



Nevada Housing Division (NHD) HOME ARP Allocation Plan

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Introduction

The federal American Rescue Plan Act of 2021 appropriated \$5 billion to provide housing, services, and shelter to individuals experiencing homeless and other vulnerable populations, to be allocated by formula to jurisdictions that qualified for HOME Investment Partnerships Program allocations in Fiscal Year 2021. The Nevada Housing Division (NHD) has received \$6,444,739 million in HOME American Rescue Plan (ARP) funding from Housing and Urban Development (HUD). With support from ICF, NHD conducted extensive analysis of unmet housing, shelter, and service needs and existing resources across Nevada. To ensure the HOME ARP funds have the greatest possible impact, NHD consulted with partners and stakeholders to inform the priority needs and identify opportunities for partnerships.

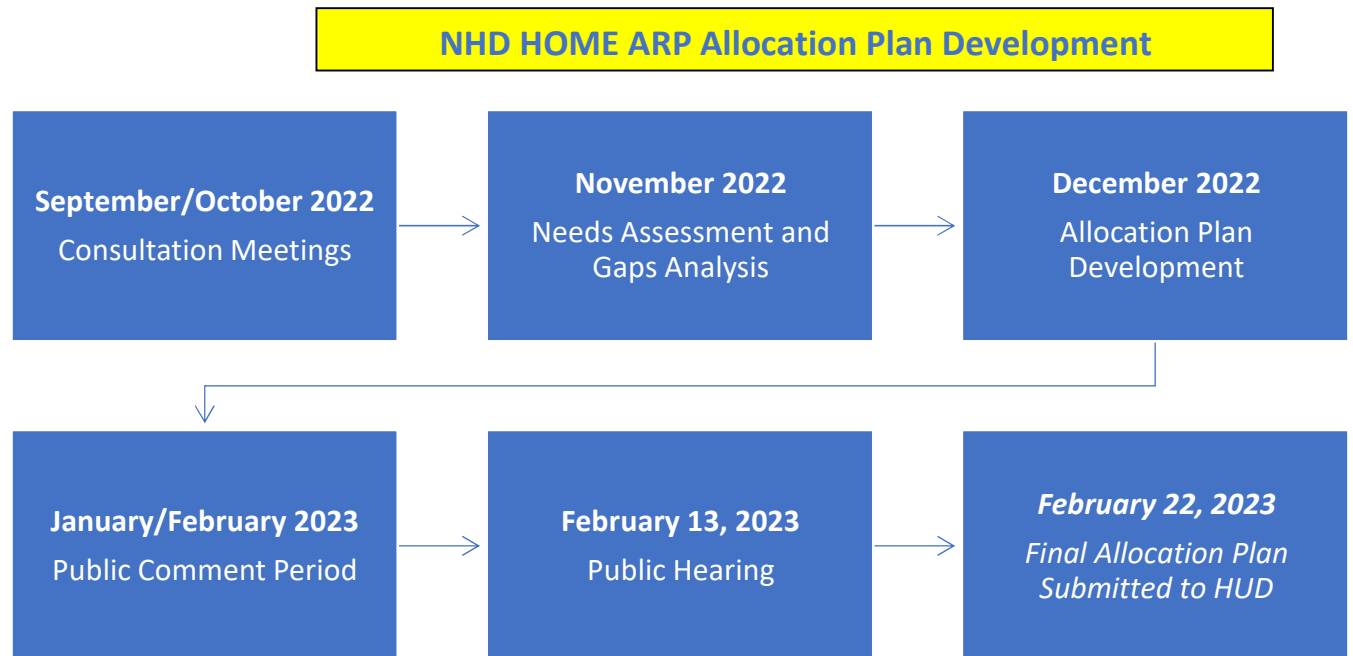
There are four Qualifying Populations (QPs) that are eligible for and must be provided access to HOME ARP activities, please refer to the [HOME ARP Notice](#) for complete definitions: 1) people experiencing homelessness; 2) people at-risk of homelessness; 3) people who are fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking, and 4) other populations for whom supportive services or assistance would prevent homelessness or who face the greatest risk of housing instability. The funding can be used to provide any of the following HOME ARP eligible client activities: rental housing (referred to in this plan as affordable rental housing), tenant-based rental assistance (TBRA), supportive services, and/or the acquisition and development of non-congregate shelter (NCS). PJs may also utilize funding for administration and planning activities and nonprofit operating and capacity building assistance.

This plan:

- Outlines the consultation and public participation process completed by NHD and a summary of the comments and results of these activities;
- Describes the needs assessment and gaps analysis completed, including a description of all four QPs;
- Summarizes how NHD intends to utilize HOME ARP funding, including an estimate of the number of housing units that will be produced or preserved for qualifying populations.

NHD HOME ARP Allocation Plan Timeline:

The allocation planning process includes the following steps which were completed during the time periods outlined in the snake diagram below:



Consultation

NHD held 12 Consultation meetings with more than 120 participants representing various regions of the state and specific subpopulations of people within each HOME ARP QP. Subpopulations and stakeholders were also given the opportunity to provide feedback via an online survey sent out following the consultation meetings (two responses were received). At each meeting, and included in the online survey, consultation groups and respondents were provided with an overview of the HOME ARP program, including qualifying populations (QPs) and eligible activities. Participants provided information about the needs of each QP and the gaps in housing, shelter, and services observed and experienced in their communities and offered feedback on how HOME ARP funding could best address those needs and gaps.

Consultation Meeting Participants and Results by Group

Agency/ Organizations Consulted	Type of Agency / Organization	Details, Date, Method	Feedback Received
Northern Nevada HOPES, Domestic Violence Resource Center, Cage and Credit at Sahara, Northern Nevada Community Housing, JF Downey Realty Consulting and Advisory Services, Ridge House	Northern Nevada CoC Leadership Homeless service providers Housing Developers Domestic Violence Service Providers Serving QPs 1-4	Northern Nevada CoC Meeting September 15, 2022 Virtual Session 36 attendees	Lack of supportive services, particularly mental health and substance abuse services. Substantial need for assistance for people fleeing domestic violence, sexual violence, and human trafficking. Lack of beds (and high turnover rates at shelters) should also be prioritized. Highest Priority(ies): Affordable rental housing/ transitional housing/TBRA and supportive services.
Reno Housing Authority, Nevada Rural Housing Authority, Southern Nevada Regional Housing Authority	Public Housing Authorities serving QPs 1-4	September 28, 2022 Virtual Session 11 attendees	Behavioral health case workers need to be able to do site visits for medication management. Need for new affordable housing stock. Highest Priorities: Affordable rental housing/ supportive services/ increasing staff capacity.
VA Southern Nevada Health Care, Nation's	Veterans Groups	October 4, 2022	Not enough funding to meet needs fully. Often, assistance may be

Agency/ Organizations Consulted	Type of Agency / Organization	Details, Date, Method	Feedback Received
Finest, Kline Veterans Fund	Public Agencies serving members of QPs 1-4 who are Veterans	Virtual Session 10 attendees	<p>available during certain parts of the year, but programs run out of funding before end of their budget year; leaving large gaps in available services.</p> <p>Other issues that impact need might be eligibility related (i.e., dishonorable discharge, negative rental history, past evictions, lower incomes). HUD VASH is limited to honorable vets. Over 40% of veterans who are homeless/at-risk are vets of color, but only represent 18% of veterans overall. Veteran transitional housing programs are for single adults only, we have a need for transitional housing for families.</p> <p>Highest Priorities: Lack of funding to meet veteran's needs/few landlords that offer flexibilities to veterans/ significant need for funding to serve veterans with co-morbidities, specifically medical needs.</p>
Nevada Legal Services	Organizations that Address Fair Housing and Civil Rights Serving QPs 2 & 4	October 5, 2022 Virtual Session 1 attendee	<p>Many clients don't speak English. Agencies struggle with hiring enough staff who can communicate with clients. There exists a lack of trust. Working to expunge records to assist with obtaining housing.</p> <p>Highest Priorities: Significant need for eviction services/ rental assistance/ utility assistance</p>
State of Nevada Bureau of Vocational Rehabilitation, Aging and Disability Services Division – Desert Regional Center, Lyon County Human Services	Organizations that Address the Needs of Persons with Disabilities Public Agencies serving QPs 1-4	October 6, 2022 Virtual Session 13 attendees	<p>People in different social groups and economic classes need services but often don't have access to educational materials/opportunities. Cost of rental units too high for people who receive only SSDI. Accessibility when it comes to getting there. Affordable services/housing on outskirts of cities and no public transportation there. Not enough</p>

