

Draft 2021 ANNUAL ACTION PLAN

HOME-ARP ALLOCATION PLAN

CITY OF HOUSTON

SYLVESTER TURNER, MAYOR

HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT

TOM MCCASLAND, DIRECTOR

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HOUSING AND
COMMUNITY
DEVELOPMENT

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This document is subject to change pending HUD approval.



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Introduction

In September 2021, the U.S. Department of Housing and Urban Development announced the allocation to the City of Houston (City) of over \$37 million in a new grant called the Home Investment Partnerships Grant American Relief Plan (HOME-ARP). The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing, administration and planning, and nonprofit operating and capacity building assistance. A certain portion of HOME-ARP funds must assist people in HOME-ARP "qualifying populations", which include

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

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 have relevant knowledge that can speak to the needs, service gaps, and potential activities that would best 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, HCDD consulted with stakeholders and asked for their input concerning the HOME-ARP grant, eligible activities, and the proposed budget. Stakeholders articulated their gap in services and/housing needs by providing written and verbal input. HCDD synthesized the consultants' feedback, and the following table summarizes the feedback received. HCDD will continue to meet with stakeholders throughout the implementation of the HOME-ARP activities in an effort to assess the ongoing needs of stakeholders' clients. HCDD will also strive to collaborate with stakeholders to develop and effectuate strategies that will help end chronic homelessness.



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

Table 1 Agencies/Organizations Consulted

Agency/Organizations Consulted	Type of Agency/Organizations	Method of Consultation	Feedback
Coalition for the Homeless of Houston/Harris County	Services-homeless Regional organization Planning organization	Homelessness Strategy Homelessness Needs – Chronically homeless Homelessness Needs – Families with children Homelessness Needs – Veterans Homelessness Needs – Unaccompanied youth	<p>HCDD consulted regarding the “Needs Assessment and Gap Analysis” section of this Plan.</p> <p>The Coalition also manages the HMIS system subrecipients report accomplishments related to homelessness. Data from HMIS is used to evaluate program performance.</p> <p>The Coalition is the lead agency to the Way Home Continuum of Care (CoC), and the CoC was consulted about potential HOME-ARP activities, fund distribution, and collaborations. The Coalition supported the need for the funds to address supportive services and providing housing options.</p>
City of Houston – Mayor’s Office of Homeless Initiatives	Other government – Local	Homelessness Strategy	<p>HCDD consulted with the Mayor’s Office of Homeless Initiatives to determine priorities for addressing needs of persons experiencing homelessness. The feedback received supported funds to be used for non-congregate shelter and supportive services.</p>
Covenant House	Services-homeless Regional organization Planning organization	Homeless Strategy	<p>Covenant House provides housing and supportive services to HOME-ARP qualifying populations, including those who are homeless, trafficked, and at-risk youth. Needs described included non-congregate shelter.</p>
Houston Housing Authority (HHA)	PHA	Public Housing Needs Homeless Strategy	<p>HHA serves on the CoC Board of Directors. HCDD and HHA will continue to meet regularly to discuss current projects and plan for potential future projects and initiatives to address homeless needs. Rental assistance continues to be a need for HHA applicants.</p>



Agency/Organizations Consulted	Type of Agency/Organizations	Method of Consultation	Feedback
Way Home Funders	Regional organization Other: Partnership with Public/Private Organizations	Homelessness Strategy	To address homeless needs identified in the HOME-ARP Allocation Plan, HCDD has consulted with Funders Together, a public/private funding group that has participated in homeless planning efforts and has agreed to strategically invest resources to leverage public investment and help meet the CoC's goals.
Houston Area Women's Center	Services-homeless Regional organization Planning organization	Homeless Strategy	HAWC serves HOME-ARP qualifying populations including women, children, and families escaping domestic violence, sexual assault, or human trafficking. Needs include non-congregate shelter to help stabilize families.



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 participation is a vital element in assessing the needs of and gathering input from Houstonians. HCDD seeks to exceed the statutory requirements of holding one public hearing by hosting two public hearings in preparation for the HOME-ARP Allocation plan.

HCDD held two public hearings that discussed the development of the HOME-ARP Allocation Plan, which incorporated information and discussion of community needs and eligible activities related to HOME-ARP, along with the chance to provide public comment on the proposed budget and activities. These hearings were held on November 4 and 10, 2021.

During the public hearings, HCDD presented eligible HOME-ARP activities and the City's proposed HOME-ARP budget. At the meetings, HCDD also had breakout groups in which each attendee had the opportunity to discuss the HOME-ARP budget and activities with HCDD staff and give their input on how HCDD should plan activities using to HOME-ARP funding.

The public notice for the HOME-ARP Allocation Plan was published in the *Houston Chronicle* on November 4, 2021 in English and in the *La Voz* on November 10, 2021 in Spanish. The public comment period on the Draft HOME-ARP Allocation Plan coincided with the public hearings, beginning November 4, 2021 and ending on November 19, 2021.

