

# City of Corpus Christi



## The City of Corpus Christi HOME ARP Allocation Plan

## City of Corpus Christi HOME-ARP Allocation Plan

In 2021, the Department of Housing and Urban Development (HUD) allocated the City of Corpus Christi \$4,213,937 in HOME funds through the American Rescue Plan Act (ARPA). The HOME-ARP funds are intended to serve primarily people experiencing homelessness or at risk of homelessness. Funds can be used on a range of activities to support this population with housing stability including rental assistance, non-congregate shelter, affordable housing development, and supportive services. The City sought a range of stakeholder input and compiled community data in development of this plan.

### Consultation

*Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.*

#### **Summarize the consultation process:**

City staff held calls, virtual and in-person meetings with the Texas Balance of State Continuum of Care (CoC) that covers Corpus Christi, domestic violence provider agencies, agencies that serve persons with disabilities, public housing authority leadership, homeless service provider agencies, a local worship center serving black, indigenous and persons of color, and public agencies to discuss gaps in services and their priorities for the funding.

A survey was distributed widely to community groups including the following: CoC membership agencies, domestic violence task force agencies, homeless veteran working group agencies, faith based organizations, public housing authority, and all social services and affordable housing agencies funded by the City of Corpus Christi.

#### **List the organizations consulted, and summarize the feedback received from these entities.**

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>Homeless Issues Partnership</b>	Local CoC Agency	Presentation at regular meeting.	Case management and other supportive services to see clients through to stabilization is lacking. There is great need for mental health services and substance use disorder treatment. Rental assistance until a public housing voucher is available is needed.

<b>The Purple Door</b>	Domestic Violence Shelter	Phone call	Reports the needs to be TBRA and Supportive Services. Can serve 75-100 households each year with TBRA and Supportive Services. The Purple Door doesn't want to own housing.
<b>The Salvation Army</b>	Local homeless shelter and service provider	Phone call	Homeless prevention is a priority. TBRA is a priority. PSH is a priority. Additional case management for longer periods of time is required for chronically homeless to be success. Supportive services in addition to case management is a priority.
<b>Corpus Christi Housing Authority</b>	Local PHA	In person meeting	PHA is not currently developing additional permanent affordable housing units but has considered creating transitional units.
<b>City of Corpus Christi Fair Housing Unit</b>	Government Fair Housing Officers	In person consultation	Providing homeless prevention services and rapid rehousing for those being evicted are priority. Assistance with knowing their rights and where to go for help and answers is a priority.
<b>Endeavors</b>	Veterans Services	Phone call	Veterans are facing housing instability. Housing and support services are needed by Veterans.
<b>New Life Refuge Ministries</b>	Child sex trafficking treatment	Phone call	Children served are not considered homeless in their care.
<b>Coastal Bend Center for Independent Living</b>	Provides services to persons with disabilities	Phone call	Permanent supportive housing and TBRA are priorities. Current HOME TBRA recipient.
<b>Corpus Christi Hope House</b>	Local homeless shelter and service provider	Phone call	Lack of affordable housing, wait list to get into public housing or Section 8, staff capacity and wait time for services for larger size of households.
<b>Nueces Center for Mental Health and Intellectual Disabilities</b>	Provides services to those needing assistance with mental and behavioral health	Phone call	Supportive services, TBRA and PSH are priorities. Needs include affordable housing, cost and startup costs, shelter options, low-barrier shelters, shelter with medical options, and follow up care.
<b>Texas Balance of State Continuum of Care</b>	CoC	Phone call and email	Provided the CE prioritization standards for CoC programs and

			referred to Point In Time (PIT) resources and local providers.
<b>Corpus Christi Police Department</b>	Public Agency – law enforcement	Meeting	Lack of rental assistance and supportive services are a need. Services that keep people in shelters and housing are needs.
<b>Coastal Bend Aging and Disability Resource Center</b>	Aging and Disability Organization	Phone Call	Lack of adequate supply of shelters, affordability, supportive services, accessible and integrated housing to meet the needs of seniors and people with disabilities.
<b>Corpus Christi Fair Housing Compliance Unit</b>	Public Agency – fair housing compliance	Meeting	Needs are the availability of affordability housing, availability of accessible units, geographic distribution of available units, education, rental assistance, supportive services during job training or education that include rent, child care and transportation.
<b>Nueces County Department of Social Services</b>	Government Agency on Social Services	Phone call and email	Not enough affordable housing, focus on prevention of evictions and utility disconnections. Supportive services are a priority need.
<b>Texas Department of Housing and Community Affairs</b>	State Agency on Housing	Phone call and email	Lack of affordable housing, affordability of local rents and staff capacity for agencies who receive state department funds.
<b>Wenholz House</b>	Transitional House Support for Substance Abuse Recovery	Phone call	Filled to maximum capacity. No wait list and strong partnerships with Cenikor and Nueces Center for Mental Health and Intellectual Disabilities.
<b>Brooks AME Worship Center</b>	Faith Based Church BIPOC	Meeting	Slum and Blight due to Harbor Bridge Realignment, lack of investment in Hillcrest neighborhood area for affordable housing, supportive services and infrastructure.
<b>Corpus Christi Independent School District</b>	Public School District	Meeting	Immediate services needed for emergency food, hotel emergency assistance, substance abuse treatment. Shelter and medical assistance for minors. Supportive services are a priority need.