Agency/ Organizations Consulted	Type of Agency / Organization	Details, Date, Method	Feedback Received
			<p>people can access. No nearby services (retail, groceries). When housing built, not enough accessibility in functionality. Kitchen, bathroom not accommodating.</p> <p>Highest Priorities: Funding needed to provide longer shelter stays/immediate attention to clients when they present/lack of awareness of options.</p>
<p>Clark County; Community Foundation; Churchill County Social Services; Northern Nevada HOPES; Carson City School District, Monai Village, Inc.; HopeLink of Southern Nevada; City of Las Vegas; City of Reno</p>	<p>Homeless Service Providers</p> <p>Public Agencies serving QPs 1-4</p>	<p>October 11, 2022</p> <p>Virtual Session</p> <p>18 attendees</p>	<p>Difficult for people with a previous incarceration to obtain housing. Requirement to make three times the rent is a large barrier. People with disabilities have fixed income, but rents are high and take up most of the family's income. Many youth with mental health issues, unable to secure housing, and are not able to live in shelter or secure housing by themselves. Many are aging out of the system but not old enough to be in a nursing home.</p> <p>Highest Priorities: Rural housing voucher not being accepted/ disabled and elderly population in critical need/need for assistance accessing and retaining housing.</p>
<p>Eddy House, HELP of Southern Nevada, Shannon West Homeless Youth Center, The Children's Cabinet, Northern Nevada HOPES</p>	<p>Homeless Service Providers</p> <p>Domestic Violence Service Providers</p> <p>Serving QPs 1-4</p>	<p>October 12, 2022</p> <p>Virtual Session</p> <p>11 attendees</p>	<p>There is a lack of beds (shelter) and a need for assistance transitioning out and obtaining housing. Substantial need for mental health services. Need for rapid housing, mental health care and supportive services. Strong need to provide a stepping stone from shelters toward other long-term housing. Affordable rental housing and getting people set up with apartments and goals to be able to manage keeping an apartment. Most clients are trying to get drivers licenses. They don't have children so</p>

Agency/ Organizations Consulted	Type of Agency / Organization	Details, Date, Method	Feedback Received
			not eligible for most vouchers and can't compete against families. Highest Priorities: Mental health/wrap-around supportive services/affordable and transitional housing. There seems to be a lack of beds (shelter) and there is a need for assistance transitioning out and obtaining housing. There is a substantial need for mental health services with this group.
Nevada Homeless Alliance, Nevada Outreach Training Organization, People with Lived Experience	Homeless Service Providers serving QPs 1-4	October 25, 2022 Virtual Session 6 attendees	Hard to get in queue for assistance unless you are also in DV situation or have mental illness. People are aging into chronicity. Elders are falling through the cracks. Families are being separated at shelters. Highest Priorities: Lack of shelters (and thusly of shelter beds)/voucher amounts are insufficient to pay rental amounts/substantial needs for senior population.
Advocates to End Domestic Violence	Domestic Violence Service Providers (serving QP 3)	October 26, 2022 Virtual Session 1 attendee	Transportation, daycare, employment, dental services, legal services and affordable rental housing and shelters are needed. Supportive services, including credit awareness counseling, needed. Highest Priorities: Supportive services/ non-congregate shelter/ transitional housing.
Social Entrepreneurs, Inc. (CoC Coordinator); HUD, Friends in Service Helping Emergency Services; Frontier Community Action Agency, Nevada Division of Welfare and Supportive Services;	Rural Nevada CoC Leadership Public Agencies serving QPs 1-4 Homeless Service Providers	Rural Nevada CoC Meeting October 27, 2022 Virtual Session 15 attendees	Strong need for mental health services. One facility took youth with mental health issues closed and has not been replaced. Can't find landlords willing to take vouchers. Highest Priorities: Hard to find housing/need for mental health services.

Agency/ Organizations Consulted	Type of Agency / Organization	Details, Date, Method	Feedback Received
Nevada Division of Public and Behavioral Health; Nevada Rural Housing Authority; HUD Field Policy and Management; New Frontier; Carson City Health & Human Services; Nevada Outreach Training Organization; Bitfocus	Serving QPs 1-4		
Reno-Sparks Indian Colony; Yerington Paiute Tribe Housing Authority	Public Housing Authorities Native American Tribes Serving QPs 1-4	October 27, 2022 November 3, 2022 2 Individual Consultations	Affordable rental housing needed. Support through temporary or permanent housing. Families with children living in their cars. Transportation/childcare needed. Addressing unhoused might the highest priority and tribal Individual owned homes (although not eligible) repairs needed. Need to build more housing and accompanying infrastructure (water/sewer lines). Supportive service needed as well as additional energy/utility assistance. Currently, rental assistance limited because they need to spread it around. Homeless persons have reached out, have had social/mental challenges and have trouble keeping a stable housing environment. Highest Priorities: Affordable rental housing/rental assistance/supportive services.
Southern Nevada CoC Leadership and Members	Southern Nevada CoC Leadership Homeless Service Providers	Southern Nevada CoC Survey 29 responses	Need more affordable housing units and ways to leverage HOME ARP funds with other public funding programs like project-based Section 8, and Rental Assistance Demonstration program (RAD).

Agency/ Organizations Consulted	Type of Agency / Organization	Details, Date, Method	Feedback Received
	Domestic Violence Service Providers Serving QPs 1-4		Highest Priorities: Permanent supportive housing/supportive services/TBRA

Consultation Overarching Needs

In consultation meetings, NHD asked participants to rank their highest priorities through comments and polling software. Participants consistently elevated affordable rental housing as the highest priority need for HOME ARP funding, followed closely by supportive services, particularly in the area of mental health. Other supportive services that participants described a strong need for included transportation and childcare services. Participants also identified TBRA and utility assistance as needs in several communities, as well as emergency shelter capacity. Frequent staff turnover and support with increasing staff capacity was also indicated as an area in need of additional resources.

People experiencing homelessness ranked as the highest priority population among HOME ARP qualifying populations. Of that population, seniors experiencing homelessness were the subpopulation most consistently highlighted. Mental health services were noted as being needed in all subpopulations, but particularly for youth.

Community Feedback on Needs, Gaps, and Opportunities Relevant to Addressing Equity and Racial Disparities

NHD found that local data reflect communities of color consistently represent a larger percentage of households experiencing housing instability compared to the percentage of the general population that people of color comprise. Consultation participants raised concerns that the Hispanic population is impacted by a lack of housing options that fit large family sizes (multi-generational, 10+ family members) and a lack of housing affordable to farm workers with low incomes. Consultation participants also cited the need for translation resources and more staff with diverse linguistic abilities. They said “we are not addressing other-language speakers effectively.” Anecdotal data indicate that translation services are also needed to connect people throughout Nevada with existing housing resources.

Public Participation (Public Notice, Public Hearings, and Public Comment Period)

NHD held a 15-day public comment period on the draft allocation plan from January 23, 2023 to February 10, 2023. A public hearing on the draft HOME ARP allocation plan was held on Monday February 13th, 2023 at 4pm PST. The meeting was held virtually, no participants attended. Participants could join online or by phone.

A notice informing the public about the public comment period and public hearing was released on Jan. 20, 2023. The notice included the amount of HOME ARP dollars awarded to NHD and the range of activities NHD intends to implement. Additionally, the notice included details about where to access the draft plan, instructions for submitting comments, and required procedures to request interpretation services for Limited English Proficiency persons and accommodations for persons with disabilities. A copy of the notice is provided as Appendix A.

Public Participation Comments

No comments were received at the public hearing or during the public comment period.

Efforts to Broaden Public Participation

In addition to meeting with the required groups during the Consultation period and completing the required 15-day comment period and public hearing on the draft allocation plan, NHD held multiple meetings with specific members of the community to seek their input on the development of the plan. This included requesting feedback from Youth and Young Adults who self-identified as having lived experiencing with homelessness and Native American Tribal Organizations.

Once the plan was drafted, in addition to making the draft plan available at multiple locations, NHD provided opportunity for citizens and groups to obtain a reasonable number of free copies that could be taken with them for further review.

Finally, the public hearing was conducted virtually to increase participation.

Needs Assessment and Gaps Analysis

In addition to feedback received through consultations, the following data sources were used to determine the size and demographic composition of qualifying populations in Nevada, their needs, and gaps within the current shelter, housing inventory, and service delivery system:

- **Housing Inventory Count (HIC)**, 2022 reports for all three Nevada Continuums of Care (CoCs)
- **Point in Time (PIT) Count**, 2022 reports for all three Nevada CoCs
- **Longitudinal Systems Analysis (LSA)**, FY2021 summary data for all three Nevada CoCs
- **Coordinated Entry (CE) Annual Performance Report (APR)**, calendar year 2021 reports for all three Nevada CoCs
- **American Community Survey (ACS)**, 2020 5-Year Estimates Data Profiles, Table DP04 Selected Housing Characteristics, S1071 Poverty Status in the Past 12 months
- **Comprehensive Housing Affordability Strategy (CHAS)**, 2015-2019 for Nevada
- **Department of the Treasury**, Emergency Rental Assistance Program (ERA1) Interim Report, January 1 - December 31, 2021
- **Nevada 211**, 2021 annual report
- **2021 Annual Housing Progress Report**, State of Nevada Department of Business & Industry, Housing Division
- **2021 Taking Stock Report**, State of Nevada Department of Business & Industry, Housing Division
- **Nevada Affordable Housing 101**, Nevada Housing Coalition, March 2022
- **National Network to End Domestic Violence (NNEDV)**, Domestic Violence Counts Report, 16th annual report for Nevada

- **National Coalition Against Domestic Violence (NCADV)**, 2020 Fact Sheet, Nevada
- **National Human Trafficking Hotline**, 2020 Statistics for Nevada
- **The Human Trafficking Initiative**, “Nevada’s Online Commercial Sex Market,” 2018
- **HOME ARP Consultation Meetings and Stakeholder Survey**

Overall Data Limitations

When American Community Survey data were utilized, 5-year estimates have been used. According to the [US Census Bureau](#), “the 5-year estimates from the ACS are “period” estimates that represent data collected over a period of time. The primary advantage of using multiyear estimates is the increased statistical reliability of the data for less populated areas and small population subgroups.”