Describe any efforts to broaden public participation:

HCDD has employed a comprehensive strategy to broaden public participation in the development of the HOME-ARP Allocation Plan. HCDD aspires to reach many residents and stakeholders from varying backgrounds, including persons of color, limited English and non-English speakers, persons with disabilities, and special needs populations. To increase public participation, HCDD created several methods for residents to participate in development of the HOME-ARP Allocation Plan. HCDD's efforts are summarized below.

- HCDD conducted two virtual public hearings to gather residents' input from all areas of the city. The hearings were held on Microsoft Teams and broadcasted on HTV, HTV Facebook Live, and HCDD's Facebook Live.
- The two public hearings were held at staggered times to broaden the resident reach.
- HCDD provided a Spanish interpreter for Spanish speakers with limited English proficiency and provided real-time captioning for persons who are deaf or have a hearing loss during the public hearings.
- Flyers for the public hearings were posted at community centers and on local news station community calendars.
- HCDD's Electronic Newsletters with information about the public hearings were sent to over 27,000 city residents on October 20 and November 1, 2021.
- The hearings and the Draft Allocation Plan comment period were advertised in the *Houston Chronicle*, *La Voz* (Spanish newspaper), and *Viet Moi* (Vietnamese newspaper).
- Residents are also able to download the draft plan or simply complete an online comment form. Residents could also comment through email, voicemail, and postal mail.
- HCDD staff attended stakeholder and community meetings to inform residents of the



HOME-ARP grant and public hearings, which included several Super Neighborhood meetings and Super Neighborhood committee meetings, HCDD's Housing Advocates Collective Meeting, and Coffee and Conversations with the Department of Neighborhoods.

Summarize the comments and recommendations received through the public participation process:

This section is pending the completion of the comment period.

Summarize any comments or recommendations not accepted and state the reasons why:

This section is pending the completion of the comment period.



Needs Assessment and Gaps Analysis

To assess the unmet needs of HOME-ARP qualifying populations, HCDD evaluated the size and demographic composition of those populations. HCDD has also identified gaps within its current shelter and housing inventory, as well as the service delivery system. In the needs assessment and gaps analysis, HCDD used current data, including Comprehensive Housing Affordability Data (CHAS), 2020 Point in Time Count (PIT Count), 2020 CoC Housing Inventory Count (HIC), or other data available data sources.

The following information includes the basis for the needs assessment and gap analysis for HOME-ARP qualified populations.

Table 2 Homeless Needs Inventory and Gap Analysis Table

Homeless														
	Current Inventory					Homeless Population				Gap Analysis				
	Family		Adults Only			Vets	Family	Adult	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	924	253	1,014	1,014	30									
Transitional Housing	176	54	617	617	63									
Permanent Supportive Housing	2,223	703	3,834	3,834	1,357									
Other Permanent Housing	1,077	350	704	704	206									
Sheltered Homeless						604	928	101	301					
Unsheltered Homeless						0	1,510	73	36					
Current Gap										992	315	2,750	2,750	

Data Sources: 2020 Point in Time Count (PIT); 2020 Continuum of Care Housing Inventory Count (HIC); Consultation
 Note: A "Family" household is a household with at least 1 child, and an "Adult" household includes a household without children. The average household size is 3.15.



Table 3 Non-Homeless Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	520,845		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	111,095		
Rental Units Affordable to HH at 50% AMI (Other Populations)	101,370		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		82,495	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		36,085	
Current Gaps			119,735

Data Sources: 2013-2017 Comprehensive Housing Affordability Strategy (CHAS)

Table 4 Current Gaps for Single Adults & Youth

Program Component	Current System for Individuals (Units)	Estimated Optimal System for Individuals (Units)	Estimated Current Gap
Emergency Shelter	1,050	1,570	520
Diversion/Prevention	0	875	875
Transitional Housing	658	625	-
Rapid Rehousing	650	1,500	850
Bridge to Permanent Supportive Housing	25	750	725
Permanent Supportive Housing	3,125	5,025	1,900

Data Sources: 2020 The Way Home Community Plan; 2020 Point in Time Count (PIT); 2020 Continuum of Care Housing Inventory Count

Table 5 Current Gaps for Families

Program Component	Current System for Individuals (Units)	Estimated Optimal System for Individuals (Units)	Estimated Current Gap
Prevention	0	50	50
Emergency Shelter	400	160	-
Diversion/Prevention	0	80	80
Transitional Housing	120	100	-
Rapid Rehousing	170	485	315
Bridge to Permanent Supportive Housing	0	50	50
Permanent Supportive Housing	415	290	-

Data Sources: 2020 The Way Home Community Plan; 2020 Point in Time Count (PIT); 2020 Continuum of Care Housing Inventory Count

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

HUD requires HOME-ARP funds be used to primarily benefit individuals and families in specified HOME-ARP "qualifying populations." Qualifying populations include, but are not limited to, the following

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness



- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

Homeless Populations

In accordance with HUD's definition of homeless under the HOME-ARP grant, HCDD will consider a homeless family or individual to generally include:

- An individual or family who lacks a permanent and adequate permanent home
- A person or family who will imminently lose their permanent home due to a lack of resources or support
- A youth under the age of 25, even if accompanied by an adult, that does not have a permanent home

The Way Home Continuum of Care (CoC) is a collaborative effort to prevent and end homelessness in the Houston region (3,711 sq. miles), including in Houston, Pasadena, Conroe, Harris County, Fort Bend County, and Montgomery County. The Coalition for the Homeless Houston/Harris County (Coalition) serves as the lead agency and HMIS lead agency to The Way Home. The Coalition's 2021 Point-in-Time Homeless Count & Survey (PIT Count) found a total of 3,055 individuals experiencing homelessness on the night of January 19, 2021, 1,532 people staying in shelter (51%) and 1,510 people living unsheltered (49%) in Harris, Fort Bend and Montgomery counties, Texas.

In the homeless population, over four out of five persons experiencing homelessness were over the age of 24. Approximately one out of eight were under the age of 18, and all of those under age 18 were residing in sheltered situations. The population living unsheltered was older with forty-nine out of fifty (97%) 25 years of age or older. The sheltered population experiencing homelessness was younger, due to the inclusion of children in that population. Overall, three out of five persons, in the population experiencing homeless were male with a higher percentage in the unsheltered population (81%).

The analysis of subpopulation showed that nearly one out of five people met the HUD definition of chronic homelessness. One out of eleven people self-identified as a veteran, and high rates of serious mental illness (two out of five) and substance use disorder (three out of five) were also reported.. A total of 187 young adults (18-24) were among those experiencing homelessness, with 9% reported as chronically homeless. Thirty children were found in parenting youth households, and all of them were in emergency shelter or transitional housing.

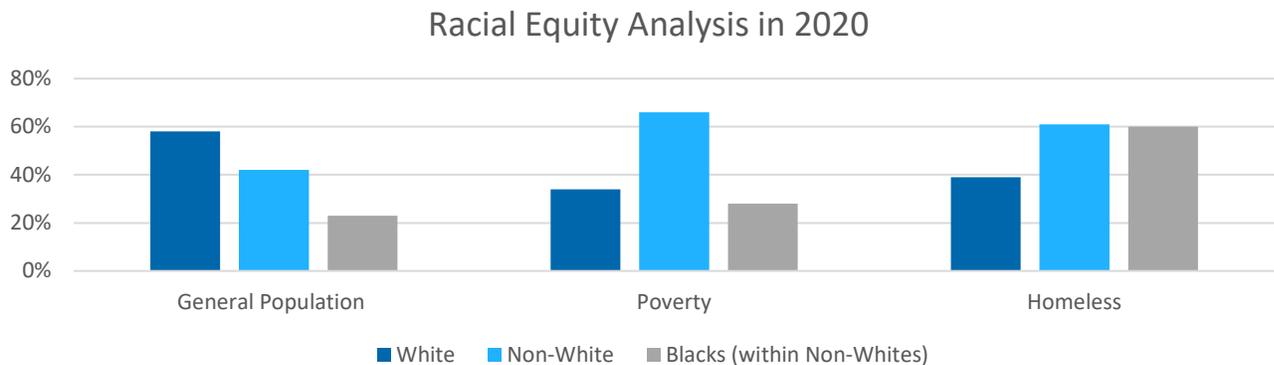
The vast majority of those experiencing homelessness were either Black/African American (56%) or White (40%). One in seven individuals experiencing homelessness who were interviewed considered themselves Hispanic. The findings show a higher percentage of white homeless people were found in the unsheltered population than in the sheltered population.

People of color are disproportionately overrepresented in the homeless system. The homeless response system and governmental funders play a role in these disturbing levels of inequity, and it has an important role to play in addressing them and must ensure that it does not perpetuate injustice. Houston, while working to end homelessness for everyone, must ensure system policies, programmatic practices, and unconscious bias are not preventing or delaying people of



color from accessing services, or directing them to services not of their choosing. As the homeless response system transforms, all people, especially people of color, must have equitable access and opportunity.

Figure 1 Racial Equity Analysis in 2020



Data Source: HMIS; U.S. Census Bureau 2019 American Housing Survey; Wellfareinfo.org

Individuals and Families at Risk of Homelessness

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability, like moving two or more times during the last 60 days due to economic reasons.

Using HUD's 2014-2018 CHAS data, Houston has 136,630 households with incomes at or below 30% AMI, which is 16.1% of all Houston's households. Almost all households, 80.0% of households, with incomes at or below 30% AMI are renter households. As shown in Table 3 above, there are approximately 82,495 renter households that earn 30% AMI or under and have one or more housing problems, which could include housing cost burden, overcrowding, lack of kitchen facilities, or lack of plumbing facilities. These households are considered to be at risk of becoming homeless.

Fleeing or attempting to flee domestic violence or human trafficking

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit.



