

# HOME-ARP ALLOCATION PLAN

CITY OF DENTON, TEXAS

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

## INTRODUCTION

In September of 2021, the City of Denton received notice of a HOME Investment Partnerships – America Rescue Plan (HOME-ARP) allocation in the amount of \$1,763,622. To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include:

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

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

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

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

## CONSULTATION

### SUMMARIZE THE CONSULTATION PROCESS:

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

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

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

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

## PUBLIC PARTICIPATION

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

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

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

#### DESCRIBE ANY EFFORTS TO BROADEN PUBLIC PARTICIPATION:

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

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

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

A comment was submitted recommending substance use treatment be included in the supportive services activities funded by HOME-ARP program. Staff plan to include this as an eligible expenditure and will continue to communicate with service providers in the community as program guidelines are developed. Additionally, a comment was received requesting the City fund viable transit options for people experiencing homelessness. Staff plan to include transportation as an eligible expenditure under supportive services activities as it is allowable for households enrolled in HOME-ARP programming.

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

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

### NEEDS ASSESSMENT AND GAPS ANALYSIS

To assess the unmet needs of HOME-ARP qualifying populations, the City evaluated the size and demographic composition of those populations. In addition, the City also identified gaps within its current shelter and housing

inventory, as well as the service delivery system. In the needs assessment and gaps analysis the City utilized current data including Comprehensive Housing Affordability Data (CHAS), 2022 Point in Time Count (PIT Count), 2022 Housing Inventory Count (HIC), or other data available data sources. The following information includes the basis for the Needs Assessment and gap analysis for HOME-ARP qualified populations.

**TABLE 1: HOMELESS NEEDS INVENTORY AND GAP ANALYSIS TABLE**

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

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

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

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

Data Source: Comprehensive Housing Affordability Strategy (CHAS)

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

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

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

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

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

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

- A total of 480 households are experiencing literal homelessness in Denton County.
- 201 of the 480 households (41.8%) are experiencing chronic homelessness.
- Four (4) known households are experiencing homelessness while attempting to flee domestic violence.
- Thirty-four (34) households experiencing homelessness are families, and 463 households are individuals.
- Thirty-six (36) households have been experiencing homelessness ten years or longer, 105 households for four the nine years, and 152 households for one to three years.
- 62.7% (291) of households experiencing literal homelessness are living with a disability, and 35.6% (170) have a chronic illness.
- Race & Ethnicity: The below data indicate the percentage breakdown of households experiencing homelessness in Denton County by race and ethnicity.
  - Black/African American – 25.68%
  - Multi-Racial – 4.21%
  - Native Hawaiian or Other Pacific Islander – 0.21%
  - White – 67.58%
  - Hispanic/Latino – 10.67%
  - Asian – 0.63%
  - American Indian or Alaskan Native – 1.68%

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

#### *INDIVIDUALS & FAMILIES AT RISK OF HOMELESSNESS*

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

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

Individuals incarcerated in Denton as well as those receiving behavioral health services, including substance abuse disorder services, may also be at risk of homelessness upon discharge. These numbers are not readily available as multiple service providers serve these persons and discharge status varies. Some may be discharged to a shelter

and others may be housed assisted by homeless service providers and then either provided additional services or transitioned to transitional or permanent housing. There is no county hospital in Denton County and private hospital systems do not have this data readily available.

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

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

#### *RESIDENTS LIVING IN HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS*

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

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

#### **DESCRIBE THE UNMET HOUSING AND SERVICE NEEDS OF QUALIFYING POPULATIONS, INCLUDING BUT NOT LIMITED TO: SHELTERED AND UNSHELTERED HOMELESS POPULATIONS; THOSE CURRENTLY HOUSED POPULATIONS AT RISK OF HOMELESSNESS; OTHER FAMILIES REQUIRING SERVICES OR HOUSING ASSISTANCE OR TO PREVENT HOMELESSNESS; AND, THOSE AT GREATEST RISK OF HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS:**

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

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

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

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

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

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

#### IDENTIFY AND CONSIDER THE CURRENT RESOURCES AVAILABLE TO ASSIST QUALIFYING POPULATIONS, INCLUDING CONGREGATE AND NON-CONGREGATE SHELTER UNITS, SUPPORTIVE SERVICES, TBRA, AND AFFORDABLE AND PERMANENT SUPPORTIVE RENTAL HOUSING:

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There is a total of 203 shelter beds available in Denton County, all located in the City of Denton. On average, these shelters have an estimated vacancy rate of 7%. The City of Denton is projected to complete the construction of a 24/7 shelter for people experiencing or at-risk of homelessness within City limits, which will increase shelter beds by 36 for a total of 271 of shelter beds in the City/County of Denton. This will leave a gap of at least 209 shelter beds for people experiencing homelessness in Denton County. The new shelter will provide three meals a day at no cost and host supportive services on-site. 124 of shelter beds will be reserved for emergency stays, and thirty-two (32) beds will be designated for extended-stay with a right-of return and storage of belongings for individuals enrolled in a transitional program. The City of Denton has also allocated American Rescue Plan (ARP) State and Local Fiscal Recovery Funding (SLFRF) to provide forty (40) rooms of non-congregate shelter for special populations (including individuals with chronic health conditions and families) through December 2024.

