Chronicle Public Notice and Affidavit of Publication

**PUBLIC NOTICE**
HOUSING AND
COMMUNITY DEVELOPMENT
Substantial Amendment to the HOME and HOME-ARP funding
for the Tenant-Based Rental Assistance Program

The City of Denton is accepting comments from September 1 to 30 for the Substantial Amendments regarding HOME Investment Partnership Program (HOME) and HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) funds received from the U.S. Department of Housing and Urban Development (HUD).

The substantial amendment includes the following:

- 2021 to 2025 Action Plan for HOME funds:** Allocate an estimated \$693,039.11 in unprogrammed HOME funds for Tenant Based Rental Assistance (TBRA) and Supportive Services programs for people experiencing homelessness, including security and utilities deposits. The City currently funds TBRA and Supportive Services with HOME-ARP funds.
- 2021 Action Plan and HOME-ARP Allocation Plan:** Amend the use of an estimated \$501,712.28 in HOME-ARP funds from TBRA and Supportive Services to only Supportive Services, prioritizing funds for case management of households transitioning to permanent housing.
- 2023-2027 Citizen Participation Plan:** Update the 2023-2027 Citizen Participation Plan to award funds directly to a subrecipient to manage TBRA and Supportive Services programs instead of a notice of funding availability and a 30-day application period. The City of Denton currently contracts with two Denton non-profit organizations managing the TBRA and Supportive Services programs.
- 2023-2027 Consolidated Plan:** Revise the 2023-2027 Consolidated Plan for Housing and Community Development to document the need for TBRA and Supportive Services and establish the same TBRA tenant preference as the City's HOME-ARP funding that targets assistance to persons from four qualifying populations. Populations include people experiencing literal homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence, or other populations where services would prevent homelessness or would service those at risk of housing instability, and include a special preference for persons experiencing literal homelessness.

For information, call (940) 349-7726 

Any comments regarding the amendment may be submitted to Community Services by mail at 401 N. Elm, Denton, Texas 76201, by faxing (940) 349-7753, by emailing CommunityDevelopment@cityofdenton.com, or by calling (940) 349-7726.

ADA/EOA/ADEA | TDD (800) 735-2989 | Pub. 08/2025
www.cityofdenton.com

COMMENT PERIOD

Substantial Amendments will be submitted to HUD for the 2021-2025 Action Plans. The City will accept comments from Sept. 1 to 30 on the substantial amendment and will consider all comments received by September 30 before submission.

Citizens may review the plan outline at www.cityofdenton.com/communitydevelopment

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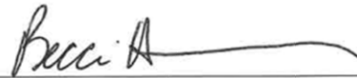
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Denton, TX 76202
940-387-3811

Publication(s): Denton Record-Chronicle

PROOF OF PUBLICATION

Being duly sworn (s)he is the Publisher/authorized designee of Denton Record-Chronicle, in City of Denton/surrounding areas in Denton County; Newspaper of general circulation which has been continuously and regularly published for a period of not less than one year preceding the date of the attached notice, and that the said notice was published in said newspaper Denton Record-Chronicle on the following dates below:

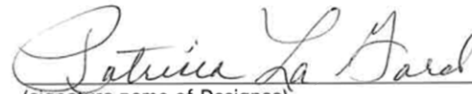
08/31/2025



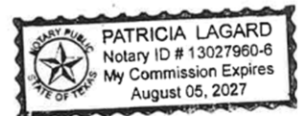
(signature of Authorized Designee)
Subscribed and sworn to before me
this 31st day of August, 2025 by


(printed name of Designee)

Witness my hand and official seal:


(signature name of Designee)

Notary Public, Denton County, Texas



DENTON CITY COMMUNITY SERVICES
401 N ELM ST
DENTON TX 76205

Ad Number: 59462

Price: \$565.00

2. Press Release

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The City of Denton is Seeking Feedback on Amendments to HOME and HOME-ARP Funds

DENTON, TX, Sept. 17, 2025 – The City of Denton is accepting comments from Sept. 1 to Sept. 30 for Substantial Amendments regarding HOME Investment Partnership Program (HOME) and HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) funds received from the U.S. Department of Housing and Urban Development (HUD). The substantial amendment includes the following:

- 2021 to 2025 Action Plans for HOME funds:** Allocate an estimated \$693,039.11 in unprogrammed HOME funds for Tenant Based Rental Assistance (TBRA) and Supportive Services programs for people experiencing homelessness, including security and utilities deposits. The City currently funds TBRA and Supporting Services with HOME-ARP funds.
- 2021 Action Plan and HOME-ARP Allocation Plan:** Amend the use of an estimated \$501,712.28 in HOME-ARP funds from TBRA and Supportive Services to only Supportive Services, prioritizing funds for case management of households transitioning to permanent housing.
- 2023-2027 Citizen Participation Plan:** Update the 2023-2027 Citizen Participation Plan to award funds directly to a subrecipient to manage TBRA and Supportive Services programs instead of a notice of funding availability and a 30-day application period. The City of Denton currently contracts with two Denton non-profit organizations managing the TBRA and Supportive Services programs.
- 2023-2027 Consolidated Plan:** Revise the 2023-2027 Consolidated Plan for Housing and Community Development to document the need for TBRA and Supportive Services and establish the same TBRA tenant preference as the City's HOME-ARP funding that targets assistance to persons from four qualifying populations. Populations include people experiencing literal homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence, or other populations where services would prevent homelessness or would service those at risk of housing instability, and include a special preference for persons experiencing literal homelessness.

The draft plan, including a full list of substantial amendments, is available [online](#). Residents are encouraged to review the plan and share feedback through one of several methods:

- Mail:** 401 North Elm Street, Denton, TX 76201
- Email:** CommunityDevelopment@cityofdenton.com
- Fax:** (940) 349-7753
- Phone:** (940) 349-7726

For more information and to submit comments online, visit www.cityofdenton.com/communitydevelopment

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**DEPUTY DIRECTOR OF MARKETING AND COMMUNICATIONS KAYLA HERROD**
City of Denton · 16 Sep

