



CITY OF PLANO: HOME-AMERICAN RESCUE PLAN (ARP)

SUBSTANTIAL AMENDMENT

January 2024

Table of Contents

Executive Summary 2

Consultation..... 4

Needs Assessment and Gaps Analysis..... 7

HOME-ARP Activities..... 16

Use of HOME-ARP Funding 17

HOME-ARP Production Housing Goals..... 18

Preferences..... 19

HOME-ARP Refinancing Guidelines..... 20

Attachment 1: Summary of Consultation Meeting Notes 21

Executive Summary

The City of Plano was allocated \$1,988,051 in HOME American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing and Urban Development (HUD). Prior to Plano receiving these funds, with specific amounts to be funded, the HOME-ARP plan must be submitted to and approved by HUD. The City used the HOME-ARP plan template provided by HUD to ensure that all required elements were included.

The funds are available to provide housing and services for households experiencing homelessness and other vulnerable populations most at risk of homelessness. The purpose of this summary is to provide a draft plan for public comment. The draft plan was developed with input from organizations that are familiar with community needs and based on data about the needs and gaps in services for persons experiencing homelessness and others most at risk of becoming homeless. The plan is consistent with related plans including the City of Plano 2020-2024 Consolidated Plan, the Collin County Homeless Coalition Strategic Plan, and the Housing Forward Strategic Plan.¹

Plano's HOME-ARP Allocation Plan was available for public comment starting December 19, 2022, and ending January 10, 2023. The City Council held a public hearing on January 9, 2023, as part of their regularly scheduled City Council meeting to gather feedback and comments on the draft plan. No comments were received on the draft plan.

HUD approved the City of Plano HOME-ARP Allocation Plan in February 2022. In January 2024, the City of Plano is seeking a Substantial Amendment to further clarify the Qualified Populations and Preference that the City of Plano seeks to assist with HOME-ARP funds.

The plan proposes to use HOME-ARP funds for the following priority housing services:

- Time-limited tenant based rental assistance
- Supportive Services, specifically short-term and medium-term rental assistance
- Case management, including housing and service navigation

Target p Populations for these services, as required by HUD, include are the following Qualified Populations (QP):

- ~~1. Homeless as defined in section 103(a) of the McKinney Vento Homeless Assistance Act~~
1. Homeless – as defined in 24 CFR 91.5 Homeless (1), (2), (3)
2. At risk of homelessness-as defined in 24 CFR 91.5
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
4. Other Populations-those who do not qualify under the other three QP definitions but meet one of the Other Populations criteria identified in Section IV of the

¹ Housing Forward, formerly Metro Dallas Homeless Alliance, is the lead agency for the Dallas/Collin County Continuum of Care.

HOME-ARP Notice

- ~~4. At risk of homelessness~~
- ~~5. Veterans and families that include a veteran family member~~
- ~~6. Other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability.~~

Preference will be given to those meeting the following QP:

1. Homeless – as defined in 24 CFR 91.5 Homeless (1), (2); and
2. Other Populations: At greatest risk of housing instability, defined as households who meet either (i) or (ii) below:
 - i. Have annual incomes less than or equal to 30% Annual Median Income (AMI) and experience severe cost burden (pay more than 50% of monthly income toward housing); or
 - ii. Have annual income less than 50% AMI and meet one of the seven housing instability conditions from the QP definition established at 24 CFR 91.5: At risk of homelessness paragraph (iii), and outlines in the HOME-ARP Notice.

Amended Budget

Tenant Based Rental Assistance (TBRA)	\$310,000	15.6%
Support Services - Homelessness Prevention (HP)	\$1,468,051 \$1,488,051	73.8% 74.8%
Case Management and Housing Navigation	\$110,000	5.6%
Administration (City of Plano)	\$50,000 \$5,000	2.52% .25%
Administration (Subrecipients)	\$50,000 \$75,000	2.52% 3.75%
Total	\$1,988,051	100%

The City's HOME-ARP plan proposes that the Neighborhood Services Department issue a Request for Proposals to identify one or more experienced and successful providers of service to operate HOME-ARP rental assistance programs. Performance goals include assisting approximately 14 households with tenant based rental assistance and 220 households with homeless prevention rental assistance.

The City will use administrative funds to provide technical assistance and ongoing training for the selected subrecipient(s) to ensure that all federal grant requirements are met. Administrative funds will also be used for planning, reporting, monitoring, financial oversight, and related responsibilities. Administrative funds provided to the subrecipient(s) will be used for program oversight, reporting, financial transactions, and development of internal policies and procedures as necessary to meet program requirements.

For more information and a detailed outline of the HOME-ARP allocation plan, please see the City of Plano Neighborhood Services Department website at: www.plano.gov/910/homeless-services.

Consultation

Recipients of HOME-ARP funding must consult with several groups before developing the plan to use funds, including the Continuum of Care lead agency serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

Summarize the consultation process:

The City of Plano Neighborhood Services Department consulted required community partners to identify needs and gaps in the target population. Housing Forward is the Continuum of Care lead agency for Collin/Dallas counties, including the City of Plano. Housing Forward provides ongoing technical assistance to the City of Plano related to a coordinated systems approach to addressing and reducing homelessness. Housing Forward and the Collin County Homeless Coalition were consulted during HOME-ARP plan development and expressed support for Plano's proposed use of HOME-ARP funds for rental assistance, based on local need.

