



City of Las Vegas

HOME-ARP Allocation Plan

Prepared by the Department of Neighborhood Services

Introduction

As part of the 2021 American Rescue Plan Act (ARPA), the City of Las Vegas has been awarded \$8,289,072 of HOME-ARP funds to address the need for homelessness assistance and supportive services for our community's qualifying populations. HUD issued guidance for the utilization of the HOME-ARP funds through CPD-Notice 21-10 on September 13, 2021. HOME-ARP funds are a one-time allocation and must be spent by September 30, 2030.

HOME-ARP funds may be used for the following activities:

1. Planning and administration of the HOME-ARP Program
2. Development of affordable rental housing
3. Tenant-based rental assistance
4. Provision of supportive services
5. Acquisition and development of non-congregate shelter
6. Nonprofit capacity building and operating assistance

HOME-ARP funds must be used to primarily benefit individuals or families in the following qualifying populations:

1. Homeless, as defined in 24 CFR 91.5 *Homeless* (1), (2), or (3)
2. At risk of homelessness, as defined in 24 CFR 91.5 *At risk of homelessness*
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking (as defined by HUD in 24 CFR 5.2003) or human trafficking (as outlined in the Trafficking Victims Protection Act of 2000 as amended [22 USC 7102]); and
4. Other populations, where providing supportive services or assistance under section 212(a) of the National Affordable Housing Act 42 USC 12472(a) would prevent a family's homelessness or serve those with the greatest risk of housing instability.

This plan describes the City's intended use of these funds.

Consultation

Prior to development of the HOME-ARP Allocation Plan, community partners were consulted including the Southern Nevada Homelessness Continuum of Care (SNHCoC), homeless and domestic violence service providers, veterans' groups, public housing agencies, public agencies that address the needs of the qualifying populations, and public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

Consultation Process Summary

The City of Las Vegas collaborated with Clark County to complete the consultation process. The consultations were conducted via virtual meetings, phone interviews, and a survey. The responses received from the consultations are outlined in the following chart.

Organizations Consulted

The organizations consulted before development of this HOME-ARP Allocation Plan are listed in the table below.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<p>Southern Nevada Homelessness Continuum of Care (SNHCoC) Providers in attendance at this meeting include:</p> <ul style="list-style-type: none"> - United Way of Southern Nevada - Catholic Charities - Las Vegas Metro Police - Nevada Partnership for Homeless Youth - Nevada Homeless Alliance - S.A.F.E. Nest - Foresight Housing Partners - City Representatives from Henderson, Las Vegas, North Las Vegas and Boulder City - Southern Nevada Adult Mental Health Services - Southern Nevada Health District - Nevada HAND - Southern Nevada Regional Housing Authority - Veterans Administration - Clark County School District - Workforce Connections - U.S. Vets - Young Adults in Charge - True Beginnings - Destiny Church 	<p>Continuum of Care</p>	<p>Attended SNHCoC virtual meeting on 1/13/2022. Power Point presentation and provided link to survey.</p>	<p>See survey results data below for feedback received.</p>
<p>144 emails were sent to community partners (including Southern Nevada Regional Housing Authority, Silver State Fair Housing, Clark County School District, Metropolitan Police Department, Stakeholders from the City of North Las Vegas, and Henderson).</p>	<p>Public Agencies Homeless, Domestic Violence, and Veteran Service Providers Fair Housing</p>	<p>Email with link to survey</p>	<p>See survey results data below for feedback received.</p>

Help Hope Home Website	Southern Nevada Homelessness Continuum of Care (SNHCoC)	Survey Link on public input landing page	See survey results data below for feedback received.
Southern Nevada Regional Housing Authority (SNVRHA)	Public Housing Authority (PHA)	Virtual Meetings on 3/21/2022 and 7/12/2022.	<p>3/21/2022 -SNVRHA is looking forward to partnering with Clark County and leverage funding to provide affordable housing opportunities for the community. Discussion on various options with project based vouchers (PBV) and talks about jurisdictional set aside funding options.</p> <p>7/12/2022:</p> <ul style="list-style-type: none"> - The PHA confirmed they have applied for PBV and are working with HUD to reassess the voucher formula due to the crisis level needs in Clark County. - Clark County has approximately 2.3 million people and the PHA has 12,500 vouchers, when another jurisdiction with similar population has 46,000 vouchers - The PHA is working on establishing and growing partnerships with landlords and developers - Working on incentive ideas and helping to understand the importance of investing in permanent affordable housing and services. - SNVRHA would like to partner with service providers and large employers to host job fairs. - Providing wrap around services and jobs ultimately will lead to self-sufficiency.
Nevada Equal Rights Commission (NERC)	Civil Rights Agency	Meeting via phone call on 3/21/2022	<ul style="list-style-type: none"> - Highest area of need for the community is access to fair and affordable housing. - NERC is seeing a higher volume of complaints filed by the following populations: disabled, extremely low

			<p>income, immigrant and families of color, female re-entry, single parent, and single woman with children needing a safe place to live.</p> <ul style="list-style-type: none"> - The priorities NERC gave for the HOME-ARP funding are Permanent Supportive Housing, Supportive Services, Affordable housing- new or rehabilitated, Rental Assistance (TBRA) and Non-Congregate Shelters with supportive services. - They also stated that landlords need to be trained on Fair Housing.
Silver State Fair Housing Council	Fair Housing Agency	Meeting via phone call on 3/30/2022	<ul style="list-style-type: none"> - More than anything else we need affordable housing. - Security deposit assistance. - Income source is not a protected class, people with disabilities are being priced out due to the three times rent rule. They are unable to qualify, along with single parent head of households, and people of color. - She would like to see that the three times rule does not apply when a person is being assisted by rental assistance and/or supportive services. - Example given is Veterans Affairs Supportive Housing (VASH) or Department of Mental Health is assisting with rent and services but landlords are refusing to rent to them because their income is not three times rent. - Recently they are seeing more disabled, single parents, and families of color impacted. - Educating landlords on fair housing practices. - If people can get stable housing, they can be successful in other areas like employment and parenting.
Project Real	Civil Rights Agency	Meeting via phone on 4/11/2022	<ul style="list-style-type: none"> - Preventative services overall are lacking in Clark County. - For example, providing basic knowledge of Tenant Rights

			<p>and Responsibilities prevents homelessness</p> <ul style="list-style-type: none"> - Domestic Violence prevention (how to recognize signs of unhealthy relationships etc.) - Domestic Violence three-tier program model (tier 1 Emergency Shelter - tier 2 Long term shelter – tier 3 long term housing/lease to own. - This provider works with youth. He stated multiple times prevention helps with sustainability. - Educate on all types of life skills. - Caseworkers should work with weeklies like Siegel Suites to provide supportive services to residents and work with the landlord to be a better partner in the community.
NHSSN- Neighborhood Housing Services of Southern Nevada	Affordable Housing Developer	Virtual meeting on 4/12/2022	<ul style="list-style-type: none"> - Need units, does not matter how we get them. - Need for 3+ bedroom units. Many families are doubled/tripled up due to shortage of units and high rents. - Municipalities need to involve Non-Profits in decision making because they are the boots on the ground. - Everyone is being impacted. Not just those below 80% area median income (AMI). Those between 80-120 AMI are one incident away from demise.
HELP of Southern Nevada	Homeless Service Provider	Phone interview meeting on 4/13/2022	<ul style="list-style-type: none"> - Lack of affordable housing for those below 50% AMI, if housing is available, it is poor quality housing. - There needs to be a bridge program to transition from transitional housing to permanent.

