

Bexar County HOME-ARP Allocation Plan

Revised May 2023



BEXAR COUNTY
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HOME-ARP ALLOCATION PLAN

Program Year 2021

BEXAR COUNTY, TEXAS

Economic and Community Development Department
Community Development Division

Table of Contents

HOME-ARP Allocation Plan

HOME-ARP Allocation Plan1

 INTRODUCTION 1

 CONSULTATION 2

 PUBLIC PARTICIPATION 8

 NEEDS ASSESSMENT AND GAPS ANALYSIS..... 11

 HOME-ARP ACTIVITIES41

 HOME-ARP PRODUCTION HOUSING GOALS43

 PREFERENCES44

 HOME-ARP REFINANCING GUIDELINES47

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HOME-ARP ALLOCATION PLAN

INTRODUCTION

On March 11, 2021, President Biden signed the American Rescue Plan Act of 2021 (“ARPA”) into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses.

To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARPA funds to communities across the U.S to assist individuals or households who are (1) homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) (“McKinney-Vento”); (2) at risk of homelessness, as defined in section 401 of McKinney-Vento; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; (4) part of other populations where providing supportive services or assistance would prevent a family’s homelessness or would serve those with the greatest risk of housing instability; or (5) veterans and families that include a veteran family member that meet the criteria in one of (1)-(4) above. The funds were allocated by formula to jurisdictions that qualified for funding through the HOME Investment Partnerships Program (HOME Program) from the U.S Department of Housing and Urban Development (HUD). This one-time supplemental round of funding is called the “HOME-ARP” program.

In September 2021, the U.S. Department of Housing and Urban Development (HUD) awarded Bexar County (COUNTY) **\$2,544,520** in HOME-ARP funds. The purpose of the HOME-ARP funds is to provide homelessness assistance and supportive services through the following eligible activities:

- Acquisition, Construction, and Rehabilitation of affordable rental housing (*may include single family or multi-family housing, transitional or permanent housing, group homes, single room occupancy (SRO) units, and manufactured housing*);
- Tenant-based Rental Assistance (HOME-ARP TBRA) (*such as rent, security deposits, utility deposits, and utility costs*);
- Supportive Services (*McKinney-Vento supportive services, Homeless Prevention Services, and Housing Counseling*);
- Acquisition and Development of Non-Congregate shelters (*non-congregate shelters are buildings that provide private units or rooms as temporary shelter*)

- Non-profit operating and capacity-building assistance; and
- Administration and planning.

HUD issued guidance for the utilization of the HOME-ARP funds through CPD Notice 21-10 on September 13, 2021, to ensure the funds are intended to benefit "qualifying populations," which include:

- **Qualifying Population 1 (QP1):** People experiencing homelessness (*Homeless, as defined in [24 CFR 91.5](#) Homeless (1), (2), or (3));*
- **Qualifying Population 2 (QP2):** People at risk of homelessness (*as defined in [24 CFR 91.5](#) At risk of homelessness*);
- **Qualifying Population 3 (QP3):** Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking (*as defined in [24 CFR 5.2003](#) and [22 U.S.C. 7102](#)*);
- **Qualifying Population 4 (QP4):** Other families requiring services or housing assistance to prevent homelessness or those at greatest risk of housing instability;
- Veterans and families that include a veteran family member that meet one of the definitions for QPs above.

To receive funding, the County 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.

CONSULTATION

SUMMARIZE THE CONSULTATION PROCESS

Bexar County collaborated with various public and private entities and consulted with them while developing the County's HOME-ARP Allocation Plan. These stakeholders have relevant knowledge that can address the needs, service gaps, and potential activities that would best benefit the HOME-ARP-qualified populations.

In developing the HOME-ARP Allocation Plan, the County consulted with stakeholders and asked for their input concerning the HOME-ARP grant, eligible activities, and the proposed budget. Stakeholders articulated their services, and housing needs gap by providing written and verbal input. As part of the Consultation process, the County developed a HOME-ARP consultation survey

that included a description of the funding opportunity, total allocation received, and requested feedback on prioritizing possible HOME-ARP eligible project types. The survey allowed for respondents to select multiple housing solutions ranging from emergency shelter to senior housing and single- family housing development, although some of these housing types may not be HOME-ARP eligible, this feedback can assist the County in future prioritization of housing needs to be undertaken with funding sources such as the HOME program. The survey also allowed for multiple selections of supportive services that may help HOME-ARP eligible populations regain and remain stably housed and allow for an open-ended input on the funding and needs surrounding homelessness and housing needs in Bexar County. The survey below specifies the questions for which rank order was allowed, otherwise all responses were based on most selected.

The County synthesized the stakeholder's feedback, and the following table summarizes the input received. The County will continue to meet with stakeholders throughout the implementation of the HOME-ARP activities to assess the ongoing needs of stakeholder's clients. The County will also strive to collaborate with stakeholders to develop and implement strategies that will help end chronic homelessness.

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

LIST OF ORGANIZATIONS CONSULTED:

Agency/Org Consulted	Type of Agency/Org	QPs Served	Method of Consultation	Feedback
American GI Forum	Veterans Group	All QPs	Phone Call/Consultation Survey	Advocated for the development and preservation of affordable rental housing with a focus on Veteran dependent families, including the expansion of emergency shelter capacity and ongoing supportive services to prevent homelessness from reoccurring.
Bexar County Behavioral Health Department	Public agency that addresses the needs of Qualifying Populations (QPs)	All QPs	Virtual Meeting	Advocated for the development and preservation of permanent supportive housing and wraparound services.
Bexar County Public Defender's Office	Public agency that addresses the needs of Qualifying Populations (QPs)	All QPs	Virtual Meeting	Advocated for the development and preservation of permanent supportive housing and wraparound services.

Catholic Charities, Archdiocese of San Antonio Inc.	Public or private organization that addresses the needs of QPs	All QPs	Consultation Survey	Advocated for Mental Health services, increased Emergency Shelter space, rental assistance, transitional housing, affordable housing, and supportive services.
City/County Joint Commission on Elderly Affairs	Public or private organization that address civil rights.	All QPs	Consultation Survey	Advocated for Affordable Housing and supportive services for the elderly so they can age in place.
Corazon San Antonio	Homeless Service Provider	QP1	Phone Call/ Consultation Survey/ Virtual Public Hearing	Advocated for developing low-barrier shelters and diversified housing models for homeless individuals in supportive living environments.
Family Violence Prevention Services, Inc.	Domestic Violence Service Provider;	QP3	Consultation Survey	Advocated for rental assistance, emergency shelter, and supportive services specifically for those fleeing domestic violence, sexual assault, stalking, or human trafficking.
FREED Texas	Public or private organization that addresses the needs of Qualifying Populations (QPs) / public or private organization that addresses Civil Rights and fair housing	All QPs	Virtual Public Hearing	Advocated for rental assistance, emergency shelter, and supportive services specifically for those that are justice involved.
Haven for Hope of Bexar County	Homeless Service Provider	QP1	Phone Call/ Consultation Survey/ Virtual Public Hearing	Advocated for the acquisition/development of non-congregate shelters, permanent supportive housing, and rental assistance specifically for individuals and families at risk of homelessness. Additionally, Haven for Hope advocated for low-barrier climate-controlled sleeping spaces for homeless individuals during extreme weather climates.
Texas Health and Human Services	Public agency that addresses the needs of Qualifying Populations (QPs)	All QPs	Virtual Meeting	Advocated for the development and preservation of affordable rental housing.

Housing Authority of Bexar County (HABC)	Public Housing Authority	All QPs	Phone Call/Consultation Survey	Advocated for the development and preservation of affordable rental housing for Veteran dependent families with extensive case management services.
National Alliance on Mental Illness (NAMI)	Public or private organizations that address the needs of persons with disabilities;	All QPs	Consultation Survey/ Virtual Public Hearing	Advocated for Permanent Supportive Housing, Transitional Housing, and supportive services for chronically homeless individuals with mental health diagnoses.
Neighborhood and Housing Services Department (NHSD)	Public or private organization that address civil rights and fair housing	QP2 QP4	Virtual meeting	Advocated for the development and preservation of affordable housing.
Opportunity Home San Antonio (formerly known as San Antonio Housing Authority or SAHA)	Public Housing Authority	All QPs	Phone Call/Consultation Survey	Advocated for the development/preservation of affordable rental housing, specifically for very low-income households.
Project Mend	Public or private organization that address the needs of persons with disabilities	All QPs	Consultation Survey	Advocated for supportive services, rental assistance, and increasing the supply of affordable multi-family units specifically for the disabled and at risk homeless population.
San Antonio Independent Living Services (SAILS)	Public or private organization that address the needs of persons with disabilities	All QPs	Consultation Survey	Advocated for supportive services, specifically Mental Health services, and development of ADA compliant housing units.
San Antonio Metropolitan Ministry Inc. (SAMMinistries)	Homeless service provider; domestic violence service provider; public or private organization that addresses the needs of QP2.	QP1 QP2 QP3	Phone Call/Consultation Survey/ Virtual Public Hearing	Advocated for supportive services, emergency shelter and street outreach specifically for unhoused individuals outside of the inner-city areas, and Homelessness prevention programs.
Schertz Housing Authority	Public Housing Authority	All QPs	Phone Call/Consultation Survey	Advocated for the development/preservation of affordable rental units, emergency shelters, and supportive services for families and victims of domestic violence

Society of St. Vincent De Paul, Southwest Texas Council (SVDP)	Homeless service provider; domestic violence service provider; public or private organization that addresses the needs of QP1, QP2, and QP3.	QP1 QP2 QP3	Virtual Public Hearing	Advocated for supportive services including homeless prevention services.
South Alamo Regional Alliance for the Homeless (SARAH)	Continuum of Care Lead Agency	All QPs	Consultation Survey	Advocated for the acquisition/development of non-congregate shelters, emergency shelters, and Permanent Supportive Housing specifically for individuals facing housing instability.
Veterans Affairs	Veterans Group	All QPs	Consultation Survey	Advocated for the homeless female Veterans facing housing instability, for increased emergency shelters capacity, and housing units for the elderly that allows them to age in place while living in an affordable and ADA compliant unit.
United Way of San Antonio and Bexar County's 2-1-1	Public or private organization that addresses the needs of QPs	All QPs	Phone Call/ Consultation Survey	Advocated for expedited rental assistance, utility assistance, and housing for individuals with criminal record.

SUMMARY OF FEEDBACK RECEIVED:

Mode of Outreach	Target of Outreach	Response/ Attendance	Summary of Comments Received	Unaccepted Comments
Public Meetings	Non-targeted/Broad community	211 participants	Needs identified by participants in the virtual public meetings and in-meeting polls include: <ul style="list-style-type: none"> • Affordable rental housing • Emergency shelter for people who are homeless • Permanent supportive housing • Food and nutrition programs <ul style="list-style-type: none"> • Senior services • Mental health services <ul style="list-style-type: none"> • Street outreach • Childcare 	None

			<ul style="list-style-type: none"> • Employment training/workforce development • Rental assistance • Resources for formerly incarcerated • Adult literacy • Assistance for people with disabilities 	
HOME-ARP Community Survey	Non-targeted/Broad community	23 participants	<p>The top needs identified by survey participants were:</p> <ul style="list-style-type: none"> • Permanent supportive housing Senior housing 	None

HOME-ARP Online Survey Results - Summary	
Q1: What qualifying homeless or near homeless population groups should be prioritized with HOME-ARP funds?	
Category	Percentage
Homeless Individuals with Disabilities/Elderly	31%
Homeless Families	26%
Fleeing Domestic Violence, Sexual Assault, Stalking or Human Trafficking	17%
Homeless Individuals	13%
Veterans	13%
Q2: Please rank the order in which these activities are most needed to address homelessness and housing insecurity.	
Category	Rank
Development or Preservation of Affordable Rental Housing	1
Acquisition/Development of Non Congregate Shelter	2
Rental Assistance	3
Supportive Services	4
Q3: What are the top housing needs in Bexar County?	
Category	Rank
Permanent Supportive Housing	1
Single-Family Housing	2
Senior Housing	3
Q4: For supportive services for the homeless, what do you think is important to help homeless stay housed and not return to homelessness:	
Category	Rank
Case Management	1
Homelessness Prevention Services	2
Housing Counseling	3
Mental Health Services	4
Life Skills Training	5

Q5: What unmet needs do you see among “Qualifying Populations” (i.e., people experiencing homelessness, at risk of homelessness, fleeing domestic violence, or otherwise at high risk of housing instability) in Bexar County? (Most common responses)
Affordable housing stock
Case management/supportive services
Emergency shelter capacity
Housing vouchers
Mental health services
Permanent supportive housing
Street outreach
Transportation
Q6: What gaps do you see within the current shelter and housing inventory, as well as the service delivery system in Bexar County? (Most common responses)
Housing for those with mental health diagnosis
Affordable housing, specifically for seniors
Emergency shelters, specifically for the domestic violence population
ADA-compliant housing
Low barrier shelters
Permanent supportive housing

PUBLIC PARTICIPATION

DESCRIBE THE PUBLIC PARTICIPATION PROCESS, INCLUDING INFORMATION ABOUT AND THE DATES OF THE PUBLIC COMMENT PERIOD AND PUBLIC HEARING(S) HELD DURING THE DEVELOPMENT OF THE PLAN:

- **PUBLIC COMMENT PERIOD: START DATE:** 05/11/2023 **END DATE:** 05/25/2023
(PUBLICATION DATE: 05/10/2023)
- **PUBLIC HEARING:** 02/15/2022; 02/17/2022; 02/22/2022; 02/24/2022

Public participation is vital in assessing the needs of and gathering input from County residents. The County seeks to exceed the statutory requirements of holding one public hearing by hosting **four (4) public hearings** in preparation for the HOME-ARP Allocation Plan. Bexar County residents were invited to provide input by attending virtual public meetings or taking a community-wide survey. Each virtual meeting included in-meeting polls to understand what attendees view as priority community development and housing needs in Bexar County. During the public hearings that discussed the development of the HOME-ARP Allocation Plan, the County staff presented the eligible HOME-ARP activities and the available HOME-ARP budget. The presentation also provided 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. **The Bexar County Community Development Division conducted these public hearings on February 15th, 17th, 22nd, and 24th, 2022.** At the meetings, the attendees were given opportunities to discuss

the unmet needs in their community with the County staff and provide recommendations on how the County should plan activities using HOME-ARP funding.