The City held consultation meetings with the following required organizations:

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

Agency/Org Consulted	Type of Agency	Method of Consultation	Feedback
Housing Forward	Continuum of Care Lead Agency	In person and virtual meetings	MDHA expressed a critical need for large-scale rapid re-housing with case management support for persons experiencing homelessness.
Hope's Door Texas Muslim Women's Foundation	Domestic Violence Shelters, Transitional Housing and Rapid Rehousing	Virtual meeting	DV providers expressed support for rental assistance. See summary input in attachment 1 from service provider discussions.
City House	Youth Emergency Shelter and Transitional Housing 18-22 Street Outreach	Virtual meeting	See summary input in attachment 1
Samaritan Inn	General Pop. Transitional Housing Shelter	Virtual meeting	See summary input in attachment 1

Blake's House	Transitional housing for young women (18-25)	Virtual meeting	See summary input in attachment 1
Collin County Homeless Coalition (CCHC) Board of Directors Representative	Homeless System Collaboration	Virtual meeting	See summary input in attachment 1
Assistance Center of Collin County	Rent/utility assistance and information/referral provider	Zoom meetings and phone calls	See summary input in attachment 1
Plano Housing Authority	Public Housing Authority – Housing vouchers, VASH vouchers	In person and phone calls	Exploration of HOME-ARP allowable activities and eligible populations. Discussed the need for TBRA and help for households on HCV waiting list.
Housing Forward, SPARC – Supporting Partnerships for Anti-Racist Communities	Fair Housing Organization	In person and Zoom meetings	See racial equity plan of action for ending homelessness. Plano is part of the coalition working on education, collaboration, and equity initiatives.
Salvation Army	Rental Assistance and support services	Virtual meeting	See summary input in attachment 1
St. Vincent de Paul, St. Marks	Hotel, motel stays, food and support services	Zoom meetings & phone calls	See summary input in attachment 1
Metro Relief	Street outreach and general assistance	Virtual meeting	See summary input in attachment 1
Catholic Charities of Dallas	Homeless housing and disaster programs	Zoom meetings and phone calls	See summary input in attachment 1
Multiple organizations listed above	Organization serving persons with disabilities and/or veterans	Zoom meetings and phone calls	See summary input in attachment 1

In general, the Continuum of Care lead agency, homeless service providers, and other social service organizations were in support of using HOME-ARP for rental assistance. For homeless prevention, agencies held the strong opinion that assistance should be capped at three months, unless extenuating circumstances warranted an additional three months. Providers also agreed that low to very low income Plano residents (earning less than 50% area median income) should have priority access to HOME-ARP rental assistance. Case management and some form

of financial education/budgeting class was also recommended. See attachment 1 for a summary of comments and input not listed in the chart above.

Public Participation

Recipients of HOME-ARP funds must provide for and encourage citizen participation in the development of the funding allocation plan. Before submission of the plan, residents of the jurisdiction must have reasonable notice and an opportunity to comment on the proposed plan for HOME-ARP of **no less than 15 calendar days**. The jurisdiction must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, at least one public hearing must be held during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, Plano is required to make the following information available to the public:

- The amount of HOME-ARP Plano will receive
- The range of activities the City of Plano may undertake

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- Public comment period: 12/19/2022 to 1/10/2023
- Public Hearing: 1/09/2023
- **Public Comment: 1/8/2023 to 1/22/2024**
- **Public Hearing: 1/22/2024**

The public comment period for the **approved** HOME-ARP Allocation Plan began on December 19 and ended on January 10, 2023. A public notice was published in the Plano Star Courier on December 18, 2022, and on the City of Plano website on December 19th, including summary information regarding the proposed plan and links to the draft plan template.

Public Hearing: The **approved** Public Hearing took place during the City Council meeting on January 9, 2023, 7:00 p.m., at the Plano Municipal Center, Council Chamber, 1520 K Avenue, Plano, TX 75074. Public comments were requested to be submitted by mail, phone, fax, or email to Housing and Community Services Manager, Shanette Eaden (Shanettee@plano.gov or 972-208-8150). No comments were submitted.

The public comment period for the proposed HOME-ARP Allocation Plan Substantial Amendment began on January 8 and ended on January 22, 2024. A public notice was published in the Plano Star Courier on January 7, 2024, and on the City of Plano website on January 8, 2024, including summary information regarding the proposed plan substantial amendment and links to the proposed plan template.

Public Hearing: The HOME-ARP Allocation Plan Substantial Amendment Public

Hearing took place during the City Council meeting on January 22, 2024, 7:00 p.m., at the Plano Municipal Center, Council Chamber, 1520 K Avenue, Plano, TX 75074. Public comments were requested to be submitted by mail, phone, fax, or email to Housing and Community Services Manager, Shanette Eaden (Shanettee@plano.gov or 972-208-8150). No comments were submitted.

Describe any efforts to broaden public participation:

In addition to the Public Notice being published in the Plano Star Courier and on the City of Plano website, notices were emailed to community stakeholders requesting comment on the draft allocation plan. This included social service organizations, homeless service providers, veterans groups, and other nonprofit organizations serving persons with disabilities. A copy of the Public Notice, draft HOME-ARP allocation plan, and PowerPoint presentation were posted to the City of Plano Neighborhood Services Department website and available upon request.

HUD requires that the jurisdiction consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

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

The City of Plano received no comments related to the published draft HOME-ARP plan.

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

There were no comments or recommendations not accepted.

Needs Assessment and Gaps Analysis

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

OPTIONAL Homeless Needs Inventory and Gap Analysis Table (see note 1)

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	
	# beds	# units	# beds	# units	# beds					# beds	# units	# beds	# units

Emergency Shelter	100	39	29	9	0								
Transitional Housing	285	73	120	40	0								
Permanent Supportive Housing/ RRH	80	23	17	6	40								
Other Permanent Housing						0	0	0	0				
Sheltered Homeless						108	103	15	67				
Unsheltered Homeless						0	13	2	0				
Current Gap										0	0	61	61

Data Sources: 1. PIT count; 2. CoC Housing Inventory Count (HIC); 3. Consultation

Note 1: Bed inventory is reported for Collin County. The homeless population in the chart is also reported for individuals (not households)