			<ul style="list-style-type: none"> - They are in a holding pattern due to cost and lack of available units. - There is no Permanent Supportive Housing for Youth. - Youth are in desperate need of Mental Health Services. - This provider is seeing significant increase in youth 16-24 - Of the 150 beds the provider has, 20% meet the definition of chronically homeless. - By addressing the problem sooner, rather than later it would save youth from being chronically homeless adults in the long run. - Mental Health Services are needed for Medication Management and some are so mentally ill, they are not able to live on their own. - Municipalities and other Non-Profits need to work together as partners because we are all here to serve the same people with the same issues. Seems that with the competition for funding in the recent years, it has created a bit of division between the nonprofits. - HELP serves all populations with a wide range of programs for adults, families, and youth. They serve the hardest to serve- Tri-Morbid homeless and Youth. If we are ever going to end homelessness, then we need to get youth before they are the future adult homeless.
Family Promise	Homeless Service provider	Phone interview on 4/13/2022	<ul style="list-style-type: none"> - Affordable Housing is needed, immediately. - Security deposit funding is a huge need. - Under employment is another issue.

			<ul style="list-style-type: none"> - Many families are working full time and do not make enough to pay rent/utilities, childcare etc. - Number one need regarding supportive services is childcare. There is such a delay in the current availability it can take two plus months to process the application and by that time the parent has already lost their job or has been unable to accept work due to the lack of childcare. - There are so many casinos and hotels that have not re-opened since the COVID shut down. These could be rented or bought and used as shelter space - temporary housing. The Casino floors could be used as a resource center with computers and job training. The buffet restaurants can be used as a cafeteria. It's a shame we have space sitting empty with people being homeless on the street, in cars and doubling up due to astronomical rent prices in Clark County. - This agency always serves the same populations- Single Mom, Dad and Grandparent head of household. Single moms are always more impacted.
Catholic Charities of Southern Nevada	Homeless Service provider	Phone interview on 4/13/2022	<ul style="list-style-type: none"> - Permanent supportive housing (PSH) needed - There needs to be buckets for PSH with specialized housing. - They are seeing a lot of inappropriate medical drop-offs (which means in hospital gowns or having medical equipment in hand) - Seniors that are intellectually disabled, mental illness and

			<p>NDOC (Nevada Department of Corrections) needs to have a better re-entry program. They are seeing an increase of parolees that are discharged with no address.</p> <ul style="list-style-type: none"> - Barriers - silos need to be avoided and collaboration is necessary and partnering with other agencies and municipalities. - Clark County not only needs to catch up with the growth, but we also need to move beyond it and plan for future growth. - They are seeing an increase in seniors, and clients deemed to have dementia/Alzheimer's. - Veterans are also a steady stream but noted there are other resources available for Vets.
<p>Las Vegas Habitat for Humanity</p>	<p>Non-Profit assisting low-income individuals into home ownership</p>	<p>Phone interview on 4/13/2022</p>	<ul style="list-style-type: none"> - Affordable Housing and enough services to hit every need with housing. - Subsidy is generational and there are not enough tools for families to be self-sufficient. - There is a need to preserve affordable housing within the community. - Supportive service needs to be more multifaceted not one dimensional, figure out cause and need. Providers need to collaborate and work together to better serve the community. - Habitat needs land donated! - They serve a particular population into home ownership but that is not for everyone. - They felt the biggest impact is on those with less than 30%AMI and they have the least number of available units.

<p>The Shade Tree</p>	<p>Domestic Violence, Sexual Assault, Human Trafficking</p>	<p>Phone interview on 4/13/2022</p>	<ul style="list-style-type: none"> - Affordable Housing! - One of the biggest barriers for their clients is getting approved. They have low income and being victims of domestic violence, they may not have good credit or rental history. - The waiting lists are extensive. The program they offer is 90 days, however the waiting list for permanent housing may be 7-8 months or longer. Which in turn means the "temporary space for immediate safety" isn't available. - Chronic Homeless and those in shelters should qualify first. - Supportive services needed to eliminate barriers are vital, ex. documents, eviction assistance (expungement of evictions), credit repair, and criminal record assistance to remove minor offenses. - This agency is seeing more human trafficking and families. Other homeless are victims of evictions.
<p>JFSA – Jewish Family Service Agency</p>	<p>Homeless Service provider</p>	<p>Phone interview on 4/14/2022</p>	<ul style="list-style-type: none"> - Affordable housing needed - Barriers are having programs that are set up without obstacles. - Having guidelines in place for policies/procedures. Previous funding didn't have this and caused delays. - Agencies are having to do lots of landlord outreach due to stigma and unit prices being so high. - Landlords do not want to accept clients with assistance. - Supportive services gaps/needs. PSH is needed to ensure the clients are not in the same situation in a year or two.

			<ul style="list-style-type: none"> - All Service providers are serving the same clients but are viewed as competitors due to funding being so competitive. - Consider the length of the program. For example, a 12–24-month program may take 6-9 months to set up and staff. - Rent control is needed in Clark County - Pet services, security deposits, furnishings, dishes etc. upon move in; - Landlord education and Fair Housing. - They normally serve single adults (male); however, they are now seeing more families. Food Panty grab and go are seeing more mid -age males (40-late 50's)
Boys and Girls Clubs of Southern Nevada	Supportive Services Provider	Phone interview on 4/14/2022	<ul style="list-style-type: none"> - Affordable Housing number one need. - Lots of issues with overcrowding due to evictions. - Seniors are struggling due to being on a fixed income and having limited resources including mobility issues. - Families with mixed citizen statuses are also having issues. - This provider said they are seeing families in rental housing. Landlord selling unit and family being put in homeless situation due to lack of available units. Way more demand than available units.
East Valley Family Services	Non-Profit Supportive Service provider / Addresses needs of persons with disabilities.	Phone interview on 4/18/2022	<ul style="list-style-type: none"> - Lack of affordable housing. - Housing was already a challenge but now it is impossible. - There are more at risk of homelessness due the market. - Seniors are impacted.

			<ul style="list-style-type: none"> - Working people cannot meet the two and a half times rent requirements to qualify for a unit. - The time it takes to get people housed with current programs. They end up couch surfing or even moving out of state due to not getting housed here. - Services needed are the following: childcare, credit repair, eviction forgiveness, self-sufficiency services and PSH. - Legislation - Rent control; Seniors are being imposed late fees on the 3rd, most seniors receive their checks on that day. So automatically the rent is \$50 higher. - This provider said that seniors are being more impacted. Rent increases are leaving them with less than \$20.
Accessible Space Incorporated- ASI	<p>Affordable Housing Developer and Service provider</p> <p>Addresses needs of persons with disabilities, seniors and veterans.</p>	Phone interview on 4/18/2022	<ul style="list-style-type: none"> - Need more permanent supportive housing - We also need to have the ability to do care for those in PSH. - Supportive services are needed to meet the needs of the community. - Find a way to get low to moderate income people into homeownership. - Those at risk of homelessness have doubled. - Those at 120% AMI at risk of homelessness or 80-120% AMI are one paycheck away from homelessness.
SafeNest	Domestic Violence and Sexual Assault Service provider	Phone interview on 4/18/2022	<ul style="list-style-type: none"> - Clark County needs housing! - Survivors of domestic violence have vouchers but cannot find units. - Clark County needs Shelter Beds for survivors and those fleeing and staff for them.