REMINDER: The City of Denton is accepting comments from September 1 to 30 for Substantial Amendments regarding HOME Investment Partnership Program (HOME) and HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) funds received from the U.S. Department of Housing and Urban Development (HUD). The substantial amendment includes the following: --2021 to 2025 Action Plans for HOME funds: Allocate an estimated \$693,039.11 in unprogrammed HOME funds for Tenant Based Rental Assistance (TBRA) and Supportive Services programs for people experiencing homelessness, including security and utilities deposits. The City currently funds TBRA and Supporting Services with HOME-ARP funds. --2021 Action Plan and HOME-ARP Allocation Plan: Amend the use of an estimated \$501,712.28 in HOME-ARP funds from TBRA and Supportive Services to only Supportive Services, prioritizing funds for case management of households transitioning to permanent housing. --2023-2027 Citizen Participation Plan: Update the 2023-2027 Citizen Participation Plan to award funds directly to a subrecipient to manage TBRA and Supportive Services programs instead of a notice of funding availability and a 30-day application period. The City of Denton currently contracts with two Denton non-profit organizations managing the TBRA and Supportive Services programs. --2023-2027 Consolidated Plan: Revise the 2023-2027 Consolidated Plan for Housing and Community Development to document the need for TBRA and Supportive Services and establish the same TBRA tenant preference as the City's HOME-ARP funding that targets assistance to persons from four qualifying populations. Populations include people experiencing literal homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence, or other populations where services would prevent homelessness or would service those at risk of housing instability, and include a special preference for persons experiencing literal homelessness. Substantial Amendments will be submitted to HUD for the 2021-2025 Action Plans. The City will accept comments from Sept. 1 to 30 on the substantial amendment and will consider all comments received by September 30 before submission to HUD. Citizens may review the plan outline at www.cityofdenton.com/communitydevelopment. Any comments regarding the amendment may be submitted to Community Services by mail at 401 N. Elm, Denton, Texas 76201, by faxing (940) 349-7753, by emailing CommunityDevelopment@cityofdenton.com, or by calling (940) 349-7726.

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Public Comment Opportunity: Housing Funding Updates

The City of Denton is accepting comments from September 1 to 30 for the Substantial Amendments regarding HOME Investment Partnership Program (HOME) and HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) funds received from the U.S. Department of Housing and Urban Development (HUD). The substantial amendments include the following:

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[View the Substantial Amendment Plan](#)

Substantial Amendments will be submitted to HUD for the 2021-2025 Action Plans. The City will accept comment from Sept. 1 to 30 on the substantial amendment and will consider all comments received by September 30 before submission.

Any comments regarding the amendment may be submitted to Community Services by mail at 401 N. Elm, Denton, Texas 76201, by faxing (940) 349-7753, by emailing CommunityDevelopment@cityofdenton.com, or by calling (940) 349-7726.

Contact Us

Community Development

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Physical Address

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401 N. Elm St.
Denton, TX 76201

[Directions](#)

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Public Comment Opportunity: Housing Funding Updates

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The substantial amendments include the following:

1. **2021 to 2025 Action Plan for HOME funds:** Allocate an estimated \$693,039.11 in unprogrammed HOME funds for Tenant Based Rental Assistance (TBRA) and Supportive Services programs for people experiencing homelessness, including security and utilities deposits. The City currently funds TBRA and

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[CLICK HERE TO VIEW THE SUBSTANTIAL AMENDMENT PLAN](#)

Substantial Amendments will be submitted to HUD for the 2021-2025 Action Plans. The City will accept comments from Sept. 1 to 30 on the substantial amendment and will consider all comments received by September 30 before submission.

Citizens may review the plan outline at www.cityofdenton.com/communitydevelopment.

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Attachment 2: 2021 HOME-ARP Allocation Plan

HOME-ARP ALLOCATION PLAN

CITY OF DENTON, TEXAS

Community Development

401 N. Elm St.

Denton, TX 76201

REVISED 08-27-25 TO INCREASED HOME-ARP ALLOCATOIN

INTRODUCTION

In September of 2021, the City of Denton received notice of a HOME Investment Partnerships – America Rescue Plan (HOME-ARP) allocation in the amount of \$1,765,602. To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include:

1. development and support of affordable housing,
2. tenant-based rental assistance (TBRA),
3. provision of supportive services; and
4. acquisition and development of non-congregate shelter units.

ARP requires that funds be used to primarily benefit individuals and families in the following specified qualifying populations.

1. Experiencing Literal Homelessness;
2. At Risk of Homelessness;
3. Fleeing, or Attempting to Flee Domestic Violence; OR
4. Other Populations where services would prevent homelessness or would serve those at risk of housing instability.

To receive funding, the City must develop and submit to HUD a HOME-ARP Allocation Plan, which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and community engagement. The following is the HOME-ARP Allocation Plan.

MINOR AMENDMENT – 2025: A minor amendment to the 2021 Action Plan was completed to the HOME-ARP Allocation Plan to update the funding available in HOME-ARP funds. HUD notified the City that the total allocation was increased from \$1,763,622 to \$1,765,602. Below are the necessary changes to the plan due to the minor amendment.

1. **SF-424:** An updated SF-424 and grant agreements were provided to HUD that reflects the revised HOME-ARP grant allocation.
2. **HOME-ARP Allocation Plan:** HOME-ARP allocation table was revised to reflect the additional \$1,980 in HOME-ARP funding with the additional funds budgeted to supportive services.
3. **HOME-ARP Activities:** The activities in the original Allocation Plan remain the eligible under HOME-ARP and consistent with HOME-ARP regulations. No new activities were proposed with the additional funding.
4. **Citizen Participation:** The increase in HOME-ARP funding of \$1,980 did not meet the threshold for a substantial amendment, so a minor amendment was completed based on Denton’s 2023-2027 Citizen Participation Plan.
- 5.

CONSULTATION

SUMMARIZE THE CONSULTATION PROCESS:

The City partners with public and private entities, which several were consulted with during the development of the HOME-ARP Allocation Plan. These consulted stakeholders, members of Denton’s Housing Crisis Response System, have relevant knowledge that can speak to the needs, service gaps, and potential activities that would most benefit qualified populations. Stakeholders consulted included those who work with families or individuals experiencing or at-risk of homelessness, fleeing domestic violence, and other vulnerable qualifying populations.

In the development of the allocation plan, the City consulted with stakeholders and asked for their input concerning the HOME-ARP grant, eligible activities, and the proposed budget. Stakeholders articulated the gap in their services and/housing needs by providing written and verbal input. The City has synthesized feedback from participants and the following table will provide summaries of the feedback received. The City will continue to meet with stakeholders throughout the implementation of the HOME-ARP activities to assess the ongoing needs of stakeholders' clients.

LIST THE ORGANIZATIONS CONSULTED, AND SUMMARIZE THE FEEDBACK RECEIVED FROM THESE ENTITIES.

