

**Participating Jurisdiction:** City and County of Denver

**Date:** October 5, 2022

## Consultation

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

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

The pool of consultation partners consisted of individuals representing organizations across the housing and service provider sector. Among them, non-profit affordable housing developers, CDFIs, governmental entities and PHAs, and community-based organizations. Many of these partners, including community representatives, were sourced from the Department of Housing Stability's (HOST) strategic advisory committee, Housing Stability Strategic Advisors (HSSA). The goal was to consult a spectrum of Denverites from varied backgrounds and include individuals with lived experience confronting displacement, gentrification, and housing instability/homelessness, as well as those with professional expertise in housing policy and supportive services.

HOST invited the general public and all consultation partners to two online presentations in February 2022. The presentations were announced via a press release, targeted emails to the Department of Housing Opportunity and Stability's listserv, and directly to a chosen contact at each of the consulted organizations. The City gave the consultation partners two weeks following the last presentation to provide feedback. After the last presentation, one general email reminder and, later, one personalized reminder email, was sent to the chosen contact at each partner organization that had not provided a response.

The presentations introduced the mandates and eligibilities associated with HOME-ARP funds, as well as a few ideas regarding how to spend any funds allocated to the development of affordable rental housing. A copy of the slideshow can be found in the appendices to this document. At the end of both presentations and in multiple follow-up emails, all consultation partners and the general public were asked to provide feedback via a short survey or via email.

The survey questions, all optional, asked respondents how they would prioritize the allocation of funds to each eligible use and qualifying populations. Respondents were provided space to give feedback on a few strategy-level ideas under consideration, namely "buying down" 60% of AMI units to 30% of AMI units and hotel/motel acquisition(s). There was also space to provide any other thoughts/ideas/comments.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<p>One of HOST’s Housing Stability Strategic Advisors members is a disability advocate. He is on the council for the Olin Apartments, and he’s been on the board of Denver Metro Fair Housing.</p>	<p>Representation for Persons with Disabilities</p>	<p>Through outreach to Olin Apartments council, and Denver Metro Fair Housing</p>	<ul style="list-style-type: none"> <li>• See below for details</li> </ul>
<p>AMBG Consulting</p>	<p>Consulting</p>	<p>Attempted Email/Survey, Online Presentations – 2/11/22 &amp; 2/16/2022</p>	<ul style="list-style-type: none"> <li>○ Noted that building and preserving affordable housing is a good use for the bulk of HOST’s allocation.</li> <li>○ Mentioned that applying for, qualifying for, and getting into a community, you want to live in is incredibly difficult.</li> <li>○ Denver needs radical changes that benefit BIPOC communities.</li> </ul>
<p>BlueLine Development, Inc.</p>	<p>Affordable Housing Consultant/Developer</p>	<p>Attempted Email/Survey, Online Presentations – 2/11/22 &amp; 2/16/2022</p>	<ul style="list-style-type: none"> <li>○ No comments received</li> </ul>
<p>Colorado Coalition for the Homeless</p>	<p>Homeless and domestic violence service provider</p>	<p>Survey Response 4/25/22</p>	<ul style="list-style-type: none"> <li>○ Mentioned that it makes the most sense to dedicate a large portion of the City’s allocation to the development of NCS</li> </ul>

			because of the lack of alternative funding sources for these projects and because it will make the largest impact. The organization also noted that it would be helpful to dedicate additional funding to supportive services at these NCS facilities.
Colorado Division of Housing	PHA and public agency that addresses the needs of qualifying populations	Survey Response 4/21/2022	<ul style="list-style-type: none"> <li>○ Supports the bulk of the City’s allocation going toward the development NCS or the production or preservation of affordable rental housing.</li> </ul>
Colorado Housing Finance Authority	State Housing Finance Agency	Attempted Email/Survey, Online Presentations – 2/11/22 & 2/16/2022	<ul style="list-style-type: none"> <li>○ No comments received</li> </ul>
Colorado Village Collaborative	Service Provider to homeless populations as well as people with disabilities	Attempted Email/Survey, Online Presentations – 2/11/22 & 2/16/2022	<ul style="list-style-type: none"> <li>○ No comments received</li> </ul>
Denver Human Services	City government agency that addresses the needs of qualifying populations	Survey Response 4/19/2022	<ul style="list-style-type: none"> <li>○ Supports the bulk of the City’s allocation going toward any of the 4 main eligible uses. Noted that the agency works with clients facing housing instability who could benefit from increasing the funding toward any of the eligible uses.</li> <li>○ Mentioned that Denver needs all sorts of housing, particularly at the lowest affordability levels.</li> <li>○ Stated that all ideas HOST introduced as prospective uses for its</li> </ul>