Comparatively, other data sources used in this needs assessment/gaps analysis are for one-year, different years, and across different geographies. Though the parameters are not consistent across data sources, data collected from different sources for different time periods provided a useful framework for understanding the size of qualifying populations (QPs).

Additional data limitations specific to a particular QP are indicated in the sections below, where applicable.

QP1 - Homelessness (24 CFR 91.5 *Homeless* Paragraphs 1-3)

QP1 - Data Summary

Data from the most recently submitted Point in Time (PIT) Count (2022), Housing Inventory Count (HIC) (2022) and Longitudinal Systems Analysis (LSA) (2021) reports were utilized to determine the size and demographics of the population experiencing homelessness according to the [McKinney Vento definition](#). The [HOME ARP definition of homelessness](#) is distinctly different in that it includes only paragraphs 1-3 of the McKinney Vento definition. Despite the definition differences, these sources provide the most accurate and robust data available to evaluate the size and demographic composition of the HOME ARP homeless QP. Feedback from consultations regarding unmet needs and service gaps for this QP align with the outcomes of the data analysis and are summarized accordingly.

DV data from these reports was also used to analyze the third QP, Domestic Violence/Sexual Assault/Trafficking and were not fully removed for the Homelessness QP analysis. Therefore, data on homeless persons experiencing DV are used to inform the size and demographics of this QP and the Domestic Violence/Sexual Assault/Trafficking QP.

QP1 - Size and Demographic Composition

Two main sources provide data on the total number of people experiencing homelessness in Nevada: the PIT Count and the LSA report. Taken together, they provide a picture of the daily and annual number of people in this population.

The PIT Count provides a snapshot of homelessness in a community. It represents the number of persons identified as experiencing homelessness on a single night. **The combined 2022 PIT Counts across all three CoCs in Nevada identified 7,618 people experiencing homelessness on the night of the counts**, including:

- 4,249 persons sleeping in a sheltered location (emergency shelter, safe haven, transitional housing)
- 3,367 persons unsheltered; sleeping in a place not meant for human habitation
- NV-500 CoC (Las Vegas/Clark County) had the largest number of persons identified as experiencing homeless on the night of the PIT Count with 5,645 people (74% of state total), followed by NV-501 CoC (Reno, Sparks/Washoe County) with 1,605 people (21%) and NV-502 CoC (Nevada Balance of State) with 368 people (5% of state total).
- Persons in adult-only households made up 89% of the PIT count, followed by persons in households with adults and children (10%) and persons in child-only households (less than 1%).

2022 Point in Time Count (aggregate for NV-500, NV-501, NV-502 CoCs)				
	Families		Individuals	
	Persons in households with adults and children	Households with adults and children	Persons in adult-only households	Persons in child-only households
Emergency Shelter	691	200	2581	23
Transitional Housing	76	25	676	4
Unsheltered	31	10	3534	2
Total	798	235	6791	29

Size: Longitudinal Systems Analysis (LSA)

The LSA is a system-wise report that draws upon annualized data about homelessness, available in each community's Homeless Management Information System (HMIS). The LSA was reported at the CoC level and was not unduplicated across the three Nevada CoCs. Thus, to prevent potential double counting of persons who may have been served in more than one CoC using a statewide total, each CoC's data are reported separately below.

The LSA defines homelessness as all individuals in HMIS-participating projects who spent at least one day in emergency shelter, safe haven or transitional housing, as well as individuals in rapid rehousing and permanent supportive housing who spent at least one day in those temporary facilities before moving into permanent housing. The LSA does not include Coordinated Entry (CE) Assessment or Street Outreach data and therefore undercounts the number of people experiencing unsheltered homelessness in a community. **The aggregate number of households experiencing homelessness (served in emergency shelter, safe haven or transitional housing) in the LSA statewide was 13,885 in FY2021 (October 1, 2020-September 30, 2021), as shown in the table below.**

FY2021 LSA Households Experiencing Homelessness				
	Total households	Households with adults and children	Adult-only households	Child-only households
Las Vegas/Clark County CoC (NV-500)	10,959	496	10,359	104
	2,646	40	2,600	6

Nevada Balance of State (NV-502)	280	15	265	0
Total	13,885	551	13,224	110

The table below shows LSA race and ethnicity data for all heads of households and adults (excluding children in households with both adults and children).

FY2021 LSA Heads of Households and Other Adults by Race and Ethnicity						
	Las Vegas/Clark County CoC		Reno, Sparks/Washoe County CoC		Nevada Balance of State	
	Total Households	Percent	Total Households	Percent	Total Households	Percent
Asian	219	2%	43	2%	3	1%
Black or African American	3947	39%	352	14%	12	5%
Native American/Alaskan	135	1%	210	9%	12	5%
Native Hawaiian or Pacific Islander	152	2%	36	1%	1	<1%
White non-Hispanic/Latinx	4194	42%	1490	61%	198	77%
White Hispanic/Latinx	1135	11%	215	9%	28	11%
Missing/Refused	303	3%	107	4%	2	1%
Total	10,085	100%	2,453	100%	256	100%

Household Composition

PIT and LSA data indicate that most Nevadans experiencing homelessness are in adult-only households. PIT count results indicate 89% of persons (96% of households) on a given night were persons in adult-only households. Of the 7,026 total households identified as experiencing homelessness in the PIT count, half were adult-only households in unsheltered living situations; 46% were adult-only households living in emergency shelters and transitional housing. Households with children made up a very small percentage of households experiencing homelessness in the PIT count (4%). Annualized data from the LSA are consistent with these results, with 96% of households experiencing homelessness in adult-only households.

2022 Point in Time Count (aggregate all Nevada CoCs)				
	Families		Individuals	
	Persons in households with adults and children	Households with adults and children	Persons in adult-only households	Persons in child-only households
Emergency Shelter	691	200	2,581	23
Transitional Housing	76	25	676	4
Unsheltered	31	10	3,534	2
Total	798	235	6,791	29

FY2021 LSA Households Experiencing Homelessness				
	Total households	Households with adults and children	Adult-only households	Child-only households
Las Vegas/Clark County CoC (NV-500)	10,959	496	10,359	104
Reno, Sparks/Washoe County CoC (NV-501)	2,646	40	2,600	6
Nevada Balance of State (NV-502)	280	15	265	0

Subpopulations

On the night of the PIT Count, 1,281 persons self-identified as having a severe mental illness and 2,334 persons self-identified chronic substance abuse. Veterans accounted for 752 persons experiencing homelessness, 28% of whom were sleeping in unsheltered locations on the night of the PIT count. There were 455 persons who identified as survivors of domestic violence (DV), with 10% of them sleeping in unsheltered locations on the night of the PIT count.

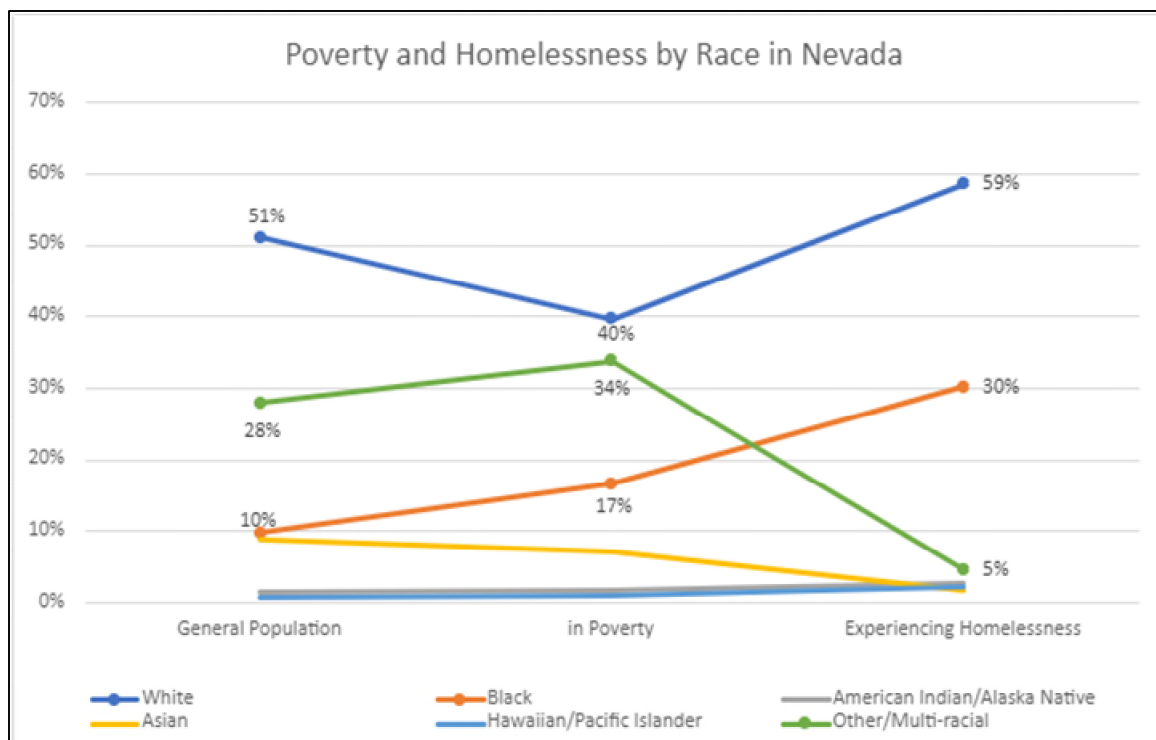
2022 Point in Time Count, Selected Subpopulations (aggregate for NV-500, NV-501, NV-502 CoCs)			
	Sheltered	Unsheltered	Total
Severe Mental Illness	955	326	1,281
Chronic Substance Abuse	784	1550	2,334
Veterans	545	207	752
Survivors of Domestic Violence	409	46	455