			<ul style="list-style-type: none"> - Child Care is another gap. The only provider of services for Child Care has a huge backlog. - This provider stated that the Las Vegas metro police department responded to 68,000 domestic violence calls last year and only about 30,000 made it to court. - They are seeing the same mix of clients, however, there are more of them, and the cases are more violent. They are survivors of victimization. - There needs to be more youth counseling services. Some are ending up homeless due to the lack of units.
Salvation Army	Homeless and Veteran service provider Addresses needs of persons with disabilities	Zoom meeting on 4/20/2022	<ul style="list-style-type: none"> - Affordable housing is needed - Alternative housing options: Rapid Rehousing programs clients need more time. Increase allowable rent amounts to reflect the current market. Prepare clients for self-sufficiency with Employment training. Extend the time for assisting to 24 months. - Shelters are overcrowded and in some cases are not an option for the client. - Vocational Services, assistance with obtaining vital documents, childcare, and access to health care. - Shelter services are badly needed. It takes 6-12 months to get through the waiting list for permanent housing. Families are especially impacted. - They are seeing more families, teachers, caregivers for seniors. - The number of first time homeless is unbelievable. These are people who have been self-sufficient and do

			<p>not understand navigating programs or there is a lack of programs for them.</p> <ul style="list-style-type: none"> - High rents and landlords increasing rent causing them to leave the unit.
St. Jude's Ranch	<p>Homeless/Supportive Services Provider</p> <p>Human Trafficking Service Provider</p>	Phone interview on 4/20/2022	<ul style="list-style-type: none"> - Lack of affordable housing for those with jobs. - Services for couples under 18 expecting or with child. - There are 3700 persons/families in need of Housing that are qualifying populations. - There is a need for youth specific PSH. Prevention and community services. Youth are couch surfing or paying for hotel/motel on their own. - Emergency shelter and need bridge housing. - Placement and wrap around services for families in Coordinated Entry que. - Tenant-Based Rental Assistance (TBRA) needs case management. - Barriers are no after care funding. Preventive action needed to prevent re-occurrence of homelessness. - Child care needed for job search. - They are seeing more young families from other states, California and Arizona. Single moms, domestic violence, and family disruption.

<p>Hookers for Jesus</p>	<p>Human Trafficking Service Provider</p>	<p>Phone interview on 4/20/2022</p>	<ul style="list-style-type: none"> - Sex trafficking victims or those at risk need emergency shelter placement and they are full, which means no escape. - Services for families leaving sex trafficking. Often the mom/victim is pregnant or has children/teens. They all need services especially mental health due to the trauma. - They also need childcare services to obtain jobs and/or job training. - Urban League is only agency offering childcare, but the wait list is so long. - They have and are still seeing unusual shifts due to COVID. - They are seeing more exploitation underground and new jobs trafficking are videos. - They see high intake volume during the holidays. - These victims need to be around other survivors for support.
<p>Ovation</p>	<p>Affordable Housing Developer</p> <p>Addresses needs of persons with disabilities with onsite services.</p>	<p>Phone interview on 4/21/2022</p>	<ul style="list-style-type: none"> - Clark County is short 85,000 units for those under 60% AMI. - PSH is the piece to deal with ongoing services and case management. - Programs are needed and they are critical and almost nonexistent for the qualifying populations. - The capital to build these projects is needed because they don't pencil. - Rental subsidy, PBV, or other TBRA would help. - Funding for services and case management. Some may need 24/7 care managers. - There has always been a gap between affordable units and available units. Covid exacerbated it.

			<ul style="list-style-type: none"> - Most seniors are not able to afford Low-Income Housing Tax Credit (LIHTC) rents without a voucher or rental assistance. - The fair market rents (FMR) are too low and do not work with market rate units either. - PHA needs to increase the FMR for the area.
Nevada Partnership for Homeless Youth	Homeless Service Provider	Phone interview on 4/27/2022	<ul style="list-style-type: none"> - Clark County needs to have a diverse housing stock, not a one size fits all. For example, group homes, and townhomes, duplexes for all populations (mental health, youth, and vets). - Severe shortage of mental health services - Residential based services and medical placement. - Clark County needs to have a balanced approach if shelter beds are added, then we need to add permanent beds. - Clients need to have somewhere to go through the process. - They are seeing more young people with heightened mental health issues and drug abuse. - Unaccompanied youth due to family instability, domestic violence fleeing, and overall breakdown of the family.
Veterans Administration - Services	Public Agency/ Veteran's Group Homeless/Supportive Services Provider	Phone interview 5/26/2022	<ul style="list-style-type: none"> - Biggest issue right now is lack of emergency housing, long-term permanent housing, assisted living – aging population with health declining; limited resources to remain safe in their own homes. - The VA is seeing newly homeless that have decent (\$50,000-\$60,000) income but are having to move due to sale or non-lease renewal.

US Vets	Veteran's Group Homeless/Supportive Services Provider	Phone interview 6/9/2022	<ul style="list-style-type: none"> - Housing! Affordable Housing - Permanent Supportive Housing - Service enriched housing. - After-care services - Supportive services needs to be throughout process from shelter to independent living. - This provider is seeing a little bit of everything. First time homeless, young families, but the top two are chronically homeless and mental health issues.
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Summarize feedback received and results of upfront consultation with these entities:

Stakeholders throughout the community emphasized the need for affordable housing, pointing to a large gap between the number of affordable units and the number of people in need of affordable housing. Over the last few years, availability of rental units has become limited and rents have increased.

Several providers described an increase in persons experiencing first time homelessness and those who are newly at-risk of homelessness. One developer commented that Clark County is short 85,000 units for those under 60% area median income. A service provider identified 3,700 persons/families in need of affordable housing that are qualifying populations. A service provider who works with survivors of domestic violence noted that their clients have housing vouchers but cannot find available units. Many service providers described long waiting lists for permanent housing.

Populations identified by stakeholders as having priority needs include persons with disabilities, single parents, chronically homeless, survivors of domestic violence, families with children, survivors of human trafficking, seniors, low-income households, and homeless young adults.

In addition to one-on-one consultations with stakeholders, an anonymous survey was conducted. The survey link was posted on the Help Hope Home landing page for public comment and an email was sent to 144 community partners, including public agencies, service providers, and affordable housing developers. There were 29 responses to the survey.

A summary of the survey participants and responses to unmet needs or gaps in housing or services is listed below.

