



**Washoe County HOME Consortium**  
City of Reno • City of Sparks • Washoe County

**HOME Investment Partnerships  
Program – American Rescue Plan  
(HOME-ARP)  
Allocation Plan**

**Presented To:**  
U.S. Department of Housing and Urban Development (HUD)

**Prepared By:**  
City of Reno, Housing and Neighborhood Development Department

**Substantial Amendment to the 2021 Annual Action Plan**

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## Consultation

### ***Describe the consultation process including methods used and dates of consultation:***

Prior to each one on one consultation, each participant was sent information on HOME-ARP via email. The information included the allowable uses for HOME-ARP funds, the qualifying populations (QPs,) and the amount of funding allocated to the region. The email with the information about the HOME-ARP consultation also included a link to the HUD guidance published on HOME-ARP. All of the consultations were conducted via virtual meetings. The responses received from the consultations are outline in the following chart.

### ***List the organizations consulted:***

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Northern Nevada Continuum of Care Leadership Council	CoC Governing Board	Virtual Meeting (6/7/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing units for those experiencing homelessness</li> </ul>
Reno Housing Authority	Public Housing Authority	Virtual Meeting (6/9/2022)	<ul style="list-style-type: none"> <li>• Supportive housing with case management</li> <li>• Programs that target transition age youth who are homeless</li> </ul>
City of Sparks	Public Agency	Virtual Meeting (6/13/2022)	<ul style="list-style-type: none"> <li>• Tenant based rental assistance</li> <li>• Targeted assistance for people with serious mental illness and co-occurring disorders</li> </ul>
Reno Initiative for Shelter and Equality	Homeless Service Provider	Virtual Meeting (6/15/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing inventory</li> <li>• Create non-congregate shelter opportunity</li> <li>• Supportive services</li> <li>• Target victims of DV</li> </ul>
Awaken	Domestic Violence/ Human Trafficking	Virtual Meeting (6/15/2022)	<ul style="list-style-type: none"> <li>• Tenant based rental assistance for people fleeing domestic violence or human trafficking</li> </ul>
Washoe County	Public Agency/ Homeless Service Provider	Virtual Meeting (6/16/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing inventory</li> </ul>

			<ul style="list-style-type: none"> <li>• Increase supportive housing, and permanent supportive housing beds</li> <li>• Target assistance towards those experiencing homelessness</li> </ul>
<b>Safe Embrace</b>	Domestic Violence	Virtual Meeting (6/16/2022)	<ul style="list-style-type: none"> <li>• Tenant based rental assistance for people fleeing domestic violence</li> </ul>
<b>United Health Care</b>	Managed Care Organization	Virtual Meeting (6/27/2022)	<ul style="list-style-type: none"> <li>• Increase homeless prevention services</li> <li>• Tenant based rental assistance</li> <li>• Supportive services for domestic violence survivors</li> </ul>
<b>Volunteers of America</b>	Homeless Service Provider	Virtual Meeting (6/27/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing units, or rehab of existing units</li> <li>• Target assistance to those experiencing homelessness</li> </ul>
<b>Catholic Charities</b>	Homeless Service Provider	Virtual Meeting (6/27/2022)	<ul style="list-style-type: none"> <li>• Tenant based rental assistance and supportive services for those at risk of homelessness</li> </ul>
<b>Children’s Cabinet</b>	Homeless Service Provider	Virtual Meeting (6/27/2022)	<ul style="list-style-type: none"> <li>• Tenant based rental assistance and supportive services for families at risk of homelessness</li> </ul>
<b>Veteran’s Affairs</b>	Veteran’s Group/ Homeless Service Provider	Virtual Meeting (6/29/2022)	<ul style="list-style-type: none"> <li>• Increase emergency shelter options for those with medical needs</li> <li>• Increase rental and deposit assistance</li> <li>• Increase affordable housing units for community benefit</li> </ul>
<b>The Eddy House</b>	Homeless Service Provider for Youth	Virtual Meeting (6/30/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing</li> <li>• Increase transitional housing options for youth</li> </ul>

			<ul style="list-style-type: none"> <li>• Target assistance towards youth, and those with mental health issues</li> </ul>
<b>Nevada Department of Health and Human Services</b>	Homeless Service Provider/Public Mental Health	Virtual Meeting (7/11/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing units</li> <li>• Increase supportive services for people who are homeless and with mental illness</li> <li>• Increase mental health supportive services</li> </ul>
<b>Silver State Fair Housing</b>	Fair Housing/Civil Rights	Virtual Meeting (7/12/2022)	<ul style="list-style-type: none"> <li>• Create non-congregate shelter</li> <li>• Increase affordable housing units</li> <li>• Supportive services for people experiencing homelessness</li> </ul>
<b>Northern Nevada Community Housing</b>	Affordable Housing Developer	Virtual Meeting (7/13/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing units in the area</li> <li>• Rehab to improve existing affordable units</li> </ul>
<b>Nevada Housing Division</b>	State Public Housing Authority	Virtual Meeting (7/13/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing units</li> <li>• Target assistance to those experiencing homelessness</li> </ul>
<b>Regional Alliance to End Homelessness</b>	CoC Stakeholder Group	Virtual Meeting (7/14/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing</li> <li>• Increase shelter options</li> <li>• Increase supportive services for people experiencing homelessness</li> <li>• Tenant based rental assistance</li> </ul>
<b>Community Services Agency</b>	Affordable Housing Developer/ Supportive Service Provider	Virtual Meeting (7/18/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing units</li> <li>• Provide supportive services for people at risk of homelessness</li> </ul>
<b>Northern Nevada Center for Independent Living</b>	Advocacy Agency for People with Disabilities	Virtual Meeting (7/19/2022)	<ul style="list-style-type: none"> <li>• Supportive services for people with disabilities who are homeless or at risk</li> </ul>