			allocation will meet needs in Denver.
Denver Indian Center	Community Organization/Service Provider	Attempted Email/Survey, Online Presentations – 2/11/22 & 2/16/2022	<ul style="list-style-type: none"> <li>○ No comments received</li> </ul>
Denver Housing Authority	Housing Authority	Attempted Email/Survey, Online Presentations – 2/11/22 & 2/16/2022	<ul style="list-style-type: none"> <li>○ No comments received</li> </ul>
Denver Metro Fair Housing Center	Non-profit organization that addresses fair housing	Survey Response 4/18/2022	<ul style="list-style-type: none"> <li>○ Noted that the production and preservation of affordable housing stood out as a better candidate for the bulk of HOST’s allocation but recommended that the population served should be in the 30-40% AMI range. The organization also said Denver is experiencing a growing need for supportive services and funding for TBRA is needed.</li> <li>○ Recommended that the City devise a better way – relative to NCS - to transition persons experiencing homelessness into VLI housing and noted that those struggling with substance misuse and mental health issues present a separate problem that requires better solutions.</li> </ul>
Denver Rescue Mission	Services – Special Mission	Survey Response 2/28/2022	<ul style="list-style-type: none"> <li>○ Noted that the production and preservation of affordable housing with supportive services was the best use of the PJ’s allocation.</li> </ul>

			<ul style="list-style-type: none"> <li>○ Recommended against the direct purchase of properties for homeless services due to maintenance concerns.</li> </ul>
Dickerson Community Solutions	Non-profit service provider	Survey Response 2/28/2022	<ul style="list-style-type: none"> <li>○ Noted that the best use of the PJ’s allocation would be the production/preservation of affordable housing or supportive services.</li> <li>○ Recommended that the PJ tie HOME-ARP allocations to population-level outcomes aligned with the PJ’s strategic plan.</li> <li>○ Suggested that the PJ also look at acquisition and preservation beyond just hotel/motel conversions.</li> </ul>
Enterprise Community Partners	National Non-profit/Investor/ CDFI	Survey Response 2/11/2022	<ul style="list-style-type: none"> <li>○ Recommended the PJ focus resources on homelessness prevention/rehousing by providing supportive services and TBRA to people currently facing eviction or who were evicted due to the pandemic.</li> <li>○ Noted the importance of providing supportive services when housing people currently experiencing homelessness.</li> <li>○ Recommended the PJ consider how dedicating HOME funds to acquisitions will complement allocations already made for that</li> </ul>

			purpose at the City and State levels.
Gorman & Company	Affordable Housing Developer	Attempted Email/Survey, Online Presentations – 2/11/22 & 2/16/2022	<ul style="list-style-type: none"> <li>○ No comments received</li> </ul>
Habitat for Humanity of Metro Denver Inc.	Affordable Housing Developer	Survey Response 2/28/2022	Noted that the production and preservation of affordable housing was the best use of the PJ’s allocation.
Metro Denver Homeless Initiative	CoC	Survey Response 2/28/2022	<ul style="list-style-type: none"> <li>○ Noted that the production/preservation of affordable housing, TBRA, supportive services, and homeless prevention services would be the best uses of the PJ’s allocation.</li> <li>○ Recommended that the PJ allocate a portion of funds to supportive services in order to improve housing stability, as there is often a limited availability of such funds.</li> </ul>
Olin Resident Council	Neighborhood Group	Attempted Email/Survey, Online Presentations – 2/11/22 & 2/16/2022	<ul style="list-style-type: none"> <li>○ No comments received</li> </ul>
Watson Wenk Group	Consulting	Survey Response 2/28/2022	<ul style="list-style-type: none"> <li>○ Noted that the best use of the PJ’s allocation would be the production or preservation of affordable housing or TBRA.</li> <li>○ Said that providing direct funding to households needing rental assistance would be a good use of the PJ’s allocation but “buying down” the affordability</li> </ul>

			<p>of units from 60% of AMI to 30% of AMI is also important.</p> <ul style="list-style-type: none"> <li>○ Recommended that the PJ use some of its allocation to increase support for a third “housing surge” (rapid homelessness-to-housed initiative).</li> </ul>
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**Public Participation**

*PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.*

*For the purposes of HOME-ARP, PJs are required to make the following information available to the public:*

- *The amount of HOME-ARP the PJ will receive,*
- *The range of activities the PJ may undertake.*

***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:*** 3-22-2022 to 4-8-2022
- ***Public hearing:*** 4-6-2022

In the development of the allocation plan, HOST created a House America web page on its website and populated the HOME-ARP section with information on the eligible uses of funds, the creation of the allocation plan, and the dates for the presentations and public hearing. As mentioned in the description of the Consultation process above, the City hosted two presentations (on February 11, 2022, and February 16, 2022) which were open to public and outlined the specifics of the HOME-ARP funds and the potential uses under consideration for the City’s allocation. The public meetings were noticed in paid advertisements in local publications, as well as in HOST’s monthly newsletter, which goes out to about 3,000 subscribers. The two presentations were hosted at different times of the day to try and accommodate members of the public and their schedules. Real-time Spanish translation services were provided during the presentation. Approximately 40 members of the public attended the two consultation sessions in February 2022.

Questions were taken during the presentations, and attendees were invited to reach out directly to HOST staff after the presentation if questions arose later or if they had questions that were outside the

scope of HOME-ARP or the allocation plan. HOST staff also followed up directly with attendees to provide resources such as HUD's Final Implementation Notice or a copy of the slideshow if requested during the presentation. Afterward, a link to a recording of the presentation and the slideshow were posted in the HOME-ARP section of HOST's House America web page.