Population Your Organization Serves	Survey Responses
Homeless	11
At-Risk of Homelessness	4
Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking	3
Other populations where, providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a) would prevent the family's homelessness or would serve those with the greatest risk of housing instability.	9
None of the Above	2
Total Responses	29

Unmet needs or gaps in housing and/or services	Survey Responses
Increase Affordable Housing Units	15
Permanent Supportive Housing	7
Preventative Services	3
Tenant Based Rental Assistance	3
Youth Services	2
Services for Homeless/At-Risk of Homelessness	2
Land Acquisition/Banking	1
Total*	33

*Multiple responses allowed

Additional information provided in the survey responses are listed below and quoted directly from the survey.

- Keeping people in housing is key! We need more affordable housing units. Our units are very limited in our community.
- Conduct a Homelessness Impediments study
- Prioritize developments that are ready to start except for funding.
- A student-body wide survey with 4,500 respondents indicated that within the last year, 12% of the UNLV student body, or approx. 3,600 students, experienced housing insecurity as a barrier that hindered their performance in classes and overall pursuit of degrees. UNLV established the HOPE Scholars Program in 2016 to assist unaccompanied homeless youth and has a proven track record of successfully graduating scholars at rates better than the institution's own averages, but our capacity is outpaced by this reported need. Recognizing that both institutions serve the Las Vegas community and there are many students transferring from one to another or dual enrolled, we have engaged in discussions with CSN about establishing additional supports structures for their students experiencing this challenge as well as the possibility of establishing a clear transfer program for students experiencing (or at risk of) homelessness. To realize this goal, we need the capacity to support the anticipated number of students. We believe a portion of these funds should be used to help fill a major gap in addressing housing insecurity in our community: post-secondary students. The two groups that reported the greatest need at UNLV for housing assistance were juniors (23%) and seniors (25%). There are typically assumptions made about the resources that college students have available to them, but this local data - as well as national data from the HOPE Center for College, Community, and Justice - indicate that college students are struggling with homelessness at shockingly high rates.
- Determining the qualifying areas of need.
- More programs for disabilities
- Training and Mental health programs. People need to know their value and be able to see how to sustain housing or a job, etc.
- Seek ways to leverage HOME ARP funds with other public funding programs like project-based Section 8, Faircloth to RAD, agency service funding for supportive services
- Giving extenuating circumstance consideration
- Value new applicants AND high performing nonprofits.
- Material and labor continue to increase. With standing inventory, nonprofits can acquire rehab and rent to help fill the gap for of affordable housing. We currently own and manager 160 + units of which are scattered throughout the valley dedicated to LMI renters. It works and with the help of partnering nonprofits they can help by integrating supportive services. 2nd funds to develop quickly if nonprofit

has land allocated toward affordable housing. 3rd - equalize the playing field and allow nonprofits first opportunities for donation of land. Purpose over politics

- Funding for transitional living is a desperate need in the LV valley
- Prevention measures can save a LOT of money and make the funds going towards direct & immediate solutions a LOT more equitable.
- Using agencies that have a proven track record.
- recognition of the impact of mental health needs on homelessness
- Life skills program designed to help people emerge from generational poverty.
- With Rental assistance you keep families stable and prevent Homelessness
- Time is of the essence.
- Support and Involve New/Upcoming Developers Like Lake Mead West Apts.
- Let's prioritize the type of housing we have been historically lacking based on need. Flex use for supportive services and flex use for frontline organizational needs.

In both one-on-one consultations and in survey responses, most stakeholders identified the need to increase the number of affordable housing units. The need for supportive services was also frequently discussed to reduce and prevent homelessness. Information obtained from the consultation process has informed the development of the allocation plan.

Public Participation

In accordance with Section V.B of the Notice (page 13), 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.

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

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:

- ***Date(s) of public notice: Monday, February 20, 2023***
- ***Public comment period: Tuesday, February 21, 2023 - Wednesday, March 8, 2023***
- ***Date(s) of public hearing: Wednesday, March 15, 2023***

Describe the public participation process:

On Monday, February 20, 2023 the City publicized the availability of its HOME-ARP Allocation Plan in the Las Vegas Review-Journal media outlet for comment. It described how the public could access the Allocation Plan. In addition, the City uploaded a copy on its website, provided hard copies upon request, and invited the public to submit their written comments to the Department of Neighborhood Services. The Public Review and Comment period will end on Wednesday, March 8, 2023. The City will hold a public hearing at the March 15, 2023 City Council meeting for final adoption of the plan.

Describe efforts to broaden public participation:

Facilities are provided throughout City Hall for convenience of persons with disabilities. For meetings held in the Council Chambers, sound equipment is available for persons with hearing impairments. Reasonable efforts will be made to assist and accommodate persons with disabilities or impairments. If an accommodation is needed to attend and participate in this meeting, the City Clerk's office is contacted and should advise of the need at least 48 hours in advance of the meeting. Dial 7-1-1 for Relay Nevada.

The Public Notice was also available in English and in Spanish.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

No Comments Received

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

Not applicable

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. 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.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	439	138	1485	n/a	61								
Transitional Housing	44	35	715	n/a	282								
Permanent Supportive Housing	393	144	1693	n/a	1542								
Other Permanent Housing	0	0	0	n/a	20								
Sheltered Homeless						529	2249	410	172				
Unsheltered Homeless						14	2853	161	22				
Current Gap										+333	-226	-1209	n/a

Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

1. PIT Count 2022 - https://files.hudexchange.info/reports/published/CoC_PopSub_CoC_NV-500-2022_NV_2022.pdf
2. HIC Count 2022 - https://clarkcountynv-my.sharepoint.com/personal/moorepau_clarkcountynv_gov/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fmoorepau_clarkcountynv_gov%2FDocuments%2F500%20Home%20ARP&ga=1

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

Homeless as defined in 24 CFR 91.5

The Southern Nevada CoC conducted the 2022 PIT Count on February 23, 2022, which identified 5,645 homeless persons in Southern Nevada. Of these persons, 51% were unsheltered and 49% were sheltered. The 2022 data indicates that between 2021 to 2022, the total number of persons experiencing homelessness increased from 5,083 to 5,645 respectively. The majority of homeless individuals surveyed in Southern Nevada, identified as White/Caucasian and were of male gender.

Gender

70.7% of survey respondents identified as male, 28.4% identified as female 0.2% of respondents identified as transgender; and 0.6% identified as gender non-conforming.

Age

In 2022, 88.0% of respondents were adults over the age of 24, 6.0% were between the ages of 18 and 24, and 6.0% were children under the age of 18.

Race and Ethnicity

Most respondents identified their racial group as White/Caucasian (52.0%), and 37.0% identified as Black/African American. The fewest number of respondents identified as American Indian or Alaska Native

(1.7%). 15.0% of respondents identified their ethnic group as Hispanic/Latino. 85.0% of respondents identified their ethnic group as Non-Hispanic/Non-Latino.

In 2022, 90.0% of the homeless population were single adults, 9.0% were families with children, 6.0% were unaccompanied youth, and 10.0% were homeless veterans.