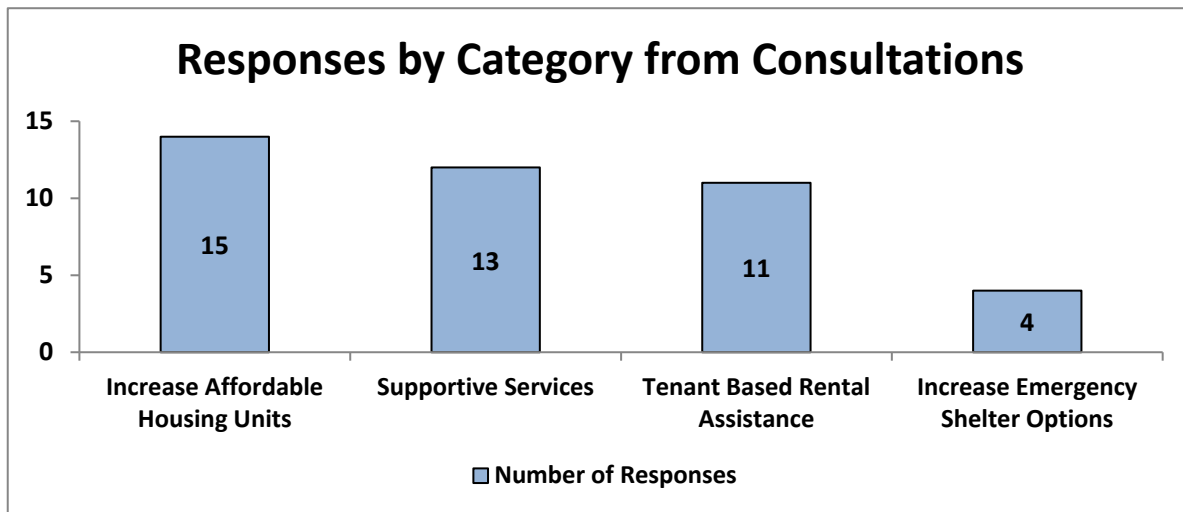
			<ul style="list-style-type: none"> <li>• Increase affordable housing units</li> <li>• Tenant based rental assistance</li> </ul>
<b>Nevada Disability Advocacy and Law Center</b>	Advocacy Agency for People with Disabilities/Fair Housing/Civil Rights	Virtual Meeting (7/19/2022)	<ul style="list-style-type: none"> <li>• Tenant based rental assistance</li> <li>• Target assistance towards transition aged youth at risk of homelessness</li> </ul>
<b>Northern Nevada HOPES</b>	Homeless Service Provider/ Healthcare Provider	Virtual Meeting (7/20/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing units</li> <li>• Supportive services for people addiction and mental health issues</li> </ul>
<b>American Civil Liberties Union (Reno Chapter)</b>	Advocacy Agency for Civil Rights	Virtual Meeting (7/20/2022)	<ul style="list-style-type: none"> <li>• Increase affordable housing units for people with little to no income</li> <li>• Target services towards people experiencing homelessness, and youth experiencing homelessness</li> </ul>
<b>Washoe Legal Services</b>	Advocacy Agency for People with Disabilities/Fair Housing/Civil Rights	Virtual Meeting (7/21/2022)	<ul style="list-style-type: none"> <li>• Tenant based rental assistance</li> <li>• Supportive services – legal support to prevent homelessness, or allow for a person to obtain housing</li> </ul>

**Summarize feedback received and results of upfront consultation with these entities:**

Enter narrative response here.

Regionally, HOME funds are administered by the Washoe County HOME Consortium (WCHC), which is comprised of the City of Reno, the City of Sparks and Washoe County. The WCHC has a Technical Review Committee (TRC) that includes staff from the three jurisdictions and other regional planning bodies. The TRC meets monthly, and acts as an advisory committee to the WCHC directors who are the Managers of the three respective jurisdictions. The WCHC receives an annual allocation of HOME funds, which are allocated through a competitive process for affordable housing projects. On May 10, 2022, the WCHC heard a presentation on HOME-ARP, the eligible uses for the funds, and the qualifying populations the funds are designed to serve. The WCHC gave their blessing to move forward with pursuing the funds, and from there the consultation process began.

