



Memorandum

Date: January 12, 2024

To: Mark Israelson, City Manager
Sam Greif, Deputy City Manager

From: Curtis Howard, Director of Neighborhood Services
Shanette Eaden, Housing and Community Services Manager

Subject: HOME-ARP Substantial Amendment

In February 2023, the U.S. Department of Housing and Urban Development (HUD) approved the City of Plano Home Investment Partnerships – American Rescue Plan (HOME-ARP) Allocation Plan. This HUD approved plan listed funding amounts and program activities that are administered by the City of Plano to include Support Services (Homelessness Prevention) and Tenant Based Rental Assistance. However, the HUD approved plan did not list HUD’s HOME-ARP Qualified Populations or state our preference order of those populations.

In June 2023, following discussions with HUD staff members regarding HOME-ARP income eligibility, HUD assigned a HUD consultant to provide technical assistance to modify the eligible HOME-ARP populations in this plan. This assistance was to ensure that we only provide funding to Qualified Populations and that we specify our Qualified Population preferences. One of the qualifying factors the City used was based on household income. The HOME-ARP program, unlike all other HUD programs, does not require that household income is used to initially qualify for program participation. Rather, program participants must fall within one of the four HOME-ARP Qualified Populations. These Qualified Populations (QP) are listed below.

During the months of November and December 2023, city staff worked with the HUD consultant to add clarifying language to the approved allocation plan resulting in this HOME-ARP Allocation Plan Substantial Amendment. The areas amended based on the recommendation of the HUD consultant include:

Qualified Population	Qualified Population Brief Explanation
1. Homeless – as defined in 24 CFR 91.5 Homeless (1), (2), (3)	(1) Literally homeless, living in a place not meant for human habitation or temporary shelter; (2) Imminent Risk of Homelessness as evidenced by losing housing within 14 days and lacking support resources to obtain permanent housing; or (3) Considered Homeless under another federal program statute (i.e. Department of Education)

Qualified Population	Qualified Population Brief Explanation
2. At risk of homelessness, as defined by 24 CFR 91.5 which aligns with HUD's Continuum of Care (CoC)/Emergency Solution Grant (ESG) definition	An individual/family with an annual income at or below 30% of the Area Median Income (AMI) that does not have a support system or sufficient resources to prevent them from becoming homeless <u>AND</u> (a) lives in housing paid for a government/nonprofit program, (b) has been notified that they will be terminated from their housing in 21 days, or (c) lives in an unstable housing condition
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking	HUD has historically listed survivors of domestic violence as presumed benefit population. HOME-ARP expands domestic violence benefit to include similar and/or overcrossing experiences.
4. Other Populations that do not qualify under the one of the other three QPs	i. An individual/family whose annual income is at or below 30% AMI <u>and</u> pays more than 50% of their monthly income towards housing; or ii. An individual/family whose annual income is at or below 50% AMI <u>and</u> is at-risk of homelessness

One targeted population included in the original plan was “Veterans and families that include a veteran family member.” Since this population is not a HUD Qualified Population the HUD consultant recommended this language be removed from the plan. Veterans and their families are still eligible for services if they fall within the Qualifying Populations.

The City of Plano HOME-ARP Program participation preference will be given to individuals/households that fall within Qualifying Populations (1) Homeless and (4) Other Populations.

Additionally, the substantial amendment reduces the City’s use of administrative dollars from \$50,000 to \$5,000 thereby allowing additional funds to be provided to the administering agencies, Assistance Center of Collin County and Texas Muslim Women’s Foundation, to further assist program participants.

The amendment language does not change the administration of the existing City of Plano HOME-ARP Homelessness Prevention and Tenant Based Rental Assistance programs.

ATT: Redline version of the HOME-ARP Allocation Plan Substantial Amendment