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



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

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

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##### *SHELTER & HOUSING INVENTORY*

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

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

##### *SERVICE DELIVERY SYSTEM*

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

All homeless services agencies use a shared, centralized system, called the Homeless Management Information System (HMIS); any actions and referrals are tracked and can be seen by all agencies in Denton County in order to provide better service and outcomes. Every individual experiencing homelessness is assessed to identify their unique needs and be connected to the appropriate resources and housing intervention. This is referred to as the Coordinated Entry system assessment and can be done at any of the participating agencies. This creates a coordinated Housing Priority List (HPL), an actively managed and prioritized list of the names and unique needs of every household experiencing homelessness.

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

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

increasing literal homeless population, and for supportive services to best support those households in maintaining permanent housing.

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

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

**IDENTIFY PRIORITY NEEDS FOR QUALIFYING POPULATIONS:**

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

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

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

## HOME-ARP ACTIVITIES

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

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

**IF ANY PORTION OF THE PJ’S HOME-ARP ADMINISTRATIVE FUNDS WERE PROVIDED TO A SUBRECIPIENT OR CONTRACTOR PRIOR TO HUD’S ACCEPTANCE OF THE HOME-ARP ALLOCATION PLAN BECAUSE THE SUBRECIPIENT OR CONTRACTOR IS RESPONSIBLE FOR THE ADMINISTRATION OF THE PJ’S ENTIRE HOME-ARP GRANT, IDENTIFY THE SUBRECIPIENT OR CONTRACTOR AND DESCRIBE ITS ROLE AND RESPONSIBILITIES IN ADMINISTERING ALL OF THE PJ’S HOME-ARP PROGRAM:**

Not Applicable.

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

## USE OF HOME-ARP FUNDING

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 589,312.98		
Acquisition & Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$1,124,309.02		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 0	0%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 50,000.00	3%	15%
<b>Total HOME ARP Allocation</b>	<b>\$1,763,622</b>		

**ADDITIONAL NARRATIVE, IF APPLICABLE:**

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

**DESCRIBE HOW THE CHARACTERISTICS OF THE SHELTER AND HOUSING INVENTORY, SERVICE DELIVERY SYSTEM, AND THE NEEDS IDENTIFIED IN THE GAP ANALYSIS PROVIDED A RATIONALE FOR THE PLAN TO FUND ELIGIBLE ACTIVITIES:**

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

**HOME-ARP PRODUCTION HOUSING GOALS**

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

Not Applicable.

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

Not Applicable.

**PREFERENCES**

**IDENTIFY WHETHER THE PJ INTENDS TO GIVE PREFERENCE TO ONE OR MORE QUALIFYING POPULATIONS OR A SUBPOPULATION WITHIN ONE OR MORE QUALIFYING POPULATIONS FOR ANY ELIGIBLE ACTIVITY OR PROJECT:**

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

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

IF A PREFERENCE WAS IDENTIFIED, EXPLAIN HOW THE USE OF A PREFERENCE OR METHOD OF PRIORITIZATION WILL ADDRESS THE UNMET NEED OR GAP IN BENEFITS AND SERVICES RECEIVED BY INDIVIDUALS AND FAMILIES IN THE QUALIFYING POPULATION OR CATEGORY OF QUALIFYING POPULATION, CONSISTENT WITH THE PJ'S NEEDS ASSESSMENT AND GAP ANALYSIS:

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

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

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

## HOME-ARP REFINANCING GUIDELINES

IF THE PJ INTENDS TO USE HOME-ARP FUNDS TO REFINANCE EXISTING DEBT SECURED BY MULTIFAMILY RENTAL HOUSING THAT IS BEING REHABILITATED WITH HOME-ARP FUNDS, THE PJ MUST STATE ITS HOMEARP REFINANCING GUIDELINES IN ACCORDANCE WITH [24 CFR 92.206\(B\)](#). THE GUIDELINES MUST DESCRIBE THE CONDITIONS UNDER WITH THE PJ WILL REFINANCE EXISTING DEBT FOR A HOME-ARP RENTAL PROJECT, INCLUDING:

ESTABLISH A MINIMUM LEVEL OF REHABILITATION PER UNIT OR A REQUIRED RATIO BETWEEN REHABILITATION AND REFINANCING TO DEMONSTRATE THAT REHABILITATION OF HOME-ARP RENTAL HOUSING IS THE PRIMARY ELIGIBLE ACTIVITY

Not Applicable.

REQUIRE A REVIEW OF MANAGEMENT PRACTICES TO DEMONSTRATE THAT DISINVESTMENT IN THE PROPERTY HAS NOT OCCURRED; THAT THE LONG-TERM NEEDS OF THE PROJECT CAN BE MET; AND THAT THE FEASIBILITY OF SERVING QUALIFIED POPULATIONS FOR THE MINIMUM COMPLIANCE PERIOD CAN BE DEMONSTRATED.

Not Applicable.

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

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Not Applicable.

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

---

Not Applicable.

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

---

Not Applicable.