OPTIONAL Housing Needs Inventory and Gap Analysis Table

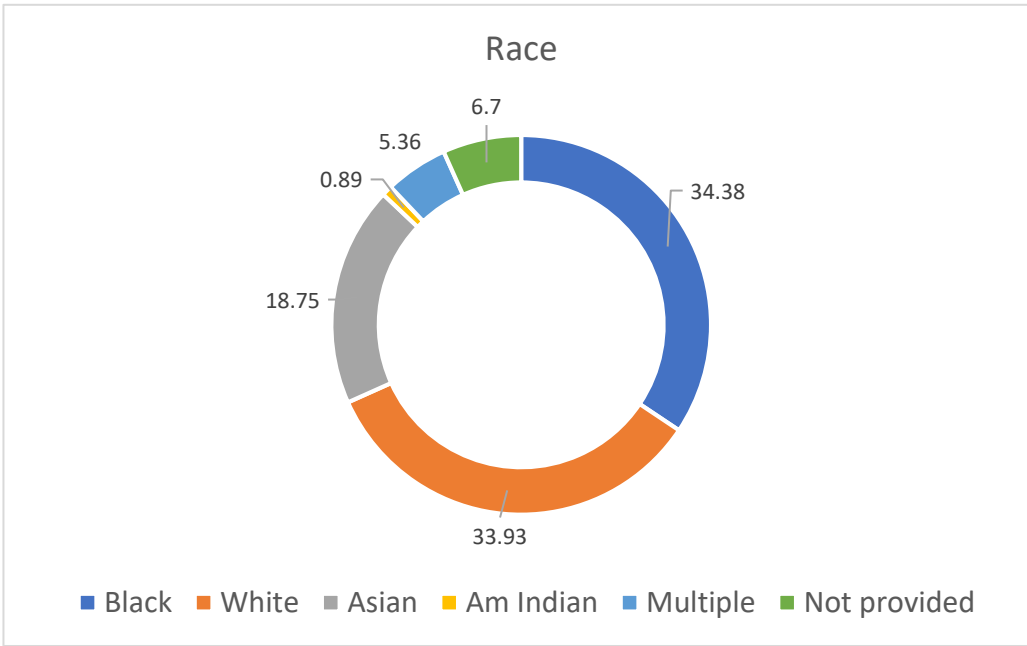
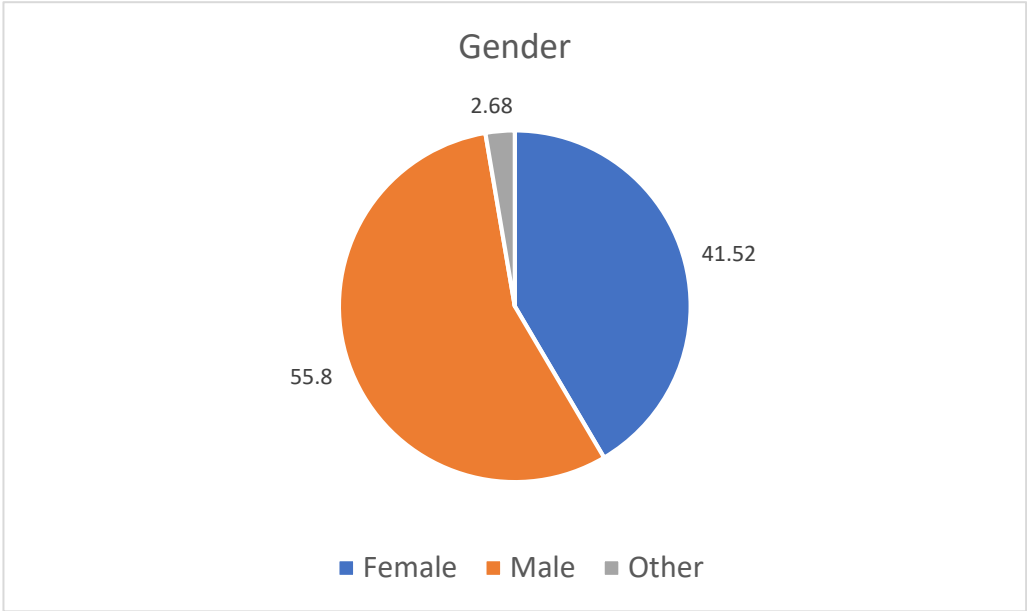
Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	39,054		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	920		
Rental Units Affordable to HH at 50% AMI (Other Populations)	2415		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4135	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2410	
Current Gaps			3210