AGENCIES/ORGANIZATIONS CONSULTED	TYPE OF AGENCY/ORG	METHOD OF CONSULTATION	FEEDBACK
Denton Housing Authority	Public Housing Agency (PHA)	Virtual Meeting (October 20, 2021)	Need for more rental units and increased supportive services for Housing Choice Voucher holders.
Denton Affordable Housing Corporation	Community Housing Development Organization (CHDO)	Virtual Meeting (October 20, 2021)	Need for more rental units and increased supportive services for special/vulnerable populations housed in CHDO properties.
Denton County Friends of the Family	Domestic Violence Service Provider	Virtual meeting (October 21, 2021) In-person meeting (September)	Communicated upcoming project, the Family Justice Center, including Transitional Housing for people experiencing homelessness as a result of domestic violence or sexual assault.
Texas Homeless Network	Continuum of Care Lead Agency	Virtual meeting (March 30, 2022)	Provided feedback to consult the Denton County Homeless Coalition and referred to need for rental assistance for literal homeless population.
Denton County Homeless Coalition	Local Homeless Coalition; Veterans Organization (Denton County Veterans Service Office)	In-person meeting (August 31, 2022)	Members in attendance indicated a need for funding to house people experiencing literal homelessness and the rising costs of rent.
North Texas Fair Housing Center	Civil Rights/Fair Housing	Consultation Letter (Sent November 15, 2022)	No feedback was received.

North Central Texas Aging & Disability Resource Center	Address the Needs of Persons with Disabilities	Consultation Letter (Sent November 15, 2022)	No feedback was received.
Denton County MHMR Center	Local Mental Health Authority	Consultation Letter (Sent November 15, 2022)	No feedback was received.

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:

- Public comment period: November 27, 2022 – December 14, 2022;
- Public hearing: December 13, 2022.

The Public Comment period for the HOME-ARP Allocation Plan began on Sunday, November 27, 2022, and concluded on Wednesday, December 14, 2022. A Public Notice was published in the local newspaper, the Denton Record Chronicle, on November 27, 2022 and included information regarding the proposed plan as well as the scheduled Public Hearing. An additional Spanish Public Notice was published in the local newspaper December 4, 2022. The Public Hearing took place on Tuesday, December 13 at 6:30 p.m., as a part of the regular Council. During the public hearing, City staff discussed the development of the HOME-ARP Allocation Plan, which incorporated community needs and eligible activities related to HOME-ARP, along with an opportunity for the public to provide comments on the proposed budget and activities. Public comments were submitted by mail, phone, fax or email to Community Development. Three comments were received via email during the comment period and no comments were received in-person at the public hearing. Copies of communication efforts with the public are included in the appendix.

DESCRIBE ANY EFFORTS TO BROADEN PUBLIC PARTICIPATION:

In addition to the Public Notice published in the Denton Record Chronicle and in-person consultation with various community partners, consultation letters were sent via email to key community stakeholders on November 15 requesting comment on the allocation plan. Organizations consulted included social service organizations, homeless service providers, advisory boards, and other nonprofit organizations. A list of these organizations and the letter are included in this plan. A copy of the Public Notice and draft HOME-ARP Allocation Plan were also posted to the City of Denton Community Development Department website. Notice of requests for comment were also shared via the City's social media accounts (in English and Spanish), Constant Contact email blast, in the City's weekly Friday Report to City Council and forwarded via email to the aforementioned stakeholders.

SUMMARIZE THE COMMENTS AND RECOMMENDATIONS RECEIVED THROUGH THE PUBLIC PARTICIPATION PROCESS:

Comments received stated support for prioritizing resources for people experiencing literal homelessness, and primarily pertained to supportive services needs of the qualifying populations including transportation and substance use treatment. Copies of comments received are included in the appendix.

A comment was submitted recommending substance use treatment be included in the supportive services activities funded by HOME-ARP program. Staff plan to include this as an eligible expenditure and will continue to

communicate with service providers in the community as program guidelines are developed. Additionally, a comment was received requesting the City fund viable transit options for people experiencing homelessness. Staff plan to include transportation as an eligible expenditure under supportive services activities as it is allowable for households enrolled in HOME-ARP programming.

SUMMARIZE ANY COMMENTS OR RECOMMENDATIONS NOT ACCEPTED AND STATE THE REASONS WHY:

One comment received referred to the prioritization of local public resources for capital improvement projects that would benefit people living unsheltered such as sidewalk improvements and increased bike lanes. The comment also included a suggestion to prioritize improving public transportation for this population. While the suggestions provided in this comment are not activities that can be implemented utilizing HOME-ARP funding, City staff will share with the relevant departments and community members and continue to collaborate beyond the scope of HOME-ARP programming.

NEEDS ASSESSMENT AND GAPS ANALYSIS

To assess the unmet needs of HOME-ARP qualifying populations, the City evaluated the size and demographic composition of those populations. In addition, the City also identified gaps within its current shelter and housing inventory, as well as the service delivery system. In the needs assessment and gaps analysis the City utilized current data including Comprehensive Housing Affordability Data (CHAS), 2022 Point in Time Count (PIT Count), 2022 Housing Inventory Count (HIC), or other data available data sources. The following information includes the basis for the Needs Assessment and gap analysis for HOME-ARP qualified populations.

TABLE 1: HOMELESS NEEDS INVENTORY AND GAP ANALYSIS TABLE

Type of Need	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (≥1 child)	Adult HH (≥ 1 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	29	9	174	0	0								
Transitional Housing	32	8	5	0	0								
Permanent Supportive Housing	20	13	86	0	10								
Other Permanent Housing						0	0	0	0				
Sheltered Homeless						63	198	30	48				
Unsheltered Homeless						2	185	10	15				
Current Gap										see below narrative			

Data Sources: Point-In-Time (PIT) Count; Continuum of Care (CoC) Housing Inventory Count (HIC)

TABLE 2: HOUSING NEEDS INVENTORY AND GAP ANALYSIS TABLE (NON-HOMELESS)

Metric	Current Inventory	Level of Need	Gap Analysis
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	# of Units*	# of Households*	# of Households
Total Rental Units	22885		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	665		
Rental Units Affordable to HH at 50% AMI (Other Populations)	5710		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6060	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		5350	
Current Gaps			5035

Data Source: Comprehensive Housing Affordability Strategy (CHAS)

*2011-2015 CHAS Data; +2015-2019 CHAS Data

There is a gap of 4,760 rental units for At-Risk households (30% Area Median Income) in Denton. For renter households at 50% Area Median Income, there is a surplus of 360 units. In total, there is a gap of 5,035 units.

DESCRIBE THE SIZE AND DEMOGRAPHIC COMPOSITION OF QUALIFYING POPULATIONS WITHIN THE PJ'S BOUNDARIES:

The City of Denton's Participating Jurisdiction (PJ) boundaries for HOME-ARP funding are the geographic boundaries of the City. Qualifying population data pertaining to the City's PJ boundaries (available via the annual Point-In-Time (PIT Count) and the Homeless Management Information System (HMIS)) is only available at the county level. Denton serves as the county seat and houses the majority of services for people experiencing or at risk of homelessness in Denton County. Data shared in this section is as of September 30, 2022, and is reflective of populations within the City of Denton's PJ boundaries.