<b>Christus Spohn</b>	Hospital System	Meeting	Affordable Housing, supportive services, street outreach, transitional housing or hospice, respite care or hospital step-down.
<b>Choice Living Community</b>	Provide services to persons with Disabilities	Phone Call	TBRA and supportive services identified as priority needs.
<b>Health and Human Services Commission</b>	Public agency services to persons with Disabilities	Phone Call	Transitional supportive services identified as priority needs.
<b>Bloomberg Harvard Innovation Track</b>	Various services providers, homeless persons, residents, and business owners	Stakeholder groups, in person street interviews, meetings	Gaps exist within the existing system for providing adequate access to services and access to housing.
<b>Community Groups Response to Homelessness Survey</b>	Various community groups including service providers, government agencies, business owners and community members	Survey	Priority populations in order are persons who are homeless, persons who are at-risk of homelessness, persons who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other households who require services or housing assistance to prevent homelessness. Number one priority assistance was supportive services. Tied for second are TBRA and production or preservation of housing and third is purchase and development of non-congregate shelter.
<b>Various Civil Rights Groups</b>	CASA, American GI Forum, National Association for the Advancement of Colored People, The Mosaic Project of South Texas and Coastal Bend Pride Center	Various attempts to make contact with groups.	Affordable housing and shelter needs. Supportive services identified as priority need. Responses received from The Mosaic Project of South Texas and Coastal Bend Pride Center.
<b>Coastal Bend Wellness Foundation</b>	Social Service agency	Phone Call	Transitional housing is a need. Supportive services identified as a priority.

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

**Continuum of Care**

The Texas Balance of State Continuum of Care provided their prioritization standards for Coordinated Entry which identifies where the CoC believes the greatest need to be. During the

development of the plan, the CoC made the decision to revert to pre-COVID priorities. The CoC Rapid Re-housing priorities, in priority order, are those with the highest service needs, households sleeping in an unsheltered sleeping location, households with the longest history of homelessness and households with the earliest enrollment date in HMIS or HMIS-comparable database. For Permanent Supportive Housing, the CoC prioritizes, in order of priority, chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs, chronically homeless individuals and families with the longest history of homelessness, chronically homeless individuals and families with the most severe service needs and then all other chronically homeless individuals and families. The CoC deferred to local service providers for the best information on local gaps in services. The local CoC partner identified gaps with case management, substance use disorder treatment and mental health services.

### **Homeless Services Providers**

Homeless service providers overall reported shelter and staff capacity issues, affordable housing, supportive service needs, non-congregate shelter needs, shelter space for people unable to ambulate or use facilities without assistance, homeless prevention, and TBRA. Additionally, transitional housing waiting lists for public housing and Section 8, job skills training deficits, social services waitlists, and appropriate housing for larger families were also identified as obstacles. TBRA and supportive services were stated as priority need.

### **Human Trafficking/Domestic Violence Service Providers**

Human trafficking social service providers identified priority needs as affordable housing and reliable child care. Social services were identified as a priority need. The domestic violence service provider identified TBRA and supportive services as the primary needs to include legal assistance and child care.

### **Educational Institution**

Corpus Christi Independent School District (CCISD) identified students' biggest needs as assistance with emergency food, hotel emergency assistance, and substance abuse treatment. The school district reported attendance went from 76 to 91 percent just after opening a food pantry at CCISD. The students who are at-risk of homelessness or who are homeless and in the biggest need of assistance are 85% Hispanic. Junior high schools show the highest rate of runaways and highest number of homelessness, highest number of dropouts, and highest number for truancy and discipline issues in middle school. Area needs identified a shelter for minors or young adults and medical assistance because of the age of parental consent. Gaps in services include supportive services, youth placement and bed availability for minors in area shelters. Supportive services were identified as a priority need.

### **Hospital Systems**

Christus Spohn identified substance use disorder treatment, mental health treatment, and case management as priority needs. Gaps in services included access to affordable housing, social services, street outreach, transitional housing or hospice, respite care or hospital step-down. Target populations to benefit most from these services are the homeless and at-risk of homelessness.

Supportive services were identified as a priority need.