The County's HOME-ARP Allocation Plan was made available for a 15-day public comment period on December 6, 2022 through December 21, 2022. The County's revised HOME-ARP Allocation Plan was made available for a 15-day public comment period on February 28, 2023 through March 14, 2023 (published on February 27th). An additional revised HOME-ARP Allocation Plan was made available for a 15-day public comment period from **May 11, 2023** through **May 25, 2023** (published on May 10th).

The County notified the public of the HOME-ARP Allocation Plan with a notice in the local newspaper, San Antonio Express News, and by emailing local providers the link to the County's website where the HOME-ARP Allocation Plan is published. The County also notified the public by posting on Economic and Community Development (ECD) social media platforms.

DESCRIBE ANY EFFORTS TO BROADEN PUBLIC PARTICIPATION:

The County employed a comprehensive strategy to broaden public participation in the development of the HOME-ARP Allocation Plan. The County 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, the County created several methods for residents to participate in the development of the HOME-ARP Allocation Plan by ensuring reasonable accommodations were made available upon request. The County's efforts are summarized below.

- Conducted four (4) virtual public hearings to gather residents' and stakeholders' input from all areas of the County.
- The public was informed of the four (4) virtual public hearings through the local newspaper, San Antonio Express News, at least seven (7) days before the first public hearing; flyers were also sent out via postal mail and through Meals on Wheels and San Antonio Foodbank, emergency shelters, and Housing Authority of Bexar County
- County staff made a Spanish interpreter available for Spanish speakers with limited English proficiency
- The Draft HOME-ARP Allocation Plan was uploaded to the Bexar County Community Development website for public comments. The public was notified of its availability through a public notice in San Antonio Express News, County social media, and email notice.
- Electronic copies of the draft Allocation Plan were made available for download on the Bexar County Community Development website.

- Physical copies of the Draft Allocation Plan were made for public review at the Bexar County Community Development Office located at 233 N Pecos La Trinidad, Suite 320, San Antonio, Texas 78207. The office building offers reasonable access to include van-parking spaces, door clear width, door opening force, and elevators that meets ADA compliance as required by the Americans with Disabilities Act of 1990 (ADA) and the Architectural Barriers Act of 1968 (ABA).
- Public comments could be submitted through email, voicemail, postal mail, or complete an online survey.

SUMMARIZE THE COMMENTS RECEIVED THROUGH THE PUBLIC PARTICIPATION PROCESS:

Describe how the feedback received affected the PJ's approach to allocating HOME-ARP funds among eligible activities. An optional best practice is to also explain how feedback led to any preferences, methods of prioritization, or limitations on eligibility of QPs for a HOME-ARP activity, as well as the use of any referral processes such as coordinated entry for any of the eligible activities.

Bexar County did not receive any public comments during the required 15-day public comment periods. Please refer to the Consultation section regarding significant feedback received from the community during the County's four (4) virtual public hearings session to solicit input from community members and stakeholders on the gaps in the housing and service delivery systems within the County.

The County staff provided an overview to the community of the qualifying populations and uses of HOME-ARP funding. Following this overview, participants were encouraged to complete an online HOME-ARP survey to determine their needs and priorities for HOME-ARP eligible activities and qualifying populations. In addition, participants were given the opportunity to discuss priorities and nuances within the gaps and needs assessment in an open forum during the Public Hearing.

In their feedback, many organizations noted the distinct need to expand the local affordable housing supply, as this is the only long-term solution to address homelessness within Bexar County. Many consultations also described the need for supportive services that were linked to housing (i.e., Case Management, Workforce development, Financial Literacy, Childcare, and Housing Counseling).

Based on the public consultation process, the local community identified affordable rental housing with supportive services as the top priority for the County's HOME-ARP program. Additionally, participants of the consultation process emphasized the need for prioritizing chronically homeless households with mental and physical disabilities as a strategy to address the increasing unsheltered population within the Bexar County area.

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

All the above-mentioned comments/feedback were received and considered.

NEEDS ASSESSMENT AND GAPS ANALYSIS

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. PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. 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.

To assess the unmet needs of HOME-ARP qualifying populations, the County evaluated the size and demographic composition of all four qualifying populations, identifying gaps within its current shelter and housing inventory, as well as the service delivery system. In the needs assessment and gaps analysis, the County used current data, including San Antonio 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data, 2022 Point in Time Count (PIT Count), 2022 CoC Housing Inventory Count (HIC), City of San Antonio's Strategic Housing and Implementation Plan (SHIP), and consultation feedback from local service providers. While the amount of people estimated to be experiencing homelessness may be inadequately represented due to the COVID-19 pandemic, the below information comprises the basis for the needs assessment and gap analysis for HOME-ARP qualified populations based on the available data.

TABLE 1: 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 ²	695	144	1,670	1,670	36								
Transitional Housing ²	202	71	182	182	78								
Permanent Supportive Housing ²	970	328	1,090	1,090	1,150								
Other Permanent Housing ²	1,134	351	801	801	311								

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
Sheltered Homeless ¹						644	1,315	189	306				
Unsheltered Homeless ¹						0	1,036	33	55				
Current Gap										253	17	(499)	(320)

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

Gap Analysis (Family Beds) = Family Beds (897), less Homeless Persons in Households with at least 1 child (644 – see Table 3) = 253 beds

Gap Analysis (Family Units) = Family Units (215), less Homeless Family Households (198– see Table 3) = 17 units

Gap Analysis (Adult Beds) = Adult Beds (1,852), less Homeless Adult Persons (2,351 – see Table 3) = (499) beds

Gap Analysis (Adult Units) = Adults Units (1,852), less Homeless Adult Households (2,172) = (320) units

The table above (table 1) outlines current inventory for the sheltered and unsheltered population captured during the 2022 CoC Point-in-time (PIT) Count and Housing Inventory Count (HIC) within Bexar County. The current housing inventory gap analysis was determined by the number of family units available less the number of homeless family households which shows an excess of 17 units. While the number of adult only units less the number of adult only households (2,172 as per 2022 PIT Count report) results in a shortage of 320 units. These results are consistent with the feedback received from the public hearings and stakeholder consultations summarized in the public participation section emphasizing the need for more affordable housing stock.

TABLE 2: HOUSING NEEDS INVENTORY AND GAP ANALYSIS TABLE

NON-HOMELESS			
	Current Inventory ¹	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	286,680		
Rental Units Affordable to HH at 30% AMI (At Risk of Homelessness)	18,310		
Rental Units Affordable to HH at 50% AMI (Other Populations)	18,675		

NON-HOMELESS			
	Current Inventory ¹	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At Risk of Homelessness)		36,760	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		15,200	
Current Gaps			(14,975)

Data Sources: 1) Bexar County 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

Table 2 above details the available housing units and the level of need for more affordable housing options from the 2015-2019 American Community Survey and Comprehensive Housing Affordability Strategy data. A unit is considered affordable when a household does not need to spend more than 30% of their income towards rent. This data shows that there are approximately 286,680 rental units available in Bexar County. Of these units, only 18,310 (Vacant: 950; Occupied: 17,370) are affordable to households earning less than 30% of the area median income (AMI), or those at risk of homelessness. There are 36,760 households within the 30% AMI that are in need of affordable rental units in Bexar County. The resulting gap of 18,450 units for households under 30% AMI (less than half of the demand) reflects a critical need to increase affordable rental housing inventory.

There are 18,675 (Vacant: 6,035; Occupied: 12,640) additional rental units that are affordable to households earning between 30% and 50% AMI. There are 15,200 renter households earning less than 50% AMI in the County. The surplus of 3,475 units for 30-50% AMI households, combined with the high vacancy rate (32.32%) for that category of housing, may indicate a lack of quality rental options or limited availability in certain neighborhoods with access to public transit.

From January 2021 to December 2021, the 2-1-1 Helpline (Alamo Region United Way of San Antonio and Bexar County) received 173,573 calls from residents of the Alamo Region (Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, Medina, and Wilson Counties). Of that, 150,314 (86.6%) are from Bexar County. The 2-1-1 Helpline identified housing/shelter as the primary request received from these calls.

AREA MEDIAN INCOME (AMI)



Household Size	Area Median Income (\$83,500)				
	30% AMI	60% AMI	80% AMI	100% AMI	120% AMI
1	\$17,400.00	\$34,860	\$46,450	\$58,450	\$70,140
2	\$19,900.00	\$39,840	\$53,050	\$66,800	\$80,160
3	\$22,400.00	\$44,820	\$59,700	\$75,150	\$90,180
4	\$24,850.00	\$49,740	\$66,300	\$83,500	\$100,200
5	\$26,850.00	\$53,760	\$71,650	\$90,180	\$108,216
6	\$28,850.00	\$57,720	\$76,950	\$96,860	\$116,232

Note: The San Antonio-New Braunfels, TX HUD Metro Fair Market Rent (FMR) Area includes: Bandera County, Bexar County, Comal County, Guadalupe County, and Wilson County.

DESCRIBE THE SIZE AND DEMOGRAPHIC COMPOSITION OF QUALIFYING POPULATIONS WITHIN THE PJS BOUNDARIES:

The following information supplements the County's Five-Year Consolidated Plan (FY 2021- 2025) and FY 2021-22 Annual Action Plan, which is incorporated by reference herein.

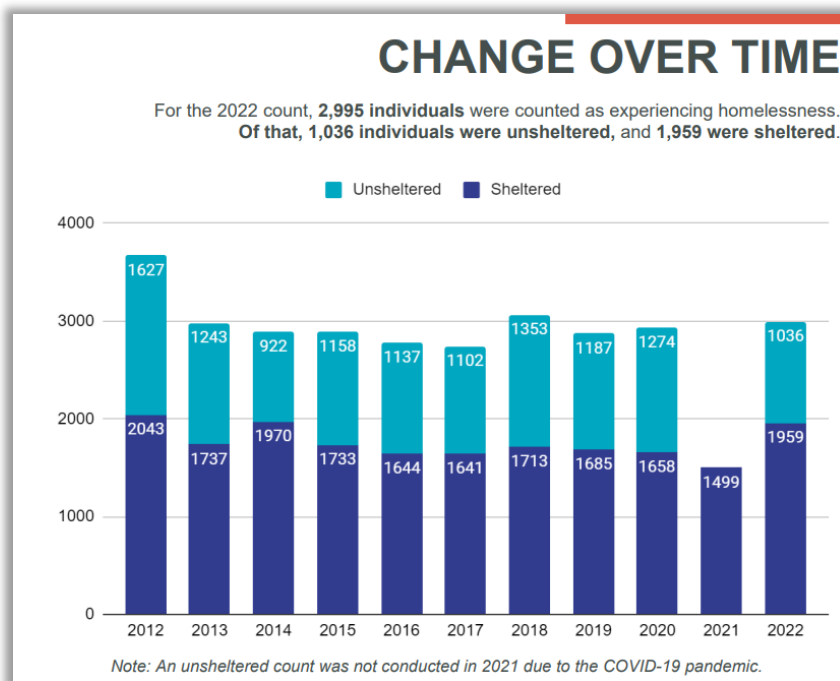
QUALIFYING POPULATION 1 (QP1): HOMELESS AS DEFINED IN 24 CFR 91.5 PARAGRAPHS (1), (2), AND (3)

The 2022 Point-in-Time Count (PIT Count) Report analyzes the PIT Count data captured on March 1, 2022, in San Antonio/Bexar County. Due to the pandemic, it is the community's first complete sheltered and unsheltered count since 2020. As the CoC Lead Agency, SARA led the planning and implementation of the PIT Count in coordination with the Homeless Management Information System (HMIS) Lead Agency, Haven for Hope, along with local providers to verify and update the reported counts of people enrolled during the night of the PIT Count.

The overall count of individuals experiencing homelessness, both sheltered and unsheltered, increased by 2% from 2020 to 2022. The sheltered count increased by approximately 30% from the 2021 count. The unsheltered count decreased nearly 19% from the 2020 unsheltered count.

During the 2022 PIT Count, **2,995** were counted as experiencing homelessness. Of that, **1,036** individuals are unsheltered, and **1,959** are sheltered individuals within San Antonio/Bexar County. There were **33** unsheltered veterans experiencing homelessness while **189** are sheltered. The

number of families with children in shelters during the PIT Count denotes 198 families, representing a 27% decrease from 2020.