Race

Nearly 59% of persons experiencing homelessness on the night of the PIT count were White (4,467 individuals). Thirty percent were Black or African American (2,298). Smaller percentages of persons were multiple races (~5%), American Indian or Alaska Native (~3%), Native Hawaiian or Pacific Islander (2%) and Asian (~2%).

2022 Point in Time Count, Race (aggregate for NV-500, NV-501, NV-502 CoCs)				
	Sheltered	Unsheltered	Total	Percentage
American Indian or Alaska Native	112	96	208	3%
Asian	88	40	128	2%
Black or African American	1,308	990	2,298	30%
Native Hawaiian or Pacific Islander	71	96	167	2%
White	2,345	2,122	4,467	59%
Multiple races	127	223	350	3%
Total	4,051	3,567	7,618	100%

To understand the meaning of the PIT data related to racial demographics, it is necessary to place it in the context of the jurisdiction's general population, and the demographics of residents living in poverty. Compared to their share of the general population, both White and Black residents are disproportionately represented in the homeless system. White residents represent 59% of people experiencing homelessness compared to 51% of the general population, while Black residents represent 30% of people experiencing homelessness, compared to 10% of the general population. These statistics show that Black residents experience homelessness at a greater rate than White residents, as compared to their share of the general population. As seen in the graph below, the combined populations of the three Nevada CoCs are 51% White and less than 10% Black. While only 17% of the population living in poverty is Black, over 30% of the residents experiencing homelessness are Black. These disproportionate rates of poverty and homelessness as compared to the total population for Black residents are found nationwide and in nearly every CoC across the country.



The LSA provides race and ethnicity data for all heads of households and adults (excluding children in households for which children are not the head of household).

FY2021 LSA Heads of Households and Other Adults by Race		
	All Nevada CoCs	
	Total Households	Percent
Asian	313	2%
Black or African American	6,015	35%
Native American/Alaskan	465	3%
Native Hawaiian or Pacific Islander	256	1%
White non-Latinx	8,081	47%
White Latinx	1,803	10%
Missing race	438	3%
Total	17,371	

LSA data reveals racial or ethnic disparities among participants in HMIS-participating homeless projects. The disparities seen in the LSA mirror those found in the PIT data. Thirty-five percent of the people experiencing homelessness reported in HMIS identify as Black, while persons identifying as Black make up only 10% of the general population. Additionally, White residents account for 59% of the total population of people participating in homeless system interventions across Nevada, while persons identifying as White make up 51% of the general population.

QP1 - Unmet Housing, Shelter, and Service Needs

Emergency shelter provides safety to households during their immediate crises, while long-term housing stability is available via housing projects such as rapid rehousing (RRH), permanent supportive housing (PSH), and other housing interventions. Housing gaps analyses compare a homeless response system's inflow, as measured through CE assessment processes, to the availability of housing within the system (known as "housing inventory"). This gaps analysis compares CE system needs shown by Nevada CoC's annual performance report (APR) to available housing within the system shown by the Nevada CoC's 2022 Housing Inventory Count (HIC).

A review of Nevada CoC's APR reveals:

- Las Vegas/Clark County (NV-500): 8,731 households were assessed for housing needs in calendar year 2021, with 6,471 households placed on a prioritization list for housing programs. Just 39% of households received a referral for a housing program in 2021.
- Reno, Sparks/Washoe County (NV-501): 1,744 households were assessed for housing needs in calendar year 2021, with 1,068 households placed on a prioritization list for housing programs. Just 22% of households received a referral for a housing program in 2021.
- Nevada Balance of State (NV-502): 382 households were assessed for housing needs in calendar year 2021, with 243 households placed on a prioritization list for housing programs. Just 55% of households received a referral for a housing program in 2021.

A review of Nevada CoC's 2022 HIC reports reveal:

- Las Vegas/Clark County (NV-500): The CoC has 2,599 units of RRH and PSH, with 1,389 of these units dedicated to veterans, leaving 1,210 units available to the general population (non-veterans).
- Reno, Sparks/Washoe County (NV-501): The CoC has 530 units of RRH and PSH, with 322 of these units dedicated to veterans, leaving 208 units available to the general population (non-veterans).
- Nevada Balance of State (NV-502): The CoC has 130 units of RRH and PSH, with 87 of these units dedicated to veterans, leaving 43 units available to the general population (non-veterans).

The following is a summary of the Housing Inventory Count (HIC) combined across Nevada's three CoCs:

2022 HIC for all NV CoCs combined								Subset of Total Bed Inventory	
	Family units	Family beds	Adult only beds	Child only beds	Year-round beds (total)	Seasonal beds	Overflow / Voucher beds	Veteran beds*	Youth beds*
Emergency Shelter/Safe Haven/Transitional Housing									
Emergency Shelter	213	751	2,348	22	3,121	0	555	109	164
Transitional Housing	66	159	925	38	1,122	0	0	417	182
Permanent Housing									
PSH	192	539	2,187	0	2,726	0	0	1,920	1
RRH	276	943	604	1	1,548	0	0	240	195
Other PH	7	20	61	0	81	0	0	28	6
Grand Total:	754	2,412	6,125	61	8,598	0	555	2,714	548

*Veterans and youth are a subset of the total count of people experiencing homelessness on the night of the PIT Count.

Finally, consultation data cited mental health services as a significant unmet need across all QPs.

QP1 - Gaps Analysis

The homeless response system provides both crisis response (emergency shelter and transitional housing) and housing interventions. Therefore, the gaps analysis in this report considers the current availability of project beds for persons experiencing homelessness, equity in the types of interventions offered to different groups experiencing homelessness, and the efficacy of the homeless response system in assisting those groups in resolving their homeless crises.

Nevada has a large unsheltered population. If the goal of Nevada's homeless response system is to provide all unsheltered persons with a shelter bed, the state has insufficient shelter capacity to meet the needs of those experiencing homelessness. Increasing shelter beds is unlikely to have a significant impact on reducing unsheltered homelessness, as shelter is not a housing solution that all persons experiencing unsheltered homelessness would utilize. Therefore, a combination of additional shelter beds and permanent housing is likely to have more impact in reducing unsheltered homelessness.

Data from the three Nevada CoCs were consolidated to perform a statewide analysis of gaps in the homeless crisis response system. The table below compares current emergency shelter inventory, the number of families/individuals experiencing sheltered and unsheltered homelessness, and the gap in available inventory. This table shows both the total available inventory (total inventory minus occupied inventory) and the excess inventory (available inventory minus the number of unsheltered families/individuals). Because inventory categorized as seasonal or overflow is not identified by household type on the HIC, it is not included in the tables below but is noted where potentially applicable.

Nevada Shelter Gaps Analysis (combined across 3 CoCs)					
	Current Inventory (HIC)	Sheltered homelessness (PIT)	Unsheltered homelessness (PIT)	Available Inventory	Excess Inventory
Persons in adult-only households	2,348	2,581	3,534	-233	-3,767
Households with adults and children	213	200	10	13 (surplus)	3 (surplus)
Persons in child-only households	22	23	2	-1	-3
Veterans	109	221	207	-112*	-319**

*Negative "available" inventory indicates that the system was housing more people than they had dedicated homeless beds for in the system on the night of the count.

** "Excess" inventory is meant to show how many more beds would be needed to house everyone experiencing homelessness including those in the unsheltered count.

The following three tables show the statewide shelter gaps broken down by CoCs.