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

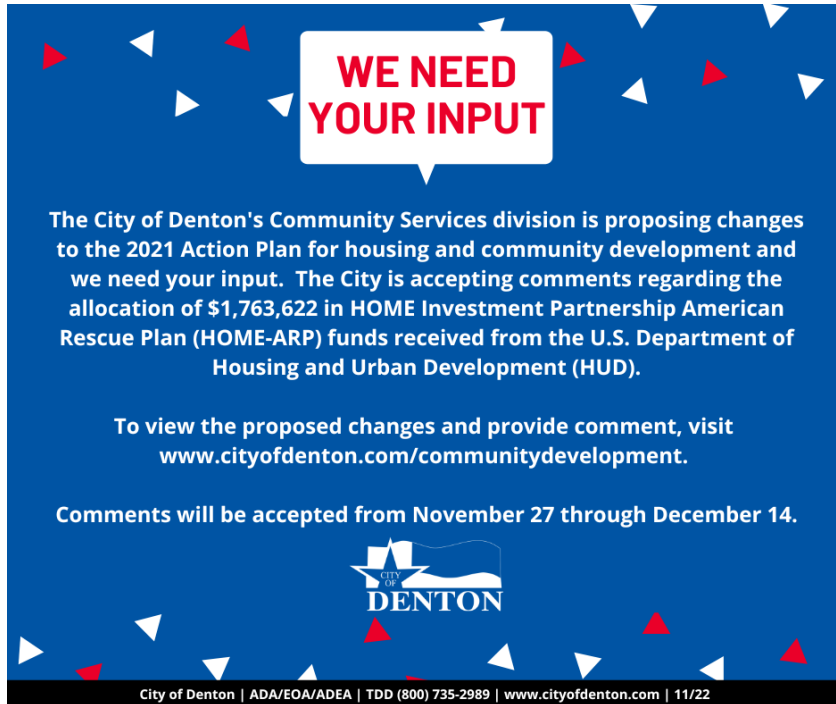
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Not Applicable.

## APPENDIX

## PUBLIC PARTICIPATION ACTIVITY

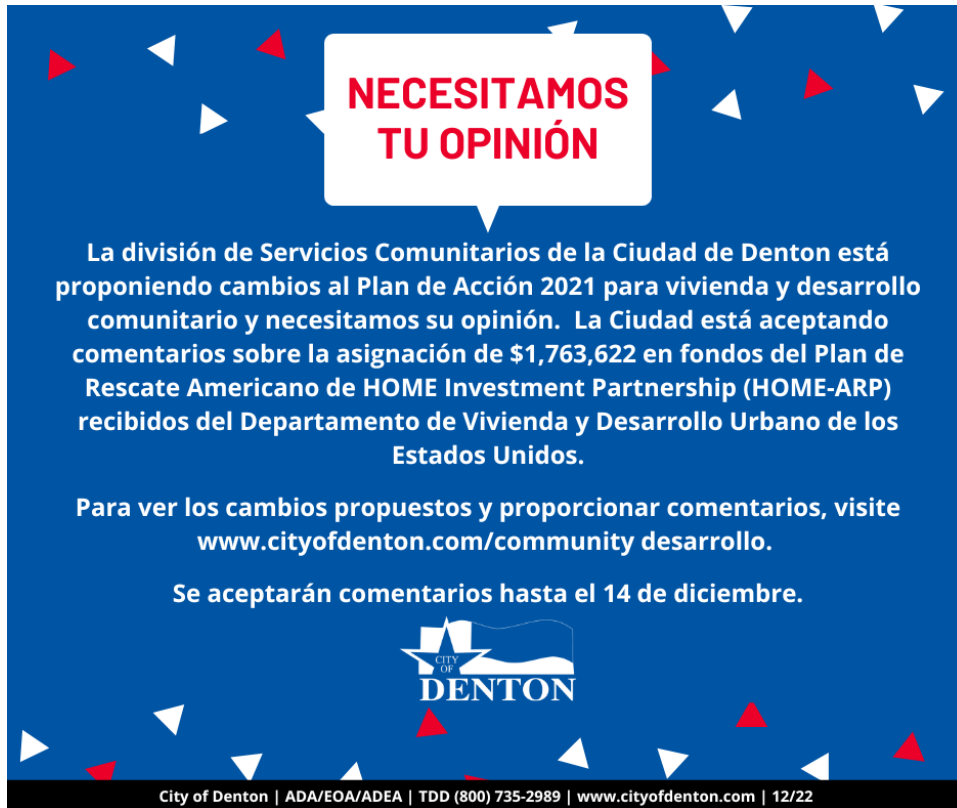
## SOCIAL MEDIA PROMOTION



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EMAIL PROMOTION

**Douangdara, Courtney**

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


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

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

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

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

**VIEW THE HOME-ARP ALLOCATION PLAN**

### **We Need Your Input by December 14!**

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

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

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



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[www.cityofdenton.com/communitydevelopment](http://www.cityofdenton.com/communitydevelopment)

City of Denton | 215 E. McKinney St., Denton, TX 76201

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## NEWSPAPER PROMOTION

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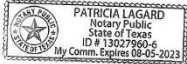
Being duly sworn (s)he is the Publisher/authorized designee of Denton Record-Chronicle, in City of Denton/surrounding areas in Denton County; Newspaper of general circulation which has been continuously and regularly published for a period of not less than one year preceding the date of the attached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

11/27/2022

*Alice M'Conaughy*  
(signature of Authorized Designee)  
Subscribed and sworn to before me this 27th day of November, 2022 by

*Alice M'Conaughy*  
(printed name of Designee)  
Witness my hand and official seal:

*Patricia La Bard*  
(signature name of Designee)  
Notary Public, Denton County, Texas



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

For more information about street construction projects in Denton, visit [www.dentoncitydevelopment.com](http://www.dentoncitydevelopment.com).