Since 2017, Houston has experienced an alarming rise in domestic violence reports. According to the Texas Council on Family Violence Annual Honor Victims report, the Houston-Harris County area has seen a 45% increase in reported domestic violence cases. Of the domestic violence cases in Texas during 2019, about 21% of those incidents occurred in the Houston/Harris County Area, but since COVID-19 in 2020, the number of domestic violence cases increased by 8.2%.¹

According to the Texas Council on Family Violence (TCFV), the conditions of the coronavirus pandemic in 2020 increased isolation and economic stressors that compounded the impact of abuse, including frequency and severity of violence. They documented the highest number of intimate partner homicides in the last decade and a 23% increase in homicides between 2019 and 2020. This increase is also shown through the crisis response hotline calls from the Houston Area Women's Center which received a marked increase in calls in 2020 at 45,904 calls, compared to 2019 at 39,615 calls and 2018 at 36,471 calls.

The majority of family violence fatalities are women. In 2020, TCFV found that 183 women were killed by male partners, 40 men were killed by female partners, and 5 men and women were killed by a same sex partner. The victims ranged in age from 14 to 90 years old. In addition, according to the Domestic Violence Defense using data from the Texas Department of Public Safety, Harris County had more family violence incidents, at 41,300, than any other county in Texas in 2018. The next highest number of incidents occurred in Dallas County with 22,136 incidents and Bexar County with 15,242 incidents.

In the Houston Area Women's Center (HAWC) 2020 Annual Report, HAWC reported that the organization housed or assisted 4,178 families or individuals fleeing domestic or dating violence, sexual assault, or sex trafficking. Of those families or individuals assisted 4,000 received supportive services such as counseling, court and/or legal services, and case management. HAWC's also assisted families and their families or friends which included accompanying 399 survivors to the hospitals, housing 632 survivors, placing 557 survivors in safe harbor hotels, and providing \$1.6 million in direct assistance, yet HAWC was only able to support 30% of families or individuals in need or their services.²

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. 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.

¹ 2020 Crime in Texas Report (2020) Texas Department of Public Safety)
https://www.dps.texas.gov/sites/default/files/documents/crimereports/20/2020cit.pdf&sa=U&ved=2ahUKEwjW9pSZ1PzfAhX7k2oFHTwgBS84HhAWegQIBhAB&usq=AOvVaw3Vqli1_v5AP84irIPHBua7.

² HAWC 2020 Annual Report (2020) Houston Area Women's Center.
https://hawcdv.org/sdm_downloads/hawcs-fiscal-year-2020-annual-report/.



Many renters in Houston experience varied housing challenges. Over half (59.6%) of all Houston renters have housing problems or 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% of more. Of these problems, housing costs negatively impact most renters whose household income is at or below 50% AMI. About three in four (70.1%) renters earning at or below 50% AMI are either cost burdened or severely cost burdened.

The Houston-Harris County Emergency Rental Assistance Program launched in March 2021. As of October 28, 2021, 131,843 applications for assistance had been submitted to receive rent assistance because they were financially impacted by the COVID-19 pandemic, experienced housing instability, and whose household income was at or below 80% AMI. In addition, the Coalition, through the Community COVID Housing Program (CCHP), has housed 873 people experiencing chronic homelessness in permanent supportive housing, provided short term rapid re-housing for 2,674 people who have fallen into homelessness due to COVID-19, and provided diversion services to assist 2,224 people maintain or regain housing over the past year, from October 1, 2020 to October 20, 2021.

This shows the extreme additional need in Houston for rental assistance and wrap around or supportive services to assist households who are living in housing instability or that have recently received housing assistance due to COVID-19 impacts.

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:

Many of the needs of the qualifying populations are similar and include the need for a flexible response system, available housing that is affordable, wrap around services, and supportive services or assistance that could prevent homelessness or greater housing instability. The following reviews the needs of each qualifying population.

Homeless Populations

People experiencing unsheltered homelessness are at great risk of continued harm due to higher rates of morbidity and mortality resulting from pre-existing health conditions, exposure to the elements, lack of access to healthcare, and elevated rates of hospitalizations with longer, more complex hospital stays. Long periods of living without shelter also put individuals at a greater risk of social isolation and the chance of victimization. The process of resolving unsheltered homelessness is much more complicated and takes longer compared to that for people receiving crisis shelter.

Houston has seen success in reducing the number of people experiencing literal homelessness by prioritizing the most vulnerable households first. This means that the CoC makes every effort to pair the Houston area's limited resources to those who are most vulnerable. Affordable housing



paired with supportive services is the solution to homelessness, and the City continues to work to expand access to permanent supportive housing.