74.0% of survey respondents self-reported at least 1 or more disabling conditions. Of these persons, 36.0% reported a substance abuse problem, 33.0% reported mental illness, 3.0% respondents indicated being victims of domestic violence, and 2.0% of respondents reported experiencing HIV or AIDS related illnesses.

Source: <https://helphopehome.org/wp-content/uploads/2022/07/2022-Census-One-Sheeters-Combined-07-14-2022.pdf>

At Risk of Homelessness as defined in 24 CFR 91.5

For HOME-ARP, HUD defines those at risk of homelessness as individuals and families, who have an income at or below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, and show specific indications of housing instability. The indications of housing instability in HUD’s definition include moving two or more times during the last 60 days due to economic reasons, living in another’s home due to economic hardship, living in overcrowded housing, or exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution). HUD’s at-risk definition also includes families and youth that qualify as homeless under the standard used by the Department of Education. Generally, this definition incorporates households with children that are “doubled up.”

Comprehensive Housing Affordability Strategy (CHAS) data indicates that the City of Las Vegas has 24,625 extremely low-income renter households with incomes at or below 30% AMI. Among these households, 16,965 households have one or more of four severe housing problems reported in the CHAS data. These severe housing problems are incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and a rent cost burden greater than 50%. The table below illustrates the rental housing needs of extremely low-income and very low-income households in the City of Las Vegas.

Housing Needs Inventory and Gap Analysis Table

Non-Homeless		
	Current Inventory	Level of Need
	# of Units	# of Households
Total Rental Units	109,680	
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	5,555	
Rental Units Affordable to HH at 50% AMI (Other Populations)	2,490	
Extremely Low Income (ELI) 0% -30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		16,965
Very Low Income (VLI) 30% -50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		7,220
Total of ELI and VLI with 1 or more severe housing problems		24,185

Source: Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.

https://www.huduser.gov/portal/datasets/cp.html#2006-2019_query

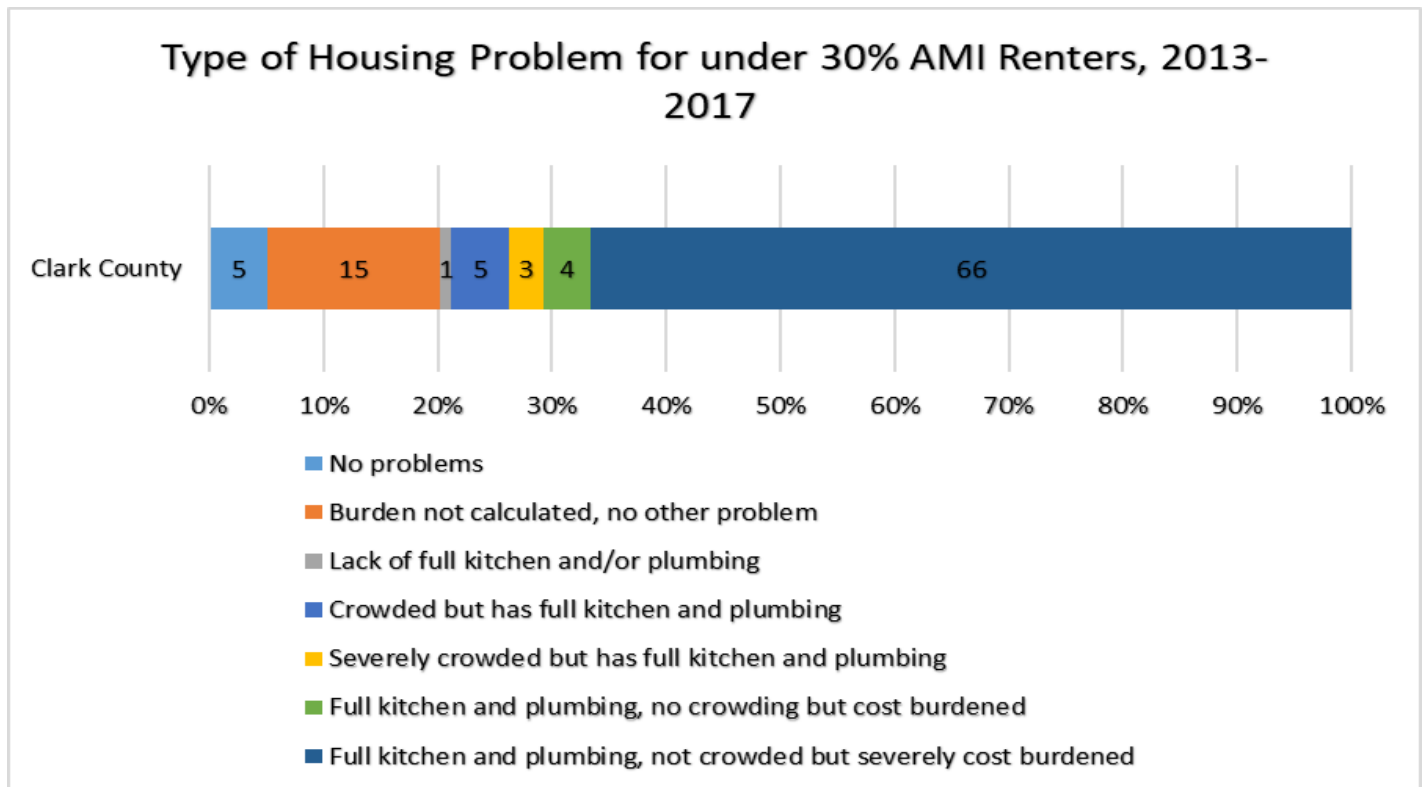
The table below shows that, among City of Las Vegas households with severe cost burden, Black, Indigenous, and Persons of Color (BIPOC) are disproportionately impacted.

Renter Households with severe cost burden, by race and ethnicity

Race/ethnicity	# with severe cost burden	# households	% with severe cost burden
White, non-Hispanic	8,915	44,630	19.98%
Black, non-Hispanic	7,580	21,410	35.40%
Hispanic	7,575	33,070	22.91%
Asian or Pacific Islander, Non-Hispanic	1,225	6,435	19.04%
Native American, non-Hispanic	200	510	39.22%
Other, Non-Hispanic	1,025	3,620	28.31%
Total	26,540	109,675	24.20%

Source: CHAS, 2015-2019; Table includes all HAMFI categories

A 2020 Nevada Housing Division report titled *Overcrowding and Other Problems in Nevada Rental Housing* revealed overcrowding in Clark County among extremely low-income renters accounted for 8% of housing problems. The majority of housing problems among extremely low-income renters was the cost burden of rent as demonstrated in the table below.



Source: <https://housing.nv.gov/uploadedFiles/housingnewnv.gov/Content/Programs/HDB/HDB224OvercrowdingInNevadaHousing20200903.pdf>

An October 2022 strategic plan from Nevada’s Interagency Advisory Council on Homelessness to Housing (ICHH), indicated at least 10,586 homeless students were enrolled in the Clark County School District during

the 2020 – 2021 school year. The majority of homeless children/youth enrolled in Nevada public schools through school year 2018- 2021 were doubled-up households as shown in the table below.