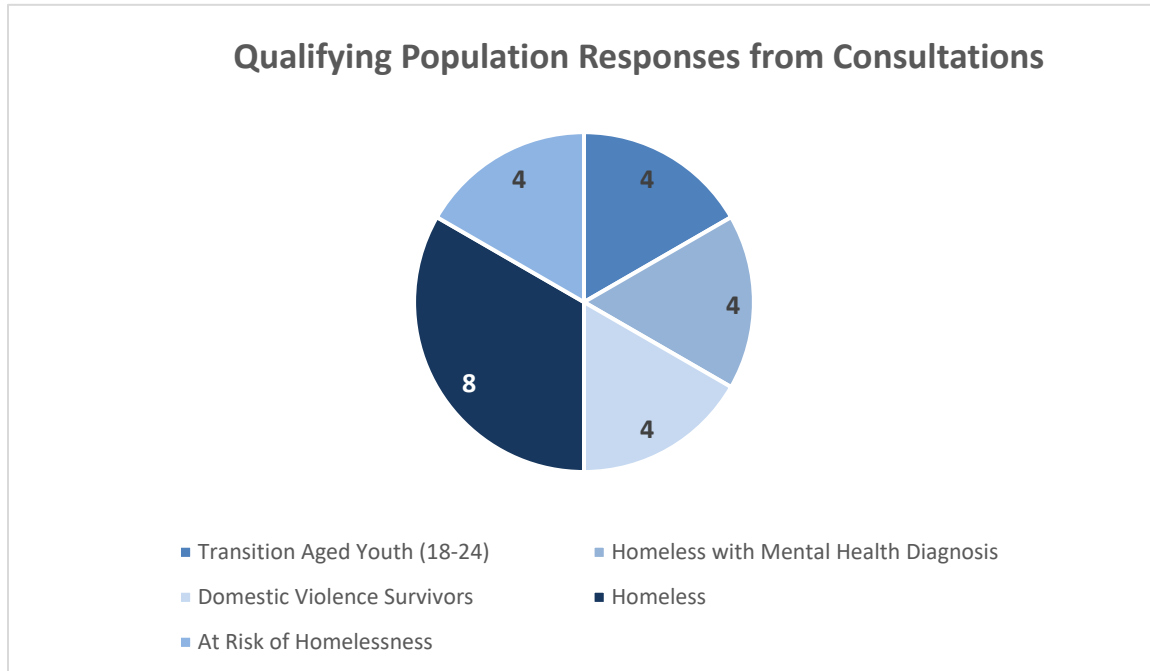
The Northern Nevada Continuum of Care Leadership Council (NNCLC) is the governing board for the regional Continuum of Care (CoC.) The NNCLC heard a presentation on HOME-ARP on June 7, 2022. The NNCLC has representation from homeless service providers, the three local jurisdictions covering the CoC’s geographic area (City of Reno, City of Sparks, and Washoe County,) Veteran service providers, emergency shelter providers, domestic violence providers, the local housing authority, and private non-profit service providers. Not all NNCLC members provided feedback during the meeting; one member did state there is a need for increased affordable housing units, which is reflected in the consultation summary. After meeting with the NNCLC as a group, one on one consultations were scheduled with NNCLC members as well as other community stakeholders.



Many stakeholders acknowledged the need to increase the number of affordable housing units in the region. Most stakeholders stated increasing affordable housing stock should be the highest priority for the HOME-ARP funds. Many stakeholders indicated supportive services are a key factor to a successful housing placement, especially when an individual or family is exiting homelessness. A number of stakeholders also expressed the need for tenant based rental assistance (TBRA). The majority of people who advocated for rental assistance funding believed supportive services should be funded in conjunction with the rental assistance, in order to have a more lasting impact. While increasing emergency shelter options did receive some support, it had the lowest response rate of the four categories.

The one on one consultations weighed heavily in the decision-making process around HOME-ARP. Social service and homeless service providers are on the front lines in terms of seeing the needs of those they serve. Service providers are able to articulate the needs of their clientele, and are very aware of gaps in the local service delivery system. Their input was very valuable to the creation of this Allocation Plan.

During the one on one consultations, many of the providers consulted advocated for services for a specific sub-population. Some providers advocated for the sub-population they work with directly, while others advocated for sub-populations where they see a gap in services. Out of the qualifying populations for HOME-ARP, the majority of those consulted said that funds should be allocated for services for people experiencing homelessness. A common thread throughout the consultations was that the HOME-ARP funds provide an opportunity to provide additional services that will help people exit homelessness.



As part of the consultation process, an Information and Q&A session on HOME-ARP was held on August 11, 2022. During the Information and Q&A session, potential HOME-ARP project applicants were able to ask questions about the eligible uses for HOME-ARP funds, as well as how the local funding process will take place. The Session was available both virtually and in person. Attendees provided feedback on how HOME-ARP could have the most lasting impact. Service providers noted that the amount of funding the region is set to receive could fund supportive services for multiple years. The attendees also noted that the amount of funding the region is set to receive would require layers of funding for an affordable housing project to be feasible. Based on the feedback from Information and Q&A session, the percentage of funding allocated to supportive services in this plan was increased.

**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.

**Template:**

***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: 8/18/2022***
- ***Public comment period: start date – 8/18/2022 end date – 9/3/2022***
- ***Date(s) of public hearing: 8/30/2022***

***Describe the public participation process:***

The Public Notice appeared in the Reno Gazette journal, the local newspaper covering the Reno/Sparks/Washoe County area, from 8/18/2022 to 9/3/2022. The public notice explained the amount of funding the region received, and the eligible funding categories for HOME-ARP. The Public Notice also explained that the Allocation Plan can be found on the City of Reno’s website [www.reno.gov](http://www.reno.gov), and any public comment could be submitted in writing, or via phone. The Public Notice also provided the date, time, and location for the Public Hearing that was scheduled for August 30, 2022.

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

In addition to the Public Notice, information on HOME-ARP, including eligible uses, qualifying populations, and the amount of funding allocated, was presented at the WCHC TRC meetings on May 10, 2022 and June 14, 2022 both of which are public meetings with public notice given. Information on HOME-ARP was presented at the Continuum of Care (CoC) Governing Board meeting on June 7, 2022, and the CoC Stakeholder meeting on July 14, 2022, both CoC

meetings are open to the public. A Public Hearing was held on August 30, 2022, which had zero attendance.

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

No written comments were received during the public comment period, and there were no attendees to the public hearing on August 30, 2022.

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

No comments or recommendations were not accepted.