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

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

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

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

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

Any comments regarding the amendment may be submitted in writing to Community Services by faxing (940) 349-7753, by emailing [CommunityDevelopment@cityofdenton.com](mailto:CommunityDevelopment@cityofdenton.com) or by calling (940) 349-7725.

ADA/DEIA/DEIA: TDD (800) 735-2989 | TDD 11/21/2022  
[www.cityofdenton.com](http://www.cityofdenton.com)

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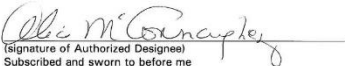
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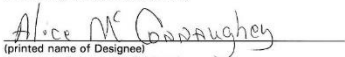
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Being duly sworn (s)he is the Publisher/authorized designee of Denton Record-Chronicle, in City of Denton/surrounding areas in Denton County; Newspaper of general circulation which has been continuously and regularly published for a period of not less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

12/04/2022


  
(signature of Authorized Designee)

Subscribed and sworn to before me  
this 4th day of December, 2022 by

  
(printed name of Designee)

Witness my hand and official seal:

  
(signature name of Designee)

Notary Public, Denton County, Texas  


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NECESITAMOS TU OPINIÓN  
La división de Servicios Comunitarios de la Ciudad de Denton está proponiendo cambios al Plan de Acción 2021 para vivienda y desarrollo comunitario y necesitamos su opinión. La Ciudad está aceptando comentarios sobre la asignación de \$1,763,622 en fondos del Plan de Rescate Americano de HOME Investment Partnership (HOME-ARP) recibidos del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos.  
Para ver los cambios propuestos y proporcionar comentarios, visite [www.cityofdenton.com/communitydesarrollo](http://www.cityofdenton.com/communitydesarrollo).  
Se aceptarán comentarios hasta el 14 de diciembre.  
Drc 12/04/2022

Ad Copy:  
NECESITAMOS TU OPINIÓN

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

Se aceptarán comentarios hasta el 14 de diciembre.

Drc 12/04/2022

## PUBLIC COMMENTS RECEIVED

## Comment #1 – Received Monday, December 5, 2022

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

## Comment #2 – Received Thursday, December 8, 2022

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

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

## Comment #3 – Received Thursday, December 8, 2022

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

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

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

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



ORDINANCE NO. 22-2468

AN ORDINANCE OF THE CITY OF DENTON APPROVING A SUBSTANTIAL AMENDMENT TO THE CITY'S 2021 ANNUAL ACTION PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT, INCLUDING A HOME INVESTMENT PARTNERSHIPS GRANT-AMERICAN RESCUE PLAN ("HOME-ARP") ALLOCATION PLAN AND AN APPLICATION AND BUDGET FOR THE HOME-ARP GRANT IN THE AMOUNT OF \$1,763,622.00; AUTHORIZING THE CITY MANAGER TO SIGN AND SUBMIT SAID AMENDMENT; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the American Rescue Plan Act of 2021 ("ARPA") required the United States Department of Housing and Urban Development ("HUD") to allocate ARPA funds to eligible government organizations using an allocation method similar to that which provides the City with its annual HOME grant allocation; and

WHEREAS, in September of 2021, the City received notice that HUD had allocated to the City \$1,763,622.00 in HOME-American Rescue Plan ("HOME-ARP") grant funds; and

WHEREAS, to receive the HOME-ARP funds, the City must prepare a HOME-American Rescue Plan Allocation Plan ("Allocation Plan") for distributing the funds, and HUD must approve the Allocation Plan; and

WHEREAS, on December 13, 2022, City Council held a public hearing to discuss and receive public comments on the Allocation Plan; and

WHEREAS, citizen participation requirements, including a 15-day comment period, have been met; and

WHEREAS, City Council must approve the Allocation Plan before its submittal to HUD;  
NOW THEREFORE,

THE COUNCIL OF THE CITY OF DENTON HEREBY ORDAINS:

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

SECTION 2. City Council hereby adopts the HOME-ARP Allocation Plan set forth in "Exhibit A," which is attached hereto and incorporated herein, to utilize the HOME-ARP grant of \$1,763,622.00, and amends the Fiscal Year 2021 Annual Action Plan to incorporate the Allocation Plan.

SECTION 2. The City Manager or their designee is authorized to submit the Allocation Plan to HUD and to distribute funds and undertake any administrative actions necessary to implement the amended Action Plan.

SECTION 3. This ordinance shall become effective immediately upon its passage and approval.

The motion to approve this ordinance was made by Brian Beck  
and seconded by Brandon Chase McGee, the ordinance was passed and  
approved by the following vote [5 - 0]:

	Aye	Nay	Abstain	Absent
Mayor Gerard Hudspeth:	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
Vicki Byrd, District 1:	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
Brian Beck, District 2:	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
Jesse Davis, District 3:	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
VACANT, District 4:	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Brandon Chase McGee, At Large Place 5:	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
Chris Watts, At Large Place 6:	<u>      </u>	<u>      </u>	<u>      </u>	<u>✓</u>

PASSED AND APPROVED this the 10<sup>th</sup> day of January, 2023.