### **Veterans Groups**

Agencies who provide Veteran's services stated concerns with uncoordinated services for the Veteran population and recommended focusing funds on homeless prevention for sustainability with a concentration on coordinated entry and supportive services. Priority was given to supportive services as a primary need.

### **Public Housing**

Corpus Christi Housing Authority (CCHA), which services as the City's primary housing agency (PHA), stated supply of rental housing is low and affordable rental housing is even lower, affordability is not really affordable and what is available is substandard. CCHA not only stated an affordable housing crisis but also an income crisis; with too many people existing at income levels too low to cover their housing needs; in terms of subsidized housing (section 8 vouchers, etc).

CCHA stated the following priority needs for qualifying populations:

1. The more doorsteps there are the more pressure there is on the landlords to make their properties appealing and healthy, and safe, the more opportunities for progression; attention by the property management company to take care of their tenants and ensure a safe experience.
2. Supportive services to help people understand accountability and teach them to be good renters.
3. Displacement programs to assist with involuntary removal in any apartment complex; all must take vouchers;
4. Give anyone experiencing or about to become homeless a tenant protection voucher for a certain amount of money for a certain amount of months; people can use the vouchers for a lease period, work with CCHA for supportive service during that time and then transition to a CCHA voucher – CCHA would administer this program. Give the CCHA 100 tenant protection vouchers and establish a preference rating system. The City could develop its own preference and CCHA would administer (Veterans Affairs Supportive Housing is the model). CCHA would give a 100 point preference for Corpus Christi Voucher Partnership between the City and the Housing Authority to get people into housing and when the program ends, they get a CCHA voucher, which becomes permanently funded.

CCHA supports the idea of a using HOME ARP funding to purchase a hotel for use as transitional housing and share the cost of operations after acquisition. The costs could be shared by the City, CCHA and rental income.

### **Public Agencies**

Coastal Bend Aging and Disability Resource Center (CBADRC) provides a single coordinated system of information and access for all persons seeking housing assistance. There is a great need for additional accessible, affordable and integrated housing in the 11 counties served. Lack of adequate supply of shelters, affordable, accessible and integrated housing to meet the needs of

seniors and persons with disabilities is an unmet need that hinders housing options for people to choose where they want to live.

The current subsidized housing inventory listing compiled by CBADRC includes shelters, however due to some accessibility concerns and strict regulations at the shelters; many of the qualifying populations do not consider going to a shelter and thus a gap does exist for this temporary housing option.

The following priorities were identified for the qualifying populations 1). Accessibility features at all shelters, 2). No work requirements, 3). Able to stay at shelters during the day.

Overall, public agencies identified lack of affordable housing, staff capacity, high housing costs, supportive services and wait list for supportive service programs as a gap. Priorities included transitional housing, supportive services, some type of other permanent housing, TBRA for rental assistance, utility assistance, and security deposits and services for persons with disabilities as top priorities followed by services related to fair housing/Civil Rights, rapid rehousing, homeless prevention, new construction of affordable housing units, and the need for emergency and temporary shelters. Consensus centered around TBRA and supportive services instead of constructing a building or shelter.

Corpus Christi Fair Housing public agency serves the following three Qualifying Populations including at Risk of Homelessness; Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, stalking or human trafficking and other.

Nueces County Department of Social Services public agency serves the following three Qualifying Populations including at Risk of Homelessness; Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, stalking or human trafficking and other.

Texas Department of Housing and Community Affairs is inclusive of all Qualifying Populations including homeless, at risk of homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking and other.

Corpus Christi Independent School District is inclusive of all Qualifying Populations including homeless, at risk of homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking and other.

Corpus Christi Police Department is inclusive of all Qualifying Populations including homeless, at risk of homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking and other.

Texas Health and Human Services Commission is inclusive of all Qualifying Populations including homeless, at risk of homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking and other.

### **Fair Housing**

The Fair Housing Unit identifies the needs as the availability and affordability of units for both homeowners and rents, the available of accessible units and geographic distribution affordable units. Priorities include education about options, rights, and resources, rental assistance, and



supportive services. Supportive services identified included job training, education, homeless provision, child care, legal services, and transportation.

### **Public or Private Organizations**

Affordable housing developers are building one to two projects in Corpus Christi per year. Permanent financing options that allow for affordable rents are limited and properties that are developed using Low-income Housing Tax Credits must compete with other communities in our area. New projects include units for persons at or below 80% of the area median income (AMI), 60% AMI, 50% AMI and 30% AMI but the lower the AMI served the more difficult the project is to develop. The deeper income targeting requires deeper development subsidies, rent subsidies (TBRA or PHA vouchers), and healthy operating and replacement reserves.

