

*CITY OF GRAND PRAIRIE, TEXAS
HOME - ARP ALLOCATION PLAN DRAFT*



City of Grand Prairie

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Introduction

The City of Grand Prairie is a federal entitlement community that receives an annual allocation of Community Development Block Grant (CDBG) and Home Investment Partnership Act (HOME) grant funds from the U.S. Department of Housing and Urban Development (HUD). As an entitlement community, the City is required to prepare an Annual Action Plan detailing the uses of CDBG funds to meet its affordable housing and community development goals as outlined in its Consolidated Plan.

For Program Year 2021-2022, the city is proposing to make substantial amendments to its submitted Annual Plan. The purpose for the substantial amendment is to include \$1,907,879 HOME-ARP grant funding received from the U.S. Department of Housing and Urban Development. The purpose of the allocation is to serve households who are at greatest risk of housing instability, including individuals and families experiencing homelessness and/or who are at imminent risk of becoming homeless. Meeting this requirement, HOME-ARP Allocation Plan is the substantial amendment to the adopted Action Plan FY 2021-22.

HOME-ARP funds can only be expended on eligible activities:

- Provision of Supportive Services (such as housing counseling, homelessness prevention, childcare, job training, legal services, case management, moving costs, rental applications, and rent assistance)
- Acquisition and Development of Non-Congregate Shelters: Purchase and Development of Non-Congregate Shelter (these structures can remain in use as a non-congregate shelter or can be converted to 1) emergency shelter under the Emergency Solutions Grants (ESG) Program; 2) permanent housing under the Continuum of Care (CoC) Program; or 3) affordable housing under the HOME Program)
- Tenant-Based Rental Assistance (TBRA)
- Production or Preservation of Affordable Housing (such as acquisition and rehabilitation)
- Non-Profit Operating (5% maximum allocation) (may not exceed the greater of 50 percent of the general operating expenses of the organization for that fiscal year)
- Non-Profit Capacity Building (5% maximum allocation) (may not exceed the greater of 50 percent of the general operating expenses of the organization for that fiscal year)
- Administration and Planning for the HOME ARP Program (15% maximum allocation)

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

- Sheltered and unsheltered homeless populations
- Those currently housed populations at the risk of homelessness
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Other families requiring services, housing assistance, or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

Below are definitions for terms that are used frequently in relation to HOME-ARP funds.

NON-CONGREGATE SHELTER: As opposed to congregate settings, such as traditional homeless shelters, non-congregate shelter provides more private accommodations (individual rooms). During the COVID-19 pandemic, people living in congregate facilities have been at higher risk of contracting or having complications from the virus because physical distancing is difficult.

QUALIFYING POPULATIONS: For HOME-ARP funds, this means people experiencing homelessness, at risk of homelessness, fleeing domestic violence, or otherwise at high risk of housing instability.

SUPPORTIVE SERVICES: Services that help households maintain housing stability and quality of life. These may include support with finding and applying for housing, financial assistance for moving costs, childcare, legal services, mental health, and substance use services, and more.

TENANT-BASED RENTAL ASSISTANCE: A rent subsidy to help households afford housing costs, such as rent and security deposits. "Tenant-based" means the subsidy is attached to the household, and they can use it to rent any rental unit that meets program guidelines and whose landlord is willing to accept the subsidy payment.

HOME-ARP Allocation Plan with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a Participating Jurisdiction (PJ) must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- 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.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