NV-500: Las Vegas/Clark County CoC Shelter Gaps Analysis					
	Current Inventory (HIC)	Sheltered homelessness (PIT)	Unsheltered homelessness (PIT)	Available Inventory	Excess Inventory
Persons in households with only adults	1485	1745	2853	-260	-3,113
Households with adults and children	138	143	5	-5	-10
Persons in child-only households	17	23	2	-6	-8
Veterans	61	143	161	-82	-243

NV-501: Reno, Sparks/Washoe County CoC Shelter Gaps Analysis					
	Current Inventory (HIC)	Sheltered homelessness (PIT)	Unsheltered homelessness (PIT)	Available Inventory	Excess Inventory
Persons in households with only adults	802	787	411	15 (surplus)	-396
Households with adults and children	49	50	2	-1	-3
Persons in child-only households	5	0	0	5 (surplus)	5 (surplus)
Veterans	39	75	16	-36	-52

NV-502: Nevada Balance of State Shelter Gaps Analysis					
	Current Inventory (HIC)	Sheltered homelessness (PIT)	Unsheltered homelessness (PIT)	Available Inventory	Excess Inventory
Persons in households with only adults	61	49	270	12 (surplus)	-258
Households with adults and children	26	7	3	19 (surplus)	16 (surplus)
Persons in child-only households	0	0	0	0	0
Veterans	9	3	30	6 (surplus)	-24

It is important to note that the excess inventory demonstrated in the table above shows the number of beds available if all access barriers were removed and emergency shelters operated at 100% utilization.

In addition to looking at data from those who have accessed the homelessness system, it is useful to examine data for those who have attempted to access the homelessness system but were unsuccessful. Each of Nevada's 3 CoCs utilize an integrated CE process through the State's HMIS system. CE is a consistent, community-wide intake process that matches people experiencing homelessness to community resources that are the best fit for their situation. Thus, CE is the "front door" to the state's homelessness system. However, not all those who are assessed via the system are able to gain access to appropriate housing. In 2021, across Nevada's three CoCs, approximately 54% (2,017 of 3,756) of households referred to CE for housing were able to access housing because of that referral. However, another 5,765 households—nearly 74% of those who were assessed and prioritized by the CE system—

were not successfully referred to a housing opportunity. In about 60% of unsuccessful referrals (1,057 out of 1,739), the provider could not accept the household at the time of referral. This situation is commonly related to bed capacity or other constraints, and not necessarily indicative of an unmatched referral. Thus, it should be expected that some of those referred households ultimately did achieve housing of some kind based on their CE assessment and referral even if they were not able to obtain housing at the time of the initial referral.

Nevada Coordinated Entry Data and Unmet Housing Need				
	Southern Nevada	Northern Nevada	Rural Nevada	Total
HHs prioritized for referral	6,471	1,068	243	7,781
Total Housing referrals	3,180	263	133	3,756
Successful Housing Referrals	1,934	77	6	2,017
% of successful referral	60.8%	35.2%	4.5%	53.7%
Unmet need (prioritized HHs less successful referrals)	4,537	991	237	5,765

In summary:

- Most unsheltered homelessness is experienced by individuals in adult only households.
- If Nevada were to provide a shelter bed for every person identified in the PIT count, a significant gap of 3,767 shelter beds for persons in adult only households exists. This is represented by totaling the need for 233 additional beds beyond its year-round inventory plus 3,534 persons in adult only who were homeless on the night of the PIT count.
- Nevada has a very small surplus of 3 shelter units for households with adults and children. There were 13 units available on the night of the PIT count, however there were 10 families in unsheltered locations on the night of the PIT count.
- A gap of 319 beds exists for veterans experiencing homelessness, much of which may be accounted for in non-veteran dedicated beds.
- The state reported a high number of overflow and seasonal beds (555). The majority (503) of these beds are in the Las Vegas/Clark County (NV-500) CoC, but 418 of these beds appear to be COVID-related beds and are therefore not likely to be part of a long-term overflow inventory.

There are 1,461 units of RRH and PSH available to the general population (non-veterans) and 1,798 units available to veterans. With veterans comprising only about 10% of the state's homeless population according to PIT count results, the state is significantly under-resourced for rapid rehousing and permanent supportive housing for the general population. The demand for housing resources is high across the state, and the percentage of households that are assessed, placed on prioritization lists, and referred for a housing program is low. Nevada has a large unsheltered population across the state as identified in the PIT count (3,369 persons), but insufficient housing stock to adequately serve its residents experiencing homelessness. Additionally, consultation data points to a significant gap in available services. The lack of emergency shelter and housing units leaves many individuals and households experiencing homelessness without access to the services available within those facilities. Unfortunately, consultations also indicated that services that are available are insufficient and there is a

strong need to provide stepping stone services to help individuals and families transition from shelters to long-term housing solutions.

QP2 - At-risk of Homelessness (24 CFR 91.5)

QP2 – Data Summary

The HOME ARP program identifies individuals and families at risk of homelessness as the second eligible QP. The program utilizes the McKinney Vento definition for at-risk of homelessness with no changes.

A valuable source of additional data regarding housing need for the at-risk population is provided through Nevada’s 211 system. According its 2021 annual report, Nevada 211 provided a total of 172,730 referrals for contacts received via calls, text messages, or web inquiries. Of these, the most common referral type was for rental payment assistance, constituting 18% of all referrals made statewide in 2021. Overall, referrals made for housing related needs (rental assistance, shelter, street outreach) accounted for 31% of all referrals. Note that contacts to 211 may receive more than one referral, so it is possible that an individual contact will appear in more than one referral category.

Nevada 211 Annual Report 2021		
	Total	Percent of Total
Total referrals (calls/text/web)	172,230	
Referrals: Rental Payment assistance	30,867	17.92%
Referrals: Low income/Subsidized Private Housing	14,571	8.46%
Referrals: Community Shelters	2,208	1.28%
Referrals: Extreme Weather Shelters	2,176	1.26%
Referrals: Transitional Housing/Shelter	1,949	1.13%
Referrals: Street Outreach Programs	1,215	0.71%

QP2 - Size and Demographic Composition

As noted in the previous section, 52,986 referrals from Nevada 211 were specifically for housing related needs, which constitutes over 30% of the total number of referrals. While demographic data is not reported by specific referral type, of those 211 contacts for which race data was recorded approximately 30% of callers identified as White, 30% as Black, and 9% as multi-racial. In addition, 16% of callers who provided demographic information identified as Hispanic or Latino.

Data from the Comprehensive Housing Affordability Strategy (CHAS), 2015-2019 for Nevada indicates that 72,515 renter households with income at less than 30% of Area Median Income (AMI) have one or more severe housing problems, which the CHAS defines as incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, or cost burden greater than 30%. It should be noted that while statewide data from the CHAS was utilized for the purposes of this report, similar data is available at the county level. A review of that data indicates that a significant majority (66,680, or nearly 92%) of the households reported in this category were in Clark or Washoe County.

QP2- Unmet Housing, Shelter, and Service Needs

The total number of rental units in Nevada is approximately 521,920, as reported in the 2015-2019 CHAS report. Of these, approximately 14,630 units are considered affordable to households with income less

than 30% of AMI. A further breakdown of these units shows that only 10% (1,515) of these units are currently vacant and potentially available for renters in need of housing affordable at this level.

Consultation data indicates that rental assistance is inconsistently available and financially limited due to budget constraints. This leaves many individuals and households at-risk of homelessness unable to truly stabilize even when temporary supports are available to prevent them from becoming homeless. More affordable housing units and ways to leverage HOME ARP funds with other public funding programs like project-based Section 8, and Rental Assistance Demonstration program (RAD) is needed.

Finally, consultation data cited mental health services as a significant unmet need across all QPs.

QP2 - Gaps Analysis

An analysis of American Community Survey (ACS) and CHAS data suggest a significant shortage in affordable housing based on estimated need. This data shows that there are 72,515 households with income less than 30% AMI and one or more housing problems, and only 14,630 rental units considered affordable for renters at this income bracket. Therefore, approximately 57,885 households at-risk of homelessness are living in rental units that are either substandard or are considered “rent-burdened” (meaning that rent is 30% or more of their total income). This data suggests that there are 3.5 households at-risk of homelessness for every unit that would be considered affordable to them. Once again, it is important to note that over 95% (55,445) of the identified unit gap is concentrated in Clark and Washoe Counties. It is also noteworthy that this CHAS-based analysis suggests a smaller gap in affordable rent units at or below 30% of AMI. A similar analysis undertaken by the National Low Income Housing Coalition suggests that there is a shortage of 84,320 rental homes affordable and available for extremely low-income households (at or below 30% AMI). Based on this analysis, it is estimated that there are only 20 affordable and available units for every 100 households in the income category.

However, according to the 2021 Nevada Annual Housing Progress Report, there is potential good news: in that year, Clark and Washoe Counties and their jurisdictions added 1,497 affordable housing units. This is more than twice the number of affordable units that came online in any single year since 2014. Of these new affordable units, 29% (434 units) are considered affordable for households at or below 50% of AMI. The report also cites another 3,824 units in the pipeline (projects that are funded or under construction), 32% of which are considered affordable for households at or below 50% of AMI. So, while the rental unit gap remains significant, it may decrease in years to come if efforts to increase the affordable unit inventory continue. However, up to 20% of Nevada’s subsidized or rent restricted units (approx. 7,500 units) are projected to be at risk of conversion to private market units over the next 5 years. If this occurs, it would clearly offset the new affordable units coming online and would further widen the rental housing gap.