### **Bloomberg Harvard City Leadership Innovation Track**

Throughout 2022, the City of Corpus Christi was a member of the Bloomberg Harvard City Leadership Initiative Innovation Track with creating solutions in response to homelessness as the focus. Through that program, 169 services providers, unsheltered homeless persons, residents, and businesses were engaged. Engagements included identifying issues, examining gaps, and testing assumptions. Responses received through the program identified that there are gaps throughout the continuum of care for the homeless and current options are not adequate. This presents a problem for people unable to access the care and services they need trapping individuals in a cycle of homelessness. Gaps in the continuum of care were identified as rental assistance, supportive housing, supportive services such as transportation, job training, mental health services, substance use disorder treatment, maintaining adequate documents such as identification and other supportive services. The negative impacts of homelessness on neighborhoods and businesses were discussed as well.

### **Law Enforcement**

Corpus Christi Police Department stated that people in shelters and transitioning into housing need case management, life skills training, mental health services and substance use disorder treatment. Housing is available in the community but without supportive services people experience homelessness repeatedly.

### **Community Groups Survey**

A six-question survey was sent to 96 community groups who included nonprofit service providers, government agencies, Civil Rights groups, businesses, community members, mental health service providers and groups representing persons with disabilities. The response rate was 22.9%. Survey respondents ranked the eligible populations that would benefit the most from services in the following order: 1) persons who are homeless; 2) person who are at-risk of homelessness; 3) persons who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; and 4) other households who require services or housing assistance to prevent homelessness. The ranking of the types of housing assistance or supportive services available was in the following order: 1) supportive services; 2) TBRA and production and preservation of affordable housing; and 3) purchase and development

of non-congregate housing. The types of supportive services were ranked in the following order: 1) case management; 2) mental health services; 3) housing search assistance; 4) employment assistance; 5) life skills training; 6) substance use treatment; 7) food; 8) utility deposits; 9) outpatient health services; 10) outreach services; 11) transportation; 12) education services; 13) child care; 14) moving costs; and 15) legal services.

## **Public Participation**

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

- *Date(s) of public notice: 2/27/2022 and 3/5/2023*
- *Public comment period: start date – 2/28/2022 end date – 3/21/2022; and start date - 3/6/2023 end date - 3/20/2023*
- *Date(s) of public hearing: 3/8/2022, 3/22/2022, 3/21/2023, 3/28/2023 and **June 14, 2023***

The public comment period began on February 28, 2022, through March 21, 2022, with a publication and Public Comment period in the Corpus Christi Caller Times Newspaper. The comment period was open until March 21, 2022. The notice for the HOME-ARP Acceptance of \$4,213,937 was posted on the City’s website at <https://www.cctexas.com/gmd>. There were no public comments.

A public comment period began on March 6, 2023, beginning with the publication of the Notice of Public Comment period in the Corpus Christi Caller Times Newspaper. The comment period was open until March 20, 2023. The draft HOME ARP allocation plan was posted on the City’s website at <https://www.cctexas.com/detail/2023-home-arp> and available for viewing at the Neighborhood Services Department and the La Retama Library. There were no public comments.

A public comment period began on May 30, 2023 and ended on June 14, 2023. A Public Hearing was held on June 14, 2023. Notice of the public comment period and public hearing were published in the Corpus Christi Caller Times Newspaper on May 21, 2023, posted on the City’s website, and promoted through a social media post. The draft HOME ARP allocation plan was posted on the City’s website at <https://www.cctexas.com/homearp> and available for viewing at the Neighborhood Services Department and the La Retama Library.

### ***Describe efforts to broaden public participation:***

The City broadened participation by launching a survey across stakeholders, community and Civil Rights groups and incorporated the Bloomberg Harvard City Leadership Innovation Track with creating solutions in response to homelessness as the focus. The track tasks interdisciplinary city teams to build innovation capabilities as they design, test, and prototype solutions to a pressing city problem. Homelessness was the focus of the track and identified gaps in services and priority needs.

The survey asks the community groups to reflect on the priority needs. The public also had the opportunity to comment at the in-person Corpus Christi City Council meeting held on March 21, 2023, at City Hall. The meeting site is wheelchair accessible. Aids and services, including deaf interpreters, and translation services were made available.

Throughout 2022, the City was a member of the Bloomberg Harvard City Leadership Initiative Innovation Track looking at the issues of homelessness in the community. Throughout the process, the City engaged service providers, persons who are homeless, residents and business owners. The City conducted stakeholder meetings, held on street interviews at common homeless gathering points and service provider locations, attended service events such as feedings and free stores and conducted interviews with businesses. The City engaged 169 people through these

personal interactions.

Also, throughout the HOME-ARP Allocation Plan development, the City engaged community stakeholders not commonly considered part of the homelessness response network. These engagements included organizations in the health system, public education, fair housing, BIPOC places of faith, and law enforcement.