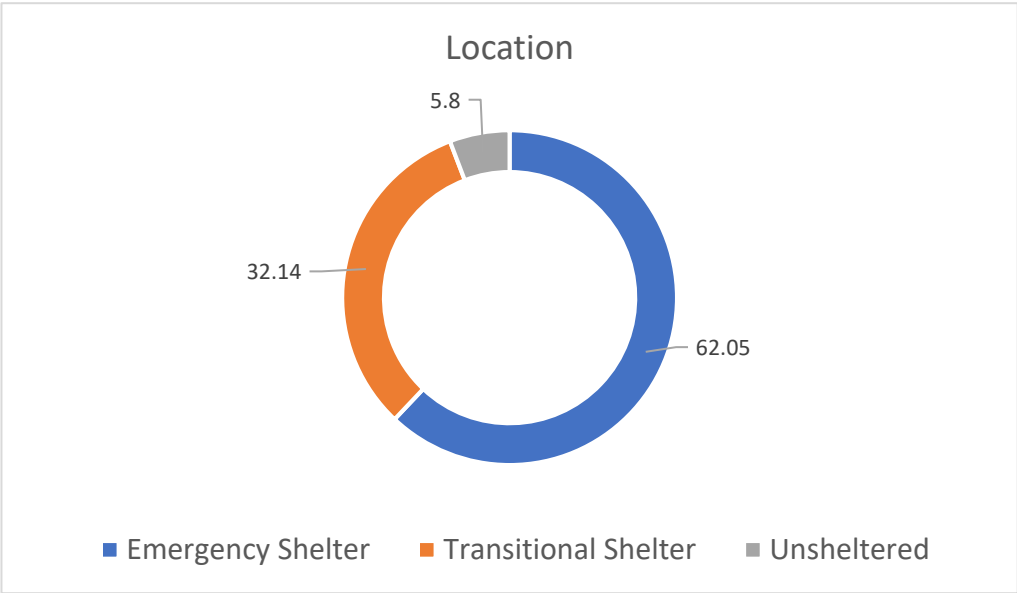
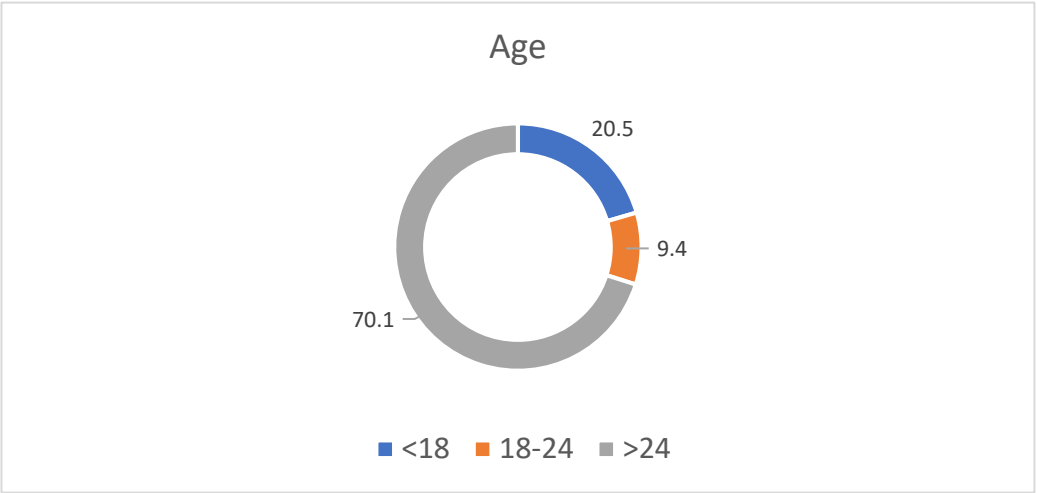
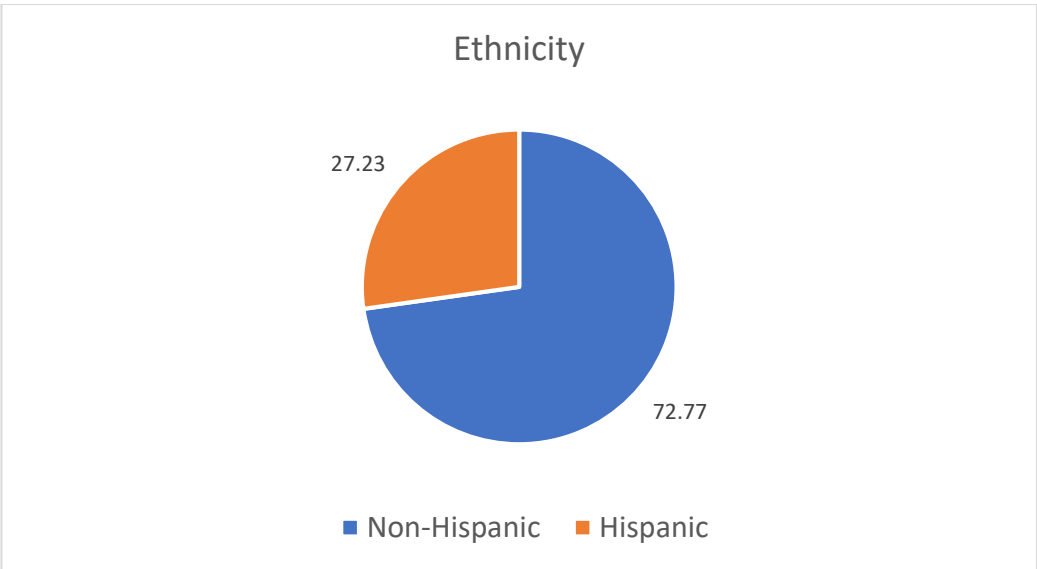
Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

Population Experiencing Homelessness: Within the City of Plano, there were a total of 224 individuals experiencing homelessness on any given night as of the 2022 Point in Time (PIT) count. Of this total, 157 were adults 25 and over, 21 were young adults (18-24), and 46 were children under the age of 18. Of the adults, 17 were Veterans.

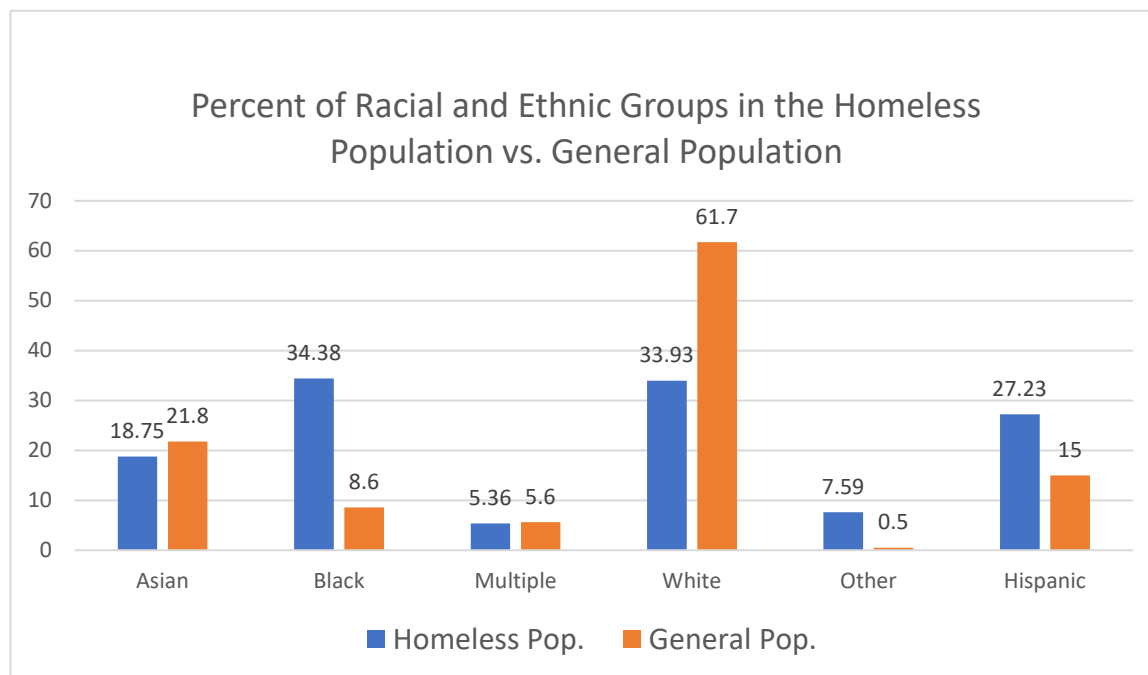
Demographic characteristics of the homeless individuals identified during the 2022 PIT count are summarized below:





More males than females were reported as homeless during the PIT count (55.8 versus 41.5). In the general population, males and females are represented equally (50%), therefore, males are disproportionately represented in the homeless

population. Racial and ethnic composition of the homeless population versus the general population is skewed toward a greater proportion of minorities being homeless than is represented in the general population. See the chart below for racial and ethnic comparisons. Housing Forward is working with coalition partners to reduce racial and ethnic disparities among homeless populations across the continuum. Actions include development of a Racial Equity Plan of Action for Ending Homelessness. Key components of the plan include education, collaboration, and initiation of policies and fundraising strategies to reduce inequities.



