



**City of Wichita Falls
PY 2021 HOME-ARP Allocation Plan**

Substantial Amendment to PY 2021 Action Plan

**For Submission to the
U.S. Department of Housing and Urban Development
on or about August 3, 2022**

Introduction

In September 2021, the U.S. Department of Housing and Urban Development (HUD) announced the allocation of \$1,572,000 to the City of Wichita Falls, Texas for a new grant called the Home Investment Partnerships Grant – American Rescue Plan. (HOME-ARP). CPD Memo 21-10 noted that HOME-ARP funds were intended to provide assistance and/or services to the homeless through acquisition/development of a non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing, administration and planning, and nonprofit operating and capacity building assistance. HOME-ARP funds are intended to assist a certain portion of people who fall within the HOME-ARP “qualifying populations,” which include:

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

To receive funding, the City must develop and submit to HUD a HOME-ARP Allocation Plan, which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and community engagement. The City of Wichita Falls HOME-ARP Allocation Plan includes the following below.

Consultation

Summarize the consultation process.

The City partners with public and private entities, which were consulted with during the development of the HOME-ARP Allocation Plan. The consulted parties have relevant knowledge of the potential activities that would best benefit the qualifying populations. Stakeholders consulted include agencies who work with families or individuals experiencing of at-risk of homelessness, fleeing domestic violence, and other vulnerable qualifying populations.

In the development of the allocation plan, the City asked for input from stakeholders concerning eligible activities and the proposed budget for the HOME-ARP Program. Stakeholders articulated their gap in services and housing needs by providing written and verbal input. The City has synthesized feedback from participants and the following table will provide summaries of the feedback received. The City will continue to meet with stakeholders throughout the implementation of the HOME-ARP Activities in an effort to assess the ongoing needs of stakeholders’ clients. The City will also strive to collaborate with stakeholders to develop and effectuate strategies that will help end chronic homelessness. Comments are summarized below.

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

Agencies/ Organizations Consulted	Type of Agency/ Organization	Method of Consultation	Feedback
Wichita Falls Housing Authority	Public Housing Authority	Consultation Survey	Greater need for transitional shelters, short-term emergency housing, and mental health/substance abuse centers. Need greater case management resources across all programs.
City of Wichita Falls Housing Division	Public Housing Authority / Services-Homeless	Consultation Survey	Rental prices are too high, lack of affordable housing, and landlords will not work with people with no income qualifications for services. Access to client documents (ID, birth certificates) is difficult. A program to remodel rental units for low-income people with a requirement for affordability would be helpful.
Salvation Army, Inc.	Services-Homeless	Consultation Survey	Moving costs, rental assistance, and counseling were identified as unmet needs and the waitlist for affordable housing list as a gap in services. Shortages of single bedroom apartments, and funds for moving costs were noted. Access to client ID, affordable housing, counseling, and rapid rehousing services were identified as the greatest challenges.
North Texas Aging and Disability Resource Center	Organizations Serving Elderly; Organization Service Disabled	Consultation Survey	Greatest needs are moving cost assistance and assistance to obtain client documentation (ID and birth certificate). Burdensome qualifications from landlords and services, and client documentation are the greatest hindrances. Also, a negative public perception of homelessness hinders the ability to help people in need.

Northwest Texas Legal Aid, Inc.	Other: Legal Services	Consultation Survey	Greatest challenges include difficulty contacting clients, client documentation problems (ID, birth certificate), and lack of long-term solutions. Suggests legal assistance as an avenue to slow down evictions and subsidies to lower rents.
Nortex Regional Planning Commission	Continuum of Care	Consultation Survey	Limited funding for people at-risk and who experience homelessness; shortage of housing and reluctance to rent to LMI people. There is a definite needs of ADA housing, elderly housing, and housing near transportation. More assistance needed for people who lost employment or hours, and moving cost assistance. Area of need include legal assistance, and shelters for victims of domestic violence, the disabled, sex offenders, and grant writing assistance to organizations. Obtaining matching funds is one of the greatest challenges to the area.
Helen Farabee Centers – Veterans Services	Other: Military Veteran Peer Network, Mental Health and Substance Abuse Provider	Consultation Survey	Identified case management and outreach to at-risk populations as areas of particular concern along with lack of counseling access. Also identified affordable housing as a gap in services. Transportation access, and private shelter rooms were identified as needed and challenges to accommodate. Sustainability of programs and the stigma of homelessness was also seen as the greatest challenge to assisting the homeless population.
First Step, Inc.	Domestic Violence Service Provider	Consultation Survey	Identified a lack of space for people fleeing domestic violence and a need for more ADA accessible shelters, individual rooms, and transitional housing. Moving costs were also identified as a needed resource. The lack of affordable safe housing and transitional housing are the greatest challenges facing the community.
North Texas Veteran’s Relief Fund,	Services – Homeless; Other:	Consultation Survey	Long term housing coupled with supportive services is needed. Limited space and stringent requirements for