*A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.*

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

See the table summary of consultation meeting responses and summary of comments above. Insert public comments after hearing.

***Summarize any comments or recommendations not accepted and state the reasons why:***  
Insert after public hearing.

## Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

### Template:

#### OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	147	39	203	0	0								
Transitional Housing	37	11	136	0	10								
Permanent Supportive Housing	11	10	141	0	132								
Other Permanent Housing	22	22	23	0	0								
Sheltered Homeless						24	182	14	32				
Unsheltered Homeless						0	178	16	14				
<b>Current Gap</b>										0	0	0	0

**Data Sources:** 1. 2022 Point in Time Count (PIT); 2. 2022 Continuum of Care Housing Inventory Count (HIC); 3. Consultations

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	<b># of Units</b>	<b># of Households</b>	<b># of Households</b>
Total Rental Units	50,615		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	5,780		
Rental Units Affordable to HH at 50% AMI (Other Populations)	8,665		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		7,205	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,690	
<b>Current Gaps</b>			1,425

**Suggested Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

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

The City of Corpus Christi is included in the Texas Balance of State Continuum of Care (CoC). The CoC covers 215 of Texas’ 254 counties. Corpus Christi is the largest city in the CoC. Corpus Christi is represented in the CoC by a Local Homeless Coalition (LHC). LHCs are groups of organizations, individuals and leaders interested in ending homelessness. LHCs are responsible for meeting and working to meet requirements set by the CoC to build and maintain effective homeless crisis response systems that meet local needs. Homeless Issues Partnership is the LHC that represents Corpus Christi. As discussed in the stakeholder section of the HOME ARP Allocation Plan, the City consulted with the CoC and the Homeless Issues Partnership during the development of the plan.

The Point-in-Time (PIT Count) data used in the HOME ARP Allocation Plan is from Nueces County. However, when the Homeless Issues Partnership conducts the PIT Count, volunteers have not surveyed areas outside the City of Corpus Christi. PIT Count data representing areas of Nueces County outside of Corpus Christi is minuscule.

During the 2022 PIT Count, 257 sheltered and 186 unsheltered persons experiencing homelessness were identified. Of those answering the question regarding length of time they have been homeless, responses were: 102 persons for 3 years or more; 1 person for 2-3 years; 46 persons for 1-2 years; 16 persons for 7-11 months; 47 persons for 4-6 months and 78 persons for 0-3 months. The PIT identified 67 people were experiencing chronic homelessness and 110 people who were homeless for the first time.

The 2022 PIT Count identified 30 veteran households comprised of 33 persons. Of these, 12 persons were identified as chronically homeless and 3 were female. Twenty-four homeless

families with children were identified during the 2022 PIT Count. These households had 43 children under the age of 18. None of these families was unsheltered at the time of the 2022 PIT Count.

Males were 54% of the total persons counted. The racial breakdown was as follows; 41.8% of the homeless count were non-Hispanic; 36.8% of people experiencing homelessness were Hispanic; 60.5% of total individuals experiencing homelessness were White; 10.4% were Black, African American, or African; 1.6% of the total count were American Indian, Alaska Native or Indigenous; .9% Native Hawaiian or Pacific Islander; 0.7% Asian; and 0.5% multiple races.

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

According to the Comprehensive Housing Affordability Strategy (CHAS) data from the 2015-2019 American Community Survey (ACS), Corpus Christi has a total of 50,615 total occupied rental units. Of these units, 11,255 were occupied by households with incomes at or below 30% of the area median income (AMI) and 8,425 were occupied by households with income greater than 30% of AMI and at or below 50% of the AMI. There were 10,890 households experiencing a housing cost burden of greater than 50% and 11,120 with a housing cost burden of greater than 30% but less than or equal to 50%.

Additional data in the 2015-2019 ACS shows that there are 4,115 vacant rental units. Of the vacant units, 165 are affordable to households with incomes less than or equal to 30% AMI and 975 units are affordable to household greater than 30% AMI and less than or equal to 50% AMI.

The total rental units affordable to households at or below 30% AMI is 5,780 and the rental until affordable to households with incomes greater than 30% AMI and less than or equal to 50% is 8,665.

There are 7,205 renter households with incomes at or below 30% AMI with one or more severe housing problems and 3,690 renter households with incomes greater than 30% AMI and equal to or less than 50% AMI with one or more severe housing problems. Using severe housing problems, the level of need for households at or below 30% AMI with severe housing problems is 1,425 units.