EXPERIENCING LITERAL HOMELESSNESS (INCLUDING FLEEING OR ATTEMPTING TO FLEE DOMESTIC VIOLENCE)

The following data is from the Homeless Management Information System (HMIS), as of September 30, 2022.

- A total of 480 households are experiencing literal homelessness in Denton County.
- 201 of the 480 households (41.8%) are experiencing chronic homelessness.
- Four (4) known households are experiencing homelessness while attempting to flee domestic violence.
- Thirty-four (34) households experiencing homelessness are families, and 463 households are individuals.
- Thirty-six (36) households have been experiencing homelessness ten years or longer, 105 households for four the nine years, and 152 households for one to three years.
- 62.7% (291) of households experiencing literal homelessness are living with a disability, and 35.6% (170) have a chronic illness.
- Race & Ethnicity: The below data indicate the percentage breakdown of households experiencing homelessness in Denton County by race and ethnicity.
 - Black/African American – 25.68%
 - Multi-Racial – 4.21%
 - Native Hawaiian or Other Pacific Islander – 0.21%
 - White – 67.58%
 - Hispanic/Latino – 10.67%
 - Asian – 0.63%

- American Indian or Alaskan Native – 1.68%

The total number of households experiencing homelessness in Denton County increased by 21.2% from September 2020 (396 households) to September 2022 (480). Chronically homeless households increased by 43.6% during that time as well (140 households in September 2020; 201 households in 2022).

INDIVIDUALS & FAMILIES AT RISK OF HOMELESSNESS

Households with income less than or equal to 30% AMI with a cost burden greater than 50% are also at risk of homelessness. Based on the CHAS data, there are 4,885 households in this category of potential risk. The Denton Housing Authority (DHA) reports approximately 7,000 people on the Housing Choice Voucher (formerly Section 8) program waitlist as of May 2022 (Source: United Way of Denton County 2022 Community Needs Assessment).

The local Justice of the Peace precinct that includes primarily City of Denton recorded approximately 663 evictions in 2021 (January through December). The same precinct recorded 1,508 evictions from January 2022 through September 2022, a 138% increase in just nine (9) months.

Individuals incarcerated in Denton as well as those receiving behavioral health services, including substance abuse disorder services, may also be at risk of homelessness upon discharge. These numbers are not readily available as multiple service providers serve these persons and discharge status varies. Some may be discharged to a shelter and others may be housed assisted by homeless service providers and then either provided additional services or transitioned to transitional or permanent housing. There is no county hospital in Denton County and private hospital systems do not have this data readily available.

Denton County MHMR, the Local Mental Health Authority, reports that as of November 2022 approximately 10.6% of the total clients receiving behavioral health services were experiencing homelessness. Also, approximately 16.2% of MHMR consumers enrolled in Substance Use Services (SUD) reported experiencing homelessness, but not every consumer who could participate in SUD services has agreed to enroll.

An estimated 840 children are experiencing homelessness in Denton Independent School District (ISD) as of May 2022. Denton ISD spans multiple cities and city-level data is not available. This includes children and youth who are who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason, are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations, are living in emergency or transitional shelters, are abandoned in hospitals, or are awaiting foster care placement.

RESIDENTS LIVING IN HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS

HOME-ARP qualifying populations also include other populations who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. According to the Denton County Homeless Management Information System, thirty-three (33) households returned to homelessness in a twelve (12) month period (October 2021 to September 2022) after being housed through a local housing program. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI and are experiencing severe cost burden or have an income less than 50% AMI and meet a certain condition, like living in someone else's home or living in a hotel due to an economic hardship.

56% of Denton renters have housing problems, and 33% have severe housing problems. In CHAS data, HUD defines housing problems as a household that has one or more of the following: lacking a kitchen or plumbing, having more than one person per room, or being housing cost burdened at 30% or more. Of these problems, housing costs negatively impact most renters whose household income is at or below 50% AMI.

DESCRIBE THE UNMET HOUSING AND SERVICE NEEDS OF QUALIFYING POPULATIONS, INCLUDING BUT NOT LIMITED TO: SHELTERED AND UNSHELTERED HOMELESS POPULATIONS; THOSE CURRENTLY HOUSED POPULATIONS AT RISK OF HOMELESSNESS; OTHER FAMILIES REQUIRING SERVICES OR

HOUSING ASSISTANCE OR TO PREVENT HOMELESSNESS; AND, THOSE AT GREATEST RISK OF HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS:

SHELTERED/UNSHELTERED: The 2022 Point-In-Time Count identified 187 people living unsheltered and 261 staying in shelter in Denton County. According to HMIS data 480 households are currently experiencing literal homelessness. The following breakdown describes the system's total housing need to stably house all 480 households currently experiencing homelessness in Denton County. Funding for wrap-around (supportive) services is needed for all households experiencing literal homelessness.

- 19 households need Diversion, a housing intervention used to assist households seeking housing outside of emergency shelter by helping them identify immediate alternative housing arrangements, and if necessary, connecting them with services and/or financial assistance to return to permanent housing.)
- 206 households need Rapid Re-housing, a housing intervention that provides medium to long-term housing to bridge households from homelessness to permanent housing.
- 255 households need Permanent Supportive Housing, a Housing Intervention that provides long-term assistance along with intensive wrap around services (i.e. transportation, education, and employment) to chronically homeless households that could not support themselves otherwise.

The county's local service provider for domestic violence and sexual assault survivors was recently notified they will be receiving Emergency Solutions Grant Rapid Rehousing funding specifically to serve their clientele. This is the only guaranteed rental assistance funding for people experiencing literal homelessness in Denton.

AT-RISK OF HOMELESSNESS & HOMELESSNESS PREVENTION: Approximately 2,171 households have been evicted in Denton since January 2021. Local eviction data in neighboring counties indicate that as low as 2% of eviction filings result in homelessness in North Texas (Source: City of Fort Worth HOME-ARP Allocation Plan). Currently there is approximately \$8M of eviction prevention funding available in Denton County. More than 30% of Denton ISD's population is considered at-risk (Source: United Way of Denton County 2022 Community Needs Assessment). Over 45% of Denton households earn below the ALICE (Asset Limited, Income Constrained, Employed) threshold, meaning they earn more than the Federal Poverty Level but earn less than the basic cost of living (Source: United Way of Denton County 2022 Community Needs Assessment). In Denton, Poverty and ALICE households combined make up 31% of the population.

UNSTABLE HOUSING CONDITIONS: Residents who have been previously homeless or are currently receiving some type of rental assistance may need the assistance to continue for a short or long period of time. Funding for housing assistance programs and supportive services is important to the housing stability of these individuals and families. There is also a need to assist residents living in unstable housing situations increase their income, build savings, and acquire assets through additional supportive services in the community.