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

Before developing the plan, Grand Prairie consulted with the CoC(s) serving the city’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, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Lifeline Shelter For Families	Services-Homeless	Invited to participate in the Home ARP Plan agency meeting.	Provided the current resources, housing units and programs available to address the needs of youth homeless.
GP Community Hous. Dev. Corp, Inc	Housing	Invited to participate in the Home ARP Plan agency meeting.	Provided the current resources and programs available to address the needs of homeless populations
Children’s First Counseling Center	Services-Children	Invited to participate in the Home ARP Plan agency meeting.	Provided the current resources and programs available to address the needs of families with children and teenagers
Brighter Tomorrows.	Services-Victims of Domestic Violence	Invited to participate in the Home ARP Plan agency meeting.	Provided the current resources and programs available to address the needs of woman and children
Grand Prairie United Charities	Services - Housing Services-Children Services-Elderly Persons	Invited to participate in the Home ARP Plan agency meeting.	Provided annual reports showing the number of households and persons assisted. Provided resources available
Grand Prairie Parks And Rec Dept	Housing Need Assessment	Invited to participate in the Home ARP Plan agency meeting.	Provided overview of after-school program for children
Tarrant County Homeless Coalition	Services-Homeless	Invited to participate in the Home ARP Plan agency meeting.	Solicited input via telephone and email to request feedback and data
Grand Prairie ISD	Services – Education	Invited to participate in the Home ARP Plan agency meeting.	Provided student homelessness data
United Way/211	Services - Family	Invited to participate in the Home ARP Plan agency meeting	Provided the number of calls made daily by victims of domestic violence seeking services.
Metro Dallas Homeless Alliance	Services-Homeless	Invited to participate in the	Provided Point-In-Time and Housing Inventory Count

		Home ARP Plan agency meeting.	
Grand Prairie Homeless Outreach Organizations	Housing	Invited to participate in the Home ARP Plan agency meeting	Intends to provide feedback during Agency Workshop Session on July 21, 2022
Grand Prairie Police Victim Services	Services – Law Enforcement	Invited to participate in the Home ARP Plan agency meeting	Provided number of domestic violence victims referred for to Emergency Housing shelters
CALAB Activity Center	Services - Disabilities	Invited to participate in the Home ARP Plan agency meeting	Provided ICF/IID centers available to address the needs of persons with Intellectual Development Disabilities.
Texas Workforce Commission	Service – Fair Housing	Invited to participate in the Home ARP Plan agency meeting	Provided 2021 Annual Report showing Housing Discrimination Complaint data

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

During the July 26, 2022, agency workshop with Grand Prairie stakeholders, the participants gave presentations on their experiences working with their clients and details on the specific programs their organization offers. The group held a discussion on what they believe to be the priority needs as well as any barriers to address those needs. Additionally, the group completed in-person survey to provide specific details on the populations they are currently serving. The feedback received is below.

Issues, Concerns:

What are the needs and problems?

- *Availability (Immediate access with considerations to safety)*
- *Trauma awareness, trauma counseling (ex. Victims of DV/SA, etc. may exhibit various behaviors and emotions that can create barriers/challenges when working with them)*
- *Phones/Emails (having the ability to communicate with clients)*
- *Can this program assist other victims of crime such as homicide survivors, adults of child victims of crime (sexual, physical, etc.) and so on??? Based on them being at risk of homelessness*
- *Services for children*

How can the barriers be address (barriers)?

- *Having social security number and Proper identification*
- *Legal Status*

- *Language*
- *Safety*
- *Transportation*
- *Appointments/waiting periods (childcare, safety, etc.)*
- *Communication/Lack of (phone not working, no phone, no VM set up, considerations of DV/SA safety, abuser turning phone off, etc.)*
- *Accessibility*
- *Providing childcare*
- *Partnerships need to be established with various community partners/providers (MOUs, interagency agreements, etc.)*

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What are alternatives for addressing the problem, given the anticipated barriers?

- *Multi-disciplinary approach, wrap around services for a one stop shop (Ex. One Safe Place or Irving Cares)*
- *Communication alternatives such as emailing or texting*
- *Utilizing resources such as victim services to communicate or follow up when needed for communication with clients.*
- *Having bilingual staff and having interpreting services available if needed/as appropriate such as “language line” or “master word”*
- *If no social security, maybe accepting a tax ID number*
- *Establishing and maintaining partnerships with victim services regarding safety needs of clients (victims).*
- *Relocation/transferring housing if approved to different city/county/state (consideration for safety)*
- *Accepting other forms of identification such as work badge, debit card with picture, etc.*
- *Transportation vouchers (Via Grand Prairie, or covering costs for Uber)*
- *In particular for victims of DV, FV, SA, Trafficking, etc. expediting process (priority appointments)*

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Why should funding be prioritized for programs in this subject area(s)?