  
GERARD HUDSPETH, MAYOR

ATTEST:  
ROSA RIOS, CITY SECRETARY

BY: 

APPROVED AS TO LEGAL FORM:  
MACK REINWAND, CITY ATTORNEY

BY: 





# HOME-ARP ALLOCATION PLAN

CITY OF DENTON, TEXAS

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

## INTRODUCTION

In September of 2021, the City of Denton received notice of a HOME Investment Partnerships – America Rescue Plan (HOME-ARP) allocation in the amount of \$1,763,622. To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include:

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

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

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

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

## CONSULTATION

### SUMMARIZE THE CONSULTATION PROCESS:

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

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

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

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

## PUBLIC PARTICIPATION

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

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

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

#### DESCRIBE ANY EFFORTS TO BROADEN PUBLIC PARTICIPATION:

---

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

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

---

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

A comment was submitted recommending substance use treatment be included in the supportive services activities funded by HOME-ARP program. Staff plan to include this as an eligible expenditure and will continue to communicate with service providers in the community as program guidelines are developed. Additionally, a comment was received requesting the City fund viable transit options for people experiencing homelessness. Staff plan to include transportation as an eligible expenditure under supportive services activities as it is allowable for households enrolled in HOME-ARP programming.

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

---

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

#### NEEDS ASSESSMENT AND GAPS ANALYSIS

To assess the unmet needs of HOME-ARP qualifying populations, the City evaluated the size and demographic composition of those populations. In addition, the City also identified gaps within its current shelter and housing



inventory, as well as the service delivery system. In the needs assessment and gaps analysis the City utilized current data including Comprehensive Housing Affordability Data (CHAS), 2022 Point in Time Count (PIT Count), 2022 Housing Inventory Count (HIC), or other data available data sources. The following information includes the basis for the Needs Assessment and gap analysis for HOME-ARP qualified populations.

TABLE 1: HOMELESS NEEDS INVENTORY AND GAP ANALYSIS TABLE

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

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

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

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

Data Source: Comprehensive Housing Affordability Strategy (CHAS)

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

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

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

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

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

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

- A total of 480 households are experiencing literal homelessness in Denton County.
- 201 of the 480 households (41.8%) are experiencing chronic homelessness.
- Four (4) known households are experiencing homelessness while attempting to flee domestic violence.
- Thirty-four (34) households experiencing homelessness are families, and 463 households are individuals.
- Thirty-six (36) households have been experiencing homelessness ten years or longer, 105 households for four the nine years, and 152 households for one to three years.
- 62.7% (291) of households experiencing literal homelessness are living with a disability, and 35.6% (170) have a chronic illness.
- Race & Ethnicity: The below data indicate the percentage breakdown of households experiencing homelessness in Denton County by race and ethnicity.
  - Black/African American – 25.68%
  - Multi-Racial – 4.21%
  - Native Hawaiian or Other Pacific Islander – 0.21%
  - White – 67.58%
  - Hispanic/Latino – 10.67%
  - Asian – 0.63%
  - American Indian or Alaskan Native – 1.68%

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

#### *INDIVIDUALS & FAMILIES AT RISK OF HOMELESSNESS*

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

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

Individuals incarcerated in Denton as well as those receiving behavioral health services, including substance abuse disorder services, may also be at risk of homelessness upon discharge. These numbers are not readily available as multiple service providers serve these persons and discharge status varies. Some may be discharged to a shelter

and others may be housed assisted by homeless service providers and then either provided additional services or transitioned to transitional or permanent housing. There is no county hospital in Denton County and private hospital systems do not have this data readily available.

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

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

#### *RESIDENTS LIVING IN HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS*

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

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

#### **DESCRIBE THE UNMET HOUSING AND SERVICE NEEDS OF QUALIFYING POPULATIONS, INCLUDING BUT NOT LIMITED TO: SHELTERED AND UNSHELTERED HOMELESS POPULATIONS; THOSE CURRENTLY HOUSED POPULATIONS AT RISK OF HOMELESSNESS; OTHER FAMILIES REQUIRING SERVICES OR HOUSING ASSISTANCE OR TO PREVENT HOMELESSNESS; AND, THOSE AT GREATEST RISK OF HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS:**

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

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



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

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

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

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

**IDENTIFY AND CONSIDER THE CURRENT RESOURCES AVAILABLE TO ASSIST QUALIFYING POPULATIONS, INCLUDING CONGREGATE AND NON-CONGREGATE SHELTER UNITS, SUPPORTIVE SERVICES, TBRA, AND AFFORDABLE AND PERMANENT SUPPORTIVE RENTAL HOUSING:**

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There is a total of 203 shelter beds available in Denton County, all located in the City of Denton. On average, these shelters have an estimated vacancy rate of 7%. The City of Denton is projected to complete the construction of a 24/7 shelter for people experiencing or at-risk of homelessness within City limits, which will increase shelter beds by 36 for a total of 271 of shelter beds in the City/County of Denton. This will leave a gap of at least 209 shelter beds for people experiencing homelessness in Denton County. The new shelter will provide three meals a day at no cost and host supportive services on-site. 124 of shelter beds will be reserved for emergency stays, and thirty-two (32) beds will be designated for extended-stay with a right-of return and storage of belongings for individuals enrolled in a transitional program. The City of Denton has also allocated American Rescue Plan (ARP) State and Local Fiscal Recovery Funding (SLFRF) to provide forty (40) rooms of non-congregate shelter for special populations (including individuals with chronic health conditions and families) through December 2024.