While safe, habitable and affordable housing units continue to be a need in Denton, the most emergent need in our community is rental assistance funding prioritized for the growing population of people experiencing literal homelessness. In addition to the immediate need of housing assistance for those currently experiencing homelessness, there are also supportive service needs to be met for this population. This includes case management support, transportation, employment training, child care, food, and physical and mental health services.

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 is a total of 203 shelter beds available in Denton County, all located in the City of Denton. On average, these shelters have an estimated vacancy rate of 7%. The City of Denton is projected to complete the construction of a 24/7 shelter for people experiencing or at-risk of homelessness within City limits, which will increase shelter beds

by 36 for a total of 271 of shelter beds in the City/County of Denton. This will leave a gap of at least 209 shelter beds for people experiencing homelessness in Denton County. The new shelter will provide three meals a day at no cost and host supportive services on-site. 124 of shelter beds will be reserved for emergency stays, and thirty-two (32) beds will be designated for extended-stay with a right-of return and storage of belongings for individuals enrolled in a transitional program. The City of Denton has also allocated American Rescue Plan (ARP) State and Local Fiscal Recovery Funding (SLFRF) to provide forty (40) rooms of non-congregate shelter for special populations (including individuals with chronic health conditions and families) through December 2024.

Currently, there is no guaranteed rental assistance or supportive services funding in Denton to support people living unsheltered or in emergency shelters moving into permanent housing. The Denton Housing Authority currently administers 1,922 Housing Choice Vouchers and has a waitlist of over 7,000. Available units for people exiting homelessness are limited, and many households are unable to afford units without short to medium term subsidies and supportive services as they work towards maintaining stability in their housing. Denton County Commissioners Court is currently administering \$8M of emergency rental assistance to households at-risk of eviction.

There are two Permanent Supportive Housing programs serving Denton County with a total of sixty-six (66) beds, both of which are consistently at capacity and rarely have vacancies. Affordable rental housing is limited. The City of Denton recently completed an Affordable Housing Assessment and developed a Strategic Toolkit for increasing Denton's stock of affordable housing in the coming years, including lowering barriers for developers and relaxing zoning requirements.

IDENTIFY ANY GAPS WITHIN THE CURRENT SHELTER AND HOUSING INVENTORY AS WELL AS THE SERVICE DELIVERY SYSTEM:

SHELTER & HOUSING INVENTORY

As stated in the previous section, by the end of 2022 there will be a gap of approximately 209 shelter beds for people experiencing homelessness in all of Denton County by the end of 2022.

According to American Community Survey, Denton has a rental unit vacancy rate of approximately 7.9%. As previously stated, approximately 480 households are experiencing homelessness in Denton County as of September 2022, a 21% increase from the same time in 2020. 206 households experiencing homelessness in Denton County need medium to long-term housing assistance to sustain permanent housing – a 24% increase in this type of housing need from 2020. Additionally, the need for long-term housing assistance with intensive wrap-around services increase by 17% from 2020 (218 households) to 2022 (255 households). According to the United Way of Denton County's 2022 Community Needs Assessment, the cost of living has outpaced the minimum wage in every state. As this continues to be the case, the number of households at-risk of and experiencing homelessness in Denton will increase as they have in previous years.

SERVICE DELIVERY SYSTEM

Since 2016, the City has collaborated with over twenty (20) organizations through the [Denton County Homelessness Leadership Team \(linked\)](#) to create a coordinated Housing Crisis Response System in Denton County. This initiative transformed and changed homelessness service agencies from working independently to a networked crisis response system across Denton County working together to prevent homelessness and rapidly return people who experience homelessness to stable housing.

All homeless services agencies use a shared, centralized system, called the Homeless Management Information System (HMIS); any actions and referrals are tracked and can be seen by all agencies in Denton County in order to provide better service and outcomes. Every individual experiencing homelessness is assessed to identify their

unique needs and be connected to the appropriate resources and housing intervention. This is referred to as the Coordinated Entry system assessment and can be done at any of the participating agencies. This creates a coordinated Housing Priority List (HPL), an actively managed and prioritized list of the names and unique needs of every household experiencing homelessness.

A local team of approximately 15 case managers meets together every week to review and actively work through the HPL to determine who is new to the list (inflow), who has moved off the list (outflow), who may have changed in priority, and what housing units or funding is available or coming available in order to get individuals and families housed and stay housed.

Because of the existing infrastructure of the Denton County Housing Crisis Response System that the community built collaboratively over four (4) years, emergency eviction prevention funding was quickly deployed, and thousands of families have remained housed throughout the instability of the COVID-19 pandemic. Denton County has the infrastructure and service delivery in place to help get and keep families housed. Additionally, the county currently has approximately \$8M of eviction prevention funding available to keep families in their homes. The biggest resource deficit in our community after affordable housing is funding for rental assistance to house the increasing literal homeless population, and for supportive services to best support those households in maintaining permanent housing.

IDENTIFY THE CHARACTERISTICS OF HOUSING ASSOCIATED WITH INSTABILITY AND AN INCREASED RISK OF HOMELESSNESS IF THE PJ WILL INCLUDE SUCH CONDITIONS IN ITS DEFINITION OF “OTHER POPULATIONS” AS ESTABLISHED IN THE HOME-ARP NOTICE:

The City of Denton is not suggesting expanding the program eligibility beyond the populations noted above and those at greatest risk of housing instability (under 30% AMI and severely cost burdened) as provided by HUD in CPD Notice 21-10.

IDENTIFY PRIORITY NEEDS FOR QUALIFYING POPULATIONS:

City of Denton Community Services staff are in regular communication with nonprofit and social service organizations and conducted activities specific to this allocation plan to solicit feedback regarding priority needs for this population. The immediate priority need identified for qualifying populations is tenant based rental assistance and supportive services prioritized for people experiencing literal homelessness.

EXPLAIN HOW THE LEVEL OF NEED AND GAPS IN ITS SHELTER AND HOUSING INVENTORY AND SERVICE DELIVERY SYSTEMS BASED ON THE DATA PRESENTED IN THE PLAN WERE DETERMINED:

The gaps in services and programs needed to provide shelter, housing, and services were determined using data from multiple sources. The level of need for unsheltered and shelter households experiencing homelessness was determined by evaluating the number of unsheltered households and the level of resources available to adequately house the families or individuals with permanent supportive housing and critical long-term supportive services to achieve housing stability.

HOME-ARP ACTIVITIES

DESCRIBE THE METHOD FOR SOLICITING APPLICATIONS FOR FUNDING AND/OR SELECTING DEVELOPERS, SERVICE PROVIDERS, SUBRECIPIENTS AND/OR CONTRACTORS AND WHETHER THE PJ WILL ADMINISTER ELIGIBLE ACTIVITIES DIRECTLY:

The City of Denton will not administer HOME-ARP activities directly. Pending HUD approval of its HOME-ARP plan, the City will issue a Notice of Funding Opportunity (NOFO) for interested TBRA and Supportive Services providers. Subrecipient applications will be reviewed by the City’s Community Services Advisory Committee (CSAC), and the

committee will make recommendations for funding to City Council. City Council will consider subrecipient contracts for approval.