On an annual basis persons experiencing homelessness in Plano include approximately 165 individuals in family households, 400 in adult only households, and 12 persons in households with children only. The households with only children are primarily older teens served by City House, an organization providing emergency shelter to youth under 18 and transitional housing to young adults, ages 18-22.

Victims of Domestic Violence: Based on the most recent Consolidated Plan, Plano has approximately 320 individuals fleeing domestic violence each year and in need of housing assistance. DV shelter beds were at 81% capacity during the 2019 PIT count, before the pandemic. Currently, there are 39 DV shelter beds, and programs report that they are at capacity most of the time and struggle to help clients find market rate units they can afford once rental assistance has been exhausted. According to DV providers, individuals they serve are 42% children ages 0-17, 5% young adults ages 18-23, and 53% adults ages 24 and over. Racial composition is approximately 22% white, 39% Black/African American, 14% Asian, and 25% other race or multiple races. Of persons served in housing programs approximately 82% were non-Hispanic, 16% Hispanic, and 2% other.

Population At Risk Of Homelessness: Cost burden and rapidly rising housing costs put low-income families at risk of homelessness. According to the data reported in the Consolidated Plan, over one quarter of all Plano households are cost burdened, and 37% of all renter households are cost burdened. Among low- and moderate-income renters, 13,004 are cost burdened and 6,759 are severely cost burdened (i.e., paying more than 50% of their income on housing). Single mother households, domestic violence survivors, and persons with disabilities are the most vulnerable to becoming homeless. There are about 2,300 adults with disabilities and 1,400 single mother households living below the poverty line (2014-2018 ACS as reported in the Con Plan).

Current fair market rents for a two-bedroom apartment in Plano are between \$2088 and \$2820/month, depending on the zip code of the unit. Low-income households (<50% AMI) with four family members make below \$48,700 annually. Even at the top of this range, monthly income would be \$4058. In order for a household at this income level to be able to afford a unit and still pay for other expenses, an affordable rental rate would be \$1217/month. Subsidies in the average amount of \$1200/month would be needed in Plano to allow a household at this income level to live without undue housing cost burden.

An alternative option to housing subsidies is to provide additional affordable housing units at the lowest income level. The amount of funds provided by the HOME-ARP allocation to Plano are not of the scale needed to address the development of new housing units. Therefore, the HOME-ARP funding will be used to provide immediate rental relief for low and very low income households who meet the definition of one of the qualifying population groups. Other resources will be sought to address the housing supply issue.

Persons with Disabilities: The Consolidated Plan estimates that 18,305 individuals with disabilities live in Plano and of these, 2,500 need housing assistance each year. Median earnings for persons with disabilities (\$27,871) are lower on average than for those without disabilities (\$46,501). More persons with disabilities live below the poverty line (18%) than those without disabilities (11%). Data reported in the Consolidated Plan indicated that there were 129 households with a disability on the waiting list for Housing Choice Vouchers out of a total of 909 on the waiting list (12%).

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations***
- ***Those currently housed populations at risk of homelessness***
- ***Other families requiring services or housing assistance or to prevent homelessness***
- ***Those at greatest risk of housing instability or in unstable housing situations***

Sheltered and unsheltered homeless populations: Of the total 224 individuals that were identified as experiencing homelessness during the 2022 Point-in-Time

Census, 13 were unsheltered and 211 were sheltered. Individuals housed in Plano Overnight Warming shelters were counted as sheltered in 2022, so the 13 reported as unsheltered were truly out in the elements. If the weather had been warmer, it is likely that the unsheltered count would have been over 100, which is more in line with prior year counts.

The following breakdown describes the system's total housing need to stably house the 224 individuals identified as experiencing homelessness in Plano:

- About 143 households are represented in the total count of 224 homeless individuals. Some of these households are in transitional programs, and will be able to pay their own rent once stabilized, but others (estimated to be about 50%) will need additional rental and supportive service assistance.
- The homeless gaps analysis chart shows a need for 61 beds for single adults. These individuals likely need up to 24 months of rental assistance and likely need longer term housing solutions such as housing choice vouchers, VASH vouchers, or other permanent supportive housing options.
- Single parent households with children need access to childcare, jobs and training programs, and affordable medical care.
- Victims of domestic violence need safe shelter and access to case management, childcare, jobs and training programs, and affordable medical care.
- Youth experiencing homelessness have access to temporary and transitional housing in Plano and Collin County, but also need ongoing support and access to training programs and good paying jobs to be able to transition to affordable housing without subsidies.

Currently housed populations at risk of homelessness: The Housing Needs Inventory and Gaps Analysis Table, as represented in the Consolidated Plan, shows a gap of 3210 affordable units for very low and low income households. Households making less than 50% of area median income have difficulty finding suitable housing without being extremely cost burdened. With housing costs rising, this population may need of rental assistance to avoid homelessness, in the event of a crisis. One-time funding for crisis events may also prevent homelessness such as medical expenses, car repairs, and other emergencies.

Other families requiring services or housing assistance to prevent homelessness: The 2019 Collin County PIT Homeless Census Report also reported a similar PIT count for homeless students. A one-day snapshot of homelessness in the five Collin County school districts resulted in a total of 1300 homeless students and 408 in Plano schools. The report estimated anywhere between 508 and 897 additional homeless households above and beyond the regular PIT count. These are students who lack a fixed, regular, and adequate nighttime residence and may include families in hotels/motels, doubling up with friends, or living in cars. These families are also experiencing housing instability and are in need of access to suitable housing units and housing navigation/case management.

Those at greatest risk of housing instability: The 2020-2024 Consolidated Plan lists several groups at greatest risk for housing instability including persons with

disabilities, victims of domestic violence, and single parent households with young children, particularly mothers of young children.