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

The Corpus Christi Police Department reports that 4,421 incidents were reported to the Family Violence Unit in 2022. According to The Purple Door, Corpus Christi's domestic violence service provider, they served between 800-900 nonresidential clients in 2022. They served 573 residential clients in the same period. The total number of bed days was 17,001. Ages of those served varies and generally falls between 18-55 years old some with minor children. They serve men and women and see a small population of LGBTQ clients, but the vast majority of clients are women. The racial distribution of clients is approximately 80% Hispanic, 15% White, 5% Black and a small percentage is Asian. Among those they serve, approximately 85-95% are below the poverty level, especially those seeking residential services.

Regarding human trafficking, the Nueces County Sheriff's Office reports that the bookings for alleged perpetrators of Trafficking of Persons and Continuous Trafficking of Persons were two in 2021, five in 2022 and none to date in 2023. Local service providers and law enforcement do not have human trafficking victim specific data. The Fiscal Year 2022 Report of Annual Activities for the Texas Human Trafficking Prevention Task Force does not report any activities in Corpus Christi, Nueces County, or the Coastal Bend area. According to public reports, the area with greatest trafficking figures in Texas is referred to as the Texas Triangle which is designated by a series of highways and interstates connecting Houston, San Antonio, and the Dallas-Fort Worth area. Corpus Christi is not located in the Texas Triangle. This is not to say that Corpus Christi does not have victims of human trafficking but federal and state resources to combat, prosecute and track trafficking are concentrated in other areas. In June 2023, the City will accept a grant from the Texas Governor's Homeland Security Grants Division to combat human trafficking and drug smuggling along state and local highways and the extensive coastal waterways surrounding Corpus Christi. This activity may lead to an increase in known victims of human trafficking needed services. New Life Refuge Ministries, a nonprofit serving children who are victims of sex trafficking in the Corpus Christi area, has 10 residential beds and serves ages 11 to 17.

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

Other populations that may require services or housing assistance to prevent homelessness or are at the greatest risk of housing instability include those on the Corpus Christi Housing Authority waitlist. According to the Corpus Christi Housing Authority, there are 3,264 household on the tenant based list and 13,577 on the project based list. The project-based list broken down by bedrooms is 9,681 for one-bedrooms, 1,888 for two-bedrooms, 1,456 for three-bedrooms, and 552 for four-bedrooms. The housing authority selects households from the waiting list using local preferences. Those preferences include involuntary displacement (30 points), homeless (5 points), local residency (50 points), mainstream who are transitioning out of institution of other segregated setting, at serious risk of institutionalization, homeless, or at risk of homelessness (35 points), elderly (5 points), disabled (5 points), Veterans (5 points), time on the waiting list (5 points each year), and working families (5 points).

***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 (Optional):***

Enter narrative response here.

***Describe the unmet housing and service needs of qualifying populations:***

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

The unmet housing and service needs of homeless persons include case management, mental health services, substance use disorder treatment, food, transportation, legal services, life



skills training, job training, security deposits and rental assistance. Persons who are homeless need initial case management and other supportive services while becoming sheltered and transitioning to housing. Housing search assistance is critical. Finding a cooperating landlord and securing a lease is difficult for the homeless. Rental assistance such as TBRA is required while the household waits for a voucher or the situation otherwise stabilizes. Continued case management can help the household remained housed and meet daily living activities.

The Homeless Needs Inventory and Gap Analysis Table shows the current gap for beds and units to be zero. Based on the homeless population as compared to the current inventory, there isn't a demonstrated need for additional beds. For example, the Homeless Population data shows that there are 24 sheltered homeless with at least one child and no unsheltered homeless with children and that there are 217 beds that can accommodate families. The data shows 360 sheltered and unsheltered adults and 503 adult beds. There are 30 homeless veterans reported and 142 beds for veterans. The City and stakeholders believe that unsheltered adults are under represented in the PIT Count Homeless Population. To address this, the City is working with a nonprofit service provider to add an additional 120 emergency shelter beds to address the need. This is being funded with sources other than HOME-ARP and so is not included in the HOME-ARP budget.

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

The unmet housing and service needs of those at risk of homelessness include child care, transportation, mental health services, substance use disorder treatment, life skills training, food, job training, utility assistance, and rental assistance. Due to low wages or other income limiting factors, those at risk of homelessness benefit from assistance with child care and transportation. Rents are rising but wages are not keeping up and those on fixed incomes have limited options. Homeless prevention services like those listed, assist these households with remaining housed. Homeless prevention reduces trauma, is less costly than rehousing, and reduces the need for additional interventions.

As a participating jurisdiction, the City of Corpus Christi receives an annual Emergency Solutions Grant (ESG) fund allocation for four eligible components, one of which is Homeless Prevention. The City provides ESG funding to three local shelters including, The Salvation Army, Corpus Christi Hope House and Endeavors. The City assisted 43 households through homeless prevention programs as reported in the PY21 Consolidated Annual Performance Evaluation Report (CAPER). For current program year, the City committed \$52,157 to the Homeless Prevention component of which \$36,698 has been drawn with 58 households assisted to date. The annual ESG funding allocation to the City is limited and stakeholders reported a greater need than can be provided through existing ESG funding.