It is important to connect people to permanent housing with the right level of services to ensure their success. Housing options must be flexible, client-centered, easily accessible and paired with support services necessary to help clients remain in housing for the long-term. Returning to homelessness after a housing placement is re-traumatizing for the families and an inefficient use of assistance resources. The CoC's most recent 5-year plan outlines the strategies to address immediate unmet needs:

- Expand the supply of permanent supportive housing (PSH) to meet the current total system gap of 1,900 units for single adults and youth; this includes a place to live that is affordable paired with supportive services.
- Expand the annual supply of rapid re-housing to meet the current system gap of 1,165 annual slots for single adults, families, and youth; this includes a place to live that is affordable paired with supportive services.
- Secure resources to provide rehousing navigation support by recruiting and retaining a reliable supply of landlords and rental units.
- Implement a “moving on” strategy, targeting up to 20% of current PSH residents for transition to general population affordable housing, thus freeing up PSH for new tenants, which often requires access to affordable and/or subsidized units.
- Establish, support, and use all available homeless preferences for affordable housing resources and assets available through public housing authority (PHA) properties, multi-family developments, and Low-Income Housing Tax Credit developments.

In addition to the strategies to meet immediate needs listed above, both the housing response system and crisis response system must also be strengthened. To address these needs, the CoC has also identified the following ways to refine engagement strategies for people living unsheltered:

- Expand the number of outreach teams and staff to ensure appropriate coverage to all geographies throughout the CoC. Coordinate outreach teams to ensure standardization of outreach practices, schedules, and engagement strategies across all outreach efforts.
- Undertake proactive, non-punitive responses to outreach, which are critical when there are high numbers of people who are unsheltered to reduce significant dangers found at encampments.
- Expand crisis housing response to include a navigation/ engagement center for the most vulnerable unsheltered people who require specialized services to address comorbidities of mental illness, substance use disorders, chronic health conditions and prolonged social dislocation.
- Reduce barriers to existing crisis services by easing sobriety requirements and by easing restrictions that inhibit access for people with untreated behavioral health issues, couples, people with support animals, people of non-binary gender identity, and people needing extra space for storage of their belongings.
- Ensure expanded crisis housing capacity is accessible and targeted to special populations for whom there are not enough beds in current shelters. Target groups include single people experiencing mental illness, developmental disabilities, and chronic health conditions. Crisis housing should be low barrier, enabling immediate access without preconditions such as requiring engagement in treatment, employment, or services.



- Leverage person-centered, housing-focused case management with enhanced training in evidence-based best practices (e.g., trauma-informed care, critical time intervention, motivational interviewing, and housing first strategies) for service delivery.

Individuals and Families at Risk of Homelessness

Individuals and families at risk of homelessness may need housing assistance that could vary from eviction assistance, diversion assistance, or rent and utility assistance in addition to other types of supportive services. Households who need assistance with maintaining or regaining housing to prevent homelessness will benefit from targeted services, like diversion services. However, diversion services, for instance require specialized outreach and engagement services targeted to high-risk populations and geographies to ensure people and communities at highest risk for homelessness are engaged with housing supports before experiencing literal homelessness. Services that may be needed to assist individual and families at risk of homelessness include

- Short-term subsidies to defray rent and utility arrearages for families that have received eviction or utility termination notices or are experiencing a hardship that may lead to homelessness
- Security deposits and first month's rent to permit homeless families to move into their own apartment
- Light case management services geared towards problem solving and rapid resolution for people receiving diversion services
- Mortgage payments
- Rapid resolution case management and/or mediation services

Fleeing or attempting to flee domestic violence or human trafficking

The City of Houston Mayor's Office of Human Trafficking and Domestic Violence recently formulated a comprehensive municipal response to human trafficking through engaging a 6-month analysis and stakeholder engagement period. The analysis found that survivors lacked easy access to short-term shelter and quick access to medical and psychological services. In addition, there were only informal networks to connect survivors to job opportunities. Without economic independence, many survivors are caught in abusive relationships and the gains they make with traditional social services are not fully realized. Creating better access to short-term shelter and housing as well as increasing the supportive services available could help stabilize this qualifying population.

Residents living in housing instability or in unstable housing situations

Residents who have been previously homeless or are currently using some type of rental assistance may need the assistance to continue for a short or long period of time. Funding existing services and housing assistance programs is important to the housing stability of these individuals and families. In addition, the City of Houston and surrounding region has a lack of quality affordable housing available for residents in need causing cost burdens leading to housing instability. 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.



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:

The City of Houston receives an annual allocation of almost \$45 million in federal formula grant funding such as the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME) Grant, the Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons Living with HIV/AIDS (HOPWA). HCDD utilizes this grant funding to assist families with obtaining affordable homes, supportive services, rental assistance, emergency shelter and other services. These services can and often benefit qualifying populations. For instance, although the City uses CDBG to fund public services to the greatest extent possible, which can help stabilize individuals and families by providing services like healthcare, childcare, job training, and homeless services; however, there is a cap of 16.77% of the total grant amount of CDBG that can be used for public services. The City works with community partners to leverage resources and build up systems to serve Houstonians.

Since March of 2021, HCDD has partnered with Harris County to serve the community with the Houston-Harris County Emergency Rental Assistance Program. This program provides comprehensive rental and utilities assistance to households who are at risk of losing their homes due to COVID-19. As of October 2021, the program was funded with over \$283 million. Although the current funds are expected to be exhausted by the end of 2021, there may be additional funding available over the next year to continue this program.