~~Veterans: Plano has a total of 11,181 veterans among its adult population or about 5% of the total adult population. During the latest Point in Time homeless count, 17 veterans were identified, which was 10.8% of the homeless adult total. There was a 750% increase in homeless veterans identified in 2022 compared to the homeless count in 2021. Of the veterans identified, 15 were sheltered and 2 unsheltered. Of the veterans served by VASH vouchers, 71.4% were Black/African American, 28.5% were White, and none were Hispanic. Plano's 40 VASH vouchers are targeted to chronically homeless veterans with a disability.~~

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:

Collin County has two overnight warming stations, one youth shelter, four domestic violence shelters/transitional housing programs, several other transitional housing programs, and shelter for pregnant and parenting women accessible to Plano residents. Adult and family transitional living programs are available through Samaritan Inn in McKinney, Family Promise, Agape Resource & Assistance Center, Blake's House, and Family Gateway. Five full service emergency shelters in neighboring Dallas County are open to area residents as well. Rental assistance programs have provided emergency assistance to more than 1000 Plano residents over the past few years.

Plano is part of the Dallas and Collin County Continuum of Care, with Metro Dallas Housing Alliance, recently rebranded as Housing Forward, as the lead agency. Housing Forward has made great strides in identifying the urgent needs of the most vulnerable homeless populations and working together with public and private sector resources to address those needs. Examples of new programs with significant impact include the Dallas REAL time Rapid Rehousing program, set to provide rental vouchers to 2,700 households. The City of Plano is a partner in the collaborative.

Supportive Services: Supportive services have been identified as a need but will be provided by a combination of local resources available through service providers. The Dallas/Collin County Continuum of Care has identified rental assistance as the priority need and Housing Forward has raised private funds for supportive services not met through traditional sources. The flex fund, for example, may be used for furniture, bedding, cleaning supplies, critical documents such as birth certificates, landlord incentives, health care expenses, and other items listed in the Flex Fund guide.

TBRA: The City of Plano has funding available for a TBRA program through regular HOME funds for those affected by COVID-19, however, identifying a provider has been a challenge. The addition of HOME-ARP funding for TBRA will provide an opportunity to identify a provider through an RFP process. The plan is to use TBRA as a transitional rental assistance program to help stabilize homeless households until the family can pay rent on their own or until they can access longer term subsidized programs (e.g., Housing Choice Voucher, Social Security Disability, Project based vouchers, VASH vouchers, etc.).

Affordable and permanent rental housing: Currently, the City of Plano has 920 housing units affordable to households making less than 30% AMI and 2415 units for households making less than 50% AMI. The gap is for the very low-income households (<30% AMI), where there is a need for 3215 housing units. Higher priced units are available, but subsidies are needed to make them affordable to very low-income families.

At Risk/Prevention: Plano has received a large amount of resources dedicated to homelessness prevention over the past two years. From the Emergency Rental Assistance Programs (ERAP) I & II combined, Plano received \$15,570,430 dedicated to rental assistance for households at or below 80% of area median income and affected by COVID-19. These funds provided up to 12 months of rental assistance and were available from March 2021 to August 2022. The average amount of assistance per household was \$12,869 and 1,048 households were served. Funds have been depleted and the program is no longer accepting applications. Additional rental assistance through HOME-ARP is needed to prevent homelessness among vulnerable households.

The City also operated a Homelessness Prevention Program in program year 2021 with \$122,000. Funds were exhausted in nine months and the program served 104 households for up to 3 months of rent. Average amount of assistance per household was \$2,517.

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

The Homeless Needs Inventory and Gaps Analysis Table shows a deficit of 61 beds for single adults; however, the need is likely greater because the warming shelters provided overnight stay during cold weather and those staying at these shelters were not counted as “unsheltered.” The community will continue to explore how best to address gaps in shelter beds, however, HOME-ARP funding will be dedicated to assisting those individuals with rental assistance rather than temporary shelter beds. The gap in housing inventory has been described in the previous section on affordable and permanent rental housing.

To summarize the needs and gaps of housing resources for people experiencing homelessness in Plano, Plano’s PIT count data trends show that the overall homeless count has not significantly increased from 2018 to 2022, due to the extraordinary amount of rental assistance available to individuals at risk of homelessness and others who are literally homelessness. These resources have been nearly depleted after helping hundreds of households and need continuation to keep levels of homelessness low and stabilize housing situations for more families.

Gaps have been identified in overall housing inventory for very low-income Plano residents, however, other funding sources and partnerships will be considered to address this issue (e.g., regular HOME funds, Low Income Housing Tax Credits, or Permanent Supportive Housing resources).

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

The City of Plano will not place additional conditions or requirements to access HOME-ARP funds, however, there are some households that have been identified as more at risk of housing instability and at increased risk for homelessness. The 2020-2024 Consolidated Plan identifies low-income renters who pay more than 50% of their income for housing as being most at risk of homelessness. There are approximately 6,030 low income severely cost burdened renters in Plano. Of these households, single mother households with young children have added risk for becoming homeless due to childcare expenses and additional household costs. Adults with disabilities are also at risk for housing instability due to limited incomes and health care costs. In Plano, 41% of individuals with a disability, aged 18-64, are not in the labor force. There are approximately 1,400 single mother households and 2,300 adults with disabilities living below the poverty line (2014-2018 ACS). Data from the City's homelessness prevention programs show that 75% of participants in the program were female-headed households and 65% were extremely low income.

Identify priority needs for qualifying populations:

The priority need identified is to alleviate housing cost burden by providing access to short term and medium term rental assistance to help vulnerable households afford rental rates in Plano. During the development of the initial plan, the city determined that preferences are not needed and will utilize funding to provide services to individuals in the defined qualified populations. The City found the need for assistance greatly outpaced the funds available for assistance. **In January 2024, a subsequent substantial amendment was made to prioritize homeless prevention assistance and tenant based rental assistance.**

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

The CoC looked at the community's total available housing and service resources for households experiencing homelessness and for households at risk of homelessness. They also used data from the community's Housing Inventory Count (HIC) and Point in Time Count, including Plano specific data and Collin County data and resources. Service providers and experts in homeless programs were also consulted to ensure an accurate approach to gaps and needs.