Percentage of homeless children/youth enrolled in public schools by type of primary nighttime residence in Nevada

School Year	Shelters, transitional housing	Doubled-up (e.g., living with another family)	Unsheltered (e.g., cars, parks, campgrounds, temporary trailer, or abandoned building)	Hotels/Motels
2018-2019	5.9%	75.9%	2.3%	15.9%
2019-2020	5.8%	77.7%	1.5%	15.0%
2020-2021	4.4%	80.6%	1.6%	13.4%

Source: U.S. Department of Education's ED Facts Initiative <https://profiles.nche.seiservices.com/StateProfile.aspx?StateID=39>

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The Nevada Coalition to End Domestic & Sexual Violence Statewide Collection Project for 2021, reported that they received a total of 57,721 victim contacts in the calendar year. This mostly comprised of hotline calls, as well as case management & crisis intervention. Of the 31,317 incidents reported, 79% (24,684) were reported as cases of domestic/intimate partner violence.

The contacts were made by a total of 26,966 victims served. Of those 26,966 victims, the reported demographics were 5,188 Caucasian, 2,809 Black, 3,011 Asian and an overwhelming 14, 534 were reported as unknown. Of these victims, there were many special populations reported. 498 LGBTQ, 1,562 Immigrant/Asylum, 3,224 homeless, 1,922 cognitive/physical/mental disabilities and 2,328 limited English proficiency.

Of the 26,966 victims served; 21,619 were residents of Clark County, which is the County for the City of Las Vegas.

The National Human Trafficking Hotline reported that Nevada had 249 signals received from victims or survivors of human trafficking in 2021. With this data, Nevada ranked 14th in the nation for the number of human trafficking cases. There were 201 cases identified, that involved 296 victims. Of the 296 victims, 168 were female and 28 were male.

The National Domestic Violence Hotline received 2,203 contacts from Nevada in 2019. Las Vegas represents 68% of the contact volume and 22% of contacts requested DV shelter services.

As of December 31, 2021, Nevada had reported 3,413 domestic violence misdemeanor in the NICS Indices.

Nevada has historically been in the top five states with the highest number of unsheltered unaccompanied youth. Las Vegas is also a city with one of the highest rates of runaway and trafficked homeless youth.

In conjunction with having one of the highest sex trafficking rates in the country, The National Runaway Safeline (NRS) estimates that 6% to 7% of youth run away from home each year, which equates to 1.5 million children and adolescents annually. NRS's Why They Run report states that youth reported leaving their homes due to sexual and molestation issues, being LGBTQ+, family violence, verbal, physical and other types of

abuse. Many LGBTQ+ youth are “throwaways” being forced out of their homes by family members. It is estimated that 40% of homeless youth are LGBTQ+.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

The first part of the Other Populations category are households who have previously been qualified as “homeless,” are currently housed due to temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. This category includes households currently receiving time-limited rental assistance such as rapid rehousing. City of Las Vegas program data from 2022 indicated 228 households received rapid rehousing, supportive services, and/or rental assistance. The majority of these households will need continued support to prevent homelessness.

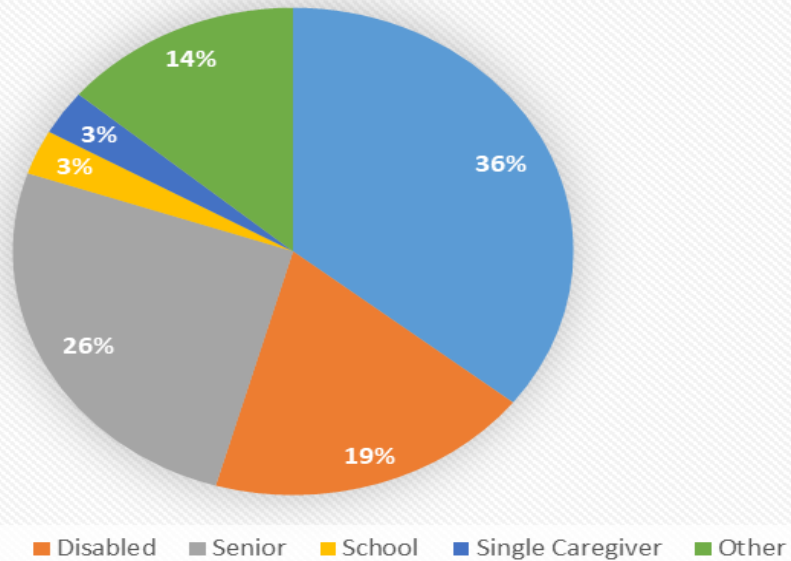
Additionally, the City of Las Vegas Rental Assistance for Tenants Program (RAFT), funded by the U.S. Department of the Treasury Emergency Rental Assistance (ERA), provided assistance to 2,275 households during 2021-2022. The average months of rental assistance provided to each household was 5.74 months. 1,397 of the total households assisted had incomes of less than 30% AMI, which is 61.4% of the households served.

The second part of the Other Populations definition is: a) extremely low-income households paying more than 50% of income for rent, or b) low-income households (income up to 50% AMI) and shows the signs of housing instability identified in the at-risk definition above.

CHAS data indicates that the City of Las Vegas has 16,965 extremely low-income households paying more than 50% of income for rent. When these households are in the midst of housing instability, they qualify for HOME-ARP under the At-Risk definition cited above. This ‘Other’ designation allows them to qualify during periods when they are not experiencing a housing crisis. Additionally, there are 18,320 renter households in the City of Las Vegas with incomes between 30 and 50% AMI, and 7,220 of these households pay more than 50% of income for rent.

The chart below classifies ELI renter households across Nevada into six mutually exclusive categories (in labor force, senior, disabled, single adult caregiver of a child under seven or a person with a disability, and other). The data compiled by the National Low Income Housing Coalition indicates over 80% of ELI renter households fall into three categories, in the labor force, senior, and disabled.

Extremely Low Income Renter Households



Source: 2020 5-Year ACS PUMS <https://nlihc.org/housing-needs-by-state/nevada>

The City has a shortage of rental housing affordable and available to extremely low-income households, with incomes at or below 30% of area median income (AMI). According to CHAS data, many of these households are severely cost burdened, spending more than half of their income on housing. Severely cost burdened ELI households are more likely than other renters to experience housing instability.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

Describe the unmet housing and service needs of qualifying populations :

Homeless as defined in 24 CFR 91.5

Consumer, provider, and key stakeholder feedback — as well as data from the most recent Housing Inventory Counts and Point-in-Time Counts — indicates that the current stock of homeless housing available in Southern Nevada is insufficient to serve the overall homeless population in the region.

As of February 2022, Southern Nevada had a total of 5,645 total homeless persons, of whom 2,778 were sheltered (in emergency shelter or transitional housing) and the remaining 2,867 were unsheltered (living on the streets or in places not meant for human habitation). This represents an 11.1% increase in the homeless population since 2021.

As of October 2022, there were 4,769 total year-round homeless beds in Southern Nevada, of which 1,924 were in emergency shelter, 759 in transitional housing, and 2,086 in permanent supportive housing. This represents a decrease of 1.0% in total homeless beds since 2021, a decrease of 4.2% in emergency shelter beds, a decrease 5.3% in transitional housing beds, and 7.6% in permanent supportive housing beds. The existing stock of homeless housing is insufficient to serve the existing homeless population. Feedback from consumers, from providers, and from key stakeholders all underscore the fact that homeless housing is scarce in the Southern Nevada region, that waiting lists are long, and that too many people remain homeless.