The Houston region also receives approximately \$42 million in Continuum of Care (CoC) funding annually. This funding helps to keep approximately 5,000 formerly homeless people housed. The CoC Program is designed to

- Promote communitywide commitment to the goal of ending homelessness
- Provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness
- Promote access to and effect utilization of mainstream programs by homeless individuals and families
- Optimize self- sufficiency among individuals and families experiencing homelessness

In addition to the annual CoC funding, the City provides additional resources to assist Houstonians that are part of the qualifying populations. The City is partnering with Harris County and the Coalition for the Homeless to effectively utilize CARES Act relief funding through the Community COVID Housing Program (CCHP). The CCHP announced a joint, \$65 million plan to serve 5,000 people experiencing homelessness by October 2022 to limit the spread of COVID-19 by permanently housing people who are currently experiencing literal homelessness (e.g., living in shelters, encampments or on the streets), as well as those who may fall into homelessness as a result of the economic effects of the coronavirus.

The CCHP began on October 1, 2020, and as of October 20, 2021, approximately 3,553 people had been housed through the CCHP. The CCHP focuses on using three primary interventions: (1) "Bridge" to PSH for those experiencing chronic homelessness, (2) Rapid re-housing for those who may fall into homelessness as a result of COVID, and (3) Homelessness diversion to help people immediately maintain or regain housing, so that they do not have to experience the



trauma literal homelessness may cause.

We are working towards solving homelessness with our current resources through the CCHP. The CCHP is expected to make a deep, and hopefully lasting, impact on homelessness in the CoC, and it is likely that there are fewer unsheltered persons counted in the 2021 PIT Count because of this program.

In addition to CCHP, The Way Home CoC was recently awarded \$10 million to end youth homelessness -- the fourth-highest award in the nation. The Youth Homelessness Demonstration Program (YHDP) will provide our community with the funding, technical assistance, and flexibility to develop and implement a coordinated community approach to youth homelessness that matches the needs, assets, constraints, and preferences of our community stakeholders. Over the next several months, the CoC will work to form a YHDP workgroup in partnership with child welfare agencies, other community partners and most importantly, youth, to create a comprehensive community plan to address and end youth homelessness in our community. This work will help address one of the implement goals in the Coalition's Community Plan to build an equitable homeless response system that can effectively end youth homelessness.

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

The Coalition, with the help of a consultant, identified permanent supportive housing and rapid rehousing as ways to address the gaps in the current shelter and housing inventory to best assist people experiencing homelessness. The following details immediate gaps in the homeless system:

- There is a current total system gap of 1,900 units for single adults and youth, which includes a place to live that is affordable paired with supportive services.
- There is a current system gap of 1,165 annual housing or shelter units for single adults, families, and youth, which includes a place to live that is affordable paired with supportive services.
- To allow for social distancing during COVID, the system's homeless response estimates a gap of 520 emergency shelter beds for youth and single adults, as well as a need for Diversion services to reduce inflow into homelessness.
- The increased service-levels and access to Diversion services are crucial to targeting and preventing households from experiencing or returning to homeless.

The Houston housing inventory has a severe gap in the number of affordable homes available compared to those that are needed. The *2021 State of Housing in Harris County and Houston* finds that the affordability gap for renters is growing. Income continues to grow at a slower pace than housing process leading to Houston and Harris County's renter's being more cost burdened than renters in Dallas, Chicago and Atlanta. In 2019 the eviction filing rate was 8.8%, and the eviction rate was 4.5%, which is higher than many similar metro areas. The supply of affordable homes is not keeping up with demand, and higher land and construction costs may lead to an additional gap in the affordable homes that are needed.

The estimated gap of affordable rental homes that are needed in Houston, as shown in Table 3, is approximately 119,735 rental homes. Housing affordability in Houston and the surrounding region impacts the HOME-ARP qualifying populations, but also other low- and moderate-income



households and other vulnerable populations, such as persons with disabilities and persons fleeing domestic violence, sexual assault, and sex trafficking.

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 number one indicator of households falling into homelessness from a place of housing instability is a previous history of homelessness. Homeless assistance is generally the last resort for households in extreme poverty with few resources of their own and limited connections to others who could offer temporary, emergency support. Additionally, when other systems of care, like hospitals, behavioral health settings, child welfare, and criminal justice systems, are unable to address the reasons why people cannot stay housed, people have no alternative than turning to the homeless response system.

To prevent people from falling into homelessness, public systems for justice, anti-poverty, prevention, health (including behavioral health), child welfare and affordable housing must use data to identify how people are falling into homelessness and target prevention strategies and policies to address these areas.

Additionally, families with children, or unaccompanied youth who are unstably housed and likely to continue in that state, including those people who are doubled up in other people’s homes because they lack a home of their own, are not considered to be experiencing homelessness by the U.S. Department of Housing and Urban Development (HUD) and are not eligible for its homeless assistance. These same families are, however, considered to be experiencing homelessness by the U.S. Department of Education and are eligible for additional educational services and supports. People are considered to be “at risk of homelessness” if they are losing their primary nighttime residence, which may include a motel or hotel or a doubled-up situation, within the next 14 days and lack resources or support networks to remain in housing.