This approach is consistent with the overall Continuum of Care plan to provide rental assistance to 2700 individuals experiencing homelessness. Through November 2022, 2,110 have been enrolled, according to the Housing Forward dashboard. This service level is for individuals across the entire geographic region covered by the CoC, including Dallas and Collin Counties.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The City of Plano has several experienced non-profit organizations that could operate the homeless prevention and/or tenant based rental programs and will not administer eligible activities directly. A Request for Proposals is planned to be able to identify the

most qualified program operator(s).

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

Not applicable

Jurisdictions must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table summarizes this information.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services (rental assistance & case mgt)	\$ 1,523,051 \$ 1,543,051		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 365,000		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning – City (\$50,000) (\$5,000) Subrecipient(s) (\$50,000) (\$75,000)	\$ 100,000 \$ 80,000	5 % 4%	15%
Total HOME-ARP Allocation	\$ 1,988,051		

Additional narrative, if applicable:

The City of Plano will retain 2.5% of the HOME-ARP administrative funds (i.e., \$50,000). These funds will pay for subrecipient technical assistance and ongoing training, monitoring, planning, reporting, financial oversight, and other related administrative responsibilities performed by city staff. An additional 2.5% of the administrative funds will be shared with the program operator(s) (i.e., \$50,000). Subrecipients will use administrative funds for reporting, policy development, financial transactions, and internal monitoring as necessary to meet program requirements. Remaining funds will be for direct client services, including case management and rental assistance programs for target populations.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The City of Plano works hand in hand with homeless service providers, particularly Housing Forward, the lead agency for the Dallas/Collin County Continuum of Care (CoC), and with the Collin County Homeless Coalition. Housing Forward produces dashboards to monitor system capacity and performance which serve as a needed supplement to the annual Point In Time count. The CoC also brings together partners to discuss new COVID-specific resources entering the community and provides information on system-wide needs and gaps as well as city-specific information. When the HOME-ARP funding was initially announced, the CoC provided input and recommendations for the best way to support target populations. The City of Plano has participated in ongoing conversations about community needs before undertaking the formal HOME-ARP allocation plan consultation process.

In the formal consultation process, the City heard similar things, and the group agreed to the following:

- 1) HOME ARP funds should be targeted to households below 50% of AMI.
- 2) Length of rental assistance should be based on income levels, with very low income receiving more months of assistance.
- 3) Program participants should attend a budgeting class as part of the service mix.
- 4) CoC and partners mentioned concerns about voucher acceptance and approval of clients for available rent units. The CoC Flex Fund might be able to assist with landlord/property owner incentives.
- 5) Homeless service agencies also reported the need for funds for case management.
- 6) Emergency shelters beds are needed for some populations such as single men; however, cold weather shelters serve the purpose of sheltering individuals in inclement weather. The community will continue to explore additional shelter beds across the county, but the level of need does not justify using HOME-ARP funds for this purpose at the present time.
- 7) The Continuum of Care's priority service is rental assistance for homeless populations.

Because of this feedback and the data on the ongoing need for rental assistance among homeless and other vulnerable households in Plano, the decision was made to invest funding in short term and medium term rental assistance and accompanying case management for qualifying households.

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:

Plano will not use HOME-ARP to create new affordable housing units, but instead will focus HOME-ARP on providing rental assistance and case management services.

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

Plano will not use HOME-ARP funds to produce additional affordable housing. As noted in the City's Housing Needs Study, sufficient units are available for low and very low-income residents, however, there is a gap in the affordability of these units, pointing to the need to provide access to rental assistance resources and to look for other resources

for new units.

Preferences

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

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

~~The City of Plano will not give preference to any of the qualifying populations or subpopulations but will provide services to any eligible individual and/or household in one of the qualified populations. For the tenant based rental assistance program, participants will be homeless and in need of longer term support. For the homelessness prevention program, individuals will be low to very low income and vulnerable to housing instability. Plano will not use the Coordinated Entry System for this program, but will use a first come, first served approach.~~

The City of Plano HOME- ARP program allows all eligible qualifying populations to apply for assistance, however, preferences will be used to ensure the most vulnerable populations in the City are prioritized. The City will provide a preference for the homeless (QP1) other populations at greater risk of homelessness (QP4), followed by persons at risk of homelessness (QP2) for supportive services. The City is using supportive services to provide homeless prevention and housing stabilization assistance.

The City will give preference to the homeless (QP1), others at greater risk of homelessness, (QP4) followed by survivors of domestic violence, stalking or human trafficking (QP3) for HOME-ARP tenant based rental assistance. The tenant based rental assistance program will provide participants with longer term support to ensure housing stability.

The City will use project specific waiting lists for homeless prevention assistance, and tenant based rental assistance. The lists will be sorted and prioritized by qualifying population type, based on the activity's preferences, and then processed in order by application date.

The rental homeless prevention activity gives priority to HOME ARP qualifying populations as follows: QP1, QP4, QP2, QP3

The tenant based rental assistance activity gives priority as follows: QP1, QP4, QP3, QP2

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

~~The City of Plano does not plan to identify a preferred group for services, which will allow more flexibility for service providers to help those most in need.~~

The needs and gaps analysis revealed there are 224 homeless persons, 3,210 at risk of homelessness, and 320 survivors of domestic violence in Plano. Other populations at risk of homelessness were identified including: 6,759 low-income, severely cost burdened, households, 2,300 disabled persons and 1,400 female headed households living below poverty.

The needs and gaps analysis revealed a deficit of affordable housing units and identified severe cost burden as a significant factor impacting housing opportunities for HOME-ARP qualifying populations in Plano.

The use of preferences will be used to meet unmet affordable housing needs through HOME ARP by providing homeless prevention assistance and tenant based rental assistance to eligible households.

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.