IF ANY PORTION OF THE PJ'S 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:

Not Applicable.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOMEARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

USE OF HOME-ARP FUNDING - REVISED

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 591,292.98		
Acquisition & Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$1,124,309.02		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 0	0%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 50,000.00	3%	15%
Total HOME ARP Allocation	\$1,765,602.00		

Allocation table was revised to increase the funding by \$1,980 as required by HUD in May 2025. The additional funds were programmed under supportive services. Grant Agreements with HUD were revised to reflect the revised grant allocation.

ADDITIONAL NARRATIVE, IF APPLICABLE - REVISED:

The City of Denton intends to allocate \$591,292.98 (revised) of HOME-ARP funding for Supportive Services, \$1,124,309.02 for Tenant Based Rental Assistance (TBRA), and \$50,000 for administrative and planning uses as described in CPD Notice 21-10 for all qualifying populations, with a preference for populations experiencing homelessness. The total HOME-ARP allocation is \$1,765,602.

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 homeless population in Denton County increased by 21% in two (2) years. There is currently no funding available to support the 480 households experiencing literal homelessness to obtain permanent housing, except for Emergency Solutions Grant Rapid Rehousing funding for survivors of domestic violence and sexual assault. While there is a lack of shelter beds, funding is needed to support successful exits from shelter and encampments

to ensure the Housing Crisis Response System continues to achieve its goal of making homelessness rare, brief and nonrecurring.

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:

Not Applicable.

DESCRIBE THE SPECIFIC AFFORDABLE RENTAL HOUSING PRODUCTION GOAL THAT THE PJ HOPES TO ACHIEVE AND DESCRIBE HOW IT WILL ADDRESS THE PJ'S PRIORITY NEEDS:

Not Applicable.

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:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

The City of Denton will utilize all HOME-ARP funding to assist qualifying populations with a preference for individuals and households experiencing literal homelessness.

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 PJ'S NEEDS ASSESSMENT AND GAP ANALYSIS:

Based on the needs and gaps analysis, the City of Denton utilize all HOME-ARP funding to assist qualifying populations with a preference for households experiencing homelessness. In addition to housing instability, homeless individuals are more susceptible to acute health concerns, physical, sexual, and psychological trauma, and behavioral health disorders, making them some of the most vulnerable populations and in need of specialized and intense services. Rental assistance and supportive services will support these households in obtaining and maintaining permanent housing.

IF A PREFERENCE WAS IDENTIFIED, DESCRIBE HOW THE PJ WILL USE HOME-ARP FUNDS TO ADDRESS THE UNMET NEEDS OR GAPS IN BENEFITS AND SERVICES OF THE OTHER QUALIFYING POPULATIONS THAT ARE NOT INCLUDED IN THE PREFERENCE:

As previously stated, there is currently funding in the community to support people at-risk of homelessness to remain housed and funding to assist survivors of domestic violence and sexual assault to obtain permanent housing. TBRA and supportive services funding will be made available to all qualifying populations, but the populations that are not prioritized will have multiple opportunities for funding available to them. The City will ensure any subrecipients receive referrals for all qualifying populations.

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 HOMEARP REFINANCING GUIDELINES IN ACCORDANCE WITH [24 CFR 92.206\(B\)](#). THE GUIDELINES MUST DESCRIBE THE CONDITIONS UNDER WITH 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

Not Applicable.

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.

Not Applicable.

STATE WHETHER THE NEW INVESTMENT IS BEING MADE TO MAINTAIN CURRENT AFFORDABLE UNITS, CREATE ADDITIONAL AFFORDABLE UNITS, OR BOTH.

Not Applicable.

SPECIFY THE REQUIRED COMPLIANCE PERIOD, WHETHER IT IS THE MINIMUM 15 YEARS OR LONGER.

Not Applicable.

STATE THAT HOME-ARP FUNDS CANNOT BE USED TO REFINANCE MULTIFAMILY LOANS MADE OR INSURED BY ANY FEDERAL PROGRAM, INCLUDING CDBG.

Not Applicable.

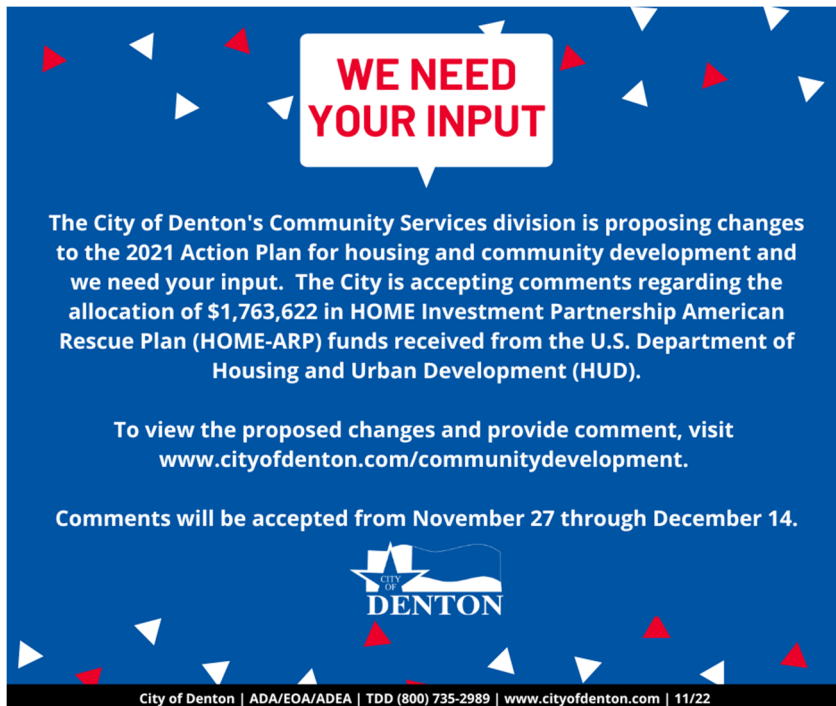
OTHER REQUIREMENTS IN THE PJ'S GUIDELINES, IF APPLICABLE:

Not Applicable.