- *ALL of the above reasons...*
- *Victims will need additional support when addressing their overall safety with consideration to their trauma experienced.*
- *Empowerment will be developed within victims as a result of this funding helping them to secure housing.*
- *Leaving a deposit for the next generation; children & youth.*

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

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

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

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

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

- ***Date(s) of public notice:*** Click or tap to enter a date.
- ***Public comment period:*** start date - 10/12/2022 end date - 7/26/2022
- ***Date(s) of public hearing:*** Click or tap to enter a date.

Describe the public participation process:

The city held a workshop session for agencies on July 26, 2022, at The Tony Shotwell Recreation Center to discuss the following issues: What are the needs and problems? How can the barriers be addressed? What are alternatives for addressing the problem, given the anticipated barriers? Why should funding be prioritized for programs in this subject area (s)? Additionally, a Priority Needs Survey was made available on the City’s website for completion and submission online.

Describe efforts to broaden public participation:

In addition to the Public Notice being published in the local newspaper and the city's website, consultation letters were sent via email to community stakeholders requesting comment on the allocation plan. This included social service organizations, homeless service providers, advisory boards, neighborhood associations, and other nonprofit organizations. A list of these organizations and the letter are attached to this plan.

The Public Comment period for the HOME-ARP Allocation Plan and Annual Action Plan Substantial Amendment will begin xxxxxx xx, 2022 and will concluded on xxxxxx xx, 2022. A Public Notice was published in the local newspaper and include information regarding the proposed plan as well as the scheduled Public Hearing. Comments were allowed to be submitted by mail, phone, fax, email or during the public hearing.

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

Grand Prairie will consider all comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan and Annual Action Plan Substantial Amendment.

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

No comments or recommendations were rejected

Needs Assessment and Gaps Analysis

Table 1 - 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	424	155	1,322	1,322	78								
Transitional Housing	404	114	360	360	91								
Permanent Supportive Housing	446	173	1,523	1,523	882								
Rapid-Re-Housing	658	199	450	450	150								
Other Permanent Housing	473	160	27	27	0								
Sheltered Homeless						198	2,562	298	133				
Unsheltered Homeless						0	1,420	72	64				
Current Gap										254	71	(2,314)	(2,300)

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

Gap Analysis (Family Beds) = Family Beds (828), less Homeless Persons in Households with at least 1 child (574) = 254 beds

• Gap Analysis (Family Units) = Family Units (269), less Homeless Family Households (198) = 71 units

• Gap Analysis (Adult Beds) = Adult Beds (1,682), less Homeless Adult Persons (3,996) = (2,314) beds

• Gap Analysis (Adult Units) = Adults Units (1,682), less Homeless Adult Households (3,982) = (2,300) units

Table 2 - 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	24,233		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	555		
Rental Units Affordable to HH at 50% AMI (Other Populations)	4,020		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,955	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,430	
Current Gaps			(190)

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

The data in Table 1 on sheltered and unsheltered homeless population is from the HUD 2021 Point in Time Count (PIT), and 2021 Housing Inventory Count (HIC). The City of Grand Prairie is part of Continuum of Care TX-600 (Dallas City & County, Irving CoC), which includes the geographic area of both Dallas and Collin Counties. In 2021, HUD gave communities the option to cancel or modify the unsheltered survey portion of their counts based on the potential risk of COVID-19 transmission associated with conducting an in-person survey.

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

Homeless as defined in 24 CFR 91.5

According to the 2021 Point-In-Time (PIT) count, there are 3,996 people who are experiencing homelessness within the Continuum of Care geographic area. The count includes people that are staying in shelters and those that are unsheltered. The count reports that out of the 3,996 people who are experiencing homelessness in the area 15 are under 18 years old and 219 are age 18 to 24. The report shows 968 are females, 3,010 are males. Regarding race, most of the population from the PIT count indicated that they are Black or African American (2,217), White (1,609), American Indian (51), Asian (51), Native Hawaiian or Other Pacific Islander (14) while the remaining 60 persons reported multiple races. The Grand Prairie 2021 PIT count finds that of the 3,996 people experiencing homelessness, 676 are Severely Mentally Ill, 514 are Chronic Substance Abuser and 197 are Victims of Domestic Violence.

The report also shows there are 301 sheltered and 74 unsheltered Veterans experiencing homelessness for a total of 375. Males are the largest population with 351 followed by females with a population of 19. Homeless Veterans by Race report Black or African as the largest population with 224 followed by Whites at 132.