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

The unmet housing and service needs of those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking include, case

management, mental health services, substance use disorder treatment, food, transportation, child care, legal services, job training, security deposits, moving assistance, utility assistance, and rental assistance. The needs of households in this category are like those who are homeless as they establish new homes. Specialized case management and mental health services are key to stabilization.

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

Other populations requiring services or housing assistance to prevent homelessness and the other populations at greatest risk of housing instability include child care, transportation, mental health services, substance use disorder treatment, legal services, food, security deposits, moving assistance, rental assistance and utility assistance. Legal services, eviction prevention, fair housing interventions and other strategies for keeping this group housed are important.

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

Gaps within the system include rental assistance that covers costs for longer than three to six months and until a voucher is available, housing search assistance finding a landlord that works with subsidies, programs that help people maintain their participation in mental health treatment programs and substance use disorder treatment. Robust supportive services during stabilization are needed to prevent homelessness from reoccurring or preventing homelessness. Many programs don't include furnishings and household items. Also, nonprofit capacity is often limited and unable to meet the demand. A total of 19 consultations stated supportive services was needed.

As previously stated, the Homeless Needs Inventory and Gap Analysis Table shows the current gap for beds and units to be zero. Based on the homeless population as compared to the current inventory, there isn't a demonstrated need for additional beds. For example, the Homeless Population data shows that there are 24 sheltered homeless with at least one child and no unsheltered homeless with children and that there are 217 beds that can accommodate families. The data shows 360 sheltered and unsheltered adults and 503 adult beds. There are 30 homeless veterans reported and 142 beds for veterans. The City and stakeholders believe that unsheltered adults are underrepresented in the PIT Count Homeless Population. To address this, the City is working with a nonprofit service provider to add an additional 120 emergency shelter beds to address the need. This is being funded with sources other than HOME-ARP and so is not included in the HOME-ARP budget.

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

None

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

For those who are homeless the priority needs are:

- Supportive services
  - Case management
  - Mental health services
  - Substance use disorder treatment
  - Transportation
  - Child care
  - Legal Services
  - Food
  - Job training
  - Life skills training
- Rental assistance for at least one year and up to two years while a housing authority voucher or other affordable rental solution is secured

For those who are at risk of homelessness the priority needs are:

- Supportive services
  - Case management
  - Mental health services
  - Substance use disorder treatment
  - Transportation
  - Child care
  - Legal Services
  - Food
  - Homeless prevention rental assistance and utility assistance
  - Job training
  - Life skills training
- Rental assistance for at least one year and up to two years while a housing authority voucher or other affordable rental solution is secured

For those who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, the priority needs are:

- Supportive services
  - Case management
  - Mental health services
  - Substance use disorder treatment
  - Transportation
  - Child care
  - Legal Services
  - Food
  - Homeless prevention rental assistance and utility assistance
  - Job training
  - Life skills training
- Rental assistance for at least one year and up to two years while a housing authority voucher or other affordable rental solution is secured

For those who are considered other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability the priority needs are:

- Supportive services
  - Case management
  - Mental health services
  - Substance use disorder treatment
  - Transportation
  - Child care
  - Legal Services
  - Food
  - Homeless prevention rental assistance and utility assistance
  - Job training
  - Life skills training
- Rental assistance for at least one year and up to two years while a housing authority voucher or other affordable rental solution is secured

The following consultations identified priority needs for qualifying populations as follows: Homeless Issues Partnerships, The Purple Door, The Salvation Army, Corpus Christi Hope House, Nueces Center for Mental Health and Intellectual Disabilities, Texas Balance of State Continuum of Care, Corpus Christi Police Department, Coastal Bend Aging and Disability Resource Center, Texas Department of Housing and Community Affairs, Wenzel House, Brooks AME Worship Center, Corpus Christi Independent School District, Christus Spohn Hospital, Texas Health and Human Services Commission, Various Civil Rights Groups and Coastal Bend Wellness Foundation serve all Qualifying Populations. Corpus Christi Housing Authority and Nueces County Department of Social Services serves QP2, QP3, and QP4, respectively. City of Corpus Christi Fair Housing Unit serves QP2 and QP3. Endeavors, Coastal Bend Center for Independent Living and Choice Living Community serves QP1 and QP2. New Life Refuge serves QP3.

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

The City determined the level of need and gaps by examining the available rental units in the community by using the ACS and CHAS as compared to those who are homeless and experiencing severe housing problems including being cost overburden. Using that information and the feedback received during the extensive consultation process described above this plan was developed. Information used was qualitative and quantitative.