Southern Nevada is currently experiencing a youth homelessness crisis. With one of the highest unemployment rates in the nation and an increasingly severe lack of affordable housing, experts predict that homelessness will only grow in our community as a result of the pandemic. Therefore, it is of the utmost importance that funding be provided to encourage efforts in prevention to save society significant long-term costs by intervening in youths' crises today and connecting them to life-changing services immediately, thereby reducing incarceration rates, chronic adult homelessness, chronic physical and mental illness, substance abuse, crime, and unemployment in the future.

Supportive Services are so important to many youth to address the multiple issues that affect their daily lives such as addictions, mental health challenges, co-occurring disorders, justice involvement, aging out of foster care, being LGBTQ+, a lack of employment skills, and limited education. Until these basic life issues are mitigated, the youth have extreme difficulty focusing on the tasks necessary to improve their education, become employment ready, and maintain employment.

At Risk of Homelessness as defined in 24 CFR 91.5

Extremely low-income households that do not have a housing subsidy are at high risk for housing instability. Nevada faces one of the highest shortages of affordable housing units in the country for extremely low-income renter households. A report titled "The Gap: A Shortage of Affordable Homes" by the National Low Income Housing Coalition, indicated the supply of affordable and available rental homes was 18 for every 100 extremely low-income renter households in Nevada. CHAS data indicates that 16,965 affordable rental units are needed for households at or below 30% AMI with at least one severe housing problem. The high number of extremely low-income households who cannot afford rent and have ongoing housing instability would benefit from affordable housing and supportive service programs that provide assistance to households experiencing a housing crisis. There are not sufficient resources available in the City of Las Vegas to meet the demand, especially with the end of the City of Las Vegas Rental Assistance for Tenants Program, which provided much needed rental and utility assistance to 2,275 households in the City of Las Vegas.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The Nevada Coalition to end Domestic & Sexual Violence reported in 2021, that a total of 2,470 persons were provided a total of 84,846 bed nights. The bed nights were a compilation of shelter beds, emergency hotels & transitional housing placements.

In 2021, the unmet requests for shelter were 215 persons/beds.

The Southern Nevada CoC conducted the 2022 PIT Count on February 23, 2022, which identified 194 homeless adult survivors of Domestic Violence in Southern Nevada. Also reported with the PIT were the total year-round bed counts. There were a total of 18 Emergency Shelter beds for households without children, 150 transitional housing beds for households with children and 0 permanent housing beds for households with only children.

Organizations like SafeNest, which provide safe housing, need more funding to meet demand. SafeNest currently can house only 100 victims, so the non-profit spends about \$30,000 monthly on hotel rooms to keep victims away from abusers.

According to Mary Kay Foundation study in 2012, 74% of domestic abuse survivors report staying with an abuser for economic reasons. Limited capacity also prevents service providers from offering in-house

employment training or legal support. Further supporting the need for vocational and job training service programs, to assist with interview skills and resume building.

Supportive Services & Case Management are so important for youth, as homelessness is a tipping point for many youth to begin trading sex for basic survival items such as semi-safe place to sleep, shower, and wash clothes, food, etc. With a lack of appropriate interventions, male and female youth can get mired in the world of prostitution increasing their risks of HIV infections, sexually transmitted diseases, physical injuries and the start of or increased use of illicit street drugs, etc.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Low-income households impacted during the COVID-19 pandemic facing a housing crisis such as eviction or utility shutoff, were able to access the city's Rental Assistance for Tenants (RAFT) program, available through the American Rescue Plan Act (ARP). The city has expended all of the program funding and many recipients have reached the maximum assistance allowed under ARP.

The Nevada Housing Division 2022 Annual Housing Report indicated that the number of public or subsidized units affordable to households at 50% AMI and below in the City of Las Vegas was just 13% of the existing need for subsidized units. As of December 2022, existing affordable housing units for households at 50% AMI and below in the City of Las Vegas were 6,025. CHAS data indicates 45,125 very low-income households are in need of affordable housing, creating a deficit of 39,100 units. There is not enough affordable housing to meet the need.

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

PIT and HIC data from 2022 show there is a gap in the number of unsheltered homeless adults and homeless housing resources available. The projected gap in the number of beds available for homeless persons was 1,209.

For those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking a gap of around 215 beds was identified based on 2021 data.

A review of the data collected identified a severe shortage of affordable housing in the City of Las Vegas. The majority of extremely low-income renter households in the city are severely cost burdened, which places the households at a higher risk of housing instability. During the consultation process, stakeholders noted that even if other types of assistance were available such as a housing voucher, affordable units were not available.

The city will prioritize affordable housing and supportive services in the allocation of HOME-ARP funds. Based on data reviewed and consultation with stakeholders affordable housing and the supportive services that help maintain housing were consistently the most critical need identified to help reduce homelessness.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Identify priority needs for qualifying populations:

The City has identified two areas as priority needs for qualifying populations.

- Affordable housing, specifically housing that is affordable to those at greatest risk of housing instability.
- Supportive services to assist households to achieve and maintain housing stability.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

In order to determine needs and gaps in the current system, the City reviewed data from recommended resources such as CHAS, PIT and HIC data. The City analyzed the resources available and unmet needs of each of the qualified populations. The areas with the greatest need and fewest resources were prioritized for the allocation of funds.

HOME-ARP Activities

The City of Las Vegas will use HOME-ARP to fund development of affordable rental housing and for supportive services. The city will retain 15% of the funds to pay for administration and planning for the grant.

The City will provide supportive services that are necessary to assist the qualifying populations, prevent homelessness, or to enable qualifying households to obtain and maintain housing.

Supportive Services could include any of the various eligible activities; childcare, education services, job training, financial coaching assistance, housing search & counseling services, costs to locate/obtain/retain housing, certain legal services, life skills training, mental health services, outreach services, substance abuse treatment services, transportation, case management and credit repair.

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The City will advertise a Request for Proposal (RFP) process to seek developers and qualified non-profit organizations to carry out the identified HOME-ARP activities. The application process, conducted through an online application portal, will describe the priorities of the allocation plan. Eligible applications will be reviewed, evaluated, scored and selected by a review committee.

Describe whether the PJ will administer eligible activities directly:

The City will not administer HOME-ARP activities directly. It will make funds available to housing developers and supportive services providers to carry out the planned activities.

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

Not applicable.

In accordance with Section V.C.2. of the Notice (page 4), 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.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,000,000	12%	
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 6,045,712	73%	
Non-Profit Operating	\$ 0	0%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 1,243,360	15%	15%
Total HOME ARP Allocation	\$ 8,289,072		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

Feedback received during the consultation process and a review of local housing data indicates development of affordable rental housing and an increase in supportive services are the highest priorities for use of HOME-ARP funds. Given the present housing situation and high cost of affordable housing development, 73% of the funding will be allocated toward the development of affordable housing units. Supportive services will provide the qualifying populations with supports to prevent homelessness and housing instability. The City will allocate 12% of funds toward supportive services. The City will use 15% of the HOME-ARP allocation to fund administration and planning activities, which will be carried out by city staff.