Although the PIT count includes some homeless data for youth under the age of 18 and between the ages of 18-24 more data was provided by the Grand Prairie School District showing a count of over 1,100 youth experiencing homelessness as of last day of the 2020-2021 school year.

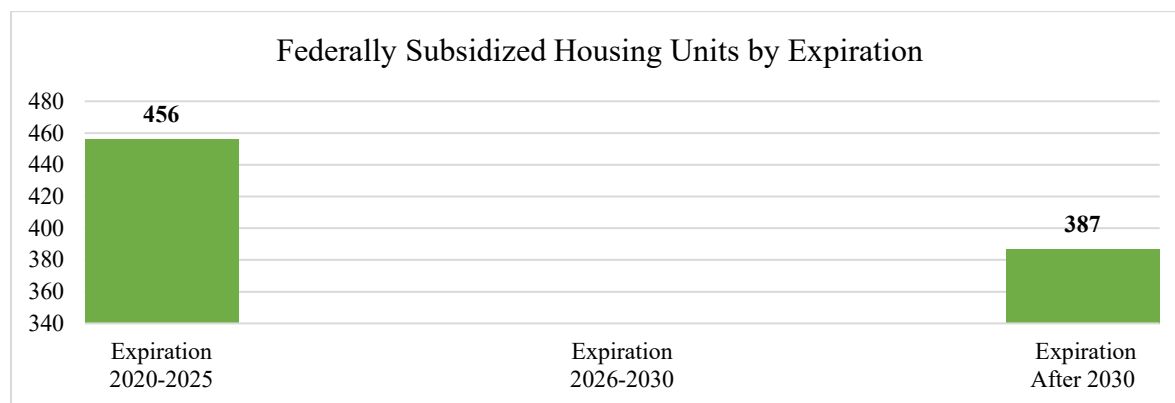
Homeless Point In Time data provided by the Metro Dallas Homeless Alliance reported 77 persons experiencing homelessness in Grand Prairie, however there are no dedicated beds.

At Risk of Homelessness as defined in 24 CFR 91.5

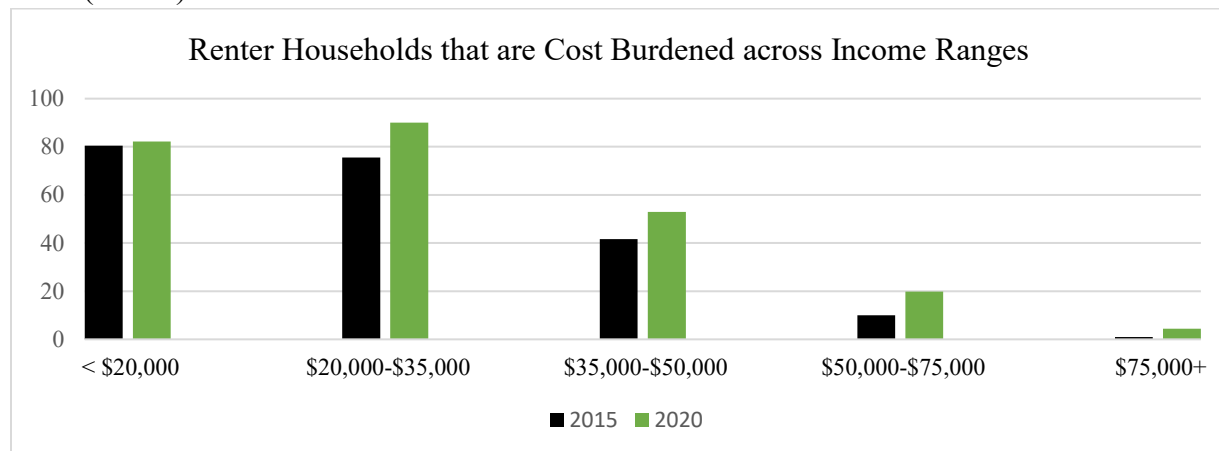
Extremely low- and low-income individuals and families with children who are currently housed are often living from one check to the next with no savings or safety net to fall back on should an unexpected event or emergency occur. These households include all types, single person, small family, large family, and elderly. Characteristics include lack of education, lack of transportation, lack of adequate daycare, inadequate health insurance, drug or alcohol abuse or serious illness. These persons are at risk of losing their homes through foreclosure or eviction,

and unless they have extended family or other support, they are at risk of needing to reside in a shelter or becoming unsheltered.