Inc. (dba Base Camp Lindsey)	Veteran's Service Provider		religious participation that excludes individuals from receiving care. Lack of affordable housing and long waiting lists for affordable housing.
Red River Aging & Disability Resource Center	Services	Written Letter after request for consultation	Strongly encourages future and continued development of affordable housing with a focus on elderly needs and ADA accessibility.
Texas Department of Housing and Community Affairs	Services-Homeless; Other: Statewide Public Housing Authority	Email; Consultation Survey	Refused consultation as their jurisdiction does not include Wichita Falls; directed City staff to City of Wichita Falls Housing Division (Section 8 Choice Voucher) and Wichita Falls Housing Authority.

Public Participation

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:

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/attendance	Summary of comments received	Summary of comments not accepted
1	Other: Notice of Funding Availability	Non-targeted/ broad community	Emails sent on 1/24/22 to local groups and posted on the City website notifying the community that HOME-ARP funds would be available to the City for allocation and encouraging the submission of applications for projects that benefit qualified populations.	Received inquiries from two organizations about applying for funds. Applications for 2 projects were submitted.	No comments were rejected.
2	Public Meeting	Minorities; Non-english speaking (Spanish); Persons with disabilities; Non-targeted/	The City posted on 3/30/22 a continuous notice on the public notices bulletin board at City Hall for a planning meeting. The meeting was held on 4/14/22 in order to solicit public input	Two individuals attended the meeting to head about the HOME-ARP Program. Attendees stated over-regulation from the federal government stopped needed help from reaching people in need and created	No comments were rejected.

		broad community	on the planning process.	inflexibility in programs. In addition, more transitional housing, drug abuse, and mental health assistance is needed and specifically for veterans.	
3	Public Meeting	Minorities; Non-english speaking (Spanish); Persons with disabilities; Non-targeted/ broad community	The City posted on 4/29/22 a continuous notice on the public notices bulletin board at City Hall for a planning meeting. The meeting was held on 5/18/22 in order to solicit public input on the planning process.	There were two attendees. No comments were received.	No comments were rejected.
4	Public Meeting	Minorities; Non-english speaking (Spanish); Persons with disabilities; Non-targeted/ broad community	The City Council Subcommittee on Outside Agencies met with organizations applying for funding on 5/26/22 to hear proposals, ask and answer questions about projects and activities for which the organizations were seeking funding.	Two organizations sent representatives to the Council Subcommittee meeting. The Subcommittee heard project proposals, organization's needs, community needs, and funding requests.	No comments were rejected.
5	Public Meeting	Minorities; Non-english speaking (Spanish); Persons with disabilities; Non-targeted/ broad community	The City posted in the Times Record News on 6/30/22 a public notice regarding a comment period on the HOME-ARP Allocation Plan, running from July 1-31, 2022 with a public meetings to occur on 7/14/22. The meeting was held on 7/14/22.	No comments were received.	No comments were rejected.
6	Public Meeting	Minorities; Non-	The City posted in the Times Record News	No comments were received.	No comments were rejected.

		english speaking (Spanish); Persons with disabilities; Non-targeted/ broad community	on 6/30/22 a public notice regarding a comment period on the HOME-ARP Allocation Plan, running from July 1-31, 2022 with a City Council hearing to be held on 7/19/22. The hearing was held on 7/14/22.		
7	Public Meeting	Minorities; Non-english speaking (Spanish); Persons with disabilities; Non-targeted/ broad community	The City of Wichita Falls City Council held a public meeting on August 2, 2022 to consider all public comments on the the HOME-ARP Allocation plan and PY 2021 Substantial Amendment.	No comments were received.	No comments were rejected.

The City of Wichita Falls held one public forum prior to the comment period to invite planning comments from any citizens, municipal officials, non-profit agencies, public housing agencies, private developers, governmental agencies, and the Continuum of Care. This forum was intended to garner any and all potential public commentary and thoughts prior to the formal submitted draft of the HOME-ARP Allocation Plan. The public forum was held on the date listed above.

Once a final prepared draft of the HOME-ARP Allocation was completed City staff published notice of the public comment period for the HOME-ARP Allocation Plan and the date of the public hearing during a meeting with the City Council on the date above. During the public hearing, City staff discussed the development of the HOME-ARP Allocation Plan, which incorporated information and discussion of community needs and eligible activities related to HOME-ARP, along with an opportunity for the public to provide comments on the proposed budget and activities. A list of eligible HOME-ARP activities and the City’s proposed HOME-ARP Budget was also presented. The public comment period and the public were held on the dates listed above.