According to census data, an estimated 2,070,655 residents live in San Antonio and Bexar County. This 2% increase from 2020 to 2022 results in the continued trend locally of about 0.14% of the total population experiencing homelessness.

Chronic Homelessness is defined as, “an individual or household experiencing homelessness with a disability who lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and has been experiencing homelessness and living as described for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months”. In Bexar County, chronic homelessness increased by 77% from 2020. In 2022, 519 individuals were experiencing chronic homelessness. Of that, 162 individuals are experiencing unsheltered chronic homelessness which is a 4.5% increase from 2020. This indicates that the most vulnerable are often being moved into safer environments, but **additional permanent supportive housing development is needed for long-term solutions.**

TABLE 3: PERSONS EXPERIENCING HOMELESSNESS

Overall Persons	Sheltered Persons ¹	Unsheltered Persons ¹	Total	Percentage
Individuals	1,315	1,036	2,351	78%
Families	644	0	644	22%
Total	1,959	1,036	2,995	100%
Percentage	65%	35%	100%	

Overall Households	Sheltered Households ¹	Unsheltered Households ¹	Total	Percentage
Individuals	1,307	865	2,172	78%
Families	198	0	198	22%
Total	1,505	865	2,370	100%
Percentage	64%	36%	100%	

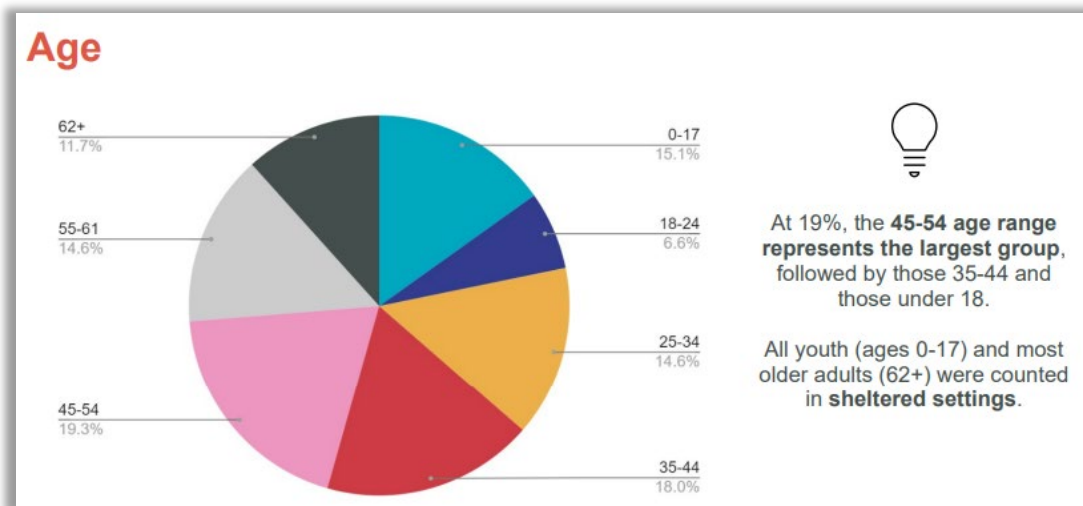
TABLE 4: DEMOGRAPHICS OF PERSONS EXPERIENCING HOMELESSNESS

Gender	Sheltered Persons ¹	Unsheltered Persons ¹	Total	Percentage
Male	1,165	773	1,938	64.71%
Female	780	259	1,039	34.69%
Transgender	13	0	13	0.43%
Gender non-conforming	1	4	5	0.17%
Total	1,959	1,036	2,995	100%

Data Sources: 1) 2022 PIT Count

Trans and non-binary individuals make up 0.6% of those counted in the 2022 PIT Count; however, this may be an undercount as stigma and fear of violence can shape how individuals disclose this identity or even present for such a count.

The 2022 PIT Count detailed that 19% of individuals encountered during this reporting period represented the 45-54 age range, followed by the 35-44 age range at 18%, while the 62 and older age range represented 11% of the homeless population.



Race

Race	Sheltered Persons ¹	Unsheltered Persons ¹	Total	Percentage
Black/African American	474	191	665	22.20%
White	1420	734	2,154	71.92%
Asian	15	14	29	1%
American Indian or Alaska Native (Indigenous)	20	62	82	2.74%
Native Hawaiian/Pacific Islander	3	2	5	0.14%
Multiple Races	27	33	60	2%
Total	1,959	1,036	2,995	100%

Data Sources: 1) 2022 PIT Count

Ethnicity	Sheltered Persons ¹	Unsheltered Persons ¹	Total	Percentage
Non-Hispanic/Non-Latino	1,020	515	1,535	51%
Hispanic/Latinx	939	521	1,460	49%
Total	1,959	1,036	2,995	100%

Data Sources: 1) 2022 PIT Count

TABLE 5: SUBPOPULATIONS OF PERSONS EXPERIENCING HOMELESSNESS

Other Sub-populations	Sheltered Persons ¹	Unsheltered Persons ¹	Total
Veterans	189	33	222
Survivors of DV	306	55	361
Disabling Condition	1,410	175	1,585
Mental Illness	783	61	844
Chronically Homeless	357	162	519
Foster Care	46	59	105

Data Sources: 1) 2022 PIT Count

During the 2022 PIT Count, the sheltered homelessness count increased by approximately 460 individuals or 30% from the 2021 count. While the unsheltered homelessness count decreased by approximately 19% from the 2020 count, the overall count of individuals experiencing homelessness, both sheltered and unsheltered, increased by 2% from 2020 to 2022. Out of the 1,036 individuals experiencing unsheltered homelessness during the 2022 PIT Count, 33 were veterans. 49% of those experiencing homelessness identified as Hispanic/Latinx. Despite 8.9% of the Bexar County's population identifying as Black/African American overall, 22.20% of those experiencing homelessness identify as Black/African Americans showing a racial disparity in the experience of homelessness. This same pattern is evident for those identify as American Indian and Alaska Native (1.3% of the overall population, but 2.74% of the population experiencing homelessness). The overall count of individuals experiencing homelessness due to domestic violence decreased by 7% from 2020.

QUALIFYING POPULATION 2 (QP2): AT RISK OF HOMELESSNESS AS DEFINED IN 24 CFR 91.5

For HOME-ARP, a household is considered at risk of homelessness if their income is below 30% AMI, do not have sufficient resources or support networks, and have experienced housing instability. Below is an analysis of 0-30% AMI renters.

Households with extremely low incomes (30% or below AMI) are often service sector workers, including those who earn minimum wage. Households at risk of homelessness are also often straining the willingness of their social networks to provide housing supports over an extended period, such as living with family or friends over an extended period.

According to the most recent Comprehensive Housing Affordability Strategy (CHAS) data from 2015-2019, there are **59,695** renter households earning between 0 to 30% AMI living in Bexar County. Of those renters, **44,950** are experiencing at least one or more of the four housing problems identified by HUD which are:

1. Incomplete kitchen facilities,
2. Incomplete plumbing facilities,
3. More than 1 person per room (overcrowding), and
4. Cost burden over 30%.

This means that 73% of 0-30% AMI renters are living with one of these housing problems that affect their daily lives in addition to being extremely low income. 8,490 (19%) of renters with one or more of the housing problems identify as White; 5,665 (13%) identify as Black/African American; and 28,950 (64%) identify as Hispanic. 9,505 (21%) are households with at least 1 person age 62+ (elderly).

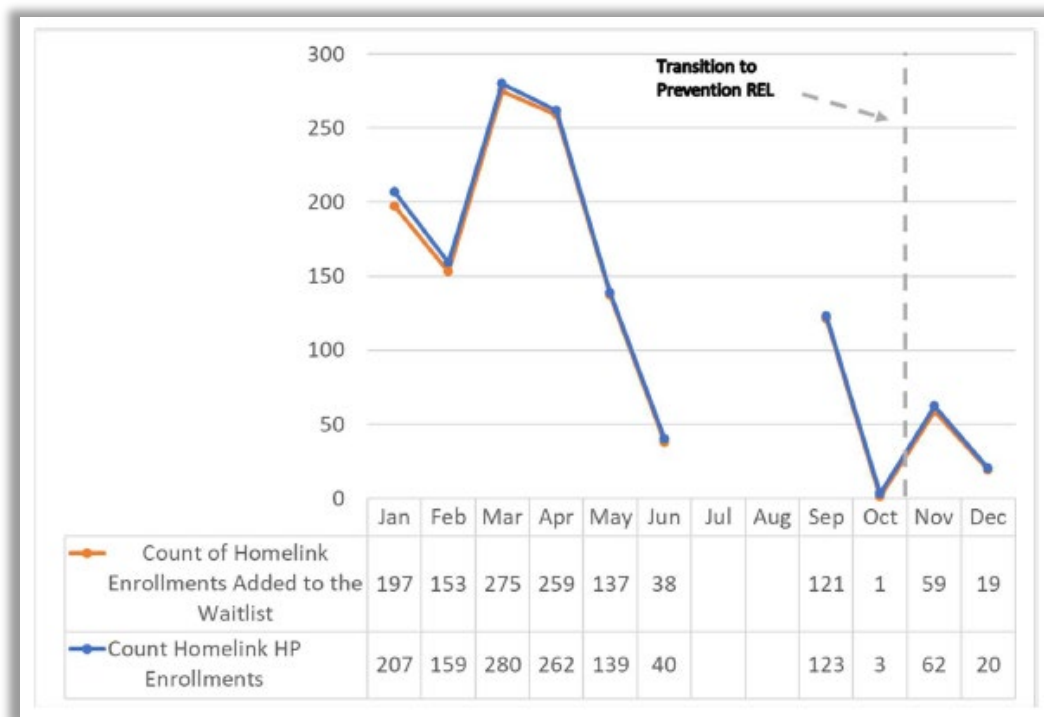
Of the 59,695 renter households earning between 0 to 30% AMI living in Bexar County, 3,230 (5%) are overcrowded (more than 1 person per room); 11,625 (20%) are households with members that has a self-care or independent living limitation with 8,985 (77%) of those households are experiencing at least one or more of the four housing problems.

According to the 2015-2019 CHAS data, there are **263,875** renter units in Bexar County. Of those units, 22,805 (9%) are vacant, however, of those units, only 950 (4%) are affordable to a household making 30% of the AMI. Of the 241,070 (91%) occupied-renter units, only 19,750 (8%) are affordable and occupied by those making less than or equal to 30% of the AMI.

Households who meet the definition of at risk of homelessness can be referred to homelessness prevention resources. According to SARAH's Homelink (Coordinated Entry System of San Antonio/Bexar County) Performance Report as of January 3, 2023, there have been **1,295**

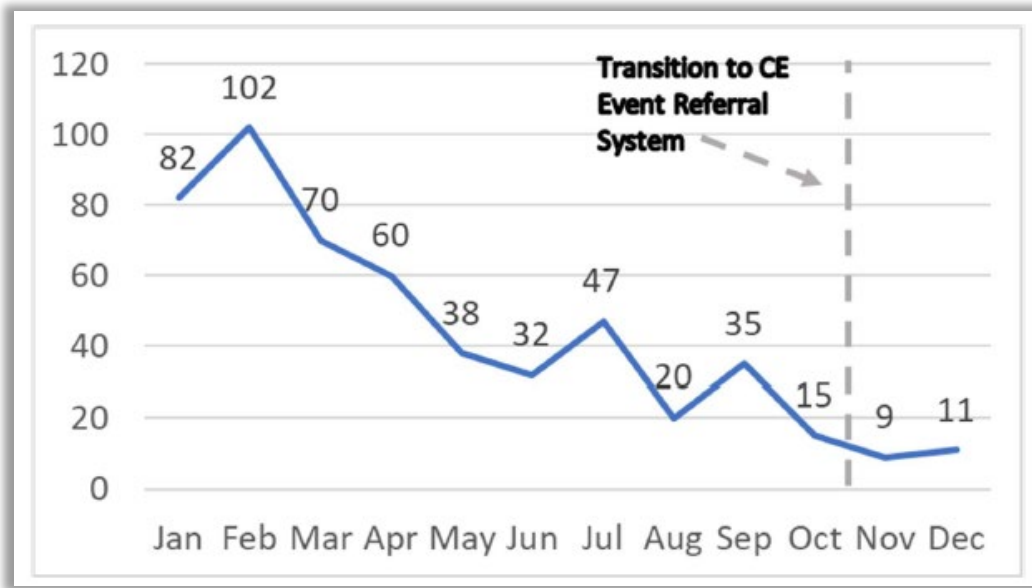
households Homelink Homelessness Prevention enrollments completed in 2022, with 1,259 of them being added to the Homelink Master Waitlist (*as illustrated in Table 6 below*) and 521 Homelink Homelessness Prevention CE enrollments referred to Homelessness Prevention (HP) providers in 2022 (*as illustrated in Table 7 below*). Of the 521 referrals made in 2022, 119 households (23%) have been reported to have successfully been enrolled in HP projects. Note that on June 16, 2022, enrollments for Homelink Homelessness Prevention project stopped accepting enrollments because of depleting funds for Homelessness Prevention in the Continuum of Care. Enrollments for Homelink Homelessness Prevention were re-opened on September 2, 2022 and closed on September 28, 2022 because of funding that had become available. It is important to take into consideration that Homelink Homelessness Prevention does not identify whether the client resides in the City of San Antonio or Bexar County limits.