Once the HOME-ARP proposal was published, HOST began the formal public comment period. Comments could be submitted via email or an online survey that was accessible on any web browser and were accepted through Friday April 8, 2022. Stakeholders submitted 34 responses to the online survey; no other comments were submitted in writing during the comment period.

The public hearing was held on April 6, 2022, on Zoom and was announced via multiple emails to HOST's existing subscribers, general press release, on HOST's website, and in the City's paper of record. Translation services were offered at the beginning of the hearing but were not requested by any attendees. Approximately 12 members of the public attended the hearing.

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

The City hosted two public presentations before the publication of the City's proposal and before the start of the formal comment period and public hearing. This was done to solicit feedback on attendees' preferences regarding its HOME-ARP allocation and to introduce a few specific uses under consideration. Afterwards, a link to a recording of the presentation was posted in the HOME-ARP section of HOST's House America web page so that the public could have 24/7 access.

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

The vast majority of Denverites that attended one of HOST's presentations or the public hearing had general questions concerning the eligible uses for funds or simply wanted clarification on the three ideas HOST presented as potential uses for its allocation. Since the first two presentations took place before HOST's proposal was published, a few individuals inquired about, and provided feedback on, existing HOST-funded programs.

One attendee and neighborhood organization leader stressed the need for solutions to rapidly transfer individuals from unsanctioned encampments to shelter and for greater communication among different neighborhoods.

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

N/A

## **Needs Assessment and Gaps Analysis**

*PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.*



## OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	22,833		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,325		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,946		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		24,769	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		13,928	
<b>Current Gaps</b>			28,426
<b>Suggested Data Sources:</b> 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)			

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

### **CPD-21-10 – IV.A.1 – Homeless Populations**

HUD defines Homeless populations as:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence ...
- (2) An individual or family who will imminently lose their primary nighttime residence ...
- (3) Unaccompanied youth under 25 years of age, or families

Denver's Point-In-Time (PIT) counts reveal:

- In January 2020 pre-pandemic, a total of 4,171 persons were experiencing homelessness, which equates to 56 out of every 10,000 residents. Of those, 3,175 were sheltered and 996 were unsheltered.
- Due to COVID-19, the city did not conduct an unsheltered count in 2021 but did collect information on those experiencing homelessness in a sheltered location.
  - o On a single night in February 2021, 3,752 individuals experienced homelessness and were staying in a sheltered location, a nearly 600-person or 18% increase in sheltered people from the year prior.
- In July the Metro Denver Homeless Initiative (MDHI) released the preliminary first phase of the 2022 annual Point-in-Time (PIT) count data, showing a total of 4,798 persons experiencing homelessness, an increase of 15% from 2020.

While the PIT count measures people staying in transitional housing, safe havens, and emergency shelter across the City and County of Denver regardless of funding source on a given night in the winter, we also measure utilization of walk-up shelter beds for single adults on a nightly basis for CCD-funded shelters only. In March 2020, 1,405 people accessed overnight shelter in Denver on a typical night compared to 1,993 in March 2022, representing an approximately 42% increase in shelter utilization.

Demographics of Denver’s homeless population are as follows:

- **Families** – During the 2020 PIT count, 820 people in 247 households were experiencing homelessness as part of a family and many of them were newly homeless.
- **Youth** – Another 195 people were unaccompanied youth under the age of 25.
- **Domestic Violence** – In 2020 13% of people experiencing homelessness were fleeing domestic violence.
- **People of Color** – **From the 2022 Point-in-Time Count, 58% of people experiencing homelessness identified as a person of color (2,792 people).** Overall, 26% of people counted identified as Hispanic or Latin(o)(a)(x); 21% identified as Black or African American; 4% identified as American Indian or Alaska Native; 4% identified as multiracial; 3% identified as Native Hawaiian or Other Pacific Islander; and 0.4% identified as Asian.

#### **CPD-21-10 – IV.A.2 – At Risk of Homelessness**

HUD defines “at risk of homelessness” as an individual or family who:

- (1) *Has an annual income below 30% AMI*
- (2) *Does not have sufficient resources or support networks ...*
- (3) *Meets one of several conditions including how often they have recently moved, is living in someone else’s home, lives in a hotel or motel, has a living situation that will be terminated within 21 days, is overcrowded (more than 1.5 people/BR), is exiting a publicly funded institution, other housing associated with instability*
- (4) *Is a child or youth who qualifies as homeless under section 387(3) of the Runaway and Homeless Youth Act*
- (5) *Is a child or youth who qualifies as homeless under section 752(2) of the McKinney Vento Homeless Assistance Act*

As noted above, there are 2,325 units available for households at or below 30% AMI, but 24,769 renter households at 0-30% AMI with 1 or more severe housing problems that need those units, indicating a gap of 22,444 units for Denver’s lowest income households.

#### **CPD-21-10 – IV.A.3 – Fleeing or attempting to flee domestic violence or human trafficking**

According to HOME-ARP guidance:

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

Data collected from the 2018 Metro Denver Homeless Initiative (MDHI) PIT count indicates that 7% of the respondents experiencing homelessness were currently fleeing domestic violence. In 2019 the number rose to 9%, and in 2020 it rose again to 13%.