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:

Housing data shows the City of Las Vegas has a significant number of cost-burdened households and that the greatest gap is for households with incomes at or below 30% AMI. Considering the current shortage of affordable and available homes, many low-income households spend an unsustainable portion of their incomes on housing, placing them at risk of housing instability. The City will use HOME-ARP funds to encourage the development of affordable housing for extremely low-income households who have the most trouble accessing existing affordable housing.

Throughout the consultation process, stakeholders pointed to the need for vulnerable populations to have supportive services available to assist them in accessing and maintaining housing. Providers noted that existing programs were insufficient to address the current need. The City is allocating funds to supportive services, where the funds will be used to address the needs of qualifying populations to achieve housing stability.

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:

The City estimates that the HOME-ARP funds it allocates will produce 15-20 units of affordable rental housing for qualifying populations.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The City expects that HOME-ARP funds will be one source of funding in projects receiving additional types of housing development funds. By leveraging other funding sources, the City anticipates that the projects receiving the City's HOME-ARP funds will create over 40 affordable housing units. The priority need for the City is to increase available affordable housing units for those at greatest risk of housing instability. Development of additional units will help to reduce the gap in available affordable housing units for low-income households and reduce the risk of homelessness.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source.

If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

The City will give preference for HOME-ARP affordable housing units to those at risk of homelessness and other populations with the greatest risk of housing instability.

The City will implement preferences for affordable rental units through its RFP for HOME-ARP funds. Projects that serve the identified populations will be given preference by the City for award of HOME-ARP funds.

The City will not use a preference for supportive services funding.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City of Las Vegas Rental Assistance for Tenants Program (RAFT) funded by the U.S. Department of the Treasury Emergency Rental Assistance program funding; provided rental assistance to 2,275 households during calendar years 2021-2022. The average months of rental assistance provided to each household was 5.74 months. 1,397 of the total household assisted had incomes of less than 30%, which is 61.4% of the households served. This program helped us identify our preference of qualifying populations, because we saw the overwhelming need for affordable housing units for this population. 61.4% of the households served were at 30% or below AMI and the households provided eviction notices, rental arrears statements and late utility statements to document the instable housing situation and risk of homelessness. The City had to close the program application January 2023 due to fully expending program funding, but at the time still had around 300 applications that couldn't be assisted.

HOME-ARP funds provide a unique opportunity to integrate the most vulnerable populations into the broader housing market. Many service providers reported challenges in finding affordable rental units for their clients, as many affordable units are not designed to serve the qualifying populations that the HOME-ARP funds target. The City's use of preferences for affordable rental units, will direct development resources to serve some of the

highest need populations. These are populations who are the most likely to be homeless without targeted resources, and whom HUD identifies as those with an AMI of 30% or below. The CHAS data also indicates 68% of households at or below 30% AMI in the City of Las Vegas are spending over 50% of their monthly income on housing, making them severely cost burdened.

The use of preferences will enable the City to attract developers for viable projects that will address the shortage of affordable units sustainably. To ensure the success of the project each developer will be required to submit a minimum of a fifteen-year pro-forma. The ability to select qualified applicants at or below 30% AMI will support the underwriting process in addition to leveraging HOME-ARP funding with other sources.

The unmet need for homeless services, shelter and housing is certainly highlighted in all the data and community outreach and comments included in our Plan, however the City provides funding to a wide variety of other homeless services in the community and felt the development of affordable rental housing funding would be most successful for other qualifying populations. Some of the City funded homeless programs include:

- Courtyard – The City of Las Vegas Courtyard is a low-barrier safe zone that provides services to a subset of the homeless population needing temporary safe haven and basic services to gain stability. As a low-barrier facility, Courtyard guests are granted entry 365 days-per-year, twenty-four hours per day, without being searched, breathalyzed or scanned by metal detectors.
- Interlocal Agreement (shelter system) – The annual Interlocal Agreement between Clark County, City of Las Vegas, City of Henderson, City of North Las Vegas and Boulder City share the costs of regional homeless responsibilities by providing funding to support year-round emergency shelter operations in Southern Nevada. All local jurisdictions contribute on a population-based formula. These funds support the following homeless service providers: Catholic Charities of Southern Nevada, the Las Vegas Rescue Mission, Well Care, and HopeLink of Southern Nevada.
- Flex Housing/Master Lease – The city of Las Vegas Flexible Housing Program links contracted housing units to clients experiencing homelessness to support the process of achieving individual housing, financial, and employment sustainability. The city has partnered with 3 community partners: Woman’s Development Center, Veterans Village, and Skyline Suites Ferrell to lease a total of 40 rental units. Each unit is fully furnished and move-in kits are provided to each enrolled guest.
- Homeless Prevention– This program is designed to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and divert resident into independent housing to prevent them from entering homeless services systems. Services are provided in the form of housing relocations and stabilization services and short-and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter.
- Non-congregate Shelter – This program is designed to help homeless clients obtain sustainable housing in the community, and to make connections to resources in the community through temporary shelter, case management, and supportive services.
- Operation Home: Rapid Rehousing – Houses high-risk unhoused community members through different pathways to permanent housing utilizing a client-centered, community, collaborative approach.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

HOME-ARP funded affordable housing projects will use a project waiting list specific to the project. The housing provider will be required to follow the outlined City of Las Vegas HOME ARP Allocation Plan preferences and process applications in accordance with these preferences.

The City will require each supportive service project to maintain a wait list to access project services. All qualifying individuals/families will have access to apply for placement on the waiting list for an activity or project.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

N/A

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

N/A

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

N/A

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City does not intend to limit eligibility for HOME-ARP projects.

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.

The City does not intend to utilize HOME-ARP funds to refinance existing debt.

Citations

PIT Count 2022 - https://files.hudexchange.info/reports/published/CoC_PopSub_CoC_NV-500-2022_NV_2022.pdf

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HUD CHAS Query Tool. Consolidated Planning/CHAS Data. Retrieved from <https://www.huduser.gov/portal/datasets/cp.html>

Homeless Point in Time Count. <https://helphomehome.org/wp-content/uploads/2022/07/2022-Census-One-Sheeters-Combined-07-14-2022.pdf>

Overcrowding and Other Problems in Nevada Rental Housing. <https://housing.nv.gov/uploadedFiles/housingnewnv.gov/Content/Programs/HDB/HDB224OvercrowdingInNevadaHousing20200903.pdf>

Nevada Interagency Council on Homelessness to Housing Strategic Plan <https://dwss.nv.gov/uploadedFiles/dwssnv.gov/content/Energy/NV%20ICHH%202022%20Strategic%20Plan.pdf>

U.S. Department of Education's EDFacts Initiative <https://profiles.nche.seiservices.com/StateProfile.aspx?StateID=39>

Nevada Housing Division, Housing Database. 2022 Annual Housing Report. https://housing.nv.gov/Programs/Housing_Database/

National Coalition Against Domestic Violence <https://ncadv.org/>

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