## 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.

### Template:

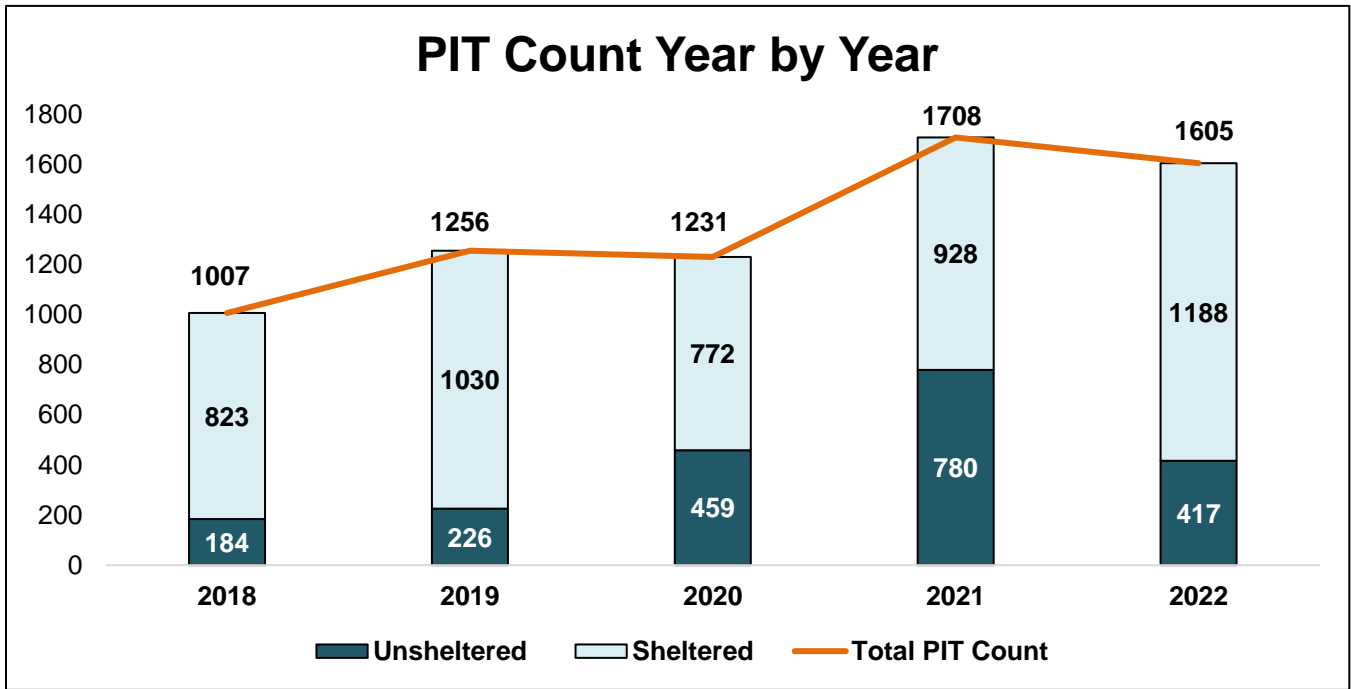
#### OPTIONAL Homeless Needs Inventory and Gap Analysis Table

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	163	-	805	-	49								
Transitional Housing	-	-	249	-	80								
Permanent Supportive Housing	25	-	205	-	273								
Other Permanent Housing	40	-	53	-	48								
Sheltered Homeless						239	785	137	37				
Unsheltered Homeless						6	391	20	-				
<i>Current Gap</i>										-17	-	+136	

**Suggested Data Sources:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation  
***Describe the size and demographic composition of qualifying populations within the PJ's boundaries:***

**Homeless as defined in 24 CFR 91.5**

The Northern Nevada Continuum of Care conducted the annual Point in Time (PIT) on February 24, 2022. As the following chart shows, the overall number of people experiencing homelessness decreased from 2021 to 2022. In 2022, the region saw a large decrease in the number of people experiencing unsheltered homelessness from 780 in 2021 to 417 in 2022. This decrease coincided with the region’s emergency shelter bed expansion from 755 in 2021 to 1017 in 2022. The total number of people experiencing homelessness in the CoC for 2022 is 1,605.



**At Risk of Homelessness as defined in 24 CFR 91.5**

As part of the COVID-19 pandemic response, the region focused on rental and deposit assistance to help those individuals and families who are at risk of homelessness attain or maintain their housing. From July 1, 2021 – June 30, 2022 4,707 unique households received assistance with rent, and 330 unique households received assistance with a security deposit from the City of Reno.

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

From July 1, 2021 to June 30, 2022 Safe Embrace, a domestic violence survivor service provider in the region, served 576 individuals (adults and children) through their case management and housing programs. Of the total, 43 families were served through their Emergency Shelter, Rapid Rehousing, and Transitional Housing programs, and as of July 2022, they had 11 individuals on their emergency shelter waitlist.

The Domestic Violence Resource Center (DVRC) is another agency providing Emergency Shelter and Transitional Housing to individuals and families fleeing domestic violence. They served 240 individuals and families from January 1, 2021 to December 31, 2021. DVRC reported they were not maintaining a waitlist as of July, 2022.

In addition to the services provided by Safe Embrace and DVRC, Awaken, an agency primarily serving those who are fleeing from human trafficking, served a total of 113 adults and 64 youth from January 1, 2021 to December 31, 2021 with case management and/or housing services. Awaken reported they did not have anyone on their waitlist as of July 2022.