#### **CPD-21-10 – IV.A.4 At Greatest Risk of Housing Instability**

HUD defines other qualifying populations as households who:

*(1) have previously been qualified as “homeless” as defined in 24 CFR 91.5 and are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness*

Denver does not have data that shows people who: a) were previously homeless, AND b) are currently housed due to temporary or emergency assistance, AND c) who need additional assistance to avoid a return to homelessness. The data we do have available is as follows:

- Of the households assessed through OneHome in 2019, about 1,300 households needed permanent housing subsidies with supportive services, and another 675 households needed shorter-term rental assistance and supports.
  - In 2020, 1,831 households at risk of housing instability were served in rapid resolution, rapid-rehousing, supportive housing, transitional housing, and bridge housing programs. (HOST Administrative data). In 2021 that number increased by 23% to 2,259, indicating both an increase in overall need and the successful deployment of additional resources.
  - The COVID-19 pandemic forced more residents to request assistance over the last two years. HOST's Emergency Rental Assistance Program (ERAP) providers served 977 households in 2021 and 1,379 so far in 2022, a 41% increase. To qualify, they must certify that they have been economically impacted by the COVID pandemic.
  - Many households at risk of housing instability need housing services but have not yet been connected with OneHome, the regional coordinated entry system, led by the MDHI, in which Denver participates. Non-congregate shelter targets those who are unsheltered, and once they are sheltered, they are connected with case management to get them into OneHome. It is our long-term goal to have one coordinated entry system and to source all tenants prioritized in that system, as the process and prioritization system is evaluated for equity considerations, and more people experiencing unsheltered homelessness are connected with service providers. There is no defacto preference by the City's tenant sourcing policies, which mirror the State of Colorado Department of Housing.
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- **Seniors** – Of the households that make under 30% of AMI, 15,512 are over the age of 62.
  - **LGBTQ+ individuals** –According to youth.gov, LGBTQ+ individuals make up an estimated 20-40% of the homeless youth population and can be at a heightened risk for violence. Furthermore, transgender and gender-nonconforming individuals are at a greater risk of being unsheltered during periods of homelessness.
  - **Disabling conditions** – In 2022, according to the Point-in-Time Count, on a single night, nearly 1,000 people identified as having any disabling condition (987 people or 21% of those counted); 1455 people identified as having a chronic health condition (30% of those counted); 1,760 people reported a mental health condition (37% of those counted); 1,256 people reported a substance use concern (26% of those counted); 307 people reported

traumatic brain injury (6.4% of those counted); and 59 people reported HIV/AIDS (1.2% of those counted). 42% of people experiencing homelessness reported a disabling condition. *(2i) have annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs)*

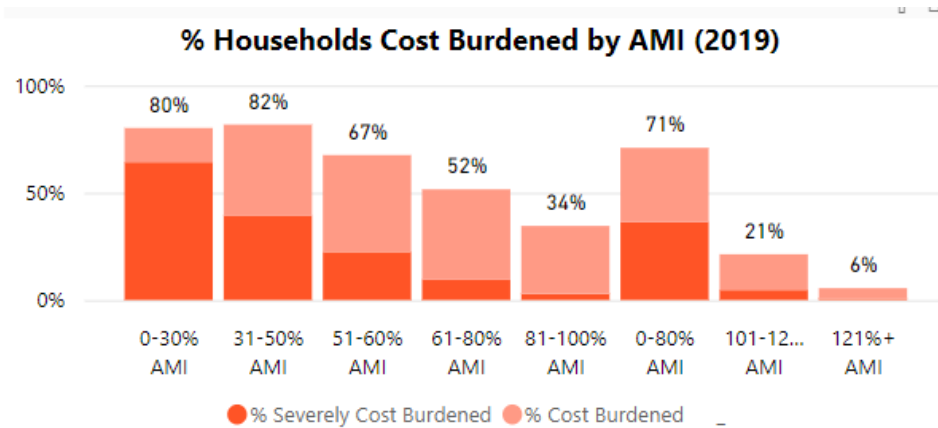
- There are 2,325 units available for households at or below 30% AMI, but 24,769 renter households at 0-30% AMI with 1 or more severe housing problems that need those units.
- Of the recipients cited above receiving ERAP in 2021 and 2022, 60% were at 0-30% AMI.
- According to the American Community Survey 2019 1-year estimates, nearly 25,000 households in Denver have annual income that is less than or equal to 30% of the AMI and are experiencing severe cost burden. <sup>1</sup>As of 2019, 65% of households at or below 30% AMI were severely cost burdened and since then rents and home prices have both increased significantly. Of the households that make under 30% of AMI, 24,780 contain just one person, while 5,834 contain two people, 7,989 contain three or more people, and 15,512 are over the age of 62.