At-risk Housing Needs and Gaps Analysis Table	
	Total Households/Units
Total Rental Units	521,920
Rental Units Affordable to HH at 30% AMI	14,630
Households with Income 0-30% AMI with one or more housing problems	72,515
Affordable Rental Unit Gap	57,885

QP3 - Domestic Violence/Sexual Assault/Trafficking

QP3 – Data Summary

The HOME ARP Notice defines QP3 as individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. Available data sources are not inclusive of the full QP3 definition.

The considerations listed below impact the overall analysis in this section. Between statewide data sources and information available from CoC data sources, however, a useful picture of the scope of QP3 across the state takes shape.

- While there are some local and statewide data sources available on the Domestic Violence/Sexual Assault/Trafficking QP, the data are generally aggregated and do not include consistent demographic or household level information.
- In cases where demographic data is present, the majority of reported cases list “unknown” in most categories.
- Data specifically speaking to the housing needs of those experiencing human trafficking was not available.
- Available data does not seem to address sexual assault survivors specifically.
- The terms domestic violence and intimate partner violence are used interchangeably.

Finally, to clearly organize the limited data that describes the demographic composition of this QP, the analysis is separated into two groups: Domestic Violence/Sexual Assault and Human Trafficking. Given the needs of this vulnerable population, it is reasonable to assume that there is overlap between persons reporting domestic violence/sexual assault and instances of human trafficking. The number of reports and persons that overlap, however, is unknown.

QP3 – Size and Demographic Composition

Domestic Violence/Sexual Assault

Based on data from the NCEDSV report and the state’s HMISs, it is reasonable to estimate that in a given year, approximately 33,000 to 35,000 individuals seek DV services in Nevada, with 2,500 to 3,000 individuals specifically seeking emergency shelter.

According to the Nevada Coalition to End Domestic and Sexual Violence (NCEDSV), in 2021, there were 34,368 total (adult and child) survivors of domestic violence reported, of which 26,966 were first time reports. Among first time reports, 25,354 were adults while 1,612 were children 17 or younger. Over 80% of these reports were received from residents of Clark County. The NCEDSV report also indicates that victims reported during this period were provided a total of 84,846 bed nights across emergency shelters, motels and transitional housing facilities. Of these bed nights, 63,140 were attributed to adults and the remaining 21,706 to children.

Additionally, according to the National Network to End Domestic Violence’s (NNEDV) 16th Annual Domestic Violence Counts Report for Nevada (“NNEDV Report”), 369 survivors of DV served across all programs statewide in one day on September 9, 2021. This includes 215 adult and child survivors who

were served in emergency shelters, transitional housing, hotels, motels, or other housing provided by VSPs. On this same day, 304 DV hotline contacts were received across Nevada.

It is worth noting that the number of DV survivors in the CoC Point in Time count conducted on February 24, 2022 reported a nearly identical number of DV survivors (367). While these numbers are similar, it is unknown if this is due to capacity issues (e.g., 367-9 people is the total capacity of the programs) or if the need for DV housing resources is less susceptible to seasonal fluctuations often seen in emergency shelter. These numbers absolutely show consistent utilization across seasons, perhaps even a full utilization. If the programs, however, don't have an ability to serve more at any given time, the data would never be able to demonstrate increased, even if need was increasing, because the programs size does not fluctuate.

	Total DV survivor population by CoC (2021)							
	Southern Nevada		Northern Nevada		Rural Nevada		Total	
	All Programs	Emergency Shelter	All Programs	Emergency Shelter	All Programs	Emergency Shelter	All Programs	Emergency Shelter
Total	2,148	1,566	350	235	191	109	2,689	1,910
Female DV Survivors	1,537	1,085	163	94	66	49	1,766	1,228

As noted in the previous section, most data sources obtained for this report do not include consistent demographic or household level information. However, according to national research conducted the National Coalition Against Domestic Violence (NCADV), people who identify as Black experience DV at a disproportionately high rate, with 45.1% of Black women and 40.1% of Black men experiencing intimate partner violence or stalking in their lifetimes. NCADV also points out that American Indian and Alaska Native women experience domestic violence at much higher rates than any other ethnicity, with 55.5% experiencing intimate partner violence and 66.6% experiencing psychological abuse in their lifetimes. According to the CDC, Hispanic women experience domestic violence at similar rates as the overall female population but may experience more severe barriers to services when culturally and linguistically appropriate programs are not available.

Human Trafficking

Data from the National Human Trafficking Hotline shows that in 2020, 186 new human trafficking cases were recorded statewide for Nevada. Of these cases, 159 were opened based on a trafficking tip from the caller. Sixty-two of the cases included requests for service referrals and crisis assistance related to human trafficking. Based on this data, Nevada ranks 15th among all states in total number of reported cases of human trafficking and has the 2nd highest report rate on a per capita basis. In addition, in their 2017 annual report, the Nevada Coalition to Prevent the Commercial Sexual Exploitation of Children gives an estimate of 5,687 victims of child sex trafficking in Nevada. It should be noted that data regarding sex trafficking in Nevada exists within a unique context as Nevada is the only location in the United States in which licensed and regulated brothels coexist alongside the criminalized commercial sex industry (where sex trafficking is most prevalent). This generally blurs the line between situations

that may represent trafficking and what is otherwise considered legal sex work across the state. This added complexity makes reliable data on sex trafficking prevalence more difficult to obtain. However, a 2018 report on Nevada's Online Commercial Sex Market noted that only 28% of sex providers in Nevada's online commercial sex market appear to be adults working independently with no risk of trafficking.

Additional demographic information such as race, ethnicity, familial status on survivors of human trafficking was not available.

QP3 - Unmet Housing, Shelter, and Service Needs

Domestic Violence/Sexual Assault

The available data show that those experiencing DV in Nevada have significant unmet need for housing, shelter, and other services. During its one-day count on September 9, 2021, NNEDV reported victims made 59 requests for services that went unmet due to lack of resources. Of the 59 unmet requests, approximately 81% were for emergency shelter or other emergency housing related needs. In FY 2021, the NCEDSV also reported that 509 requests for shelter through the DV hotline went unmet due to lack of capacity.

Data from the 2022 Housing Inventory Count (HIC) for CoCs across Nevada also indicates that there is a significant shortage of dedicated DV beds in the homeless bed inventory. According to the HIC reported on February 24, 2022, there are 4,243 emergency shelter and transitional housing beds statewide. Of those beds, 3,911 are specified as non-DV beds, indicating that there are 332 beds statewide dedicated for people fleeing or attempting to flee domestic violence. Of the 332 statewide beds for DV, 242 of them are emergency shelter specifically. Of the total dedicated DV beds statewide, approximately 40% are in Washoe County, 27.5% are in Clark County and about 22.5% are within the BoS jurisdiction.

Data from the 2022 PIT count suggests that there is a significant shortage of dedicated DV beds based on bed utilization.

2022 Point in Time DV Bed Utilization								
	Southern Nevada		Northern Nevada		Rural		Total	
	Shelter & Transitional	Shelter Only	Shelter & Transitional	Shelter Only	Shelter & Transitional	Shelter Only	Shelter & Transitional	Shelter Only
DV dedicated beds	125	125	132	47	75	70	332	242
Reported DV population	175	157	225	201	12	9	409	367
Utilization %	138%	126%	170%	428%	16%	13%	123%	152%

Human Trafficking

Due to a lack of specific data on persons in Nevada who have been trafficking victims, it is difficult to quantify the true extent of the housing need within this group. However, given the overall prevalence of

sex work across the state (both legal and illegal), it is reasonable to expect that there are significantly more people in need of crisis assistance, including housing, than reported in current statistics.

Finally, consultation data cited mental health services as a significant unmet need across all QPs.

QP3 - Gaps Analysis

Domestic Violence/Sexual Assault

The gaps analysis reveals that there appears to be a gap in available shelter and housing options for those fleeing or attempting to flee DV. As described previously, an estimated 2,500-3,000 people experiencing DV seek housing and shelter services across Nevada during a given year, with approximately 375-400 seeking housing on a given night. Based on the most recent counts of available beds dedicated for DV survivors, there are only 332 shelter or transitional beds available across the state that are dedicated for persons fleeing DV. This utilization rate (123%) suggests that there are approximately 5 DV survivors for every 4 available beds. In comparison, the overall utilization rate for shelter and transitional beds across the state is approximately 95%. The gap in shelter beds also suggests there is a significantly greater need for dedicated DV housing options. This analysis also shows that the need for additional DV housing resources is highly concentrated in the urban areas of the state, most acutely in the Northern Nevada region.

Human Trafficking

While reliable data about the true need for housing for trafficking victims is not readily available, there are many people across Nevada engaged in activity known for a high incidence of trafficking. According to 2018 data from the Human Trafficking Initiative, up to 72% of sex providers in Nevada (both regulated and unregulated) may have at least a low risk of being in a trafficking situation, with up to 14% being considered high risk based on multiple indicators (age, race, likelihood of having a “manager”). Thus, while definitive data on this population is scarce, it is reasonable to expect that there is a greater need than can be accurately reflected by available reporting.