***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***

HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% of AMI and are experiencing severe cost burden or have an income less than 50% of AMI and meet a certain condition, like living in someone else’s home or living in a motel due to an economic hardship. According to data gathered from the Comprehensive Housing Affordability Strategy (CHAS) from 2014-2018, 9% of households in Washoe County are at or below 30% HUD Area Median Family Income (HAMFI), 10% are between 30% and 50% HAMFI, and 15% are between 50% and 80% HAMFI. This means that 34% of households in Washoe County are at or below 80% HAMFI, and would qualify for a housing subsidy. It is also important to take into account that this data was calculated prior to the COVID-19 pandemic, which lead many households to face unplanned economic hardship. The following chart shows the household income distribution by owners and renters for Washoe County.

Income Distribution Overview	Owner	Renter	Total
Household Income <=30% HAMFI	4,960	11,395	16,355
Household Income >30% to <=50% HAMFI	6,945	11,535	18,480
Household Income >50% to <=80% HAMFI	11,305	15,220	26,525
Household Income >80% to <=100% HAMFI	9,935	9,090	19,025
Household Income >100% HAMFI	69,945	27,300	97,245
<b>Total</b>	<b>103,090</b>	<b>74,540</b>	<b>177,630</b>
*Source 2014-2018 Comprehensive Housing Affordability Strategy, HUD Office of Policy Development and Research			

The CHAS provides data on household cost burden in a geographic area. To be considered sustainable, a household should not spend more than 30% of their monthly income on housing. While this is not always realistic given the cost of living in an area, it is important to

note that the higher the cost burden, the more likely a household is to become unstably housed or even homeless. According to the CHAS 42% of households in Washoe County are renters. Of those 19% of households are spending over 50% their monthly income on housing, and another 24% are spending between 30% and 50% of their monthly income on housing. This means that of households renting in Washoe County at least 43% face a cost burden for their housing, leading to a greater risk of housing instability. The following chart shows the cost burden by household are median income for Washoe County.

Housing Cost Burden Overview	Owner	Renter	Total
<b>Cost Burden &lt;=30%</b>	79,040	41,330	120,370
<b>Cost Burden &gt;30% to &lt;=50%</b>	13,875	17,600	31,475
<b>Cost Burden &gt;50%</b>	9,495	14,230	23,725
<b>Cost Burden Not Available</b>	685	1,380	2,065
<b>Total</b>	103,090	74,540	177,630

\*Source 2014-2018 Comprehensive Housing Affordability Strategy, HUD Office of Policy Development and Research

Additionally, of households at or below 30% HAMFI, 70% faced a cost burden for housing of over 50% of their monthly income. 38% of households between 30% and 50% HAMFI faced a cost burden of over 50%. While 15% of households between 50% and 80% HAMFI faced a cost burden of over 50%. Meaning those in the region with the lowest monthly incomes also faced the highest cost burden. While this may seem logical, that the less you make the more of your income you are also spending on housing, it also says that many people in the region would benefit from a housing subsidy, and are at high risk for homelessness and housing instability. The following chart shows the household income and those with a cost burden of 30% or greater and 50% or greater in Washoe County.

Income by Cost Burden (Owners and Renters)	Cost Burden > 30%	Cost Burden >50%	Total
<b>Household Income &lt;=30% HAMFI</b>	12,660	10,955	16,355
<b>Household Income &gt;30% to &lt;=50% HAMFI</b>	14,355	7,110	18,480
<b>Household Income &gt;50% to &lt;=80% HAMFI</b>	14,035	3,905	26,525
<b>Household Income &gt;80% to &lt;=100% HAMFI</b>	5,865	720	19,025
<b>Household Income &gt;100% HAMFI</b>	8,280	1,035	97,245
<b>Total</b>	55,195	23,725	177,630

\*Source 2014-2018 Comprehensive Housing Affordability Strategy, HUD Office of Policy Development and Research

In addition to the data tracked in the PIT and HIC, the CoC also tracks the number of individuals and families living in motels. Living in a motel is defined by HUD as being at great risk for housing instability. Often case managers in the region report that their clients will live in motels

part of the month, and spend the rest of the month in a shelter or on the streets when they can no longer afford the motel. On February 24, 2022 there were 2,302 individuals and families identified as living in motels in Washoe County. Of those 1,279 identified as “long term residents” meaning they have lived there for one year or longer. Of the population, living in motels 33% were seniors, and 5% were under the age of 18.

***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):***

Enter narrative response here.

***Describe the unmet housing and service needs of qualifying populations:***

***Homeless as defined in 24 CFR 91.5***

As the regional PIT and HIC data show, while the number of people experiencing unsheltered homelessness decreased from 2021 to 2022, regionally there are 417 people experiencing unsheltered homelessness. The night of the PIT count the region’s emergency shelters were nearly all at capacity, leading to the observed need of more emergency shelter beds and housing options. The total number of emergency shelter beds includes all emergency shelter beds in the region. The largest shelter in the region, the Nevada CARES Campus, maintains a standard of low barrier to entry, and does not deny entry to any person over the age of 18. There are also emergency shelters designed to serve sub-populations. OUR Place emergency shelter serves women and families, the Eddy House emergency shelter serves transition aged youth (18-24,) and Safe Embrace’s emergency shelter serves victims of domestic violence.

The PIT data also shows that as the region’s beds for Rapid Rehousing increased, the overall number of people experiencing homelessness decreased. It is notable that during the consultation process many of the providers said that the region has a great need for rental assistance as well as supportive services, much like a Rapid Rehousing model. Ultimately, the solution to homelessness is housing, and without an increase in affordable units, the progress made to decrease the homeless population will remain stagnant. Increasing the number of affordable housing units will provide the needed subsidy for those experiencing homelessness to exit homelessness, and have an impact on the overall housing crisis in Washoe County as many of the service providers stated during the consultation process.