*(2ii) have annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the conditions of the “At risk of homelessness” definition established in paragraph (iii) of 24 CFR 91.5.*

- There are 7,946 rental units affordable to households at or below 50% AMI
- There are 38,697 renter households at 0-50% AMI with 1 or more severe housing problems that need those units.
- Of the recipients cited above receiving ERAP in 2021 and 2022, 85% were making 50% AMI or less.
- 75,555 households have an income at or below 50% of the HUD Area Median Family Income and the City’s 2019-2023 Consolidated Plan outlined the following housing characteristics that have been linked with instability and an increased risk of homelessness:
  - Housing costs rising more rapidly than wages
  - Job loss or hours being cut back
  - Housing condition deterioration
  - Households/individuals who have skipped a housing payment or sought additional employment to pay expenses and/or have sacrificed basic needs to pay their housing costs are also at an increased risk.
  - Households that have experienced foreclosures are another measure of the proportion of residents at risk of homelessness.

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<sup>1</sup> The ACS lags a couple years and data is not out yet for 2021 or 2022. Due to Covid during 2020 they’ve announced they’re not going to have typical estimates for the ACS for that year. Thus, 2019 is the most recent data available.



**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:**

**Congregate and Non-Congregate Shelter Units**

HOST monitors the numbers of people experiencing homelessness and adjusts shelter capacity on a permanent or temporary basis as needed, through the rental of hotel/motel rooms. As a result, there is never a point that our data will show a long-term lack of shelter beds compared to the number of people experiencing homelessness.

Household Characteristics, CY 2021 (pulled 10/3/2022)		
	Congregate Shelter	Non-Congregate Shelter
Total unique households served	7415	3510
Total unique people served	8132	4775

Most of the existing non-congregate shelter units are currently funded by FEMA COVID funding and will go away in 2023. We propose to use this allocation is to replace some of these non-congregate shelter units being paid for in private hotels to sites owned and managed by non-profit partners, making costs lower over time.

**Supportive Housing**

There are currently 3,171 beds for supportive housing in the Denver metropolitan area.

**Tenant-Based Rental Assistance (TBRA)**

The City’s contract with Colorado Coalition for the Homeless (CCH) provides TBRA to 54 households annually.

**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,**

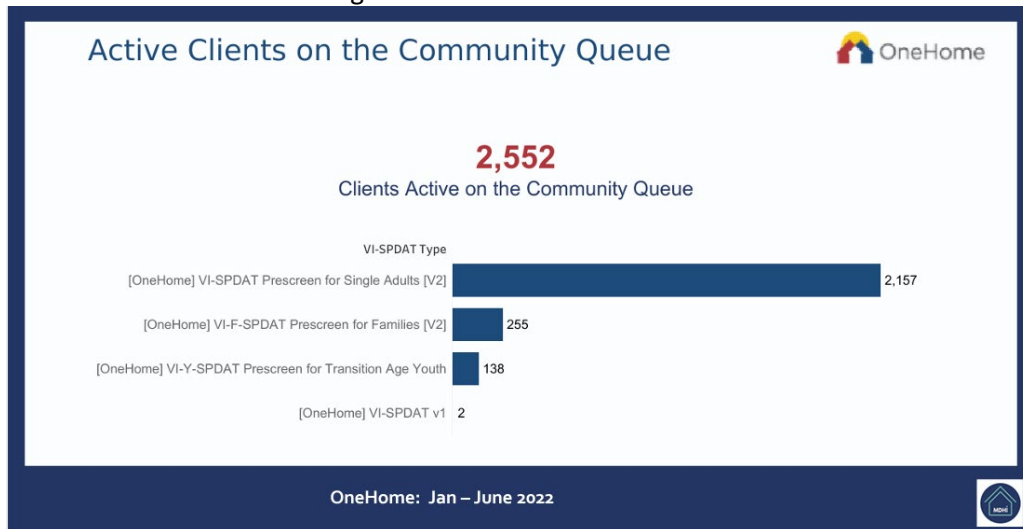
- **Those at greatest risk of housing instability or in unstable housing situations**

**CPD-21-10 – IV.A.1 – Homeless Populations**

The unmet needs of people experiencing homelessness are quite diverse. The needs of these populations are often not met in congregate shelters, or congregate shelters result in sufficient fear for people experiencing homelessness that they prefer to stay unsheltered outside. Non-congregate shelters with separate spaces meets the needs of multiple populations including families, people with pets, people that don't identify as a specific gender or are transgender, seniors, or people with disabling conditions.

Household Characteristics, CY 2021 (pulled 10/3/2022)		
	Congregate Shelter	Non-Congregate Shelter
Total unique households served	7415	3510
Total unique people served	8132	4775

The following chart details active clients in the OneHome Community Queue, demonstrating that most folks experiencing homelessness are not currently being tracked in OneHome. There is a concerted effort to increase this tracking in Denver.



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**CPD-21-10 – IV.A.2 – At Risk of Homelessness**

Folks who are at risk of homelessness are not tracked in HMIS through the coordinated entry system, though there is a coordinated entry process through OneHome for ESG Homelessness Prevention funding. In Metro Denver, HMIS is not widely used for homelessness prevention, and prevention programs that do exist do not use Metro Denver's Coordinated Entry System. However, HOST operates programs that provide rental assistance to unstably housed households. In 2021, those programs served more than 3,000 households.