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



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

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

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### *SHELTER & HOUSING INVENTORY*

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

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

### *SERVICE DELIVERY SYSTEM*

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

All homeless services agencies use a shared, centralized system, called the Homeless Management Information System (HMIS); any actions and referrals are tracked and can be seen by all agencies in Denton County in order to provide better service and outcomes. Every individual experiencing homelessness is assessed to identify their unique needs and be connected to the appropriate resources and housing intervention. This is referred to as the Coordinated Entry system assessment and can be done at any of the participating agencies. This creates a coordinated Housing Priority List (HPL), an actively managed and prioritized list of the names and unique needs of every household experiencing homelessness.

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

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

increasing literal homeless population, and for supportive services to best support those households in maintaining permanent housing.

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

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

#### IDENTIFY PRIORITY NEEDS FOR QUALIFYING POPULATIONS:

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

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

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

### HOME-ARP ACTIVITIES

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

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

#### IF ANY PORTION OF THE PJ'S HOME-ARP ADMINISTRATIVE FUNDS WERE PROVIDED TO A SUBRECIPIENT OR CONTRACTOR PRIOR TO HUD'S ACCEPTANCE OF THE HOME-ARP ALLOCATION PLAN BECAUSE THE SUBRECIPIENT OR CONTRACTOR IS RESPONSIBLE FOR THE ADMINISTRATION OF THE PJ'S ENTIRE HOME-ARP GRANT, IDENTIFY THE SUBRECIPIENT OR CONTRACTOR AND DESCRIBE ITS ROLE AND RESPONSIBILITIES IN ADMINISTERING ALL OF THE PJ'S HOME-ARP PROGRAM:

Not Applicable.

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

### USE OF HOME-ARP FUNDING

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 589,312.98		
Acquisition & Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$1,124,309.02		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 0	0%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 50,000.00	3%	15%
<b>Total HOME ARP Allocation</b>	<b>\$1,763,622</b>		

**ADDITIONAL NARRATIVE, IF APPLICABLE:**

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

**DESCRIBE HOW THE CHARACTERISTICS OF THE SHELTER AND HOUSING INVENTORY, SERVICE DELIVERY SYSTEM, AND THE NEEDS IDENTIFIED IN THE GAP ANALYSIS PROVIDED A RATIONALE FOR THE PLAN TO FUND ELIGIBLE ACTIVITIES:**

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

**HOME-ARP PRODUCTION HOUSING GOALS**

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

Not Applicable.

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

Not Applicable.

**PREFERENCES**

**IDENTIFY WHETHER THE PJ INTENDS TO GIVE PREFERENCE TO ONE OR MORE QUALIFYING POPULATIONS OR A SUBPOPULATION WITHIN ONE OR MORE QUALIFYING POPULATIONS FOR ANY ELIGIBLE ACTIVITY OR PROJECT:**



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

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

IF A PREFERENCE WAS IDENTIFIED, EXPLAIN HOW THE USE OF A PREFERENCE OR METHOD OF PRIORITIZATION WILL ADDRESS THE UNMET NEED OR GAP IN BENEFITS AND SERVICES RECEIVED BY INDIVIDUALS AND FAMILIES IN THE QUALIFYING POPULATION OR CATEGORY OF QUALIFYING POPULATION, CONSISTENT WITH THE PJ'S NEEDS ASSESSMENT AND GAP ANALYSIS:

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

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

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

## HOME-ARP REFINANCING GUIDELINES

IF THE PJ INTENDS TO USE HOME-ARP FUNDS TO REFINANCE EXISTING DEBT SECURED BY MULTIFAMILY RENTAL HOUSING THAT IS BEING REHABILITATED WITH HOME-ARP FUNDS, THE PJ MUST STATE ITS HOMEARP REFINANCING GUIDELINES IN ACCORDANCE WITH [24 CFR 92.206\(B\)](#). THE GUIDELINES MUST DESCRIBE THE CONDITIONS UNDER WITH THE PJ WILL REFINANCE EXISTING DEBT FOR A HOME-ARP RENTAL PROJECT, INCLUDING:

ESTABLISH A MINIMUM LEVEL OF REHABILITATION PER UNIT OR A REQUIRED RATIO BETWEEN REHABILITATION AND REFINANCING TO DEMONSTRATE THAT REHABILITATION OF HOME-ARP RENTAL HOUSING IS THE PRIMARY ELIGIBLE ACTIVITY

Not Applicable.

REQUIRE A REVIEW OF MANAGEMENT PRACTICES TO DEMONSTRATE THAT DISINVESTMENT IN THE PROPERTY HAS NOT OCCURRED; THAT THE LONG-TERM NEEDS OF THE PROJECT CAN BE MET; AND THAT THE FEASIBILITY OF SERVING QUALIFIED POPULATIONS FOR THE MINIMUM COMPLIANCE PERIOD CAN BE DEMONSTRATED.

Not Applicable.

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

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Not Applicable.

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

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Not Applicable.

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

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Not Applicable.