***At Risk of Homelessness as defined in 24 CFR 91.5***

The one on one consultations showed that many service providers in the region area are aiming to fill the need for rental assistance as well as supportive services with the goal of helping those who are at risk of homelessness, prevent eventual homelessness. In 2020, The American Community Survey reported the vacancy rate for rental units in Washoe County

at 4.6%. However, this data does not reflect the impact felt from the COVID-19 pandemic, and many service providers reported in their consultations that finding a rental unit for their clients has been more difficult than ever. Often as soon as a unit becomes available, there are people waiting in line for it. According to the Johnson, Perkins and Griffin 4<sup>th</sup> Quarter 2021 Apartment Survey the average rent in Reno-Sparks increased 13.5% from the same quarter the previous year. At a time when many people were facing economic hardships and unemployment, rents kept climbing.

Competition for units has been high, and many property owners are not willing to work with a client exiting homelessness, especially if they have a checkered rental history. While rental assistance and increased subsidies will help in the short term to assist those at risk of homelessness, the lack of affordable rental units has a lasting impact. To see a significant impact in Washoe County's rental market, there will need to be an increase in the number of affordable housing units.

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

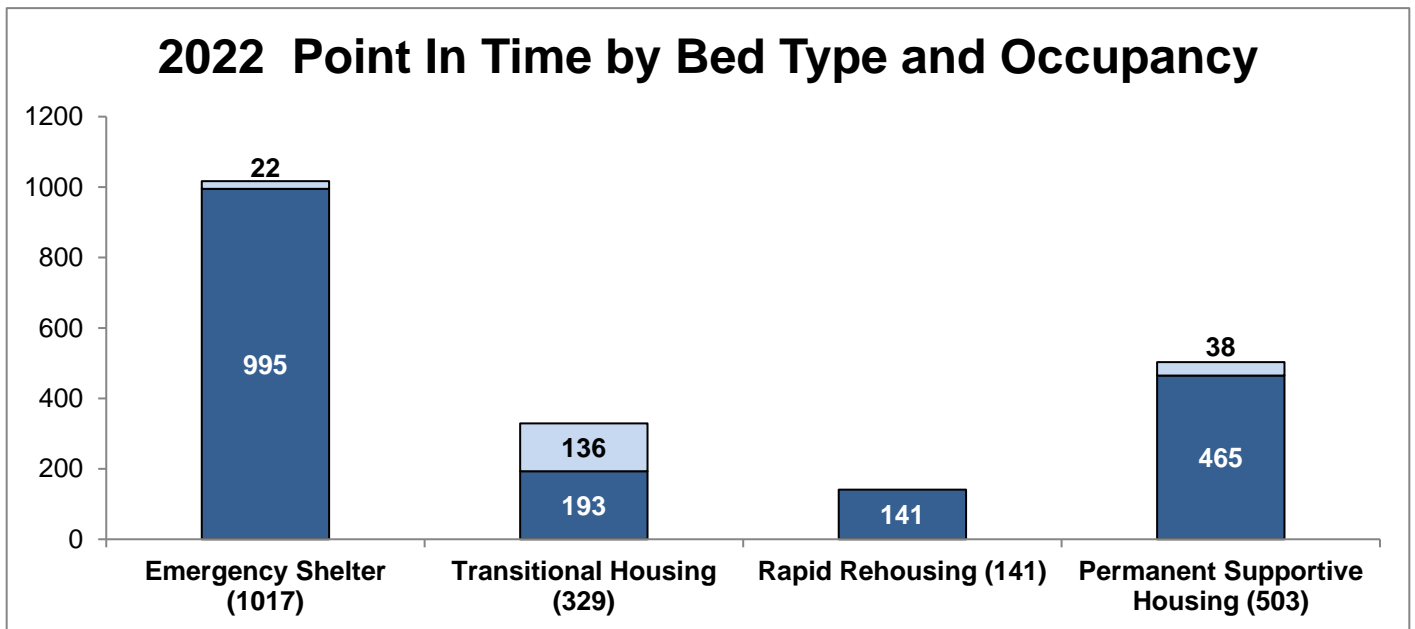
During the consultation process, the two domestic violence providers acknowledged the need for rental assistance along with supportive services. Many of the clients they see are looking for help to gain independence, maybe for the first time. They will need ongoing support through case management, as well as financial assistance for varied lengths of time. It is nearly impossible to predict what a potential client's financial situation will be when they become a client of a domestic service provider, and often finances are the reason a person will stay in a violent situation. Having more services available to those fleeing domestic or partner violence would help serve those in need in the region.

***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***

As of July 2022, there were 5,436 unique households on the Reno Housing Authority waitlist for voucher programs, and public housing units. As of July 2022, the Reno Housing Authority was assisting 3,268 unique households with housing subsidies. Much like those who are at risk of homelessness, those at greatest risk of housing instability are in need of housing subsidies to prevent instability and homelessness. In Washoe County 70% of households were at 30% HAMFI or below were severely cost burdened by their housing costs spending 50% or more of their monthly income on housing. Overall, the region needs more subsidies, and an increase in subsidized units, to combat rising rental prices and instability for the lowest income residents.

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

The PIT and HIC data showed that the overall number of people experiencing homelessness went down by 10% from 2021 to 2022. At the same time there were beds not utilized the night of the PIT. The following chart outlines the bed usage on the night of the PIT/HIC. While Emergency Shelter, Rapid Rehousing, and Permanent Supportive Housing beds all had relatively high utilization, the Transitional Housing beds did not. Transitional Housing in the region has typically had barriers to entry such as mandated sobriety, or has served a sub-population such as transition-aged youth. This data shows that while Transitional Housing programs may offer beneficial services, the beds are underutilized. Regionally, there are 417 people identified as unsheltered who are in need of housing. While more shelter beds would help alleviate the number of people experiencing unsheltered homelessness, ultimately the community needs more affordable housing units to help end homelessness.