<b>Households Served</b>	
ERAP	984
TRUA	2372
	<b>3356</b>

**CPD-21-10 – IV.A.3 – Fleeing or attempting to flee domestic violence or human trafficking**

Per HUD, folks who are actively fleeing are not in HMIS and there is a separate process for fleeing folks to access Coordinated Entry. These numbers are not shared out to the community. Domestic violence service providers use a data system that is comparable to HMIS, which HOST does not have access to or reporting from. However, we have summarized the characteristics of people counted in Denver’s 2022 Point in Time Count who identified as having experienced domestic violence. While this does not represent the full picture of everyone experiencing domestic violence in our community, it represents the best data we have available at this time.

Characteristics of People Experiencing Homelessness Who Identified as a Victim of Domestic Violence Compared to All People Experiencing Homeless

	Counts		Percentages	
	All PEH	PEH indicating they are a victim of DV	All PEH	PEH indicating they are a victim of DV
Total number of people	4794	746	100.0%	100.0%

**CPD-21-10 – IV.A.4 At Greatest Risk of Housing Instability**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	<b># of Units</b>	<b># of Households</b>	<b># of Households</b>
Total Rental Units	22,833		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,325		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,946		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		24,769	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		13,928	
<b>Current Gaps</b>			<b>28,426</b>

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

The City previously outlined housing characteristics that have been linked with instability and an increased risk of homelessness in its 2019-2023 Consolidated Plan:

- Housing costs rising more rapidly than wages
- Job loss or hours being cut back
- Housing condition deterioration

- Households/individuals who have skipped a housing payment or sought additional employment to pay expenses and/or have sacrificed basic needs to pay their housing costs are also at an increased risk
- Households that have experienced foreclosures are another measure of the proportion of residents at risk of homelessness

In previous stakeholder feedback related to community development, like those compiled for the City's most recent Consolidated Plan, by a wide margin affordable housing was the most frequently specified support service needed among those who indicated that support services for low income residents is an unmet need. As the Housing Needs Inventory and Gap Analysis Table above illustrates, the city has an acute shortage of units for these residents.

- There are 2,325 units available for households at or below 30% AMI, but 24,769 renter households at 0-30% AMI with 1 or more severe housing problems that need those units.
- There are 7,946 rental units affordable to households at or below 50% AMI, but 38,697 renter households at 0-50% AMI with 1 or more severe housing problems that need those units.

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

### **Shelter Inventory**

The City is losing 2 FEMA – funded NCS properties, both located in hotel chains. Thus far in 2022, two protective action sites have closed, representing a total of 312 NCS rooms lost. We are seeking long term opportunities to continue to invest in what has worked as FEMA scales back, to replace what is being lost.

NCS is what has worked. For this reason, HOST has included non-congregate shelter in its 5-year plan as a strategy for meeting the diverse needs of residents by expanding a range of options. Non-congregate shelter rooms serve a variety of needs not met by congregate shelter including:

- Couples
- People with pets
- Some people are afraid of congregate shelter, and thus non-congregate shelter is a pathway for people who are un-sheltered and on the street
- Congregate shelters are also lacking capacity for transgender members

The primary need is non-congregate shelter rooms to serve the variety of needs of homeless populations identified above and on page 12.

In addition, during the pandemic HOST discovered the critical need for protective action rooms and activated respite beds to protect people with significant risk from complicating health conditions, as well as to isolate people who are infected, to minimize infection rates. During the height of Covid Denver had 704 protective action rooms and 192 activated respite beds, plus another 200 rooms of NCS. HOST wants to ensure that we are prepared for any future pandemic-related needs, as well as meeting the



diverse needs of our current homeless population, by providing additional non-congregate shelter options.

**Housing Inventory**

The largest gaps in Denver’s housing inventory lie in the 0-50% of AMI range.

- There are 2,325 units available for households at or below 30% AMI, but 24,769 renter households in that range with 1 or more severe housing problems that need those units.
- There are 7,946 rental units affordable to households at or below 50% AMI, but 38,697 renter households in that range with 1 or more severe housing problems that need those units.

**Service Delivery System**

Gaps in the service delivery system, particularly in the supply of affordable housing for residents experiencing homelessness, still exist. In 2018, more than 3,000 households experiencing homelessness were newly assessed for housing needs in the Metro Denver region, but only 661 of those households were ultimately housed. Additionally, in order for households to maintain their housing, supportive services investments are critical. Though local funding commitments have increased, service providers report continued challenges appropriately resourcing long-term supportive services funding.

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

The priority needs identified are the development of extremely low-income housing at 50% AMI or 30% AMI, including supportive housing, and the acquisition and development of non-congregate shelter.