By 2025, the affordability restrictions on 456 units of federally subsidized housing in Grand Prairie are set to expire. Restrictions on an added 387 units are set to expire after 2030. Some of these units will remain within the subsidized inventory as owners elect to renew their rent subsidy contracts or recapitalize the properties using new federal subsidies.



In Grand Prairie, the share of renter households that are moderately or severely cost burdened decreased from 45.1% in 2015 to 44.4% in 2020. The incidence of housing cost burdens is highest for unassisted renter households with the lowest incomes. In Grand Prairie, renter households with incomes of \$20,000 - \$35,000 had the highest incidence of cost burden in 2020 (90.0%).



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

Approximately 4.3% of the homeless population represents survivors of domestic violence (or about 197 persons). In addition, persons who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, may also be

included in the at-risk and other unstably housed populations described below

Grand Prairie Police Department report 568 domestic cases in 2021 and 715 cases assigned for investigation. Potentially the victims of these case may be looking to flee their situations and may become precariously housed. Grand Prairie Police Department's Victim Services division referred 16 victims of domestic violence and sexual assault to Emergency Housing shelters in the past year.

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

Grand Prairie United Charities, Inc. provided rent, mortgage, food, and utility assistance to 7,209 households in 2021.

Individuals incarcerated in Grand Prairie jails as well as those receiving behavioral health services, including substance abuse disorder services, may also be at risk of homelessness upon discharge.

Among the 193,460 residents living in Grand Prairie, 17,857 or 9.2 percent are living with a disability. Within each race category report 9.3 percent of Black or African American are disabled followed by Whites with 10.5 percent. The age group with the highest percentage of persons disabled are those over the age of 75 with 54 and the age group with the largest population of disabled persons is 35 – 64 with 7,302 persons living 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 (Optional):

The Connections Program through Grand Prairie Public Schools is partially funded through a federally funded, state appropriated McKinney-Vento Grant. The program provides educational support services to the children of families identified as homeless. Students receive backpacks, educational supplies, toiletry items, clothing, transportation, tutoring, and referrals to appropriate community agencies. This program is a joint effort between the City of Grand Prairie and Grand Prairie ISD and provides resources and services from Grand Prairie United Charities, the City of Grand Prairie, North Texas Food Bank, Brighter Tomorrows Shelter, and other social service providers "connected" to assist students and families in Grand Prairie.

The City of Grand Prairie allocated \$843,083 of its 2021 CDBG funding to Rehabilitation and Housing Related activities. The Department of Housing and Neighborhood Services, Housing Services Division, manages 3,006 tenant-based vouchers. The agency does not manage any public housing units.

Low to moderate income homeowners that reside in the City of Grand Prairie may be eligible for a home improvement loan through the Housing Rehabilitation Program.

The program provides full rehab assistance up to \$30,000 and reconstruction up to \$150,000 for citizens 60 and older or disabled combining CDBG and/or HOME funds. Liens are filed to protect the City's investment on single family low to moderate owner-occupied units.

Depending on income, available assistance includes Deferred Payment Loans (DPL) and 0%, 1% or 3% loans for single-family housing rehabilitation. Multi-family rehabilitation assistance is not available.

The purpose of the Housing Rehabilitation Program is to prevent the decline and deterioration of qualified single-family occupied structures by helping them maintain their home through rehabilitation.

Grand Prairie Community Housing Development Organization, Inc provides down payment assistance in the amount of \$7,500 to first time homebuyers and the opportunity to purchase a newly constructed home at affordable price.

HOME Funded Program: Home Reconstruction

- The program provides deferred payment, 0%, 1% and 3% loans for low- and moderate-income homeowners 60 years and older or disabled citizens to rehab single family homes.

Emergency Repair:

- The Emergency Repair Program assists low- and moderate-income persons with emergency repairs that occur without warning and are a threat to the health and safety of the applicant.

Multifamily Affordable Housing Development

Developers and Property Owners may apply for consideration for low-income housing tax credits, partnership with the City of Grand Prairie's public facility corporation, or other city assistance in connection with the development or rehabilitation of affordable multifamily rental housing developments.