A public notice announcing the public forum held during the planning phase was posted on the bulletin board at Memorial Auditorium/City Hall at 1300 7th Street, Wichita Falls, Texas 76301 and on the City’s website. The public notice announcing the public comment period was published in the Wichita Falls Times Record News on the date listed above. The public comment period on the Draft HOME-ARP Allocation Plan coincided with the public hearing on the dates listed above.

Actions to improve participation

- Conduct workshops at various locations throughout the City, provide ADA accessibility for all persons with disabilities, and provide interpretation for limited English proficiency clientele;
- Use electronic and print media to solicit public participation through various media outlets including, but not limited to, the Times Record News, the City's website, and the City's public notice bulletin board. This includes mass emails to City employees, nonprofit organizations, and any interested developers/businesses;
- Review and respond to all citizen comments and incorporate such comments in the Action Plan, as applicable;
- Analyze the impact of the Allocation Plan program activities on neighborhood residents, particularly low-to-moderate-income households; and,
- Accept any comments or views of residents received in writing, or orally at a public forum, public hearing, or during the preparation of the HOME-ARP allocation plan.

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

- Some of the needs are highlighted in the Needs Assessment.
- More transitional housing is needed.
- More emergency sheltering is needed for victims of domestic violence.
- Domestic violence service providers require more space for families, men, women, and those with disabilities.
- Veterans need additional assistance.
- Stringent requirements (ID, religious, etc.) from the federal government prevent help from reaching people.
- More mental health assistance is needed.
- More drug abuse assistance is needed.

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

All comments were accepted.

Needs Assessment and Gaps Analysis

To assess the unmet needs of the HOME-ARP qualifying populations, the City evaluated the size and demographic composition of those populations. In addition, the City also identified gaps within its current shelter and housing inventory, as well as the service delivery system. In the needs assessment and gaps analysis the City utilized Current Housing Affordability Data (CHAS), 2020 Point in Time Count (PIT Count), 2020 CoC Housing Inventory Count (HIC), or other data sets available from other sources. The following information include the basis for the Needs Assessment and Gap Analysis. The City favored the 2020 PIT Count and HIC due to the completeness of the data. The local CoC received a waiver from HUD that released the organization from obtaining the unsheltered 2021 PIT Count due to the COVID-19 Pandemic unsheltered homeless populations.

Homeless Needs Inventory and Gap Analysis Tables

Homeless													
	Current Inventory					Homeless Population				Gaps 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	75	16	222	23	0	175	6,687	100	362	-100	-159	-6,465	-6,664
Transitional Housing	3	1	61	19	0	0	11	0	3	+3	+1	+47	+5
Permanent Supportive Housing	10	1	0	0	0	0	0	0	0	+10	+1	+10	/
Other Permanent Housing	0	0	0	0	0	0	0	0	0	/	/	/	/
Sheltered Homeless	1,297	1	42	12	0	11	5,260	0	0	+1,286	-10	-1,328	-
Unsheltered Homeless	0	0	0	0	0	0	5	54	0	/		-59	
Current Gap										+1,199		#	#

Non-Homeless				
	Current Inventory		Level of Need	Gap Analysis
	# of Units		# of Households	# of Households
Total Rental Units	15,915		37,297	-21,382
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)			3,725	
Rental Units Affordable to HH at 50% AMI (Other Populations)			2,705	
0-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)			840	
30-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)			450	
Current Gaps				-21,382

Data is derived from the American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS), and the National Low Income Housing Coalition Out of Reach Report 2021: Wichita Falls.

Additional Information

The supply of rentals has increased between 2010 and 2018 by 160 units. There were 15,755 occupied units paying rent in 2010 and 15,915 occupied units paying rent in 2018. The median monthly rent in 2010 was \$723 and increased to \$828 per month in 2018. The National Low Income Housing Coalition's "Out of Reach" 2019 Annual Report calculates the amount of money a household must earn in order to afford a rental unit based on the number of bedrooms in a rental unit at the Fair Market Rent (FMR), consistent with HUD's affordability standard of paying no more than 30% of income for housing costs. Data is presented in the Renter Affordability table for the Wichita Falls Metro Statistical Area (MSA). As noted in the 2021 Out of Reach Report, the NLIHC estimates that the median income for a renter in the Wichita Falls MSA is \$33,280.00. The Area's Fair Market Rent (FMR) for a two-bedroom apartment is \$832, marking a slight increase over 2018, and in order to afford this level of rent and utilities, without paying more than 30% of income on housing. The Fair Market Rent that would be considered affordable at the mean renters wage is \$670, which is \$162 below the actual FMR. In order to afford a two-bedroom housing unit without spending more than 30 percent of one's income on rent, one would need to work at a minimum of 48 hours per week or maintain at least 1.2 full-time jobs in Wichita Falls.