**CPD-21-10 – IV.A.1 – Homeless Populations**

<b>Households Served by Type</b>	<b>Congregate Shelter</b>	<b>Non-Congregate Shelter</b>
Household with children	3.5%	15.0%
Household without children	0.1%	0.8%
Single Adult	95.4%	84.0%
Single child	0.6%	0.1%
Not determined	0.0%	0.0%

Non-congregate shelter is a relatively new concept in Denver, which started under COVID. These rooms served as Activated Respite (for those actively infected with COVID) and Protective Action (for those at greatest risk for complications from COVID). Going forward, non-congregate shelter sites will primarily serve those who cannot be well served by the congregate shelter system, including households with children, couples, and those with medical/mental health needs. In Q3 2022, there were 210 unique homeless households with children, serving 585 people total, who we are primarily serving with non-congregate shelter.

Another priority population is to serve the segments of Denver’s unsheltered population, who tend to be better served with non-congregate shelter. As described above, this includes unsheltered couples,

unsheltered individuals with pets, LGBTQ+ populations (particularly transgender populations) and unsheltered individuals with significant health concerns. In the 2022 PIT Count, we measured 1,313 individuals experiencing unsheltered homelessness. Denver’s Five-Year Housing Plan calls for a reduction in unsheltered homelessness by 50% by the end of 2026. Please see above tables to see the current status of household size in congregate vs. non-congregate shelter.

**CPD-21-10 – IV.A.2 – At Risk of Homelessness**

Folks who are at risk of homelessness are not tracked in HMIS through the coordinated entry system, though there is a coordinated entry process through OneHome for ESG Homelessness Prevention funding.

On an ongoing basis (at minimum once a week), each contracted Agency for the Emergency Rental Assistance Program (ERAP) will identify the next tranche of applications to review, based on age of application (from oldest submitted forward). Within that tranche, Agency will prioritize the review of applications based on the following, when this information is available:

1. Households which have received eviction notices and these notices have been provided.
2. Households whose income is at or below 50% Area Median Income (AMI) and adequate documentation has been provided.
3. Households where one or more household members were unemployed for at least 90 days prior to the date of application and adequate documentation has been provided.
4. The rest of the weekly tranche.

Agencies focused on processing rental assistance for tenants at imminent risk of eviction may identify the next tranche of applications that indicate receipt of a demand, notice, or court date to review on an ongoing basis and prioritize among those applications based on need, regardless of application submission date.

**CPD-21-10 – IV.A.3 – Fleeing or attempting to flee domestic violence or human trafficking**

Per HUD, folks who are actively fleeing are not in HMIS and there is a separate process for fleeing folks to access Coordinated Entry. These numbers are not shared out to the community.

**CPD-21-10 – IV.A.4 At Greatest Risk of Housing Instability**

Per the City of Denver Department of Housing Stability Five-Year Housing Plan, 30% of created units are targeted to serve those earning at or below 30% of AMI.

***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:***

HOST works closely with the community and its partners to determine the gaps in services and programs needed to provide all residents with adequate housing. The needs and gaps presented above were identified after reviewing all available resources to assist households experiencing homelessness and households at-risk of homelessness. These included:

- PIT Count with MDHI
- American Community Survey
- HOST administrative data
- Root Policy research for strategic plan

Data specific to every qualifying population was always not readily available however HOST analyzed all available data and combined it with qualitative information gathered from housing providers and services agencies that work with the qualifying populations. These partners have identified the needs of their clients and through public outreach and consultation, have confirmed their support for the proposed activities. HOST’s multi-layered approach of combining data, where available, with local partner knowledge, gives us confidence that the activities proposed below represent the best use of HOME-ARP dollars to meet existing needs and gaps in our shelter and housing inventory. Moreover, the identified needs and gaps have been confirmed within the 2019-2023 Consolidated Plan. While annually allocated HOME dollars have been and will continue to be targeted primarily towards the creation and preservation of permanently affordable units to serve lowest income households, the HOME ARP allocation will allow us to address ongoing needs for non-congregate shelter, to create an effective pipeline that serves a broader scope of need and gaps now present in Denver.

## 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:***

HOST will award HOME-ARP funding to a developer(s) for completion of the intended development project(s). HOST accepts applications for funding on a rolling basis throughout the year for all affordable housing project types, including permanent supportive housing and non-congregate shelter, so it is important to retain flexibility regarding project characteristics during the selection process. HOST empowers its subrecipients to propose and deliver creative, impactful projects and will make selections based upon overall merit and alignment with the goals set forth in the Strategic Plan. As with any other form of subsidy that HOST deploys, a HOME-ARP allocation should complement additional public or private capital in order to leverage each dollar to the greatest extent possible. HOST works closely with a diverse developer community in the early concept stages and maintains a multi-year pipeline of projects from developers that are seeking necessary gap funding from HOST in order to bring the project to fruition. Once HOST receives a HOME-ARP allocation, development funding application(s) that best align with the American Rescue Plan regulations, HOME-ARP Allocation Plan priorities, and HOST’s strategic plan will be awarded the HOME-ARP funds, subject to Denver City Council approval. HOST will enter into development funding agreement(s) with the selected project sponsor and/or developer detailing the use of funds and regulatory requirements.

When working with partners to curate project services, HOST works strategically with developers to identify service providers who would serve the targeted populations. HOST structures its services contracts such that the developer/sponsor can choose the service provider. Before a selection is made, HOST completes a professional preference process for the intended service provider.

Additional information is provided in the “Preferences” section below.