Identify priority needs for qualifying populations:

HOME-ARP qualifying populations often have many competing needs. The needs overlap but also vary amongst these populations, and the following information covers the priority needs for each of the qualified populations.

Homeless or At-Risk of Homelessness Populations

HCDD has partnered with the CoC to identify and prioritize the needs of the homeless population in Houston. The CoC’s Community Plan outlines goals that address the needs of homeless veterans, people experiencing chronic or near chronic homelessness, homeless families, and youth. As identified in the Community Plan, families and individuals struggling with homelessness would benefit from an improved crisis response system.

Although the needs of each group generally overlap, each of these subpopulations may have greater needs than others. Those who are experiencing or are at-risk of homelessness need more affordable housing and shelter options that provide short-term, mid-term, and long-term interventions. Those who are at-risk of homelessness have a strong need for homelessness prevention and stabilizing services, while those who are currently homeless or experiencing chronic homelessness need more street outreach and case management services.



Domestic Violence Populations

Families or individuals fleeing domestic or dating violence need increased safety measures to minimize the risk of returning to unsafe residential environments. This qualified population has a critical need for temporary shelter for safe harboring and supportive services to help them transition to permanent supportive housing. These families and individuals also need supportive services to assist them like the legal advocacy, childcare, employment services, and case management.

Residents living in housing instability or in unstable housing situations

Many residents who are living in unaffordable or unsafe homes have many needs and face compounded challenges. These households need support with staying housed. While many families may gain stability through rental assistance, other families need more housing options that are safe and affordable. However, most of these households will also need a livable wage and supportive services to create long-term self-sufficiency.

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.

For households that are currently housed but have challenges maintaining their home, the level of need was measured by the amount of inventory that had affordable, safe, and adequate living conditions and the number of renter households that are experiencing severe housing cost burdens. These households need assistance that helps them stay housed without incumbering them with the cost of their home.



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:

As with HOME funds, HCDD will use HOME funds to promote public/private partnerships as a vehicle for preserving and expanding the stock of affordable homes. HOME-ARP funds may be leveraged with private and public funding sources to support activities for supportive services, tenant-based rental assistance, and the development of non-congregate shelters. HCDD will continue to support eligible activities through partners, like the Houston Housing Authority and other agencies, to assist very low-income households and qualifying populations.

HOME-ARP funds will be awarded to City departments or nonprofit or for-profit organizations, based on the merit of proposals or applications received prior to or during the grant implementation period. For development activities and supportive services, greater preference is given to proposals or applications that have other sources of equity and financing and are in line with HCDD’s priorities. The locations of activities will be determined after subrecipients are selected and prioritized.

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

HCDD will not allocate funds to a subrecipient or contractor to administer the entire HOME-ARP grant.

Use of HOME-ARP Funding

Table 6 HOME-ARP Budget

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 6,699,885.00		
Acquisition and Development of Non-Congregate Shelters	\$ 22,550,000.00		
Tenant Based Rental Assistance (TBRA)	\$ 2,500,000.00		
Development of Affordable Rental Housing	\$ 0.00		
Nonprofit Operating	\$ 0.00	0%	5%
Nonprofit Capacity Building	\$ 0.00	0%	5%
Administration and Planning	\$ 5,602,920.75	15%	15%
Total HOME ARP Allocation	\$ 37,352,805.00		

Additional narrative, if applicable:

Table 6 shows the HOME-ARP budget, which indicates the amount of HOME-ARP funding that is allocated for each eligible HOME-ARP activity type including administrative and planning costs within HOME-ARP statutory limits.



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:

HCDD has identified activities that will assist families and individuals of the most vulnerable qualified populations. The gap analysis shows that there is a need to strengthen the Houston area's crisis response system to identify those experiencing homelessness, prevent homelessness when possible, connect people with housing quickly, and provide services when needed.

One of the major gaps in Houston's homeless inventory is access to affordable housing. People experiencing housing crisis or fleeing an unsafe situation need to find a place to stay quickly. Access to this type of housing is a current gap in the system. Emergency shelter and interim housing can help to fill this gap to strengthen the crisis response system. Unlike other existing funding sources, like HOME grants, the HOME-ARP grant provides an opportunity to assist households with temporary supportive housing through the acquisition and development of non-congregate shelters. These shelters will not only help those experiencing homelessness, but they will also assist families or individuals who fleeing, or attempting to flee, domestic violence and sexual assault.

Many of the families or individuals who receive assistance to mitigate homelessness or to flee violent circumstances require wrap-around services with their housing because of the compounding challenges they face. HCDD will support organizations that provide supportive services to help program participants achieve self-sufficiency.

