

HOME-ARP ALLOCATION PLAN

CITY OF DENTON, TEXAS

*Community Development
401 N. Elm St.
Denton, TX 76201*

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 \$1,763,622. 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
4. Other Populations

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.

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.

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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	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 14, 2022)	Feedback will be included as it is received.
North Central Texas Aging & Disability Resource Center	Address the Needs of Persons with Disabilities	Consultation Letter (Sent November 14, 2022)	Feedback will be included as it is received.
Denton County MHMR Center	Local Mental Health Authority	Consultation Letter (Sent November 14, 2022)	Feedback will be included as it is 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;

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- 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 Denton Record Chronicle on November 27, 2022 and included information regarding the proposed plan as well as the scheduled Public Hearing. The Public Hearing took place on Tuesday, December 13 at 6:30 p.m., as a part of the regular Council 215 E McKinney Street, Council Chambers, Denton, TX 76201. 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, email or webform to Community Development. **[Number of comments received during comment period and/or at the public hearing will be included here.]**

DESCRIBE ANY EFFORTS TO BROADEN PUBLIC PARTICIPATION:

In addition to the Public Notice published in the Denton Record Chronicle, consultation letters were sent via email to community stakeholders on **November 10** requesting comment on the allocation plan. This included social service organizations, homeless service providers, advisory boards, neighborhood associations, and other nonprofit organizations. A list of these organizations and the letter are attached to 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, 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:

[Any comments received during public comment period will be included here.]

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

[Any comments received during public comment period will be included here.]

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.

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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
	# 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

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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.

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 of 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.

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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-

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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

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 374,769.68		
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	\$ 264,543.30	15%	15%
Total HOME ARP Allocation	\$1,763,622		

ADDITIONAL NARRATIVE, IF APPLICABLE:

The City of Denton intends to allocate \$374,769.68 of HOME-ARP funding for Supportive Services, \$1,124,309.02 for Tenant Based Rental Assistance (TBRA), and \$264,543.30 for administrative and planning uses as described in CPD Notice 21-10 for all qualifying populations, with a preference for populations experiencing homelessness.

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.

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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 WHICH THE PJ WILL REFINANCE EXISTING DEBT FOR A HOME-ARP RENTAL PROJECT, INCLUDING:

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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.