***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:***

N/A

***PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. 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	\$0		
Acquisition and Development of Non-Congregate Shelters	\$5,185,931	50.2%	
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$5,234,400	50.8%	
Non-Profit Operating	\$0		5%
Non-Profit Capacity Building	\$0		5%
Administration and Planning	\$400,000	4%	15%
Total HOME ARP Allocation	\$10,820,331		

***Additional narrative, if applicable:***

In September 2021, HOST published its Five-Year Strategic Plan: A Guide for Action 2022-2026, which outlined its funding priorities for the coming years and is a product of extensive community engagement, data-driven analysis, and collaboration with partners.

Furthermore, CCD rolled out a community engagement tool, RISE Together Denver, built specifically for soliciting community input on investment priorities for economic recovery funds. Input was received via a website that featured surveying, educational materials, and townhall live-streaming, telephone townhalls that were simulcast in English, Spanish, Vietnamese, and Amharic, and several other presentations. In all, 6,200 people participated online or over the phone and 2,300 unique surveys were submitted.

When asked “which housing solutions would be the most helpful to you and your family,” 47% of online and townhall respondents chose increased affordable housing, while mortgage assistance, on-going

rental assistance, and eviction prevention were chosen by 11%, 7%, and 6% of respondents, respectively.

Meanwhile, 40% agreed that housing and support for people experiencing homelessness mattered most to them. Thus, the overarching message from community members was that they want to ensure their unhoused neighbors can access the appropriate resources and want to an expansion of the affordable housing stock.

The need for the HOME-ARP funds is clear:

- a) The recent point in time count showed an increase of 31% in unsheltered homelessness since 2020.
- b) In the last year, the number of recipients of ERAP has increased 41%, a key indicator of housing instability.
- c) As mentioned above, there are 2,325 units available for households at or below 30% AMI, but 24,769 renter households in that range with 1 or more severe housing problems that need those units. And there are 7,946 rental units affordable to households at or below 50% AMI, but 38,697 renter households in that range with 1 or more severe housing problems that need those units. These units will not get produced without significant subsidy.

***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:***

While Denver has made tremendous strides when it comes to rehousing and the provision of supportive services, COVID-19 introduced new challenges to the health of its already-unbalanced housing market. A year after the start of the pandemic, the number of people in shelters had risen by 60%. (Department of Housing Stability, 2022).

What Denver needs most is:

- 1) More non-congregate shelter units, specifically that provide a long-term solution. Renting hotel/motel rooms on a temporary basis is expensive to rent from a hotel provider, and puts NCS rooms in the hands of people who are not experienced in running shelters and attending to the needs of shelter residents. Designating HOST funds to build or acquire a property to provide permanent NCS rooms, and to be developed/managed by a NCS developer, creates NCS rooms that are less expensive per room as they are managed by an organization that is experienced in providing NCS, and also gives NCS residents the benefit of working with staff who are accustomed to their needs.
- 2) The lack of extremely low-income affordable rental units at 30% AMI and 50% AMI identified above provides a clear need for the activities planned – to fund more units to fill the gaps identified.
- 3) Supportive housing to address the longer-term and more service-enriched needs of people experiencing homelessness.

HOST plans to allocate \$10,420,331 to the acquisition and development of non-congregate shelters, supportive housing, and units at 30% and 50% of AMI, plus \$400,000 to administration and planning.

In addition, during the height of Covid Denver had 704 protective action rooms and 192 activated respite beds, plus another 200 rooms of NCS. Therefore, having additional NCS rooms helps to ensure that Denver is prepared for any future health crises. These funds will be used to provide an estimated 215 units of both non-congregate shelter and supportive housing, to be provided by one of HOST's developer partners, to fill the need as 312 FEMA-funded NCS rooms are lost and provide effective and long-term solutions.

## 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:***

HOST estimates that its subrecipients will produce 215 units to address homeless populations, of which 108 will be supportive housing for people exiting homelessness, and 107 of the units/ rooms will be non-congregate shelter.

***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:***

HOST aspires to guarantee that all Denverites have:

- equitable access to housing options that meet their affordability needs
- choice in when and under what circumstances they move or remain in their homes and neighborhoods
- at a minimum, rare, brief, and one-time experiences of homelessness

HOST's HOME-ARP allocation will meaningfully accelerate the rate of production/preservation of affordable rental and NCS units, bringing the City one step close to achieving these interrelated goals.

## 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 project or activity.***

- 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.

HOST does not intend to prioritize funding by giving preference to any qualifying populations or subpopulations. Projects that HOST determines to be eligible for HOME-ARP funds will be evaluated based on their overall feasibility, the applicants' implementation of best practices related to serving the target qualifying population(s), and the applicants' demonstration of the community's need – at the qualifying population level - for the housing/shelter/services planned.

***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:***

N/A

***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:***

N/A

## **HOME-ARP Refinancing Guidelines**

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

***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

N/A

***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

N/A

***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

N/A

***Specify the required compliance period, whether it is the minimum 15 years or longer.***

N/A

***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

N/A

***Other requirements in the PJ's guidelines, if applicable:***

*N/A*