Collectively, feedback received through consultations indicated a substantial gap in services and assistance, particularly mental health and substance abuse services, for people fleeing domestic violence, sexual violence, and human trafficking.

QP4 - Other Populations

QP4 – Data Summary

The fourth eligible QP under HOME ARP is other populations where providing HOME ARP supportive services or assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability. The full definition is available in the [Notice](#). Data sources on Other Populations is less robust than for the other QPs. However, local 211 data, the statewide [Emergency Rental Assistance Program \(ERAP\)](#), and information gathered through HOME ARP consultation meetings triangulated with statewide Comprehensive Housing Affordability Strategy (CHAS) data, provide a strong understanding of the size, demographic makeup, and needs of this population.

ERAP is a U.S. Department of Treasury program funded through states and other administrators. Nevada’s ERAP program was established in 2021 to help at-risk populations mitigate the financial impacts of the COVID-19 pandemic. While eligibility criteria for ERAP do not match those of HOME ARP,

utilization of the program provides a useful source of data to help quantify housing instability across the jurisdiction. ERAP-eligible households must meet the following criteria:

- A household must be responsible to pay rent on a residential property, and;
- One or more people within the household have qualified for unemployment benefits, had a decrease in income, had increased household costs, or experienced other financial hardship due directly or indirectly to the COVID-19 pandemic;
- One or more individuals in the household can show a risk of experiencing homelessness or housing instability; and
- The household has an income at or below 80% of AMI.

QP4 - Size and Demographic Composition

As noted above, over 30% of all referrals to Nevada's 211 center were related to housing needs. Furthermore, nearly 36% of all persons who contacted one of the State's CE projects were referred for some type of housing/housing assistance. These figures suggest a strong need for housing assistance across Nevada.

From January through December 2021, across the state of Nevada (including state, county and city assistance) a total of 27,325 households received assistance via the ERAP program. Of this total, approximately 65% (17,775) received assistance for rent payments or rent arrears.

Nevada ERAP Assistance				
	HHs assisted with rent/rent arrears	HHs assisted with utilities/utility arrears	HHs receiving other assistance	Total
ERAP1	15,453	5,509	3,259	24,221
ERAP2	2,322	669	113	3,104
Total	17,775	6,178	3,372	27,325

As with data on persons at-risk of homelessness, some data sources provide only statewide information for other HOME ARP eligible qualifying populations. Data from the Comprehensive Housing Affordability Strategy (CHAS), 2015-2019 for Nevada reveals that 68,510 renter households with income between 30%-50% of AMI have one or more housing problems, defined as incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, or cost burden greater than 30%. As noted in the discussion regarding the population at-risk of homelessness, a large percentage (92%) of these households are concentrated in Clark and Washoe Counties.

QP4 - Unmet Housing, Shelter, and Service Needs

As stated above in [Unmet Housing and Service Needs: At-risk of Homelessness](#), the total number of rental units in Nevada is approximately 521,920 units (according to the 2015-2019 CHAS report). Of these, approximately 31,655 units are considered affordable to households with incomes at greater than 30% but less than 50% AMI.

Consultation data indicates an unmet need for housing support services specifically for individuals and families who previously experienced homelessness but have been rehoused through a program. Transportation, daycare, employment, dental services, legal services, and credit counseling were all

indicated as unmet service needs. Supportive service needed as well as additional energy/utility assistance was also indicated as an unmet need. Finally, consultation data cited mental health services as a significant unmet need across all QPs.

QP 4 - Gaps Analysis

Statewide CHAS data suggests a significant gap in housing inventory for other qualifying populations in Nevada. With 68,510 households with income between 30-50% AMI and one or more housing problems, and only 31,655 rental units considered affordable for renters at this income bracket, approximately 36,855 households in other qualifying populations are living in rental units that may further destabilize their current housing situation. Data from the National Low Income Housing Coalition's Nevada Affordable Housing 101 report shows that households in this income bracket have better access to affordable housing than those considered at-risk of homelessness (less than 30% of AMI), but housing availability is still very low. For households between 30% and 50% of AMI NLIHC estimates that there are only 38 affordable units available for every 100 households. However, as indicated earlier, according to the 2021 Nevada Annual Housing Progress Report, there is potential good news for this situation: within Clark and Washoe Counties and their jurisdictions, an additional 1,497 affordable units were added to the housing inventory. This is more than twice the number of affordable units that came online in any one year since 2014. Of these new affordable units, 29% (434 units) are considered affordable for households at or below 50% of AMI. So, while the rental unit gap remains significant, if efforts to increase the affordable unit inventory continue to increase, it may be reduced in the years to come.

Other Populations Housing Needs and Gaps Analysis Table	
	Total Households/Units
Total Rental Units	521,930
Rental Units Affordable to HH at 30-50% AMI	31,655
Households with Income 30-50% AMI with one or more housing problems	68,510
Affordable Rental Unit Gap	36,855

QP4 - Additional Characteristics Associated with Instability and Increased Risk of Homelessness

Based on analysis completed to date, there are no other specific characteristics recommended for consideration to determine the priority populations for HOME ARP activities.

Priority Needs for QPs

In reviewing available data for all identified qualifying populations, the following groups appears to have the most severe needs:

- Unsheltered persons experiencing homelessness
- Victims of Domestic Violence
- Households with Income 0-30% AMI with one or more housing problems

As noted, there were nearly 1,000 more unsheltered homeless persons identified across the State during the most recent PIT count than the entire homeless bed count. This represents a highly acute need within the state's housing infrastructure. Likewise, within the DV population, the CoCs across the state are serving more DV victims than there are dedicated beds, especially in the larger urban areas. Lastly, affordable housing units for the lowest income households are a severe need. NHD reports strong progress on the share of newly constructed units built to house this population, but based on current data, the need still outpaces supply nearly 3 to 1. Supportive services of all types are identified as a need across all QPs. Mental health and substance abuse services stand out as priority needs.

HOME ARP Activities

Use of HOME ARP Funding

NHD plans to distribute HOME ARP funding across all HOME ARP eligible activities:

- Rental housing (referred to in this plan as affordable rental housing)
- Supportive services
- Tenant Based Rental Assistance (TBRA)
- Acquisition and development of non-congregate shelter
- Nonprofit operating and capacity building
- Administration and planning

Activity	Amount
Affordable Rental Housing	\$3,989,080
Supportive services	\$644,474
TBRA	\$644,474
Acquisition and development of non-congregate shelter	\$100,000
Nonprofit operating and capacity building assistance	\$100,000
Administration and planning	\$966,711
Total	\$6,444,739

Rationale for Planned Activities

Consultations, public input, and the needs assessment and gaps analysis highlighted gaps in housing, shelter, and services in all parts of the state. HOME ARP resources alone are not sufficient to fill these gaps but offer a powerful tool to expand existing services and leverage other local funding to expand housing opportunities. Additionally, funding for non-profit operating and capacity building provides a unique opportunity to build the capacity of local organizations in underserved communities statewide. The capacity built and knowledge gained in operating HOME ARP projects extends well beyond HOME ARP. Funding non-profit organizations through HOME ARP will increase their overall knowledge of federal funding, thereby increasing their ability to operate other similar programs in the future.

The needs assessment and gaps analysis clearly indicate that there is a lack of affordable housing units statewide for households across all QPs. It is important to note that Clark and Washoe Counties have the greatest identified affordable housing unit gap. Though additional affordable housing is needed in all

parts of the state, the data indicate the TBRA vouchers would improve access to existing housing for lower-income households in the less populated areas of the state where the vacancy rate is higher.

Though the needs assessment identified a need for additional shelter statewide, there has historically been a lack of interest from providers and developers in taking on the high cost of developing shelter. Additionally, NHD does not expect to have funding available to support NCS operations after development. NHD is committing limited funding to NCS but is prepared to increase or decrease the amount based on the applications received through a Notice of Funding Availability (NOFA). The Nevada Citizen Participation Plan (CPP) does not require additional public participation to move funding from one activity to another.

Method for Soliciting Applications

NHD will solicit HOME ARP applications from units of local government, developers, and/or service providers to carry out eligible activities as outlined and prioritized in this plan. Applicants will be asked to leverage additional funding as much as possible to maximize the expansion of housing and services through HOME ARP activities.

A NOFA process will be utilized to distribute all HOME ARP funding. NHD expects to release two NOFAs; one for affordable rental housing and one for all remaining HOME ARP activities (TBRA, NCS, supportive services, nonprofit operating and capacity building assistance). If time and capacity constraints impact the application process, NHD may opt to separate the remaining activities into multiple NOFAs.

All NOFAs will be announced via NHD's interested parties list, web site, CoC's distribution lists and the Nevada Housing Coalition's distribution list.

Administration

NHD will oversee the administration of HOME ARP funding but will not administer activities directly. NHD will enter into written agreements with the entities that will undertake and administer the funded projects.