During the consultation process, many agencies mentioned the lack of funding for supportive services to go along with housing assistance. While the financial assistance for housing is very important, many individuals and families at risk of homelessness, or exiting homelessness benefit from case management in order to maintain stability. The lack of funding for supportive services is a factor many noted has been lacking in the community.

The Nevada Housing Division produces the Annual Housing Progress Report (AHPR,) which reports on affordable housing data both regionally and statewide. The 2021 report estimated Washoe County has a need for 40,630 affordable housing units, while only 8,455 subsidized units exist. Meaning the number of affordable units alone is meeting 21% of the need. The following chart details the affordable housing need by region. The total need column used

estimates from the 2014-2018 CHAS data. This calculation was made prior to the COVID-19 pandemic, and does not include the number of households impacted financially by the pandemic. The additional households assisted column shows the estimated number of households supported with COVID related financial assistance. The total row with vouchers estimates the number of households assisted with Housing Choice Vouchers (1,886 in 2021,) and the impact the vouchers have on the ratio of households assisted.

Region	Total Need	Total 2021 Subsidized Units	Additional Households Assisted in 2021	Ratio of assisted households to households in need
<b>Reno</b>	26,115	7,345	1,619	34%
<b>Sparks</b>	8,570	1,110	0	13%
<b>Washoe Unincorporated</b>	5,945	0	867	15%
<b>Total Without Vouchers</b>	40,630	8,455	2,486	27%
<b>Total With Vouchers</b>	40,630	10,341	2,486	32%

\*Source 2021 Affordable Housing Progress Report

While Washoe County has increased the number of subsidized units year after year (1,070 units added from 2014-2021,) the number of units is still not equal to number of households in need. Without the financial assistance provided because of the COVID-19 pandemic, even fewer households are set to receive assistance in the coming years. Increasing the number of subsidized units would have a more lasting impact.

The AHPR also calculated the number of units for very low-income (VLI) meaning households at or below 50% HAMFI, or with a rental subsidy attached. The report also calculated the number of units for low-income (LI) households between 50% and 80% HAMFI. The following chart details the total number of units for VLI and LI households in Reno, Sparks, and Washoe County, and the number of households in the income bracket in the corresponding geographic area.

### Ratio of Very Low Income Units in Reno/Sparks/Washoe County 2021



### Ratio of Low Income Units in Reno/Sparks/ Washoe County 2021



Based on CHAS estimates there are more households in Washoe County with a reported very low income (at or below 50% HAMFI) than households with a reported low-income (between 50% and 80% HAMFI.) There are also fewer units for VLI households than for LI households. 29% of low-income households receive a subsidy compared to 18% of very low-income households. Based on this data the very low-income households have the greatest need for affordable units in Washoe County.

***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:***

The WCHC (PJ) will not further identify “other populations At Greatest Risk of Housing Instability” within the qualifying populations already outlined.

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

The priority needs identified through both the data analysis and the consultation process were to prioritize services for people experiencing homelessness. During the consultation process providers also stressed the need to increase affordable housing units in the region, increase

supportive services, and increase tenant based rental assistance. In order to decrease the number of people experiencing homelessness in the region, more affordable housing will need to be developed. Homeless service providers stressed that increasing shelter beds will only decrease the number of people experiencing unsheltered homelessness, creating more permanent housing will help to decrease the overall number of people experiencing homelessness. The regional PIT data showed that additional Rapid Rehousing units, and additional housing options, had a positive impact on the overall number of people experiencing homelessness.

The data collected shows that those with the lowest income are also the most cost burdened by their housing expenses. Households with very low-income in the region also have the lowest number of subsidized housing available. Increasing the number of affordable housing units for those with very low-income will help to combat this problem within Washoe County. Providing supportive services like case management and housing navigation services will also provide the qualifying populations with supports to prevent homelessness and housing instability.

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

The gaps in services, and program needs were determined using ACS data, CHAS data, as well as the PIT and HIC data gathered regionally. The shelter bed analysis showed that there was a gap in beds for families, and a surplus of utilized beds for single adults. Further analysis showed the majority of surplus in beds were Transitional Housing beds. Transitional Housing was underutilized (41% occupancy) the night of the PIT. This is likely due to program restrictions such as mandated sobriety, and beds restricted for a specific sub-population. The Nevada CARES Campus, which is a low-barrier to entry emergency shelter, was nearly at capacity the night of PIT (99% occupancy.) This lead to the conclusion that people experiencing homelessness are more likely to take part in a program that is low-barrier to entry.

The PIT and HIC data also showed that increasing the number of permanent housing beds had a positive impact in lowering the number of people experiencing homelessness in the region. Providers report that programs that provide both a housing subsidy and supportive services show a positive lasting impact on people exiting homelessness, and at risk of homelessness. The CHAS and ACS data showed that the region's residents with the lowest income are also those with the greatest housing cost burden, making them high risk of housing instability and homelessness. People at risk of homelessness can benefit greatly from financial assistance and corresponding supportive services. The AHPR in conjunction with the CHAS showed that very low-income households have the greatest need for a housing subsidy. Only 18% of very low-income households receive a housing subsidy, leaving 82% in need.