Among the most vulnerable qualified populations in jeopardy of housing instability are families and individuals who have challenges with housing affordability. Almost 30% of all renters in Houston cannot afford their home because they are either cost burdened or severely cost burdened. Cost burdened households spend between 30% and 50% of their income on housing cost while severely cost burdened households spend over 50% of their income on housing costs. Almost all (84.6%) renters who are at or below the 50% Area Media Income (AMI) are cost burdened or severely cost burdened. To help keep families housed and address affordability challenges within the housing inventory, HCDD will fund activities that provide rental assistance to qualifying populations. Tenant-based rental assistance will be administered by local non-profits or public agencies that support families or individual who are at-risk of homelessness.



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:

During and after the housing crisis caused by the COVID-19 pandemic, HOME-ARP qualifying populations in Houston need support to improve their resilience. These vulnerable families and individuals experience compounded obstacles, including housing cost burden or living in poor housing conditions. Because of this, HCDD will use HOME-ARP to help house or keep these families or individuals housed through eligible activities such as non-congregate shelter, rental assistance, and supportive services.

Based on the need and gap analysis, HCDD will prioritize families and individuals that are experiencing or at-risk of homelessness. In addition to housing instability, homeless individuals are more susceptible to acute health concerns, physical or sexual assault, and drug and alcohol abuse, making them some of the most vulnerable populations and in need of specialized and intense services. Because of the great need for supportive housing to assist both adult and youth homeless individuals, HCDD will prioritize those who are experiencing or at-risk of homelessness. Housing or shelter assistance will support these families or individuals leaving homelessness.

HCDD will also give priority to families or individuals who fleeing, or attempting to flee, domestic violence and sexual assault. With the increase in domestic violence following the COVID-19 pandemic, more families will require housing and supportive services.

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:

To improve the quality of life for program participants, HCDD will support activities that prioritize families and individuals who are the most vulnerable within the qualified populations. These Houstonians are likely to have great compounded challenges that require more intensive supportive services to achieve and maintain housing stability. These qualifying populations require assistance transitioning to housing, including permanent supportive housing, along with short-term or long-term supportive services like case management, healthcare, legal services, and other supportive services. With better housing options and wrap-around services, these families will have a higher likelihood of becoming self-sustaining over time.



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:

Other qualified populations like veteran households or households who are at or below 50% AMI and experiencing housing problems will be eligible to receive rental assistance or supportive services. As stated in prior sections, these families and individuals have difficulty affording a rental home and have a great risk of having housing instability. HCDD will fund eligible activities that also support the stabilizations of these households, which will alleviate affordability challenges, overcrowding, and unsafe living conditions.



Appendix: SF-424s and Certifications



Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
--	--	--

* 3. Date Received: <input type="text"/>	4. Applicant Identifier: M21-MP48-0206
---	---

5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>
--	---

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
---	---

8. APPLICANT INFORMATION:

* a. Legal Name:

* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="746001164"/>	* c. Organizational DUNS: <input type="text" value="8324319850000"/>
---	---

d. Address:

* Street1:
Street2:
* City:
County/Parish:
* State:
Province:
* Country:
* Zip / Postal Code:

e. Organizational Unit:

Department Name: <input type="text" value="Housing and Community Dev Dept"/>	Division Name: <input type="text"/>
---	--

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

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:
Title:

Organizational Affiliation:

* Telephone Number: <input type="text" value="832-394-6134"/>	Fax Number: <input type="text"/>
---	----------------------------------

* Email:

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership Grant-American Rescue Plan (HOME-ARP)

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

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

City of Houston

Add Attachment

Delete Attachment

View Attachment

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

HOME-ARP Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant 22,29,36

* b. Program/Project 22,29,36

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="37,352,805.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="37,352,805.00"/>

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

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

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

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

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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

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

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT NAME City of Houston	DATE SUBMITTED

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Houston	DATE SUBMITTED

Attest/Seal:

City Secretary

Countersigned:

City Controller

DATE OF COUNTERSIGNATURE: _____, 2021

APPROVED:

Director
Housing and Community Development Department

APPROVED AS TO FORM:

Senior Assistant City Attorney

HOME-ARP Budget Page

HOME-ARP Funds	Allocation	Percentage
Sources		
Projected HOME Grant Award	\$ 37,352,805	
Projected HOME-ARP Funding	\$ 37,352,805	
Uses		
Planning and Administration*	\$ 5,602,920	15.0%
Acquisition and Development of Non-Congregate Shelters	\$ 22,550,000	60.4%
Tenant Based Rental Assistance	\$ 2,500,000	6.7%
Supportive Services	\$ 6,699,885	17.9%
Total	\$ 37,352,805	100.0%

**Planning and Administration up to 15% of Grant Amount.*

HOME-ARP CERTIFICATIONS

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

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

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

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

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

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

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

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

Signature of Authorized Official

Date

Mayor

Title



CITY OF HOUSTON
HOUSING AND
COMMUNITY
DEVELOPMENT

CITY OF HOUSTON

HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT

2100 Travis Street | 9th Floor Houston TX 77002 | 832.394.6200

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