Housing Production Goals

NHD will support the development of an estimated 23 new rental units with HOME ARP and other housing development funds. The average per unit development cost for qualifying populations is higher in Washoe and Clark counties than in other regions of the state. Though no preference will be given to development of affordable housing units in these counties, NHD is expecting that the majority of affordable rental housing applications will be for the development of affordable rental housing in Washoe and Clark counties. Therefore, the average per unit development cost used in the calculation is higher than the statewide average. The number of units referenced here was derived from the following calculation:

Total amount of HOME ARP funding allocated to jurisdiction	\$6,444,739
Amount of HOME ARP expected to be used for administration and planning	\$966,711
Amount of HOME ARP available for HOME ARP eligible activities	\$5,478,028

Amount of HOME ARP allocated to non-rental housing eligible activities	\$1,388,948
Amount of HOME ARP available for affordable rental housing operations and reserves	\$3,989,080
Estimated amount for ongoing operating costs or operating cost assistance reserve	\$817,816
Amount of HOME ARP available for affordable rental housing development	\$3,171,264
Estimated amount from other housing development funding sources	\$5,000,000
Total amount available for affordable rental housing development	\$3,171,264
Average per unit development cost for qualifying population	\$350,000
Estimated HOME ARP Housing Production Goal	23 units

Preferences & Prioritizations

Preferences

NHD is not establishing preferences or methods of prioritization for HOME ARP activities or projects.

Referral Method

NHD will use chronological waitlists as its referral method for HOME ARP activities and projects.

Limitations

Through the local funding process, NHD may select and fund applications for projects that limit admission to households that qualify under QP3: domestic violence/sexual assault/trafficking. This limitation is identified in response to the results of the needs assessment and gap analysis and was identified through consultation efforts as a preferred use of HOME ARP funding.

As stated earlier, in FY 2021, the NCEDSV reported that 509 requests for shelter through the DV hotline went unmet due to lack of capacity. Additionally, data from the 2022 Housing Inventory Count (HIC) for CoCs across Nevada indicates that there is a significant shortage of dedicated DV beds in the homeless bed inventory with only 332 beds statewide dedicated for people fleeing or attempting to flee domestic violence. Of the 332 statewide beds for DV, 242 of them are emergency shelter specifically. Of the total dedicated DV beds statewide, approximately 40% are in Washoe County, 27.5% are in Clark County and about 22.5% are within the BoS jurisdiction.

Due to the large geographic area served by NHD and the specific needs of domestic violence/sexual assault/trafficking QPs, establishing a preference for this QP would not sufficiently address the need. The significant gap in emergency shelter and housing options for this QP that is further complicated by the legal sex trade in Nevada. As stated earlier, according to the 2018 from the Human Trafficking Initiative, up to 72% of sex providers in Nevada (both regulated and unregulated) may have at least a low risk of being in a trafficking situation, with up to 14% being considered high risk based on multiple indicators (age, race, likelihood of having a “manager”). Consultation meetings and various data sources highlight the immediate safety concerns for this QP when there is a lack of access to shelter beds and

housing solutions. Establishing a limitation for the QP will enable providers specially serving this QP to request funding for projects administered in safe havens and other housing programs where access is limited.

NHD will comply with all applicable Fair Housing and nondiscrimination laws and requirements listed in [24 CFR 5.105\(a\)](#) when referring participants to HOME ARP services.

The remaining HOME ARP projects selected for funding will remain open to all QPs. NHD expects to fund several projects throughout Nevada and the overall HOME ARP program will not exclude any of the four QPs.

Appendix A

NOTICE TO PUBLIC

HOME-American Rescue Plan (ARP) allocation plan

In accordance with 24 CFR 91.115 (3) the State must provide citizens and units of general local government a reasonable opportunity to comment on the HOME-American Rescue Plan (ARP) allocation plan.

The American Rescue Plan (ARP) provides \$5 billion to assist households who are homeless, at risk of homelessness, and other vulnerable populations by providing housing, rental assistance, supportive services, and non-congregate shelter to reduce homelessness and increase housing stability. Funds were appropriated under Title II of Cranston-Gonzalez National Affordable Housing Act of 1990 – HOME Program Statute and allocated via HOME – Program Statute and allocated via HOME Program formula to jurisdictions that qualified for a HOME allocation in FY 2021. As a participating jurisdiction (PJ), Nevada Housing Division received \$6,444,739 in HOME-ARP funds and plans to use the funds for all HOME-ARP eligible activities:

Activity	Amount
Affordable Rental Housing	\$3,989,080
Supportive services	\$644,474
TBRA	\$644,474
Acquisition and development of non-congregate shelter	\$100,000
Nonprofit operating and capacity building assistance	\$100,000
Administration and planning	\$966,711
Total	\$6,444,739

Under the program requirements, an allocation plan must be developed and submitted to HUD for approval. Prior to submission, NHD is required to hold a public comment period of no less than 15 days and one public hearing.

Public Comment Period

Written comments on the draft HOME-ARP allocation plan will be accepted from 9am on Monday, January 23rd, 2023 to 5pm on Friday, February 10th, 2023.

To be considered, comments must be submitted via email to: mwortheythomas@housing.nv.gov

Copies of the draft HOME-ARP allocation plan can be found at:

- Governor's Office of Economic Development offices

Northern Office

808 W Nye Lane
Carson City, NV 89706
Tel.: (775) 687-9900
Fax: (775) 687-9924

Southern Office

555 Washington Avenue, Suite 540
Las Vegas, NV 89102
Tel.: (702) 486-2700
Fax: (702) 486-2701

- Nevada Housing Division (NHD) offices

Northern Office

1830 College Parkway Ste 200
Carson City, NV 89706
Tel.: (775) 687-2240 or (800) 227-4960
Fax: (775) 687-4040

Southern Office

3300 Sahara Ave Ste 300
Las Vegas, NV 89102
Tel.: (702) 486-7220 Toll Free: (888) 486-8775
Fax: (702) 786-7227

Citizens and groups may obtain a reasonable number of free copies of the proposed HOME-American Rescue Plan (ARP) allocation plan by contacting:

Governor's Office of Economic Development:
Rural Community & Economic Development Division
775-687-9919

or

Department of Business & Industry:

Nevada Housing Division
775- 687-2041

All comments or views of citizens received in writing during the 15-day comment period will be considered in preparing the final allocation plan. A summary of these comments or views not accepted and the reasons therefore shall be attached to the final HOME-American Rescue Plan (ARP) allocation plan.

Public Hearing will be held on February 13, 2023, at 4:00 PM

A virtual public hearing will be held on February 13, 2023, via Microsoft Teams. Join on your computer or mobile app. [Click here to join the meeting.](#) Meeting ID: 245 733 703 525 PassCode: 3TTyra or call in (audio only) [+1 775-321-6111,450353676#](#) United States, Reno

Phone Conference ID: 450 353 676#

Nevada Housing Division
3300 W. Sahara Ave., Ste. 300
Las Vegas, NV 89102
702-486-5990

A posting of this NOTICE OF PUBLIC HEARING can also be accessed at <https://housing.nv.gov>

The hearing will be shortened if there is no one to testify or there is minimal response.

If written notice is given at least seven days before a hearing date, the state will provide appropriate materials, equipment, and interpreting services to facilitate the participation of non-English speaking persons and persons with visual and/or hearing impairments. Accommodations for disabled or non-English speaking residents will be made available upon reasonable advance request by contacting Dr. Mae Worthey-Thomas at 702-486-5990.

PUBLIC HEARING AGENDA

1. Call to Order - Dr. Mae Worthey-Thomas, Deputy Administrator
2. Public Comment
3. For Comment and Discussion: HOME-American Rescue Plan (ARP) allocation plan
4. Public Comment
5. Adjournment

This notice has been mailed to persons as provided in NRS 241.020 and NAC 319.971 and has been posted at the following locations: The Division's offices in Carson City and Las Vegas as well as the Division's website, <https://housing.nv.gov>.

ADDITIONAL NOTICES

1. Items may be taken out of order listed on the agenda.
2. Two or more agenda items may be combined for consideration.
3. Items may be removed from the agenda or delayed at any time.
4. Public comment is limited to 2 minutes per person and comments cannot be restricted.

Action may be taken only on those items denoted "for possible action."

This notice and agenda have been posted on or before 9:00 a.m. on the third working day prior to the meeting at the following websites:

State of Nevada Public Notice Website at <http://notice.nv.gov>, and the Nevada Housing Division website at: <https://housing.nv.gov/Resources/Meetings, Notices, Hearings, ActionsEvents/>

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Supporting documents for this meeting may be requested by emailing Shannan Canfield at scanfield@housing.nv.gov or by phone (775) 687-2230 or 1830 E. College Parkway, Suite 200, Carson City, Nevada 89706. The supporting documents are available at either of the Division's offices in Las Vegas or Carson City or on the Division's Internet website. Members of the public may use the remote technology system to hear and observe the meeting by using any of the links above to connect via video conferencing or by telephone. Members of the public will be allowed to provide public comment via video conferencing or telephone at the indicated agenda items.

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

Title