TABLE 6: HOMELINK PREVENTION CE ENROLLMENTS COMPLETED & ADDED TO THE PREVENTION WAITLIST



Data Sources: Homelink Performance Report January 2023

TABLE 7: REFERRALS SENT TO PREVENTION PROVIDERS IN 2022



Data Sources: Homelink Performance Report January 2023

Of those HP enrollments, 67.71% are White, 26.30% are Black, African American or African, 62.10% are Hispanic or Latin(a)(o)(x), 42.62% are youth (ages 0-17), 8.99% are young adults (ages 18-24), 3.50% are elderly, and 1.96% are veterans. (See Table 8 below)

TABLE 8: HOMELINK PREVENTION DEMOGRAPHICS DATA OF 2022

Race	Count of Client	% of Grand Total
White	2,281	67.71%
Black, African American or African	886	26.30%
Multi-Racial	86	2.55%
American Indian, Alaska Native, or Indigenous	21	0.62%
Asian or Asian American	7	0.21%
Native Hawaiian or Pacific Islander	4	0.12%
Other	6	0.18%
Data Not Collected	78	2.32%
Grand Total	3,369	100.00%

Ethnicity	Count of Client	% of Client
Hispanic or Latin(a)(o)(x)	2,092	62.10%
Non-Hispanic/Non-Latin(a)(o)(x)	1,216	36.09%
Data Not Collected	61	1.81%
Grand Total	3,369	100.00%

Veteran Status	Count of Client	% of Client
Yes	66	1.96%
No	1,810	53.73%
Data Not Collected	1,493	44.32%
Grand Total	3,369	100.00%

Age Range	Count of Client	% of Client
<18	1,436	42.62%
18-24	303	8.99%
25-29	242	7.18%
30-34	251	7.45%
35-39	248	7.36%
40-44	243	7.21%
45-49	174	5.16%
50-54	154	4.57%
55-59	134	3.98%
60-62	59	1.75%
>62	118	3.50%
Data not collected	7	0.21%
Grand Total	3,369	100.00%

Data Sources: South Alamo Regional Alliance for the Homeless (SARAH) Data Request

Included above are breakdowns for race, ethnicity, veteran status, and age range for clients tied to a “Homelink Prevention CE” enrollment between 01/01/2022 – 12/31/2022. Youth are defined as those younger than 18 years old and elderly as those older than 62 years old. All members of the household enrolled in the “Homelink Prevention CE” enrollments are included in the breakdowns.

QUALIFYING POPULATION 3 (QP3): FLEEING, OR ATTEMPTING TO FLEE, DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING, OR HUMAN TRAFFICKING, AS DEFINED BY HUD IN THE NOTICE

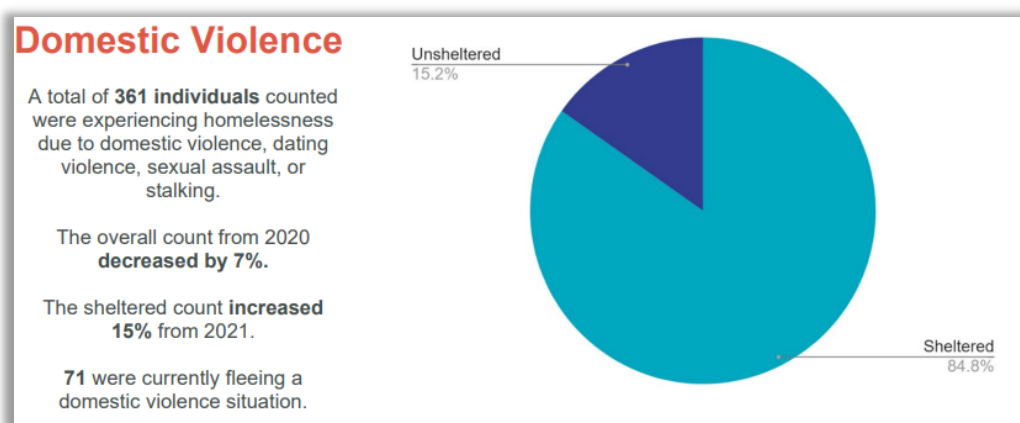
For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

This population 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. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that

the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Domestic violence contributes to homelessness. When a person decides to leave an abusive relationship, they often have nowhere to go. This is particularly true of women with few resources. Lack of affordable housing and long waiting lists for assisted housing mean that many women and their children are forced to choose between abuse at home and life on the streets. Approximately 63% of homeless women have experienced domestic violence by an intimate partner in their adult lives according to the National Network to End Domestic Violence.

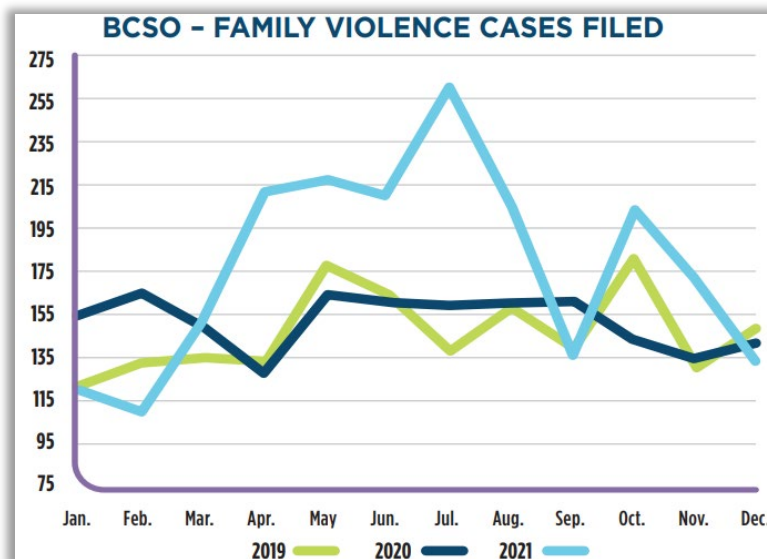
According to the 2022 PIT Count, the number of domestic violence survivors was **361** (12% of the total count), a 7% decrease from the 2020 overall count. The majority (84.8%) of survivors are sheltered, while only 15.2% are unsheltered. **71** individuals were currently fleeing a domestic violence situation. The sheltered homeless count revealed an increase of 15% in domestic violence survivors from the 2021 PIT Count report. In the 2023 PIT Count, there was nearly a 20% increase (347 individuals) in those reporting experiencing homelessness due to domestic violence, dating violence, sexual assault or stalking.



The Collaborative Commission on Domestic Violence reports statistics quarterly to identify trends and monitor progress toward the community’s comprehensive domestic violence plan. The Bexar County Sheriff’s Office (BCSO) patrols 16 districts in unincorporated Bexar County. Within those 16 districts, the following information represents the number of Family Violence cases filed. In 2020, BCSO saw a 4% increase in Family Violence cases filed. “Cases Filed” represent when there is an incident that took place indicating a criminal act was found, BCSO investigated, and a prosecution guide was submitted and filed to the Bexar County District Attorney’s Office. In April of 2021, there was a spike in family violence cases filed; however, BCSO has seen a decrease in family violence homicides. In August of 2021, BCSO in collaboration with Southwest Texas Regional Advisory Council (STRAC) began using a domestic violence navigation line to assist law enforcement officers with evaluating victims for levels of lethality. This navigation line has been

able to not only identify high risk victims but allows for assisting victims with fleeing their homes or safety planning with victims. Of those screened, 45% voluntarily left their residence to seek safety at either the Battered Women's Shelter, the Domestic Violence Hotel, or with friends or family.

	2019	2020	% Change (2019 to 2021)	2021	% Change (2020 to 2021)
January	122	155	27%	120	-23%
February	133	166	25%	110	-34%
March	135	150	11%	153	2%
April	134	128	-4%	213	66%
May	179	165	-8%	218	32%
June	164	161	-2%	211	31%
July	138	160	16%	261	63%
August	159	161	1%	205	27%
September	140	161	15%	136	-16%
October	182	144	-21%	204	42%
November	131	133	2%	172	29%
December	149	149	0%	134	-10%
Total	1,766	1,833	4%	2,137	17%



The 2-1-1 family violence related calls for assistance include four major categories: (1) Family Violence; (2) Legal Services; (3) Counseling; and (4) Shelter/Housing. In 2021, there was a total of 4,542 Family Violence-related calls received by 2-1-1 Texas, with a majority of the calls by callers requesting information on Shelter/Housing (2,801) or Legal Services (1,219). There was a 12% reduction in 2-1-1 family violence-related calls from 2020 to 2021.

2-1-1 CALLS RECEIVED FOR FAMILY VIOLENCE ASSISTANCE, ACCORDING TO 4 MAJOR CATEGORIES BASED ON TYPE OF REQUEST

	2020	2021	% Change
Category 1: Family Violence	140	122	-13%
Category 2: Legal Services	1,224	1,219	-.4%
Category 3: Counseling	394	400	2%
Category 4L Shelter/Housing	3,396	2,801	-18%
Total	5,154	4,542	-12%

CATEGORY 1 (FAMILY VIOLENCE) - CALLER REQUESTING GENERAL FAMILY VIOLENCE SERVICES OR ASSISTANCE

	2020	2021	% Change
Abused Children	0	2	N/A
Abused Men	0	0	N/A
Abused Women	0	44	N/A
Domestic Violence Hotlines	98	32	-67%
Domestic Violence Intervention Programs	31	13	-58%
Domestic Violence Issues	2	14	600%
Family Violence Prevention	1	8	700%
Sexual Assault Hotlines	8	5	-38%
Sexual Assault Prevention	0	3	N/A
Spouse/Intimate Partner Abuse Prevention	0	1	N/A
Total	140	122	-13%

CATEGORY 2 (LEGAL SERVICES) - CALLER REQUESTING LEGAL SERVICES OR ASSISTANCE

	2020	2021	% Change
Child Custody/Visitation Assistance	52	35	-33%
Children's Protective Services	0	70	N/A
Comprehensive Family Law Services	10	16	60%
Crime Victim Compensation	0	55	N/A
Divorce Assistance	10	8	-20%
Domestic/Family Violence Legal Services	47	31	-34%
Family Justice Centers	11	3	-73%
Family Law	9	29	222%
General Legal Aid	1,055	950	-10%
Parental Visitation Monitoring	0	1	N/A
Protective/Restraining Orders	30	21	-30%
Total	1,224	1,219	0%

CATEGORY 3 (COUNSELING SERVICES) - CALLER REQUESTING COUNSELING SERVICES OR ASSISTANCE

	2020	2021	% Change
Abuse Counseling	33	26	-21%
Abuse/Violence Related Support Groups	0	1	N/A
Conjoint Counseling	26	35	35%
Divorce Counseling	6	4	-33%
Domestic Violence Support Groups	6	1	-83%
Faith Based Counseling	5	6	20%
Family Counseling	121	171	41%
General Counseling Services	33	43	30%
Legal Counseling	89	48	-46%
Marriage Counseling	54	27	-50%
Parent Counseling	12	1	-92%
Sexual Assault Counseling	7	10	43%
Sexual Assault/Incest Support Groups	2	0	-100%
Victim Impact Programs	0	27	N/A
Total	394	400	2%

CATEGORY 4 (SHELTER/HOUSING SERVICES) - CALLER REQUESTING SHELTER/HOUSING SERVICES OR ASSISTANCE

	2020	2021	% Change
Community Shelters	25	0	-100%
Crime Victim Safety Planning	0	2	N/A
Crisis Shelter (Domestic Violence Motel/Shelter)	262	241	-8%
Homeless Shelter	2,140	1,841	-14%
Transitional Housing/Shelter	969	717	-26%
Total	3,396	2,801	-18%

In 2021, calls for abuse counseling, sexual assault counseling, and crisis shelter have already exceeded the number of calls from 2020. This is indicative that residents need additional assistance within these areas. Additionally, there were several new assistance requests via calls made throughout 2021 that were not previously noted in 2020. A few of the new requests are abused children, abused women, crime victim compensation, and crime victim safety planning.

Family Violence Prevention Services, Inc. (FVPS) offers residential and non-residential client's shelter, transitional housing, counseling (for adults, children, families), and legal services. FVPS provided services to 5,297 unduplicated clients in fiscal year 2021 which was a 1.3% increase from fiscal year 2020.

In 2021, Bexar County District Attorney's Family Violence Division and Protective Order Division saw a 23% increase of protective order petitions filed in the Civil District Courts. A Civil Protective Order is a tool used to help keep victims safe from their abusers by orders of a judge. In 2021, the Family Violence Division saw a 5% increase in incoming felony family violence and sex assault bookings and a 10% increase in misdemeanor family violence bookings. After a person is arrested by law enforcement, a booking will take place at the Bexar County Justice Intake and Assessment Annex. The booking process includes mugshots, fingerprints, and recording the arrest into the judicial management system.

The Center for Health Care Services (CHCS), the local mental health authority for Bexar County, screens for domestic violence during child and adult assessments. In 2021, CHCS data indicates that the number of adults and children that have witnessed family violence has increased from 2020. From 2020 to 2021, self-reported witnessing or experiencing family violence within the household increased 4.7% for adults (from 22,058 to 23,095) and increased 9.2% for children (from 7,467 to 8,156).