Approximately 26 consultations were completed. Eight of the 26 stated both Supportive Services and Tenant Based Rental Assistance were identified as priority needs. Six of the 26 stated Supportive Services and Affordable Housing were priority needs. Two out of 26 stated Affordable Housing, Supportive Services Tenant Based Rental Assistance were a priority need. Four of the 26 consultations stated Supportive Services were a priority need. Two of the 26 stated Transitional Housing and Supportive Services were a priority need. One of the 26 stated transitional units were needed. One of the 26 stated that the definition for the Qualifying Population for Human

Trafficking did not meet the victims in their care. One of the 26 stated Affordable Housing as a priority need.

The City of Corpus Christi Neighborhood Services Department 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.

## HOME-ARP Activities

### Template:

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

The City uses a formal application process for soliciting applications for funding. Funding will be allocated through a competitive process open to all nonprofit organizations serving qualifying populations. A Public Notice will be published in the local newspaper and posted on the City's website. Notice of the opportunity will be posted on the City's social media and distributed to local news outlets. A pre-application technical assistance workshop will be advertised to provide an overview of the program and the application submittal process. Each proposed project for funding shall be submitted electronically to the City and will include details of the project, project sources and uses, partners, impact on qualifying populations, proposed beneficiaries, scope of work, experience providing these services, experience administering federally funded programs, and other required information.

The City will perform a preliminary review on projects submitted for eligibility. A review team of staff and stakeholders will conduct application reviews and interviews with applicants. Applications will be scored based on the technical aspects of the applications and the impact to beneficiaries.

Recommendations for funding to the City Council will be made based on the application scoring. Applications will be subject to a public hearing during a City Council meeting. The recommended projects will be published with the regular meeting agenda in accordance with Texas rules and regulations. The nonprofits to carrying out activities, amounts of assistance, beneficiaries, scopes of work and other related information will be posted.

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

The City will not administer activities directly.

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

Not applicable.

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

**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 2,000,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 1,160,454		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 210,696	5 %	5%
Non-Profit Capacity Building	\$ 210,696	5 %	5%
Administration and Planning	\$ 632,090.55	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 4,213,937</b>		

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

Based on the priority needs established through the consultations, \$2,000,000 will be distributed through supportive service providers \$1,160,454 through TBRA, \$210,696 through non-profit operating, \$210,696 through non-profit capacity building and \$632,095.55 through administration and planning.

Any service providers receiving HOME-ARP through the previously described funding process will be required to coordinate a waitlist with no preference given among the qualifying populations. Applicants will be selected in chronological order.

***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:***

Throughout the consultations, the need for supportive services and TBRA were identified as priority needs. The City is funding these activities to meet those needs. The PIT Count and HIC do not reflect a great need for non-congregate shelter and the City is funding, through other sources, an additional 120 shelter beds. The consultations provided descriptions of the service delivery system that demonstrates a rationale for providing supportive services including case management, child care, transportation, mental health services, substance use disorder treatment, legal services, utility assistance, other supportive services and TBRA for clients stabilizing their housing situation. Providing these services will offer a gateway out of homelessness for the unsheltered, help stabilize those at-risk and provide a healthy start for those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

## HOME-ARP Production Housing Goals

### Template

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

Based on feedback from the consultations, the allocation plan does not include affordable housing rental production or preservation. This takes into consideration the costs associated with the development of new units and the reserves required as compared to the \$4.2 million allocation and the substantial need for TBRA and supportive services.

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

Based on feedback from the consultations, the allocation plan does not include affordable housing rental production or preservation. This takes into consideration the costs associated with the development of new units and the reserves required as compared to the \$4.2 million allocation and the substantial need for TBRA and supportive services.



## Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a 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).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-

ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.** For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

**Template:**

*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:*  
The City does not intend to give preference to one or more qualifying populations.

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

No preference will be given.

**Referral Methods**

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

**Template:**

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

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

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

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

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

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the

qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.

- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

### **Template**

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

The City does not intend to limit eligibility to any specific qualified population or subpopulation that is to be assisted with HOME ARP resources.

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

The City does not intend to limit eligibility to any specific qualified population or subpopulation that is to be assisted with HOME ARP resources.

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

The City does not intend to limit eligibility to any specific qualified population or subpopulation that is to be assisted with HOME ARP resources.

## HOME-ARP Refinancing Guidelines

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***  
City HOME-ARP funds will not be used for refinancing.
- ***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.***  
City HOME-ARP funds will not be used for refinancing.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***  
City HOME-ARP funds will not be used for refinancing.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***  
City HOME-ARP funds will not be used for refinancing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***  
City HOME-ARP funds will not be used for refinancing.
- ***Other requirements in the PJ's guidelines, if applicable:***  
City HOME-ARP funds will not be used for refinancing.