Grand Prairie United Charities which received an allocation of \$52,500 from CDBG funding in 2021 provides food pantry, rent/mortgage, utility assistance (electric, water, gas), etc. for Grand Prairie families in need.

Children First Center, which received an allocation of \$52,500 from CDBG funding in 2021 provides abuse prevention services such as guidance and counseling to children, teens, and adults. Examples of therapies available to children include Play Therapy which uses the elements of play in a judgement free environment to help children express the experiences and work through troubling feelings.

Brighter Tomorrows which received an allocation of \$52,500 from CDBG funding in 2021 provides shelters for battered woman and children along with supportive services including food,

clothing, shelter, emergency transportation, emergency medical care, 24-hour a day crisis intervention, legal assistance in civil and criminal justice systems, educational arrangements for children, support groups, parenting classes, survival skills, and domestic and sex violence counseling.

Lifeline Shelter for Families which received an allocation of \$52,500 from CDBG funding in 2021 provides a shelter and supportive services to families experiencing homelessness in Grand Prairie. Supportive services include food, clothing, transportation along with educational and employment services. The shelter also focuses on families with children based on students classified as homeless in the Grand Prairie Independent School District.

GP Charlie Taylor/Tony Shotwell & Dalworth Day Camps which received an allocation of \$52,500 from CDBG funding in 2021 provides after school and day camps Monday – Friday to school age children under the supervision of the Parks and Recreation Department.

CALAB Activity Center provides Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICFs/IID) services to individuals with intellectual and developmental disabilities in need of continuous care and supervision. CALAB Learning Center and CALAB Fort Scott House are the two locations available for person with intellectual and developmental disabilities.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Lifeline for Families is the only shelter in Grand Prairie providing housing units for families with children facing homelessness. However, the city does not have shelters to address the other subpopulations of homelessness. According to the Metro Dallas Homeless Alliance 77 people were homeless in 2021 within the city of Grand Prairie.

At Risk of Homelessness as defined in 24 CFR 91.5

City of Grand Prairie, Department of Housing and Neighborhood Services, Housing Services Division, manages 2,666 tenant-based vouchers. A long waiting list for rental assistance indicates a housing instability and a strong need to produce rental housing units.

By 2025, the affordability restrictions on 456 units of federally subsidized housing in Grand Prairie are set to expire. Restrictions on an additional 387 units are set to after by 2030. Some of these units will remain within the subsidized inventory as owners elect to renew their rent subsidy contracts or recapitalize the properties using new federal subsidies. Lifting of the affordability restrictions will allow for rents to rise substantially, reducing the stock of units renting at an affordable level. Additionally, the incidence of housing cost burdens is highest for unassisted renter households with the lowest incomes. Since 2020 the Fair Market Rent by bedroom has sharply increased as shown in the table below. The demand for the availability and affordability of housing is a growing unmet need of the city.

Fair Market Rent (FMR) By Unit Bedrooms					
Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2023	\$1,259	\$1,326	\$1,565	\$1,972	\$2,572
FY 2022	\$1,076	\$1,150	\$1,362	\$1,736	\$2,280
FY 2021	\$1,029	\$1,134	\$1,352	\$1,746	\$2,309
FY 2020	\$957	\$1,093	\$1,314	\$1,727	\$2,262

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

Considering 4.3% of the homeless population represents survivors of domestic violence (or about 197 persons), and the availability of 72 emergency shelter units provided by Brighter Tomorrows, additional emergency shelter units need to be produced.

Mental health service providers are needed to address victim trauma through awareness and counseling as victims of these crimes may exhibit various behaviors and emotions that can create barriers or challenges when working with them.

Consultations with Grand Prairie Police Victim Services identified the need for programs addressing the service or housing needs of survivors of crimes such as homicide.

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

Households with household income less than or equal to 30% AMI with a cost burden greater than 50% are also at risk of homelessness. Based on the CHAS data, there are 3,995 renter households and 2,745 owner households in this category of potential risk.

According to the Texas Workforce Commission which receives housing discrimination complaints from residents of Grand Prairie, disability and race were the most common basis of housing complaints filed over the past 3 years. The top 3 complaint types reported were “Discriminatory terms, conditions, privileges or services and facilities”; “Failure to make reasonable accommodation” and “Discriminatory refusal to rent”. Fair Housing rights violations are impediments to fair housing choice and can increase a person’s risk of homelessness and housing instability.