An estimated 17,113 women live in Bexar County outside of San Antonio, based on the County's 2015-2019 female population of 225,177. An estimated 7.9% of men in Texas have experienced any contact with sexual violence, physical violence, or stalking by an intimate partner in the past 12 months, equating to an estimated 17,347 men living in Bexar County outside of the city of San Antonio, based on the County's 2015-2019 male population of 219,583 (2015-2019 American Community Survey 5-Year Estimates).

HUMAN TRAFFICKING

According to National Human Trafficking Hotline, there have been 7,804 human trafficking cases and 19,051 victims identified via the hotline since 2007. In 2021 alone, more than 1,700 victims, 83% women were identified via the hotline state-wide. This is an increase from 1,604 victims identified in 2020. In both years, nearly 25% of cases involved children. The hotline does not breakdown statistics further than the state level.

The Bexar County Criminal District Attorney's Office created the Human Trafficking Task Force in 2013. Human trafficking is best described as modern-day slavery. This unit prosecutes those accused of exploiting adults who are made to engage in sex or labor by force, fraud or coercion, and children who are made to engage in sex by any means. In most circumstances, the victims are Bexar County children exploited by Bexar County citizens.

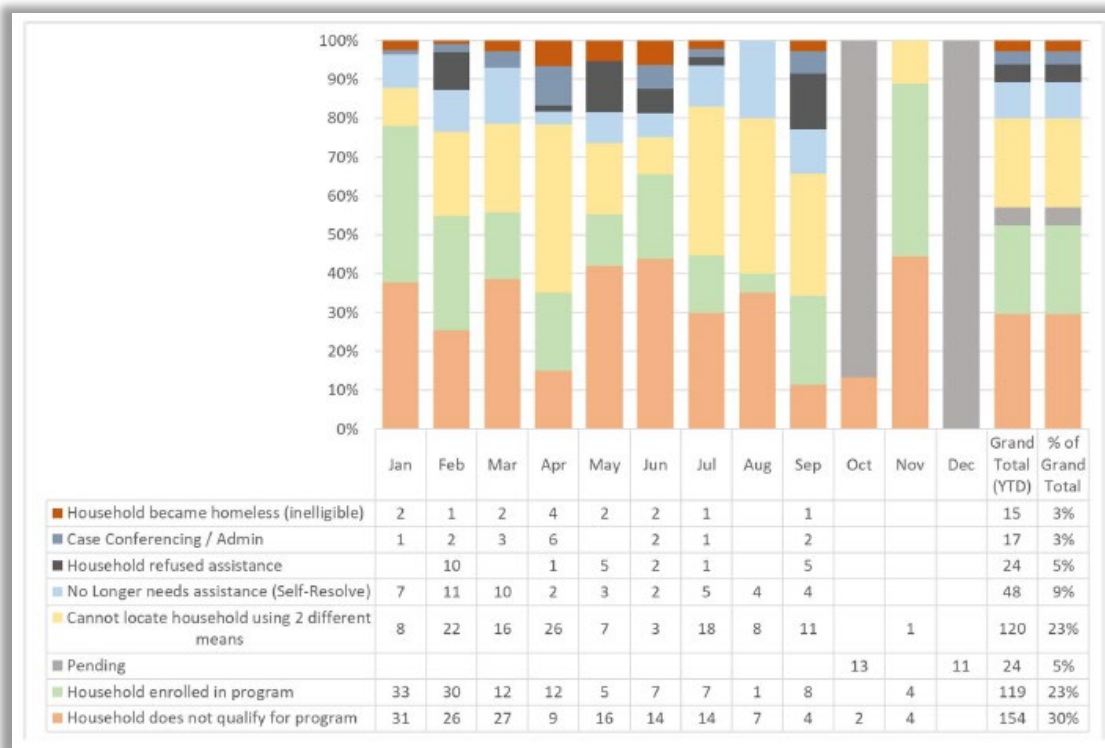
Since January 1, 2020, local law enforcement filed 43 human trafficking and related cases with the unit. Of that number, only 17 cases were specifically charged as sex trafficking or compelling prostitution. No cases of labor trafficking were filed. Unfortunately, due to the pandemic, the Bexar County District Attorney's Office's Human Trafficking Unit have been unable to resolve many of the cases on the docket. No cases from the unit have been tried before a judge or jury. Twenty-one of the cases filed this year were indicted, and 8 cases were rejected after review. Five defendants who were suspected of being trafficked by others were charged with sexual assault of a child and pled to prison sentences in 2020. The Bexar County District Attorney's Office's Human Trafficking Unit presently has 47 indicted cases, awaiting trial, and about 20 more awaiting indictment.

QUALIFYING POPULATION 4 (QP4): 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:

Another qualified population for HOME-ARP program are those (1) households requiring services or housing assistance to prevent homelessness AND those (2) at greatest risk of housing instability: (2a) households making 0-30% of AMI that are also severely cost burdened (paying 50% or more of their income in rent); and (2b) households who would qualify as at risk of homelessness per 24 CFR §91.5, except their incomes are up to 50% AMI instead of below 30% AMI. For the purposes of Bexar County's HOME-ARP Allocation Plan, only definition (1) and (2a) are applicable.

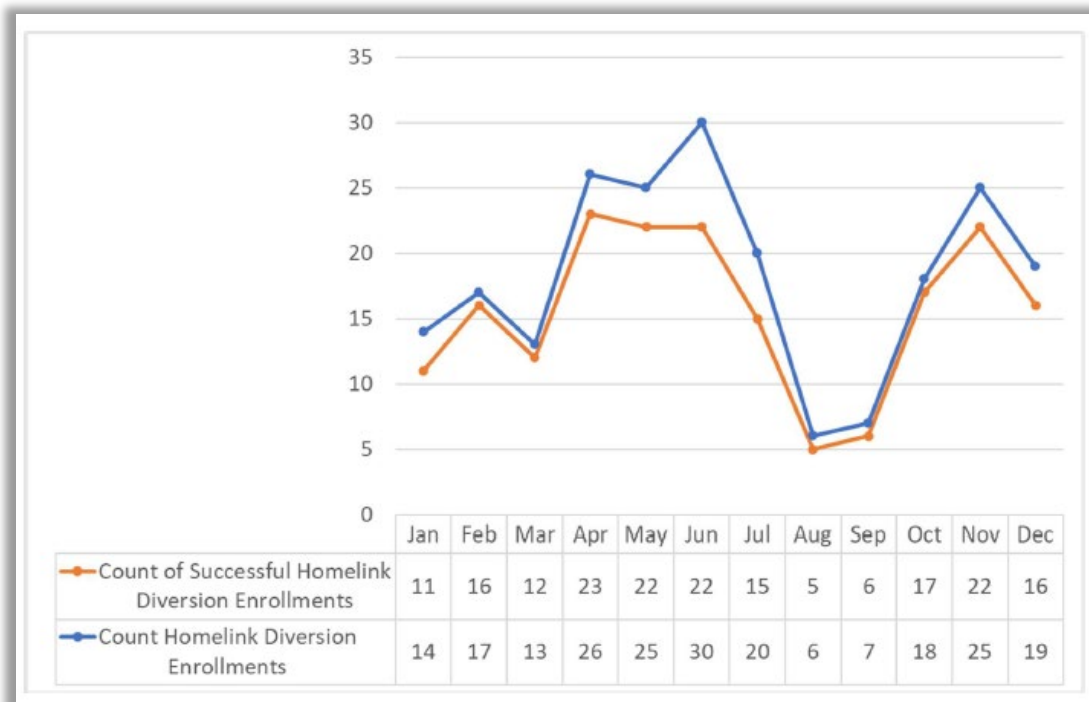
For QP4 (1) definition, according to San Antonio/Bexar County Coordinated Entry System Homelink Performance Report on January 2023, there were 1,480 households enrolled in a housing program in 2022 (Homelessness Prevention: 119; Diversion: 187; Rapid Rehousing/Permanent Supportive Housing/ Other Permanent Destinations: 1,174).

TABLE 9: HOMELINK PREVENTION CE REFERRALS & OUTCOMES OF 2022



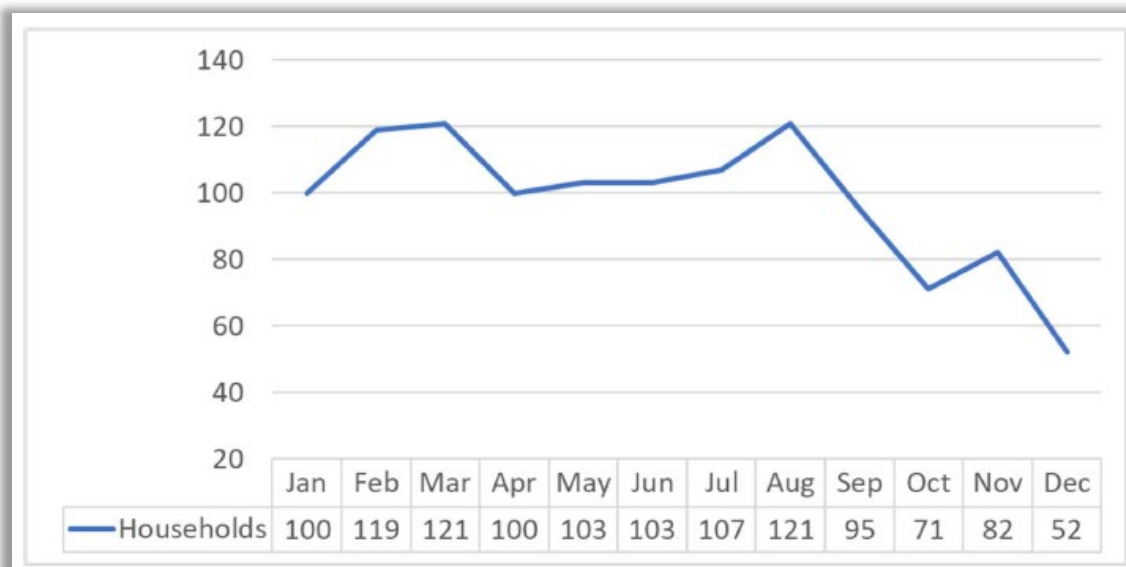
Data Sources: Homelink Performance Report January 2023

TABLE 10: HOMELINK DIVERSION ENROLLMENTS OF 2022



Data Sources: Homelink Performance Report January 2023

TABLE 11: OTHER PERMANENT DESTINATIONS, RRH, PSH HOUSING PLACEMENTS OF 2022



Data Sources: Homelink Performance Report January 2023

In 2022, there were 2,033 individuals enrolled in Homelink’s Rapid Rehousing (RRH). 1,141 (56%) are men; 543 (27%) are Black or African American; 465 (23%) are White; 925 (46%) are Latinx/Hispanic; 435 (22%) are youth; 197 (10%) are young adults; 181 (9%) are elderly; 653 (32%) are veterans.

For QP4 (2a), according to the most recent Comprehensive Housing Affordability Strategy (CHAS) data from 2015-2019, there are **59,695** renter households earning between 0 to 30% AMI living in Bexar County. Of those renters, **44,950** (75%) are experiencing at least one or more of the four severe housing problems identified by HUD which are:

1. Incomplete kitchen facilities,
2. Incomplete plumbing facilities,
3. More than 1 person per room (overcrowding), and
4. Cost burden over 50%.

Of those renters, 20% are White; 14% are Black or African American; and 66% are Hispanic.

An additional **45,505** renter households earn between 30 to 50% AMI. Of those renters 6,205 (14%) are experiencing at least one or more of the four severe housing problems. Collectively, renters between 0-50% total **105,200** with 80% of renters facing a severe housing problem, demonstrating housing instability. Not only are renters facing housing problems, but they are facing high-cost burden with **51,960** (50%) of renters between 0-50% AMI with severe cost burden (paying more than 50% of their income to housing costs) which decreases a household’s housing stability.