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

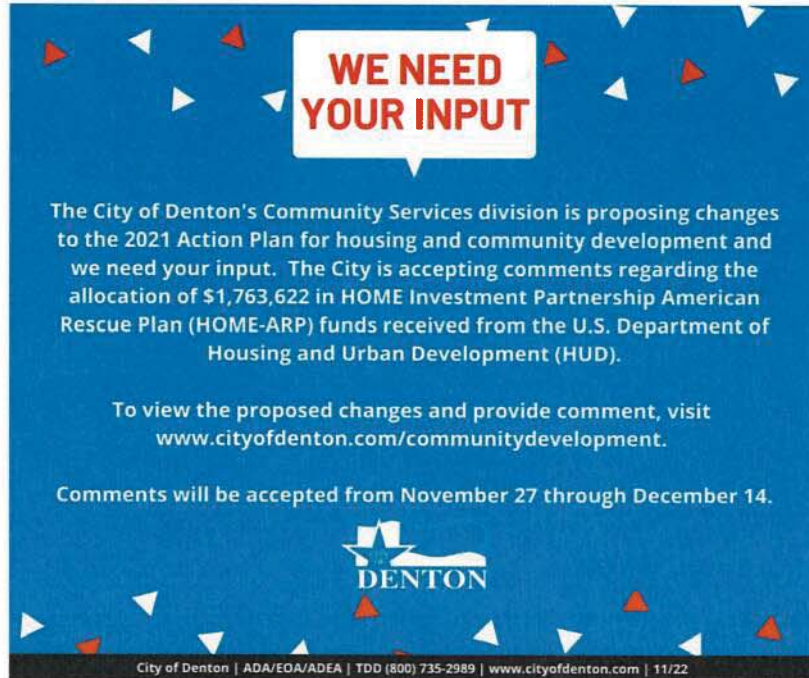
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Not Applicable.

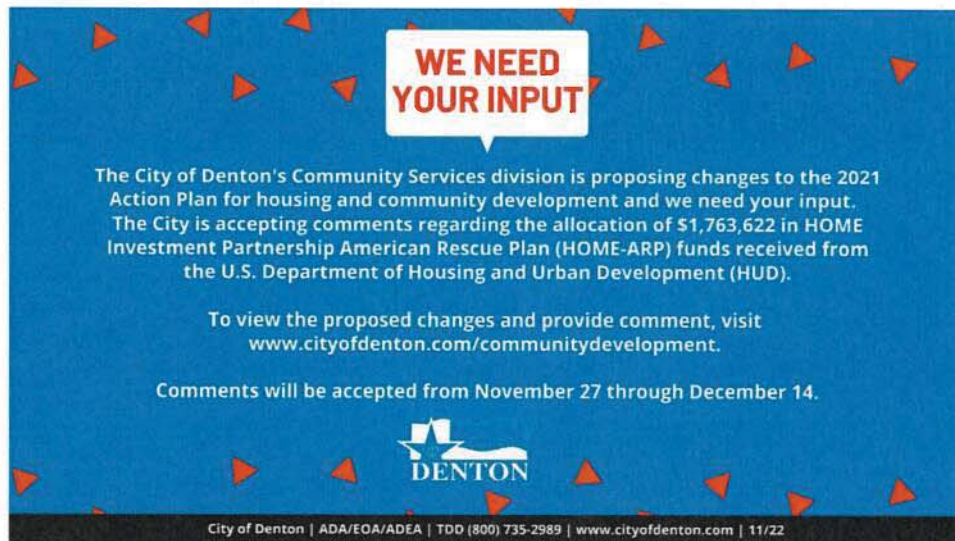
## APPENDIX

## PUBLIC PARTICIPATION ACTIVITY

## SOCIAL MEDIA PROMOTION

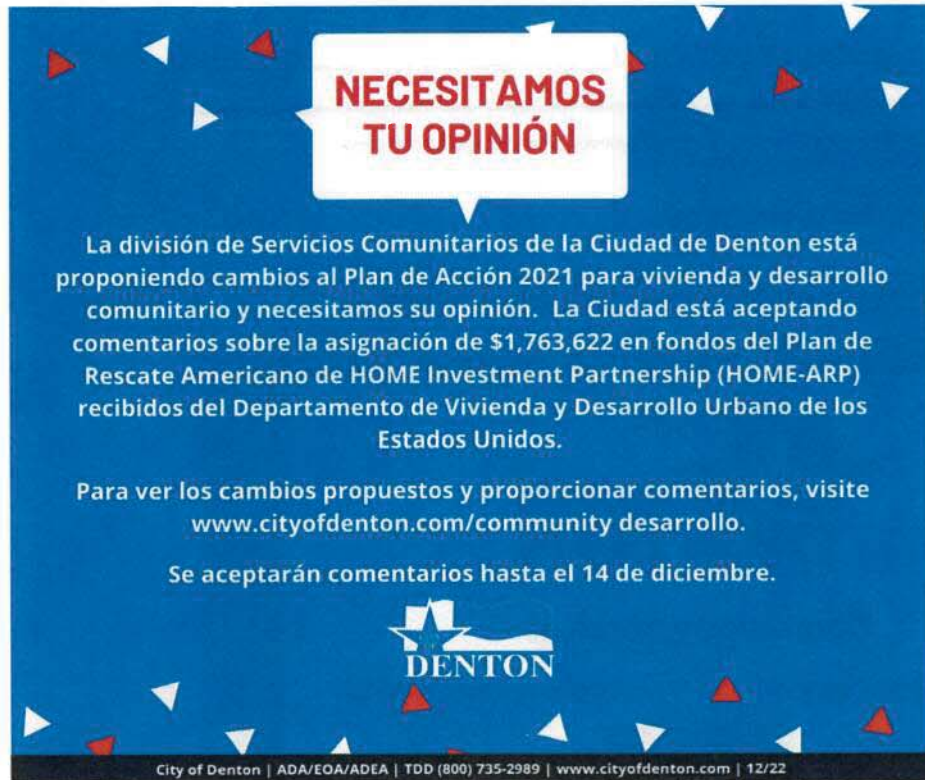


Facebook Graphic – English



Twitter Graphic – English





Facebook Graphic – Spanish



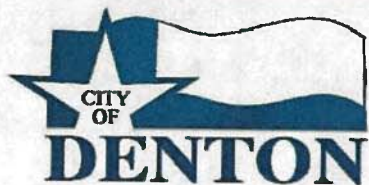
Twitter Graphic – Spanish

EMAIL PROMOTION

**Douangdara, Courtney**

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

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



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

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

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

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

[VIEW THE HOME-ARP ALLOCATION PLAN](#)