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

Homeless Point In Time data provided by the Metro Dallas Homeless Alliance reported 77 persons experiencing homelessness in Grand Prairie, however there are no dedicated beds available leading to a gap in emergency housing.

Considering 9.8 percent of the city's disable population has independent living difficulties, self-care, and ambulatory difficulties, there are no housing unit's utilizing funding from Federal Programs such as Section 202/811 which provides supportive housing for elderly persons and persons with disabilities.

As shown in Table 2 the need for housing resources for 190 households cost burdened and earning less than 50 percent of the area median income. These households typically struggle paying rent and utilities and are at risk and living in unstable housing situations.

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 number one indicator of households falling into homelessness from a place of housing instability is a previous history of homelessness. Homeless assistance is the last resort for households in extreme poverty with few resources of their own and limited connections to others who could offer temporary, emergency support. Additionally, when other systems of care, like hospitals, behavioral health settings, child welfare, and criminal justice systems, are unable to address the reasons why people cannot stay housed, people have no alternative than turning to the homeless response system.

To prevent people from falling into homelessness, public systems for justice, anti-poverty, prevention, health (including behavioral health), child welfare and affordable housing must use data to identify how people are falling into homelessness and target prevention strategies and policies to address these areas.

Additionally, families with children, or unaccompanied youth who are unstably housed and likely to continue in that state, including those people who are doubled up in other people's homes because they lack a home of their own, are not considered to be experiencing homelessness by the U.S. Department of Housing and Urban Development (HUD) and are not eligible for its homeless assistance. These same families are, however, considered to be experiencing homelessness by the U.S. Department of Education and are eligible for additional educational services and supports. People are "at risk of homelessness" if they are losing their primary nighttime residence, which may include a motel or hotel or a doubled-up situation, within the next 14 days and lack resources or support networks to remain in housing.

Identify priority needs for qualifying populations:

HOME-ARP qualifying populations often have many competing needs. Consultation Survey planned meetings with stakeholders are expected to indicate a variety of needs for qualifying populations, including 1) housing, such as shelter, short-term housing, permanent supportive housing, and rental and utility assistance, and 2) supportive services, such as medical care, counseling, substance abuse service, case management, childcare, transportation, legal services, and job training. The needs overlap but also vary amongst these populations, and the following information will cover the priority needs for each of the qualified populations.

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 programs need to provide shelter, housing, and services were determined using data from multiple sources, including stakeholder and public engagement. The level of need for unsheltered and shelter households experiencing homelessness was determined by evaluating the number of unsheltered households and the level of resources available to adequately house the families or individuals with permanent supportive housing and critical long-term supportive services to achieve housing stability. For households that are currently housed but have challenges maintaining their home, the level of need was measured by the amount of inventory that had affordable, safe, and adequate living conditions and the number of renter households that are experiencing severe housing cost burdens. These households need housing outcomes that help them stay housed without incumbering them with the cost of their home.

HOME-ARP Activities

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

Pending HUD approval of its HOME-ARP allocation plan, the City of Grand Prairie will issue a Notice of Funding Availability (NOFA) for interested and experienced operators and developers of permanent supportive housing and/or affordable housing; tenant based rental assistance; and qualifying supportive services. Preceding the issuing of the RFP, the City will host an advertised pre-solicitation workshop to advise prospective applicants of the process, HOME and HOME ARP Guidelines and Regulations, and documentations and supportive bid materials that will be required as part of the solicitation. Next, the city will solicit proposals through a Request for Proposals (RFP) process. The agencies selected through the request for proposal (RFP) will then be contracted to move forward with development, rehabilitation, supportive services, referral,

and administration of services for qualified populations and the city will provide oversight, monitoring, and reporting

Describe whether the PJ will administer eligible activities directly:

The city will administer the administration and planning activities under the grant. However, administering the remaining eligible activities will be subject to the results of the request for proposal process to identify and contract with agencies, developers, and organizations to submit proposals and those selected for funding will administer activities and projects. Considerations will be given to City Agencies including Grand Prairie Housing and Neighborhood Service to assist in the administration of specialized activities such as Tenant Based Rental Assistance in conjunction with their current programs for HOME ARP Applicants.