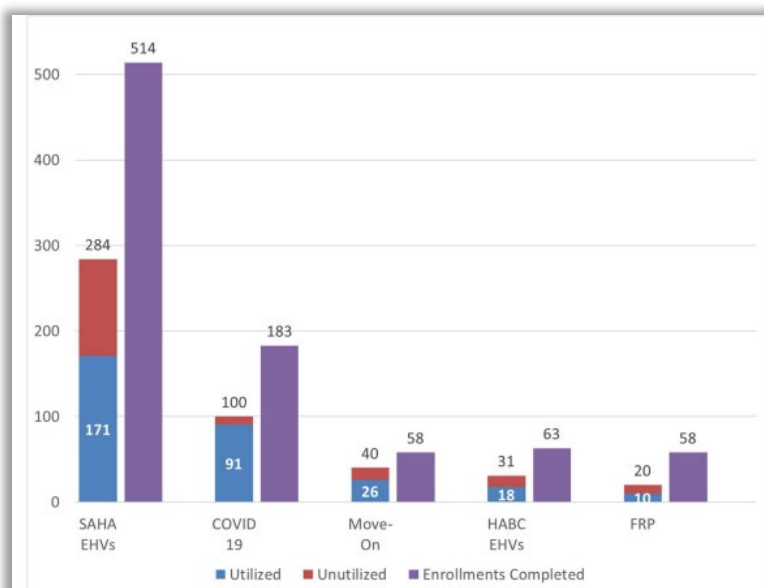
There are three (3) housing authorities serving Bexar County:

1. Opportunity Home (OH, *formerly* San Antonio Housing Authority)
2. Housing Authority of Bexar County (HABC)
3. Schertz Housing Authority (SHA)

The primary public assistance tool that helps cost burdened households is housing vouchers. OH and HABC offer many voucher programs for low-income households, veterans, persons with disabilities, and other special needs. SHA provides affordable housing for up to 229 low- and moderate-income households through its Section 8 Housing Choice Voucher (HCV) and public housing programs. OH administers approximately 14,000 housing vouchers (including Veterans Affairs Supportive Housing Vouchers “VASH”). Based on attrition, 1,200 – 1,400 become available annually for a total of 13,000 new clients helped over a 10-year period. While movement occurs on the housing choice waitlist, the need for affordable housing rental support far outpaces the 1,200-1,400 housing vouchers available. Additionally, the waitlists for most of the housing choice voucher programs, including the housing choice voucher program in Bexar County, is closed resulting in those who are cost-burdened less options for housing stability. Housing Authority of Bexar County Section 8 Waitlist had 4, 023 households with an average of 1,019 days in waiting. 3,254 (80.88%) are extremely low income (at or below 30% AMI); 2,058 (51.16%) are White; 1,811 (45.02%) are Black or African American; 1,963 (48.79%) are Latinx/Hispanic; 975 (24.24%) are disabled; and 60 (1.49%) are elderly.

Emergency Housing Vouchers (EHVs) can be provided to families referred to OH and HABC by South Alamo Regional Alliance for the Homeless (SARAH). For 2022, SARAH received 876 voucher enrollments. The following vouchers are coordinated through Homelink. The graph below reflects the enrollments completed versus the utilized vouchers which highlights the need for additional affordable housing options.

TABLE 12: OTHER PERMANENT DESTINATIONS, RRH, PSH HOUSING PLACEMENTS OF 2022



Data Sources: Homelink Performance Report January 2023

DESCRIBE THE UNMET HOUSING AND SERVICE NEEDS OF QUALIFYING POPULATIONS

QP 1: HOMELESS POPULATION

There may not be a direct correlation between the types of housing offered in Table 1 and the number of people experiencing homelessness, as not every person experiencing homelessness would need or want to use emergency shelter, transitional housing, or permanent supportive housing. Therefore, the gap analysis may not accurately be reflected in Table 1, but possible gaps are discussed below.

As identified in Table 1, there are 1,036 unsheltered homeless adults without children and zero unsheltered homeless families in San Antonio and Bexar County on the night of March 1, 2022. Since there are 1,315 sheltered homeless adults without children and only 1,852 temporary beds (emergency shelter and transitional housing beds – ES & TH), this appears to indicate that there is a gap in temporary housing options of at least 499 beds (or 320 units). This could be emergency shelter beds or transitional housing beds.

Few resources are available to homeless persons when it comes to helping find safe, decent, and affordable housing units and property owners willing to lease to homeless persons. With the current low vacancy rates and rising rental rates, homeless populations have to compete (often unsuccessfully when on their own) with other renters in the market for available units. They have difficulty finding a property owner that will lease to them, sometimes even with support or backing from a homeless service provider. Some property owners require incentives or risk mitigation fees,

particularly where a homeless person has a poor credit history, little/no rental history, or criminal history. Additional funding for rental assistance could help overcome these barriers for some.

Furthermore, during the 2022 PIT Count, South Alamo Regional Alliance for the Homeless (SARAH), the local Continuum of Care for the San Antonio Bexar County area, identified three top needs for the homeless population as housing, ID recovery, and healthcare. These insights illuminate the possibilities for meeting our community needs, including permanent supportive housing with wrap-around, comprehensive services, accessibility in shelter settings, robust medical needs response, and helping program participants access benefits to which they are entitled.

Within the homeless response system, street outreach teams have documented a need for additional options for people experiencing homelessness who cannot meet their activities of daily living (“ADLs”, e.g., bathing, eating, toileting, and dressing). Individuals, who cannot meet ADLs without assistance, are generally not appropriate for or successful in existing emergency shelter options. This population often requires a long-term housing assistance program with incorporated medical services at a level appropriate to maintain stability. In addition, short-term shelter options with appropriate medical care are necessary to transition this population from an unsheltered setting into such a long-term placement.

During the consultations noted above there were noted gaps in supportive services, but the greatest need was in actual units for persons experiencing homelessness, primarily the need for deeply affordable supportive housing units, especially for the chronically homeless. Housing ends homelessness. Once housing is secured and housing assistance is in place, those who have experienced homelessness need support to maintain their housing. Quality housing that offers intensive, wraparound supportive services and is accessible to families and individuals with multiple challenges, disabilities, and histories of literal and chronic homelessness is a fundamental and urgent investment in Bexar County’s future. Housing alone, without attention to health, behavioral health, employment and education, and other supportive service, will continue to result in instability and recurrent homelessness.

QP 2: AT RISK OF HOMELESSNESS POPULATION

The surge in population growth and rising rent costs in Bexar County are putting more households at risk of homelessness. Unlike individuals experiencing homelessness, at risk and other unstably housed populations are housed, and typically do not need help to secure or move into new housing – rather they are at risk of losing their housing and need help to maintain their housing so that they do not fall into homelessness. Those at risk and other unstably housed populations, requires rental/utility assistance to help them keep their housing while they get back on their feet.

With eviction court proceedings resuming after a pandemic moratorium, as well as rising rent prices and economic uncertainty, providers of homeless prevention services see an increased demand for their services to help relocate families who have been evicted and to help maintain stability for families not yet forced to leave. In an effort to keep Americans housed, the U.S. Department of the Treasury introduced the federal Emergency Rental Assistance (ERA) program,

which provides financial assistance to households struggling to pay their rent. In December of 2020, the first allocation of ERA funds (ERA1) distributed \$25 billion and on March 11, 2021, under American Rescue Plan Act of 2021 (ARPA), the second allocation of ERA funds (ERA2) distributed \$21.55 billion to jurisdictions across the nation for the creation and administration of state and local ERA programs. Bexar County received \$13,788,576.20 (ERA1) and \$10,910,255 (ERA2).

The County's ERA1 and ERA2 were administered by the City of San Antonio in their Emergency Housing Assistance Program (EHAP). As of July 30, 2022, 65,932 applications for assistance had been approved, totaling \$206, 214, 006 for rent/mortgage, utility, and cash assistance. EHAP serves homeowners and renters earning under 80% of the AMI and in need of assistance to maintain housing stability. Of the over 65,932 approved applications, 3,217 are Bexar County residents totaling \$12, 349,198 in assistance. Of the total approved applications, 38,412 were for households at or below 30% AMI (inclusive of both City and County residents).

Additionally, the Texas Rent Relief Program launched in February 2021 as the first and only statewide rent and utility assistance program in Texas. The Texas Department of Housing and Community Affairs (TDHCA) administered the program with Emergency Rental Assistance Program Funds from the U.S. Department of the Treasury.

By providing rent and utility assistance, Texas Rent Relief helped low- and moderate-income Texas renters remain stably housed during the pandemic. Federal reporting showed that Texas Rent Relief served more households than any other state using Emergency Rental Assistance Program Funds nationwide. According to TDHCA, 27,566 Bexar County households received an average of \$6,437 for a total of \$177,438,831 in rent and utility assistance to prevent housing instability. Many of these programs are winding down or are no longer accepting applications, so the need for rental and utility assistance remains high.

While most who are at risk of becoming homeless or who are in unstable situations are actually housed, this is not always the case. Some at risk and other unstably housed populations are living in overcrowded situations or in housing of inferior quality or living in temporary housing (hotels or motels). In those and similar situations, at risk and unstably housed populations like those experiencing homelessness, may also require supportive services assistance to relocate to other suitable housing. If they have poor credit histories, past evictions, or criminal history, they may need help finding a landlord who is willing to rent to them. Due to limited or no income, they will need assistance paying upfront costs to move in.

Homelessness is costly, both financially and from a human perspective. The community cost of taking care of someone who is literally homeless is considerably more expensive than preventing that person from losing housing in the first place. Families continue to be impacted by the pandemic as well as the rising costs of rent, food, and transportation and overall, households are seeking larger amounts of assistance to maintain housing.

It should be noted that a common theme through all consultations was the need for more affordable units. Consultation with homeless service providers and CoC leadership identified an immediate need for additional homeless prevention resources. With eviction court proceedings now resuming after a pandemic moratorium, as well as rising rent prices and economic uncertainty, providers of homeless prevention services see an increased demand for their services to help relocate families who have been evicted and to help maintain stability for families not yet forced to leave.

QP 3: FLEEING, OR ATTEMPTING TO FLEE, DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING, OR HUMAN TRAFFICKING

Individuals fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking are often at risk of housing instability as they may face unstable employment history, poor credit, broken leases, etc. This population may require additional wrap-around services, including long-term housing support, childcare, job training, and healthcare, due to limited or nonexistent financial resources, long wait lists for housing vouchers, or unfavorable rental history.

Housing and service needs of persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking would largely mirror those of homeless persons or at risk and unstably housed persons (described above) – depending on their situation. However, as explained in the consultation section, homeless providers indicate that this population has some unique needs. For example, providers advocate for more transitional housing or shelter for this population because they have difficulty obtaining a lease in their own name due to lack of credit or bad/damaged credit. Also, particularly important for this population would be the supportive services need for mental health services and counseling, due to the trauma experienced by the individual and their family. Additional affordable units in diversified areas of the County can also provide more choice in location that can affect the long-term safety of survivors.

According to the Collaborative Commission on Domestic violence Annual report of 2021, the following gaps were identified for this population:

- Child, youth & family prevention programs are insufficient to meet community needs.
- Community norms nurture domestic violence, and the community is generally unaware of services.
- Resources and evaluations are not consistently coordinated between agencies and sectors.

- Evidence-based tools to identify survivors with a high risk of death or serious injury are inconsistently implemented.
- Services for survivors of domestic violence are scattered, and entry points are unclear.

Housing and legal services are stretched and need additional capacity. Services and accountability for offenders do not sufficiently remove weapons and provide treatment to break the cycle of violence.

QP 4: OTHER POPULATIONS REQUIRING SERVICES OR HOUSING ASSISTANCE TO PREVENT HOMELESSNESS AND THOSE AT GREATEST RISK OF HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS

QP2 and QP4 share near the same or very similar characteristics and similar housing and service needs.

TABLE 13: ALL RENTERS WITH HOUSING PROBLEMS

	All Renter Households with Housing Problems	Percentage of Total Renter Households (263,875)
	Housing Problems	
Renter Households with at least 1 of 4 Housing Problems	127,110	48%
Renter Households with at least 1 of 4 Severe Housing Problems	70,405	27%
Cost Burden		
Renter Households with Cost Burden Greater than 30% of Income	61,625	23%
Renter Households with Severe Cost Burden Greater than 50% of Income	55,210	21%

Data Sources: 1) Bexar County 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

For QP4 (1) households requiring services or housing assistance to prevent homelessness, the need for more affordable rental units is reflected in Table 13. As many as 197,515 renter households in Bexar County (75%) are experiencing housing instability thus increasing the risk of homelessness. With as much as 61,625 (23%) renter households paying more than 30% of their income toward housing. For QP4 (2a) there are 55,210 (21%) renter households making 0-30% of AMI that are also severely cost burdened paying more than 50% of income toward their housing.

Generally, assistance to persons experiencing homelessness may be time-limited, subject to the program requirements and the availability of funds. Specific to the homeless program resources in San Antonio/Bexar County, the Emergency Solutions Grants (ESG) and ESG Coronavirus Aid

(ESG-CV), Coronavirus Aid Recovery, and Economic Security (CARES) Act funds infused approximately \$19,409,968 in ESG funds and with an expenditure deadline of September 30, 2023. Bexar County received \$696,845 (Round 1) and \$1,859,901 (Round 2) in ESG-CV funds which were used to:

- a) support the City of San Antonio's Temporary Emergency Shelter operations and essential services;
- b) Emergency Shelter operations, essential services, renovations
- c) operations and administration of Homeless Management Information System (HMIS);
- d) Homelessness Prevention activities

Since ESG-CV funding will end soon, there will be gaps for resources or assistance that may be provided by several sources, including services through the U.S. Department of the Treasury's Emergency Rental Relief, regular ESG funds, Homeland Security's Emergency Food and Shelter Program, or HOME-ARP funds. In 2022, Bexar County shifted a large portion of the ESG annual funds to homelessness prevention to attempt to fill in gaps, however, this funding is projected to serve 50 households out of the thousands that need assistance. The County assisted 97 persons using ESG HP & RRH and 1,415 persons using ESG funds in PY 2021. With a total of 1,335 (or 88%) exiting the funded programs during the program year. Of those 1,335 exits, 262 (or 20%) exited to some form of permanent housing. These include exits to private rentals (with or without subsidies), and public housing. A large majority, 698 (or 52%) persons exited to temporary housing situations, such as emergency shelter, transitional housing, or temporary stays with family or friends showing a need for different support.