### We Need Your Input by December 14!

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

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

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



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[www.cityofdenton.com/communitydevelopment](http://www.cityofdenton.com/communitydevelopment)

City of Denton | 215 E. McKinney St., Denton, TX 76201

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11/27/2022

*Alice M. Cunningham*  
(signature of Authorized Designee)  
Subscribed and sworn to before me  
this 27th day of November, 2022 by

*Alice M. Cunningham*  
(printed name of Designee)  
Witness my hand and official seal:

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



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**PUBLIC NOTICE**

**SUBSTANTIAL AMENDMENT TO 2021 ACTION PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT**

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

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

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

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

Any comments regarding the amendment may be submitted in writing to Community Services by calling (940) 345-7553, by emailing [CommunityDevelopment@cityofdenton.com](mailto:CommunityDevelopment@cityofdenton.com), or by calling (940) 345-7725.

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Publication(s): Denton Record-Chronicle

**PROOF OF PUBLICATION**

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

12/04/2022

*Alice M. Gough*  
 (signature of Authorized Designee)  
 Subscribed and sworn to before me  
 this 4th day of December, 2022 by

*Alice M. Gough*  
 (printed name of Designee)  
 Witness my hand and official seal:

*Patricia La Gard*  
 (signature of Notary Public)  
 Notary Public, Denton County, Texas

**PATRICIA LAGARD**  
 Notary Public  
 State of Texas  
 ID # 13627960-6  
 My Comm. Expires 08-03-2023

DENTON CITY COMMUNITY SERVICES  
 401 N ELM ST  
 DENTON TX 76205

Ad Number: 49438      Price: \$49.90

**Ad Copy:**  
**NECESITAMOS TU OPINIÓN**

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

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

Se aceptarán comentarios hasta el 14 de diciembre.

Dic 12/04/2022



## PUBLIC COMMENTS RECEIVED

## Comment #1 – Received Monday, December 5, 2022

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

## Comment #2 – Received Thursday, December 8, 2022

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

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

## Comment #3 – Received Thursday, December 8, 2022

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

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

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

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

### 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:**

01/18/2023

**4. Applicant Identifier:**

75-6000514

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

M21-MP-480223

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Denton, Texas

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

756000514

**\* c. Organizational DUNS:**

7138019000000

**d. Address:**

**\* Street1:**

215 E. McKinney Street

**Street2:**

**\* City:**

Denton

**County/Parish:**

**\* State:**

TX: Texas

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

76201-4229

**e. Organizational Unit:**

**Department Name:**

Community Services

**Division Name:**

Community Development

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

**Prefix:**

**\* First Name:**

Courtney

**Middle Name:**

**\* Last Name:**

Douangdara

**Suffix:**

**Title:**

Deputy Director of Community Services

**Organizational Affiliation:**

**\* Telephone Number:**

940-349-7235

**Fax Number:**

**\* Email:**

Courtney.Douangdara@cityofdenton.com

## Application for Federal Assistance SF-424

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

C: City or Township Government

### Type of Applicant 2: Select Applicant Type:

### Type of Applicant 3: Select Applicant Type:

### \* Other (specify):

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

U.S. Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

### CFDA Title:

HOME Investment Partnership Program

### \* 12. Funding Opportunity Number:

N/A

### \* Title:

N/A

### 13. Competition Identification Number:

### Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Allocation Pan includes administration and TBRA assistance with supportive services.

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

26

\* b. Program/Project

26

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

09/20/2021

\* b. End Date:

09/30/2030

**18. Estimated Funding (\$):**

* a. Federal	1,763,622.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	1,763,622.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

☒ \*\* I AGREE

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

**Authorized Representative:**

Prefix:

\* First Name:

Sara

Middle Name:

\* Last Name:

Hensley

Suffix:

\* Title:

City Manager

\* Telephone Number:

940-349-8307

Fax Number:

940-349-8596

\* Email:

Sara.Hensley@cityofdenton.com

\* Signature of Authorized Representative:

\* Date Signed:

11/19/23

## 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.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b> 	<b>TITLE</b> Sara Hensley, City Manager
<b>APPLICANT ORGANIZATION</b> City of Denton Texas	<b>DATE SUBMITTED</b> 1/19/23



## 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).
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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.
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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).
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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.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b> 	<b>TITLE</b> Sara Hensley, City Manager
<b>APPLICANT ORGANIZATION</b> City of Denton Texas	<b>DATE SUBMITTED</b> 

## **HOME-ARP CERTIFICATIONS**

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

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

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

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

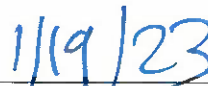
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the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

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

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

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

  
Signature of Authorized Official

  
Date

Sara Hensley, City Manager

Title