APPENDIX

PUBLIC PARTICIPATION ACTIVITY

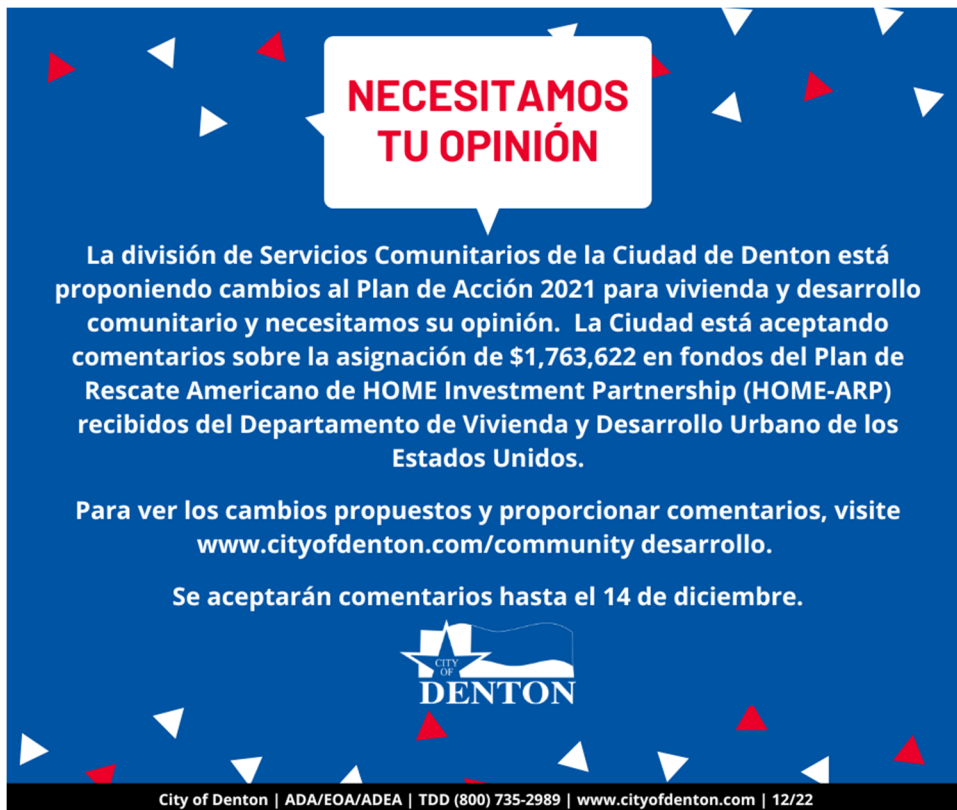
SOCIAL MEDIA PROMOTION



Facebook Graphic – English



Twitter Graphic – English



Facebook Graphic – Spanish

A blue rectangular graphic with red triangle patterns at the top and bottom. A white speech bubble at the top center contains the text "NECESITAMOS TU OPINIÓN". Below it, white text provides information about the 2021 Action Plan for housing and community development, mentioning a \$1,763,622 allocation from the HOME-ARP funds. It includes a website link and a deadline of December 14th. The City of Denton logo is centered below the text. A black footer bar at the bottom contains contact information and the date 12/22.

**NECESITAMOS
TU OPINIÓN**

La división de Servicios Comunitarios de la Ciudad de Denton está proponiendo cambios al Plan de Acción 2021 para vivienda y desarrollo comunitario y necesitamos su opinión. La Ciudad está aceptando comentarios sobre la asignación de \$1,763,622 en fondos del Plan de Rescate Americano de HOME Investment Partnership (HOME-ARP) recibidos del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos.

Para ver los cambios propuestos y proporcionar comentarios, visite
[www.cityofdenton.com/community desarrollo](http://www.cityofdenton.com/community%20desarrollo).

Se aceptarán comentarios hasta el 14 de diciembre.


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City of Denton | ADA/EOA/ADEA | TDD (800) 735-2989 | www.cityofdenton.com | 12/22

Twitter Graphic – Spanish

EMAIL PROMOTION

Douangdara, Courtney

From: City of Denton Community Services <communitydevelopment@cityofdenton.com>
Sent: Sunday, November 27, 2022 10:01 AM
To: Douangdara, Courtney
Subject: 15-Day Comment Period Beginning Nov. 27

This message has originated from an **External Source**. Please be cautious regarding links and attachments.



Community Services

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Now Accepting Feedback on the City of Denton's HOME-ARP Allocation Plan

The City of Denton is accepting comments on a draft HOME-ARP Allocation Plan. The plan details how the City intends to distribute the \$1,763,622 in HOME Investment Partnership American Rescue Plan (HOME-ARP) funds received from the U.S. Department of Housing and Urban Development (HUD). The plan proposes to allocate funds to eligible entities through a Notice of Funding Opportunity (NOFO) application process to provide Tenant-Based Rental Assistance (TBRA) and Supportive Services.

A public hearing will be held on Dec. 13, 2022, at 6:30 p.m. during a City Council meeting in Council Chambers at City Hall, 215 E McKinney Street, Council Chambers, Denton, TX 76201.

The HOME-ARP Allocation Plan will be submitted as a substantial amendment to the 2021/22 Action Plan for Housing and Community Development. All comments received by December 14, will be considered by the City before submission of the HOME-ARP Allocation Plan to HUD.

VIEW THE HOME-ARP ALLOCATION PLAN

We Need Your Input by December 14!

During a 15-day comment period from November 27 to December 14, the City of Denton will be accepting comments regarding this amendment. Help ensure our community needs are being addressed by providing input. Citizens and organizations can comment on this Substantial Amendment the following ways:

- Email CommunityDevelopment@cityofdenton.com;
- Phone (940) 349-7726; or
- Fax (940) 349-7753

[Read more](#) about current Community Development activities, and share information about how the City of Denton is making an impact in the community.



ADA/EOE/ADEA ~ TDD (800) 735-2989

www.cityofdenton.com/communitydevelopment

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11/27/2022

Alice M'Conough
(signature of Authorized Designee)
Subscribed and sworn to before me
this 27th day of November, 2022 by
Alice M'Conough
(printed name of Designee)
Witness my hand and official seal:

Patricia LaBard
(signature name of Designee)
Notary Public, Denton County, Texas



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DENTON TX 76205

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tion work between Prairie and Lottine streets.
Bridgeway Street has utility and pavement work between Hickory and McKinney streets.
Crawford Street has utility and pavement work between Hickory and McKinney streets.
Crescent Street has street reconstruction work between Fulton and Alice streets.
Fulton Street has street reconstruction work between Oak Street and Congress Street.
East Hickory Street has utility and pavement work between Exposition and Ruddle streets.
Jim Christal Road has paving work between Western Boulevard and Masch Branch Road.
East McKinney Street has utility and pavement work between Crawford Road and Audra Lane.
McKinney Street also has work at the entrance to Frame Street.
North Texas Boulevard has utility and pavement work between Oak and Hickory streets and between Interstate 35E and Oak.
East Oak Street has utility and pavement work between Miller Street and North Texas Boulevard.
Oak Street also has utility and pavement work between Crawford and Wood streets.
Panhaville Street has street reconstruction work between Allen and Malone streets.
Reberston Street has utility and pavement work between Bell Avenue and Morse Street.
Stella Street has utility and pavement work between North Texas Boulevard and Bonnie Bras Street.
Windsor Drive has utility and pavement work between Bonnie Bras Street and Presidio Lane.
Wood Street has utility and pavement work between McKinney and Hickory streets.