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):

As shown in Table 1, there are 1,852 temporary beds (emergency shelter and transitional housing beds – ES & TH), and 2,060 beds that offer permanent supportive services; Table 2 reflects there are 286,680 total rental units of those, only 18,310 units are affordable to those at or below 30% AMI, in Bexar County.

In PY 2021, the County allocated \$188,799 in ESG homelessness prevention funding and emergency shelter operations funding to programs addressing those at risk of homelessness and literal homelessness. ESG subrecipients for these funds were Corazon Ministries, the Society of St. Vincent de Paul, and The Salvation Army. These agencies have unique skill sets to assist those neediest and vulnerable populations to retain and obtain housing.

As mentioned above, the County was also a recipient of the U.S. Department of the Treasury's ERA 1 allocation of \$13,788,576.20 and ERA 2 allocation of \$10,910,255.00; these funds were administered in partnership with the City of San Antonio and were earmarked for emergency housing assistance and utility assistance in order to prevent families from becoming homeless. As of July 30, 2022, the program assisted 65,932 households with \$206, 214, 006 worth of rent, mortgage, utilities, and cash assistance (See Table 14 below for breakdown per AMI). Of the 65,932 approved applications, 3,217 are Bexar County residents totaling \$12, 349,198 in assistance.

TABLE 14: CITY OF SAN ANTONIO EMERGENCY HOUSING ASSISTANCE PROGRAM

AMI %	APPROVED	RENTERS TOTAL	RENTERS %
Overall / En General	65,916	59,504	90.3
0 - 30%	38,412	35,333	92.0
31 - 50%	16,097	14,350	89.1
51 - 60%	5,225	4,567	87.4
61 - 80%	5,569	4,796	86.1
81 - 100%	613	458	74.7

Data Sources: [DHS-SA - Status and Dashboard \(mendixcloud.com\)](https://mendixcloud.com)

The County's funding recommendations for PY 2022 include \$134,657 in homelessness prevention funding to SAMMinistries that can divert the most vulnerable households from becoming homeless by providing financial assistance for rental arrears. Additionally, the County has recommended \$50,000 in ESG funds for the operational costs associated with maintaining the Homeless Management Information System (HMIS), as this is a vital tool to track services provided to individuals experiencing homelessness in the San Antonio / Bexar County area. Data obtained from the HMIS database is then utilized to inform stakeholders and HUD about the local community trends and prevent duplication of benefits.

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

QP1 GAPS

In terms of shelter and housing resources for persons experiencing homelessness, the Homeless Needs Inventory, and Gap Analysis (Table 1) above compares the temporary housing options, such as shelter, to the homeless PIT Count data to determine whether there is an excess or a deficit in

capacity that would be needed to house those experiencing homelessness, as reflected in the PIT Count. For this purpose, the Gap Analysis does not include permanent supportive housing, as those counts are not included in the PIT Count. Those individuals no longer meet the homeless definition defined in 24 CFR 91.5.

Additionally, stakeholder consultation revealed a need for short-term low-barrier emergency shelter capacity for persons with disabling conditions and/or medical needs who cannot meet daily living activities without assistance or accommodation. This population often goes without safe and decent living conditions and frequently visits the local emergency health care facilities. Due to the lack of accommodating shelter opportunities, this population may face more extended recovery periods, as they cannot regularly access shower/laundry facilities, wound care, or structured medical care.

Based on the data in Table 1 for families, San Antonio/Bexar County has 897 beds (or 215 units) in emergency shelter, transitional housing, and safe haven housing for families, serving 644 homeless persons in families (or 198 homeless family households). This seems to indicate a surplus of 253 beds (or 17 shelter units) available for homeless families.

Based on the data in Table 1 for individual adults, San Antonio/Bexar County has 1,852 beds/units in emergency shelter and transitional housing, and yet the homeless count shows 2,995 persons (or 2,370 households) experiencing homelessness. This is a deficit of 499 beds (320 units) for homeless individuals who have no place to seek shelter (whether temporary housing or permanent housing).

Overall, there is still a deficit of about 499 shelter beds (320 units) for homeless individuals. This data shows a lack of housing options for individuals experiencing homelessness, with 1,036 of those being unsheltered living in places not meant for human habitation. Housing (units and resources to pay for those units) is a critical need for those experiencing homelessness. As per SARAH, there is an **average of 724 individuals in the PSH waitlist for the past 7 years.**

As stated previously, not every homeless person would want to stay in temporary housing available in the community. Feedback from Street Outreach workers demonstrate that most of the unsheltered population would prefer to be housed permanently with available supportive services due to some form of disability. The County's goal is not to house people through emergency shelter, but rather to provide permanent housing options. With additional affordable rental housing units that offer supportive services that the sheltered and unsheltered population would qualify for temporary housing beds/units (ES & TH) will become available for those needing short-term housing options.

QP2 GAPS

As identified in Table 2 above, there is a gap of 18,450 affordable rental units for those at or below 30% AMI. Due to the pandemic, there was a significant infusion of supplemental funding to ensure those that are at risk of homelessness remain stably housed. Since these funding sources are set to expire soon, together with rising cost of living (i.e., rental, utilities, food, etc.), it will result to possibly higher eviction rates, thus creating strain for local housing providers.

To address this concern, the City of San Antonio is utilizing other funding sources to continuously provide housing assistance for those households at risk of experiencing homelessness (i.e., Housing Assistance Program providing emergency rental assistance for housing stabilization, and resident relocation assistance).

QP3 GAPS

For QP 3, the following gaps were identified:

- Child, youth & family prevention programs are insufficient to meet community needs.
- Community norms nurture domestic violence, and the community is generally unaware of services.
- Resources and evaluations are not consistently coordinated between agencies and sectors.
- Evidence-based tools to identify survivors with a high risk of death or serious injury are inconsistently implemented.
- Services for survivors of domestic violence are scattered, and entry points are unclear.
- Housing and legal services are stretched and need additional capacity. Services and accountability for offenders do not sufficiently remove weapons and provide treatment to break the cycle of violence.

QP4 GAPS

For QP4 (1) and (2a), Table 2 identified a gap of 14,975 affordable rental units.

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:

Not Applicable

IDENTIFY PRIORITY NEEDS FOR QUALIFYING POPULATIONS

During the development of the Consolidated Plan, a set of priority needs were identified. These priorities include affordable housing, homeless needs, facilities and infrastructure, public services, fair housing, COVID-19 preparedness, and program administration.

For QP 1, Table 5 reflects 519 households are chronically homeless, combined with the gap of 499 beds (320 units) for homeless households who have no place to seek shelter, whether temporary housing or permanent housing, as described above, resulted in the priority need to increase the inventory of affordable supportive housing.

For QP 2, as identified in Table 2 above, there is a gap of 18,450 affordable rental units for those at or below 30% AMI. The priority need is to increase affordable rental units for those earning 30% of the AMI.

For QP 3, priority needs for persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and gaps would again include those of homeless persons (described above) or at risk and unstably housed persons (described below) – depending on their situation. Persons fleeing or attempting to flee would be eligible for the same services as other homeless or at risk/unstably housed populations. However, there may be additional challenges in securing a lease for this population (which may require a property owner incentive). Based on feedback from providers, different priority needs may include other transitional housing and supportive services, mainly mental health services.

For QP 4 (1), for formerly homeless households nearing the termination of assistance, the top needs are for increased, sustainable income (earned and unearned); access to Social Security disability and other mainstream benefits; linkages to health, mental health, and legal services; access to affordable transportation and childcare; access to transitional and supportive housing programs; and ongoing case management and supportive services. The greatest need of formerly homeless households receiving housing assistance is the availability of affordable rental housing.

For QP 4 (2a), low wages, rising rental costs, and the scarcity of affordable housing for extremely low-income households (30% AMI) that are severely cost burdened place vulnerable households at even greater risk for eviction or homelessness. The priority need is to increase the inventory of affordable rental housing units to those making 30% of the AMI.

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 County utilized a variety of data sources to determine the level of need and gaps in the housing and shelter system. Data analysis to inform the community needs comes from the Point in Time Count, the Housing Inventory Count, Comprehensive Housing Affordability Strategy data, and other local sources. Each of these studies was based on its own data but also on robust community engagement of stakeholders and people with lived experience of homelessness, housing instability, or domestic violence. Consultation with stakeholders and providers also shaped the prioritization of needs in the community in the face of the pandemic.

HOME-ARP ACTIVITIES

DESCRIBE THE METHOD(S) THAT WILL BE USED FOR SOLICITING APPLICATIONS FOR FUNDING AND/OR SELECTING DEVELOPERS, SERVICE PROVIDERS, SUBRECIPIENTS AND/OR CONTRACTORS

The County published a Notice of Funding Availability (NOFA) in the local San Antonio Express News, Bexar County Community Development website, and email blast to local community stakeholders such as non-profits, affordable housing developers, service providers, and the local CoC on January 26, 2022. The County considered all proposals received under the NOFA process and prioritized organizations that collaborate with other community groups (i.e., non-profits, public housing authorities, etc.) in order to leverage funding and better serve qualified populations within the HOME-ARP focus areas. Due to the limited number of proposals received under the NOFA process and the jurisdictional boundaries in which the proposals are located, the County opted to partner with the City of San Antonio and the South Alamo Regional Alliance for the Homeless (SARAH) to issue a Request for Proposals (RFP). The RFP was issued on November 28, 2022 and solicited proposals for the development of affordable rental housing, specifically supportive housing for households experiencing homelessness. A neutral third-party scoring committee will score proposals submitted under this RFP, and eligible recommendations will then be presented to the Bexar County Commissioners Court for discussion and appropriate action.

DESCRIBE WHETHER THE PJ WILL ADMINISTER ELIGIBLE ACTIVITIES DIRECTLY

Bexar County does not intend to administer eligible activities directly. It will instead allocate funds to qualified service providers and affordable housing developers through the County Notice of Funding Availability (NOFA) process as discussed above.

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

Bexar County does not intend to allocate any administrative funding to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

PJ'S 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 A NON-PROFIT ORGANIZATION OPERATING ASSISTANCE, NON-PROFIT CAPACITY BUILDING, AND ADMINISTRATIVE COSTS IS WITHIN HOME-ARP LIMITS

USE OF HOME-ARP FUNDING:

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$1,100,000		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant-Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$1,062,842		
Non-Profit Operating	\$0	0 %	5%
Non-Profit Capacity Building	\$0	0 %	5%
Administration and Planning	\$381,678	15 %	15%
Total HOME ARP Allocation	\$2,544,520		

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:

Bexar County is in constant communication with the local homeless service system, including affordable housing developers and non-profits, concerning the needs and growth of the local homeless and atrisk homeless populations. While SARAH also provides a collaborative space for all service providers and grantees to discuss new resources and screening tools, including COVID-

specific resources entering the local community and provides insight into system-wide needs and gaps. Although the local service providers were providing their input on the needs and recommendations for HOME-ARP activities, the County needed to wait for final HUD guidance regarding the HOME-ARP program before undertaking the formal HOME-ARP Allocation plan consultation process.

As discussed in the Needs and Gaps Analysis section, there is a shortage in supply of affordable rental housing for households needing supportive services within Bexar County. Therefore, the County opted to invest its HOME-ARP funding in the development of affordable rental housing by creating affordable rental units with supportive services for all four QPs as defined above. By investing in affordable rental housing development, the County can assist in the efforts of increasing the supply of physical units and expand housing opportunities for those that may not otherwise access safe and decent housing.

HOME-ARP PRODUCTION HOUSING GOALS

ESTIMATE THE NUMBER OF AFFORDABLE RENTAL HOUSING UNITS FOR QUALIFYING POPULATIONS THAT THE PJ WILL PRODUCE OR SUPPORT WITH ITS HOME-ARP ALLOCATION

Bexar County intends to support the development of approximately **30 affordable rental units with 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

By utilizing HOME-ARP funds to support the development of approximately **30 affordable rental units with supportive services**, the frequency of these individuals utilizing the local emergency health care systems for non-life-threatening needs will decrease. These housing opportunities will allow access to safe and decent housing conditions for the most vulnerable populations while ensuring they are able to access necessary wrap-around services and benefit from eligible mainstream resources such as Supplemental Nutrition Assistance Program (SNAP), Medicare, etc. This production goal will address the top priorities identified during the development of Bexar County's 2021-2025 Five-Year Consolidated Plan and HOME-ARP Consultation by increasing the supply of affordable rental housing opportunities thus reducing homelessness by assisting HOME-ARP eligible individuals and families with supportive services to stabilize them in safe and decent housing units supported by this initiative.

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

All Qualifying Populations will be eligible for a HOME-ARP affordable rental housing unit; however, there will be a preference for QP1. Within QP1 the following subpopulation preferences and method of prioritization will apply:

- (1) **QP1 households experiencing chronic homelessness** (as defined by [24 CFR 91.5](#)) in order by
 - (a) length of homelessness (longest to shortest), defined as the length of time in which a household has resided in a place not meant for human habitation, a safe haven, or an emergency shelter; then by;
 - (b) the severity of the household's service needs, and disability as determined by the Resource Placement Tool (RPT) (highest to lowest). Persons who have been identified as having the most severe service needs are those with history of high utilization of crisis services; those with significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing; youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations. The determination is not based on a specific diagnosis or disability type, but only on the severity of needs of the individual.
- (2) **QP1 households with disabilities** in order by length of homelessness then by severity of service needs as described above.
- (3) **QP1 households where one or more persons are at least 62 years of age or older** in order of length of homelessness then by severity of service needs as described above.
- (4) All other QP1 households in order of length of homelessness then by severity of service needs.
- (5) All other QP households in chronological order, insofar as practical.