Not applicable - The City of Plano will not use HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

Attachment 1: Summary of Consultation Meeting Notes

Virtual meeting with community partners on January 8, 2022

Attendees received information on the HUD HOME-ARP funding and requirements. They were asked to provide feedback on activity options based on their experiences providing assistance to low-income and homeless households in Plano and Collin County. Attendees and comments are summarized below:

- Samaritan Inn (General Population Transitional Housing)
- Hope's Door New Beginning (DV Emergency, Transitional, RRH)
- Texas Muslim Women's Foundation (DV Emergency, Transitional, RRH)
- City House (Youth Emergency 18 and under, Transitional 18-22)
- Salvation Army (No shelter but food and partial rental assistance)
- Collin County Homeless Coalition
- Metro Relief (street outreach and general assistance but no shelter)
- Blake's House (transitional home for young women 18-25)
- Saint Vincent de Paul – zip code 75074 (hotel/motel stays, food, for homeless and those at-risk)

Hotel Conversion to Affordable Housing

- One organization has Plano residents in need of Permanent Supportive Housing, so indicated that a facility to serve some these households would be beneficial
- A transitional facility for those who are working but still homeless would be great
- A place for families is needed
- Need more PSH, more RRH, and more affordable housing – all types of housing are needed
- In-house case management is needed
- Seniors need a facility to stage to get an application
- Hotel conversion is a great idea. Must tie this service to case management and target higher functioning residents

Hotel Conversion to Non- Congregate Shelter

- Need an option for emergency shelter, but do not believe that Plano's number are sufficient to support an emergency shelter
- B/C it's tied to the City of Plano then not emergency.
- Question was asked if they could be assisted at a day resources center
- When an agency helps people and gets them stable then it's difficult when there are no options to help them get started
- Would include onsite services.
- Don't see the need for Plano but Collin County Needs one.
- Concern is that we do not have a clear picture of homelessness in Collin County Emergency Shelter. We don't think that we have a good grasp on this number, and we

do not think that we can use Plano Overnight Warming Shelters to do this. We need to know how many emergency beds we actually need. This number is needed for a deeper conversation with the County.

- Maybe we would need about 120 beds across the county
- Emergency beds in Collin County helps the entire CoC.

TBRA

- If not enough housing units, then adding more without development of affordable housing units is still going to be a problem.
- Not a lot of hope for TBRA.
- RRH is already a lot of work to market to landlords and it's a huge battle.
- When I think about investment in Plano/Collin County, the better investment is working with developers for a long term solution
- "We are triaging the gap"
- There's an increase in hotline calls at DV providers. Providers are looking for homes for clients to lease.
- All shelters have been full for the last month.

General LP comment – Has clients that would need more intense help, PSH, possibly.

Community Circle

- Impossible without a community circle. You need a case manager assigned to the circle and case managers are already at capacity.
- This can be done without the structure or support that the City or County can provide.

Attendees were asked to rank HOME-ARP allowable activities in the order of importance to their client base. The following is a summary of the responses:

Collin County Homeless Coalition Board of Directors representative – Emergency Shelter and wrap around circle is best.

Salvation Army – Affordable housing first with wrap around services, then hotel conversion to affordable housing.

Samaritan Inn: 1) Affordable, 2) Non congregate, 3) TBRA, 4) Community Shelter

City Housing Youth Shelter: 1) Affordable housing, 2) Non congregate, 3) TBRA, 4) Community Shelter – but in converting a hotel, they would not have as great success if older population were mixed with young. Maybe we could specialize gearing towards a youth population. Maybe a different entrance for each age bracket for shelters. Less case management does not set us up for success.

Blake's House: 1) Affordable housing, 2) Non congregate shelter, 3) TBRA, 4) Community Shelter

Texas Muslim Women's Foundation: 1) Affordable housing, 2) Non congregate shelter, 3) TBRA, 4) Community Shelter

Hope's Door New Beginnings: 1) Affordable housing, 2) Non congregate shelter, 3) TBRA, 4) Community Shelter

St. Vincent de Paul: 1) Affordable housing, 2) Non congregate shelter, 3) TBRA, 4) Community Shelter, the caveat is that they do leave so new people can come in.

Metro Relief: 1) Affordable housing, 2) Non congregate shelter, 3) TBRA, 4) Community Shelter.

Input on Homelessness Prevention rental assistance

September 13, 2022 (Zoom meeting): Catholic Charities of Dallas

- 80% AMI is high and 50% is more realistic to those that need the help. For sliding scale, we might have an increased amount of complaints from people.
- Sliding scale might make people feel like they are getting discriminated against. People would also be confused on the program
- 6 months is kind of long because at some point they are relying on us to pay their rent, so 3 months is a good length of time.
- Regarding connecting to local Identification Cards, HPP clients already have this.
- Sliding scale where we backed off on what we have paid (i.e., 1 months full amount, then 75% month 2, and 3 months 25%).
- More complex, harder for clients to understand.
- People would always be asking for exceptions.
- 3 months for this pot of funding is enough for this pot of funding.
- A requirement to do something like attend a budget class would be helpful.
- It would be to have a guideline for receiving assistance, to show they need assistance.
- Make it a consistent 3 months only and have policies uploaded into zoom and no exceptions to the three months.

Wednesday, September 21, 2022 (phone call): Assistance Center of Collin County

- Assistance provided to households making 0% - 30 and 30 – 50% AMI (only a few are 50% - 80%)
- It's tough to determine whether to cap assistance at 3 months or 6 months. Up to 6 months, but the agency should have the ability to determine how many months because someone's situation could change in six months. - Case by case.
- If we keep paying the rent and not require steps, it's not productive; Case management is key!
- Sliding scales would be confusing for residents. Noted it's not only what they make. You can't factor in medical expenses, for example.
- Making program participants go to budget class and or employment workshops to assist them in finding a job.
- Online application would be best.

September 23, 2022, and October 17, 2022: Saint Vincent de Paul

- TBRA is a better way because HPP doesn't provide assistance to those on the street to get them off.
- Keep at income eligibility at 50% of AMI.
- For 50% of AMI, then 6 months for them; if 80% level limit is to 3 months; 3 months allows you to re-evaluate someone's situation and give them more, if needed.
- The agency should have discretion, but it should be spelled out what the degree of the discretion. City should set the criteria and allow the agency to adhere to the guideline.

- Yes, require participants to go to class (i.e., budget to get the money or some sort of training to get the money).
- Don't help those helped before with ERAP.
- Recommend 3 months max, no sliding scale.

Metro Dallas Homeless Alliance (Dallas & Collin County CoC Lead Agency): Meeting on May 4, 2022 (see notes in the consultation table)

Plano Housing Authority: In person meeting on December 5, 2022 (see notes in the consultation table)