For more information about street construction projects in Denton, visit www.dentoncity.com.

PUBLIC NOTICE
SUBSTANTIAL AMENDMENT TO 2021 ACTION PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT

The City of Denton is accepting comments on a draft HOME-ARP Allocation Plan. The plan details how the City intends to distribute the \$1,763,622 in HOME Investment Partnership American Rescue Plan (HOME-ARP) funds received from the U.S. Department of Housing and Urban Development (HUD). The plan proposes to allocate funds to eligible entities through a Notice of Funding Opportunity (NOFO) application process to provide Tenant-Based Rental Assistance (TBRA) and Supportive Services.

A public hearing will be held on Dec. 13, 2022, at 6:30 p.m. during a City Council meeting in Council Chambers at City Hall, 215 E McKinney Street, Council Chambers, Denton, TX 76201.

The HOME-ARP Allocation Plan will be submitted as a substantial amendment to the 2021/22 Action Plan for Housing and Community Development. All comments received by December 14, will be considered by the City before submission of the HOME-ARP Allocation Plan to HUD.

The City of Denton will be accepting comments from **Nov. 27 to Dec. 14** on the substantial amendment to the 2021 Action Plan. Citizens may review the report online at www.cityofdenton.com/communitydevelopment.

Any comments regarding the amendment may be submitted in writing to Community Services by faxing (940) 349-7753, by emailing CommunityDevelopment@cityofdenton.com or by calling (940) 349-7726.

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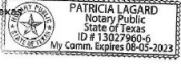
Being duly sworn (she) is the Publisher/authorized designee of Denton Record-Chronicle, in City of Denton/surrounding areas in Denton County; Newspaper of general circulation which has been continuously and regularly published for a period of not less than one year preceding the date of the attached notice, and that the said notice was published in said newspaper Denton Record-Chronicle on the following dates below:

12/04/2022

Alice McCaughy
 (Signature of Authorized Designee)
 Subscribed and sworn to before me
 this 4th day of December, 2022 by

Alice McCaughy
 (printed name of Designee)
 Witness my hand and official seal:

Patricia LaBard
 (signature name of Designee)
 Notary Public, Denton County, Texas

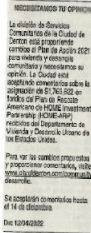


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 NECESITAMOS TU OPINI*^N

La divisi*ⁿ de Servicios Comunitarios de la Ciudad de Denton est*ⁿ proponiendo cambios al Plan de Acci*ⁿ 2021 para vivienda y desarrollo comunitario y necesitamos su opini*ⁿ. La Ciudad est*ⁿ aceptando comentarios sobre la asignaci*ⁿ de \$1,763,622 en fondos del Plan de Rescate Americano de HOME Investment Partnership (HOME-ARP) recibidos del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos.

Para ver los cambios propuestos y proporcionar comentarios, visite www.cityofdenton.com/community desarrollo.

Se aceptar*ⁿ comentarios hasta el 14 de diciembre.

Drc 12/04/2022

PUBLIC COMMENTS RECEIVED

Comment #1 – Received Monday, December 5, 2022

“Over the last few years, I’ve spent time working with the homeless and the employment component of their journey to a stable and sustainable life with the Goodwill North Central Texas Job Resource Center. Now, I’m a part of another component of that journey...reliable and affordable transportation. One of the most frustrating parts of helping those experiencing homelessness find meaningful employment was getting them to job interviews and work shifts. One of my current dreams is for there to be reliable and affordable demand-response transit that is consistently available for those transitioning from homelessness to a more stable and sustainable life. DCTA and GoZone are not making that happen. They’ve cut routes and raised prices. I’d like for the City of Denton to consider options for funding transit that would aid individuals experiencing homelessness in committing to work as part of a viable transition to a stable life.”

Comment #2 – Received Thursday, December 8, 2022

“I support the proposed draft plan to use funding to address the most unmet need of housing units and supportive services for the at-risk of homelessness populations.

Additionally, I would ask that the geographic distribution of both current and eligible 0-30% AMI groups be incorporated into phasing decisions of other projects from other funding sources to increase access of people with limited access to motor vehicles to potential jobs and necessary goods and services. This could include the phasing priority of small sidewalk projects, bike lane projects that connect to a wider network, transit supportive projects in conjunction with DCTA, or larger CIP projects which would include non-automobile access improvements to these populations. Optimizing more of our public investments to serve these at-risk populations first will help these populations progress more quickly out of needing wrap-around support, allowing us to use limited resources to serve more people in need.”

Comment #3 – Received Thursday, December 8, 2022

“This is in response to the HOME-ARP Allocation Plan. As a Denton-based nonprofit that works closely with persons experiencing homelessness or at risk of homelessness, we would like to make a couple suggestions on the allocation, especially in reference to what Support Services might be funded. According to the city-wide needs assessment and the 2021 data compilation by the organization formerly known as Hope, Inc., Substance Use Disorder (SUD) plays a substantial part in the homelessness concern in our area. However, in this Allocation Plan that is solely dedicated toward long-term stability and housing for persons experiencing homelessness, SUD is not touched upon. We’re all working toward helping people change the course of their lives and we’re all dedicating ourselves completely to bolstering our community, which is such a beautiful purpose! So, we believe that bringing SUD services into the conversation will help every organization meet these goals and create a host of services that will almost guarantee long-term success for this population.

Substance Use Disorder has been proven to be a root cause for homelessness, domestic violence, economic insecurity, and many more societal concerns in the United States. In our area, upward of 70% of homeless persons self-identify as having an issue with substances. It follows that if our community is to address homelessness in a holistic way, it would be a missed opportunity to not provide SUD services to this population through this funding allocation. We hope that the grant committee will consider including, in the Support Services category, funding for SUD treatment services.

Additionally, due to the massive impact SUD plays on this issue, we hope that local treatment providers might be included in discussions on how best to address homelessness in Denton County in the future and how to become a standard resource available to this population. Through working together, we can all reach a solution to this ever-increasing problem, rather than setting aside a major contributing factor that would instead prevent long-term success in this endeavor. We would be happy to discuss how that might be possible!

We'd love to provide any insight that might be helpful or expand upon any information we have provided thus far. We appreciate that y'all called for input and hope you consider including SUD services in this funding opportunity! Have a wonderful day and a Merry Christmas!"