To summarize, the preferences are as follows:

- **First Preference:** QP1 households experiencing chronic homelessness
- **Second Preference:** QP1 households with disabilities

- **Third Preference:** QP1 elderly households (i.e., household composed of one or more persons at least one of whom is 62 years of age or more)

The three subpopulations above are ranked in order of preference – for example, qualifying first preference households will receive assistance prior to those in the second and third preferences.

This method of prioritization aligns with that of the local Coordinated Entry system which will expand to accept referrals for all QPs for rental housing projects.

No preferences will apply in the delivery of, or client selection for, HOME-ARP Supportive Services. Supportive Services projects will use a project/activity waitlist for client selection and referral.

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 THE QUALIFYING POPULATION, CONSISTENT WITH THE PJ'S NEEDS ASSESSMENT AND GAP ANALYSIS

Preferences are intended to connect the most vulnerable residents with an appropriate intervention to ensure long-term housing stability and efficiently use available community resources. The County intends to partner with the local CoC to utilize the Coordinated Entry system to identify referrals eligible for HOME-ARP funded rental housing units. Using the prioritization method that recognizes severity of needs and long-term homelessness allows the County to serve and assist in overcoming systematic barriers to rental housing for those with long-term homelessness and disabilities. HOME-ARP programs will be available to all qualifying populations; however, preference will be given to the QPs and subpopulations as described above. These preferences will be further established in the written agreement with the owner of the rental housing and the service providers.

Homelink was established in 2016 as San Antonio/Bexar County's local Coordinated Entry System – a uniform, community-wide approach to connect persons who are experiencing or at risk of homelessness to housing resources. On November 1, 2022, Homelink was updated to include its most significant upgrade since Coordinated Entry was established locally in 2016. The effort has been massive and has included collaboration and input from the Coordinated Entry & Advisory Committee, Homeless Management Information System (HMIS), Outreach Grid (OG), Lab for Economic Opportunities (LEO), South Alamo Regional Alliance for the Homeless (SARAH), and Homelink Users.

The revamp included a new equitable prioritization tool for Homelink Housing resources, replacing the VI-SPDAT scoring system called the "Resource Placement Tool (RPT)". To ensure limited housing resources are used strategically and effectively, Homelink determines a data-driven prioritization order for each project type within the CoC's geographic area. Homelink will use the

established preferences and method of prioritization described above for HOME-ARP funded rental units.

For existing CoC's Permanent Supportive Housing Programs, clients are prioritized based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual's or family's service needs and disability. Persons who have been identified as having the most severe service needs are those with history of high utilization of crisis services; those with significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support to maintain permanent housing; youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations. The determination is not based on a specific diagnosis or disability type, but only on the severity of needs of the individual.

For HOME-ARP programs, the County intends to enter in a written agreement or Memorandum of Understanding (MOU) as applicable with the CoC/CoC Advisory Board to expand the definition of the local Coordinated Entry System to include all of HOME-ARP's qualifying populations to meet the referral requirements established in Section IV.C.2 of the CPD Notice 21-10 and ensure all HOME-ARP Qualifying Populations can be referred to a HOME-ARP funded project in a timely manner. Policies and procedures will be established for applying the established preference and method of referral.

The County selected the preferences for QP1 household experiencing chronically homeless due to the gaps and needs assessment demonstrating this population as having the highest unmet needs and system gaps. This intervention will directly serve this population and will eventually prevent further households from experiencing homelessness. The County's HOME-ARP funds will be incorporated into the existing continuum of homeless services to best leverage funds and stabilize this population in line with the gaps identified and analyzed with a deficit of 320 units housing units for individuals experiencing homeless.

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

All Qualifying Populations will have access to the HOME-ARP funded projects. For Rental Housing activities, QP1 will be given preference as described in the preferences section above, with all other QP referrals in chronological order of receipt. No preferences will be used in the Supportive Services activity, which will therefore be open to all QPs.

HOME-ARP REFINANCING GUIDELINES

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multi-family 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

Bexar County does not intend to refinance existing debt secured by multi-family rental housing that is being rehabilitated with HOME-ARP funds.

- 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.

N/A

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

N/A

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

N/A

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

N/A

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

N/A

HEARST

MEDIA SOLUTIONS

San Antonio Express News | ExpressNews.com | mySA.com

SAN ANTONIO EXPRESS - NEWS AFFIDAVIT OF PUBLICATION

STATE OF TEXAS: COUNTY OF BEXAR

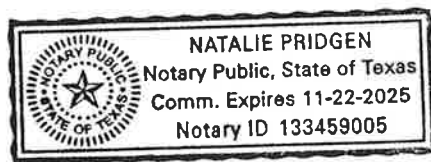
Before me, the undersigned authority, a Notary Public in and for the State of Texas, on this day personally appeared: Geena Garza, who after being duly sworn, says that she is the Bookkeeper of HEARST NEWSPAPERS, LLC - dba: SAN ANTONIO EXPRESS - NEWS, a newspaper published in Bexar County, Texas and that the publication, of which the annexed is a true copy, was published to wit:

Customer ID	Customer	Order ID	Publication	Pub Date
20000011	BEXAR CO. ECONOMIC & COMM.	34274231	SAE Express-News	05/10/23


Geena Garza
Bookkeeper

Sworn and subscribed to before me, this 10th day of May A.D. 2023

Notary public in and for the State of Texas





Bexar County Home Investment Partnerships Program - American Rescue Plan HOME-ARP Allocation Plan
Public Comment Period:
May 11, 2023 - May 25, 2023

Bexar County Economic and Community Development Department (ECD) is initiating a public comment period for the revised HOME-ARP Allocation Plan beginning Thursday, May 11, 2023 - Thursday, May 25, 2023. The Allocation Plan details how the County intends to distribute the \$2,544,520 in HOME-ARP funds received from the U.S. Department of Housing and Urban Development (HUD) as part of the American Rescue Plan Act.

Unlike the traditional HOME Investment Partnerships Program (HOME) funds, HOME-ARP will prioritize individuals and families experiencing or at risk of homelessness. The County proposes \$2,162,842 for the acquisition and development of affordable rental housing with supportive services and \$381,678 in administration and planning expenses.

The public may access a full copy of the Allocation Plan at <https://www.bexar.org/2741/HOME-Investment-Partnerships-Program-HOM>. Additionally, a copy of the Allocation Plan is available at the Bexar County Community Development office located at 233 N. Pecos la Trinidad, Suite 320, San Antonio, TX 78207. It may be examined from Monday - Friday, 8:00 A.M. to 5:00 P.M. Please call (210) 335-6648 or e-mail laura.montanez@bexar.org to receive a copy of the plan via postal service.

Any individual, group, or agency may submit comments regarding the Allocation Plan via e-mail to laura.montanez@bexar.org. All comments received by 5:00 P.M. on Thursday, May 25, 2023, will be considered by Bexar County prior to submitting a substantial amendment to the Program Year 2021 Annual Action Plan to HUD.

For more information about the HOME-ARP Allocation Plan, please contact Bexar County at (210) 335-6648 or visit <https://www.bexar.org/2741/HOME-Investment-Partnerships-Program-HOM>.

Other Information:
Special accommodations will be made available for individuals with disabilities and individuals needing language translation. Please contact Laura Montanez at laura.montanez@bexar.org or (210) 335-6648 if accommodations are needed.

HEARST

MEDIA SOLUTIONS

San Antonio Express News | ExpressNews.com | mySA.com

SAN ANTONIO EXPRESS - NEWS AFFIDAVIT OF PUBLICATION

STATE OF TEXAS: COUNTY OF BEXAR

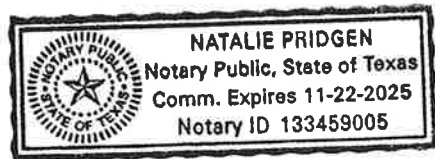
Before me, the undersigned authority, a Notary Public in and for the State of Texas, on this day personally appeared: Geena Garza, who after being duly sworn, says that she is the Bookkeeper of HEARST NEWSPAPERS, LLC - dba: SAN ANTONIO EXPRESS - NEWS, a newspaper published in Bexar County, Texas and that the publication, of which the annexed is a true copy, was published to wit:

Customer ID	Customer	Order ID	Publication	Pub Date
20000011	BEXAR CO. ECONOMIC & COMM.	34274235	SAE Express-News	05/10/23


Geena Garza
Bookkeeper

Sworn and subscribed to before me, this 10th day of May A.D. 2023

Notary public in and for the State of Texas





Programa de Asociaciones de Inversión en Viviendas del Condado de Bexar - Plan de Rescate Estadounidense
Plan de Asignación HOME-ARP
Período de comentario público: 11 de mayo de 2023 - 25 de mayo de 2023

El Departamento de Desarrollo Económico y Comunitario (ECD) del Condado de Bexar está iniciando un período de comentarios públicos para el Plan de Asignación HOME-ARP revisado a partir del jueves 11 de mayo de 2023 hasta el jueves 25 de mayo de 2023. El Plan de Asignación detalla cómo el Condado tiene la intención de distribuir el \$2,544,520 en fondos HOME-ARP recibidos del Departamento de Vivienda y Desarrollo Urbano (HUD) de EE. UU. como parte de la Ley del Plan de Rescate Estadounidense.

A diferencia de los fondos tradicionales del Programa de Asociaciones de Inversión HOME (HOME), HOME-ARP dará prioridad a las personas y familias que experimentan o están en riesgo de quedarse sin hogar. El Condado propone \$2,162,842 para la adquisición y desarrollo de viviendas de alquiler asequibles con servicios de apoyo y \$381,678 en gastos de administración y planificación.

El público puede acceder a una copia completa del Plan de asignación en <https://www.bexar.org/2741/HOME-Investment-Partnerships-Program-HOM>. Además, una copia del Plan de Asignación está disponible en la oficina de Desarrollo Comunitario del Condado de Bexar ubicada en 233 N. Pecos la Trinidad, Suite 320, San Antonio, TX 78207. Puede examinarse de lunes a viernes de 8:00 a.m. a las 5:00 p. m. Llame al (210) 335-6648 o envíe un correo electrónico a laura.montanez@bexar.org para recibir una copia del plan por correo postal.

Cualquier individuo, grupo o agencia puede enviar comentarios sobre el Plan de Asignación por correo electrónico a laura.montanez@bexar.org. Todos los comentarios recibidos antes de las 5:00 p.m. el jueves, 25 de mayo de 2023, será considerado por el condado de Bexar antes de presentar una enmienda sustancial al Plan de Acción Anual del Año del Programa 2021 a HUD.

Para obtener más información sobre el Plan de asignación HOME-ARP, comuníquese con el condado de Bexar al (210) 335-6648 o visite <https://www.bexar.org/2741/HOME-Investment-Partnerships-Program-HOM>. Otra información: Se pondrán a disposición adaptaciones especiales para personas con discapacidades y personas que necesiten traducción de idiomas. Comuníquese con Laura Montanez en laura.montanez@bexar.org o (210) 335-6648 si necesita adaptaciones.

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

09/20/2021

4. Applicant Identifier:

M21-UP-48-0500

5a. Federal Entity Identifier:

489029

5b. Federal Award Identifier:

070487020

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

Bexar County

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

746002039

*** c. UEI:**

WGCSBPYDLS78

d. Address:

*** Street1:**

233 N. Pecos, Suite 320

Street2:

*** City:**

San Antonio

County/Parish:

*** State:**

TX: Texas

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

78207-3178

e. Organizational Unit:

Department Name:

Economic & Community Develop

Division Name:

Community Development

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

Prefix:

Mr.

*** First Name:**

Robert

Middle Name:

H.

*** Last Name:**

Reyna

Suffix:

Title:

Director

Organizational Affiliation:

*** Telephone Number:**

210-335-1098

Fax Number:

210-335-6755

*** Email:**

rhreyna@bexar.org

Application for Federal Assistance SF-424

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

B: County 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:

HOME-14.239

CFDA Title:

HOME-ARP HOME Investment Partnerships Program - 14.239

* 12. Funding Opportunity Number:

N/A

* Title:

N/A

13. Competition Identification Number:

N/A

Title:

N/A

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Bexar County 2021 HOME-ARP Allocation Plan

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

* b. Program/Project

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="2,544,520.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="2,544,520.00"/>

* 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 18, 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:

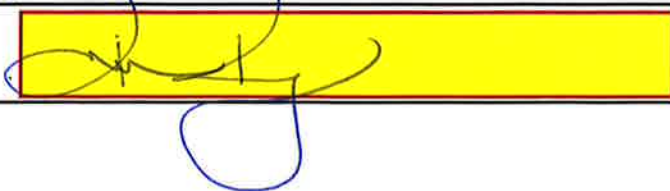
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:



* Date Signed:

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

Community Development Director

Title

12/6/2022

Date

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 Community Development Director
APPLICANT ORGANIZATION Boxer County	DATE SUBMITTED 12/6/2022

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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 (0348-0042), 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 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
	Geraldine Davis, ACT Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Bexar County	12/6/2022