## HOME-ARP Activities

### Template:

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

The WCHC(PJ) will be releasing a HOME-ARP Application once the HOME-ARP allocation is approved. The HOME-ARP Application will outline the priorities in the allocation plan, with the top priority being the creation of affordable housing units for people experiencing homelessness, and second, supportive services. The HOME-ARP Application will allow for a 60-day response time. All Applications that are submitted will be reviewed for completeness, and then the Washoe County Home Consortium (WCHC) Technical Review Committee (TRC) will review all eligible Applications. The TRC will determine which projects to recommend for funding, and then there will be at least two public hearings as part of the monthly TRC meetings. After the public hearings, and any feedback received is considered, a final recommendation is forwarded to the WCHC directors for approval. The WCHC directors consist of the City Managers from the City of Reno, and the City of Sparks, as well as the Washoe County, County Manager. Projects that receive approval from the WCHC directors will be sent to the Regional Planning Board for final approval.

***Describe whether the PJ will administer eligible activities directly:***

No, all projects will be administered by agencies whose projects are approved by the WCHC. The PJ will not be seeking any funds as part of the HOME-ARP Application process.

***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:***

N/A

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.

**Template:**

**Use of HOME-ARP Funding**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,013,382	20%	
Acquisition and Development of Non-Congregate Shelters	\$ 0	0%	
Tenant Based Rental Assistance (TBRA)	\$ 253,345	5%	
Development of Affordable Rental Housing	\$ 3,040,147	60%	
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 760,036	15 %	15%
Total HOME ARP Allocation	\$ 5,066,913		

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

Based on the feedback received during the consultation process, during the public comment period, and while analyzing the housing data in the region, the highest funding priority for HOME-ARP funds is the development of affordable rental housing. Development of affordable rental units is costly, and given the per unit construction cost, 60% of the HOME-ARP allocation should be used for development of affordable housing. After considering the recommendations received during the consultation process and public comment period, 20% of the funding will be allocated towards supportive services and the remaining 5% for TBRA.

***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:***

After review of the shelter and housing inventory, service delivery system, the needs identified in the gap analysis, as well as the one on one consultations, the development of affordable housing is the top priority in the region. Ending homelessness was the priority for many during the consultation process, and an effective solution to ending homelessness is to develop affordable housing for those that are very low-income. By targeting those that are very low-income people at or below 30% HAFMI will have the opportunity be stably housed in unit, this would include people exiting homelessness.

Developing affordable units is costly, current estimates in the region are \$350,000 per unit of affordable housing. Given the cost to construct units, the majority of HOME-ARP funds will be allocated towards the development of affordable housing. The feedback during the consultation process, and the public comment period showed high need for supportive services, therefore, it was determined that a substantial allocation should also be made to that activity. Many stakeholders also advocated for additional TBRA, therefore it has also been included in the funding allotment. The development of non-congregate shelter received the least amount of support during the consultation process, and during the public comment period, which lead to the determination to omit that funding category in the proposed allocation.

## HOME-ARP Production Housing Goals

### Template

***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:***

Estimates for the cost of development of affordable housing in Washoe County is currently \$350,000 per unit. Using that projected cost, the PJ estimates that a minimum of 9 units would be developed with HOME-ARP funds. However, the PJ anticipates affordable housing developers will use a layered funding approach in order to be able to develop more affordable housing units, using HOME-ARP as one element of their funding for a project.

***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 WCHC (PJ) hopes to achieve 100 affordable housing units for individuals and families at risk of homelessness. The priority need in the region is to increase affordable housing units for those at highest risk of homelessness. Development of additional units will help the community's need for additional affordable units, and help reduce the number of people who are continually living on the brink 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).

### **Template:**

***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 PJ has determined through the data analysis and the consultation process that individuals and families at risk of homelessness (30% AMI or below) will be prioritized. During the funding process, projects that aim to serve individuals and families at risk of homelessness will be given priority. Preference will also be given to projects that will provide supportive services along with housing assistance.

***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:***

HUD identifies those with an AMI of 30% or below are at the greatest risk of homelessness, and 70% of households at or below 30% AMI in the region are spending over 50% of their monthly income on housing, making them severely cost burdened. 9% of households in Washoe County were making 30% or below the region's HAMFI in 2018, this number has no doubt increased due to the COVID-19 pandemic. Many service providers reported the challenges with finding affordable rental units for their clients, and many affordable units do not aim to serve the QPs HOME-ARP funds are designed to serve. Targeting assistance to those at risk of homelessness will help provide ongoing housing supports to prevent homelessness for many households in the region.

### **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).

**Template:**

***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):***

The PJ will be using a prioritized waitlist for any HOME-ARP funded projects. This is the only referral method that will encompass all of the QPs. The Coordinated Entry System (CES) is only designed to serve those experiencing literal homelessness, and HOME-ARP projects will need to have the ability to serve all QPs. A prioritized waitlist is the only way projects will be able to serve all QPs. Projects will have the ability to determine how their waitlists will be structured. If a project is aiming to serve a particular QP that will need to be identified as a preference on their waitlist.

***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):***

Given that the regional Coordinated Entry (CE) system is only set up to serve those who are experiencing literal homelessness, it will not be an appropriate referral tool for HOME-ARP projects. Projects will be required to maintain a waitlist in order to be able to serve all QPs.

***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**

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

## **Template**

***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 PJ will not be putting any limitations on participant 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, including:

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

The PJ will not be refinancing existing debt with the HOME-ARP funds.

## Citations

*HUD CHAS Query Tool*. (2021, September 29). Consolidated Planning/CHAS Data. Retrieved July 14, 2022, from <https://www.huduser.gov/portal/datasets/cp.html>

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Johnson, Perkins & Griffin 4<sup>th</sup> Quarter 2021 Apartment Survey.  
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