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:

The City of Grand Prairie expects to receive \$1,907,879 from HUD for HOME ARP. The city through a competitive RFP process will determine the individual activity and amount for each category of funding listed in the HOME ARP Allocation Table below. The City will allocate funds ranging from no dollars for a category and up to the maximum grant amount of \$1,907,879 allocated. The city will 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 will be used to meet this requirement.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ 1,297,359		
Development of Affordable Rental Housing	\$ 324,339		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%

Administration and Planning	\$ 286,181	15 %	15%
Total HOME ARP Allocation	\$ 1,907,879		

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

Designated funding amounts in the allocation table are estimates based on needs demonstrated in the plan. The City at its' discretion and subject to the selected projects in the Request for proposal process, will determine final allocation of funds based on City Council approval. Non-Congregate Housing will be eligible for consideration as Affordable Rental Housing. Affordable Rental Housing and Non Congregate Housing will be considered for future HOME entitlement in addition to HOME ARP funding.

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:

Grand Prairie has been able to identify, with the development of the gap analysis and stakeholder meetings, activities that will assist the qualified populations in Grand Prairie. The results of the gap analysis shows that there is a need for an expansion of Affordable Rental Housing as cost burdened renters was 44.4% in 2021. Emergency Shelters and the capacity of the Nonprofit network who respond to families and individuals of the most vulnerable qualified populations

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:

Using HUD's 2021 Unit Total Development Cost Limits, the estimated cost per 700 square foot unit is \$155,069. The data along with the housing characteristics required by the qualifying populations was inserted into HUD's HOME-ARP Housing Production Goal Calculation Worksheet to determine the city's housing production goals. The City's goal is to allocate \$324,339 of its funding towards affordable housing to leverage and determine a combination of 5-7 newly constructed non-congregate housing units and 10-13 rehabilitated housing rental units. The city intends to provide assistance up to \$50,000 to potential developers leveraging multiple sources of funding.

To estimate the number of housing units the city plans to assist through Tenant Based Rental Assistance the city considered the average per unit cost (\$1,081) of the housing units currently managed by Grand Prairie Housing and Neighborhood Services Housing Choice Voucher Program. Using these factors as a baseline, the city plans to develop 90 housing units supported through Tenant Based Rental Assistance. The City's final housing production goals will be

determined based on the competitive RFP process allocating funding to specific projects after HUD approval of the HOME ARP Allocation Plan.

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:

Because the city lacks sufficient housing for its homeless population and those at risk of homelessness, the creation of about 5-7 non-congregate or affordable rental housing units will address the unmet housing needs and support the CoC ultimate goal of ending chronic homelessness and prevention of additional at-risk persons and families from becoming homeless. The city will determine based on the competitive RFP process allocating funding to specific projects after HUD approval of the HOME ARP Allocation Plan. The City of Grand Prairie has a goal of 10-13 units of non-congregate or affordable rental housing to be supported through rehabilitation for new development funding. Data from organizations consulted and census data support the city's goal for needed affordable rental units

Preferences

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

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

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

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

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

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

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.** For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:
None

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:
None

Referral Methods

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

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

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

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

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

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

The city does not intend to use any referral method

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):

The city does not intend to use the coordinated entry process for referrals.

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.

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

The city does intend to set any preference

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The city does not intend to any limitation

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

N/A

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***

Grand Prairie does not intend to use HOME-ARP funds to refinance existing debt

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

N/A

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

The city intends to invest HOME ARP funds to maintain current affordable units and create additional units.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

N/A

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

The city will not use HOME ARP funds to refinance any multifamily loans

- ***Other requirements in the PJ's guidelines, if applicable:***

N/A

Appendices

APPENDIX A: HOME-ARP NEEDS ASSESSMENT SURVEY

APPENDIX B: HOME-ARP NEEDS ASSESSMENT SUMMARY OF RESPONSES

APPENDIX C: STAKEHOLDER MEETING PRESENTATION
APPENDIX D: FOCUS GROUP MEETING SUMMARY
APPENDIX E: PUBLIC HEARING NOTICE
APPENDIX F: SF-424S AND CERTIFICATIONS