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

HUD requires HOME-ARP funds be used to primarily benefit individuals and families, in specified HOME-ARP "qualifying population." Qualifying populations include, but are not limited to, the following:

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

Homeless Populations

In accordance with HUD's definition of homeless under the HOME-ARP grant the City will consider a homeless family or individual to generally include:

- An individual or family who lacks a permanent and/or adequate home.
- A person or family who will imminently lose the permanent home due to a lack of resources or support.
- A youth under the age of 25, even if accompanied by an adult, which does not have a permanent home.

Using HUD's 2014-2018 CHAS data, Wichita Falls has 5,200 households with incomes at or below 30% AMI, which is 14.16% of all Wichita Falls households. Approximately 71.6% of all households with incomes at or below 30% AMI are renter households. As shown in Table 3 above, there are approximately 2,885 renter households that earn 30% AMI or under and have one or more housing problems, which could include housing cost burden, overcrowding, lack of kitchen facilities, or lack of plumbing facilities. These households are considered to be at risk of becoming homeless. Further, there are 1,115 households that are owner-occupied that have one or more housing problems.

Fleeing or attempting to flee domestic violence or human trafficking

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. Wichita Falls has many organizations, professionals, and law enforcement whose goals are ending domestic violence and supporting the victims of these crimes locally and at the state level. Persons experiencing domestic violence continues to high priority issue for the City. There is currently one domestic violence and abuse shelter and program in Wichita Falls which offers a hotline and emergency shelter. The U.S. is currently experiencing an average of an 8% increase in domestic and family violence, however this problem has reached unstable proportions in Wichita Falls with a marked 40% increase in the number of individuals receiving assistance from local shelters, including Wichita Falls' lone dedicated facility. In addition, the Wichita Falls Police Department reports almost a three-fold increase in the number of domestic and family violence calls they receive on a monthly basis.

Residents living in housing instability or in unstable housing situations

HOME-ARP qualifying populations also include other populations who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI and are experiencing severe cost burden or have an income less than 50% AMI and meet a certain condition, like living in someone else's home or living in a hotel due to an economic hardship. Many renters in Wichita Falls experience varied housing challenges. A total of 48.44% of all Wichita Falls renters have housing problems or severe housing problems. In CHAS data, HUD defines housing problems as a household that has one or more of the following: lacking a kitchen or plumbing, having more than one person per room, or being housing cost burdened at 30% or more. Of these problems, housing costs negatively impact most renters whose household income is at or below 50% AMI.

The City's Housing Division, which manages the Housing Choice Voucher Program, reports that there is a lack of affordable housing that meets HUD's standards and qualifications for livability, affordability, and safety. This has created a major backlog and waitlist for people seeking housing and is further compounded by landlords who place burdensome qualifications for deposits and income. This, coupled with the recognition of this problem by the Continuum of Care and other agencies, shows a need for more rental assistance and supportive services. However, it has been noted that developers are not interested in developing or maintaining rental properties for affordability. Despite previous approaches to this issue units are being converted to luxury and higher-end rentals. Homes and apartments are being converted into short-term rentals as well. This does not appear to be an issue that the City can readily solve at the moment despite any wish to do so. Therefore, the City believes that our efforts would be better focused on emergency shelters. In addition, the City is fortunate to have Faith Mission and Faith Refuge present in the City of Wichita Falls to support homeless populations. While the City has partnering with these entities in the past using CDBG funds, it has been unable to do so due to the

religious requirements placed upon program clients at the facility, which would be a violation of the First Amendment of the U.S. Constitution if public funds were used. However, their programs offers support for many.

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; and,**
- **Those at greatest risk of housing instability or in unstable housing situations:**

Many of the needs of the qualifying populations are similar and include the need for flexible response, available housing that is affordable, case management to track and follow-up with individuals entering the system at any given point, and supportive services or assistance that could prevent homelessness or greater housing instability. The following reviews the needs of each qualifying population.

Homeless Populations

People experiencing unsheltered homelessness are at great risk of continued harm due to higher rates of morbidity and mortality resulting from pre-existing health conditions, exposure to the elements, lack of access to healthcare, and elevated rates of hospitalizations with longer, more complex hospital stays. Long periods of living without shelter also put individuals at a greater risk of social isolation and the chance of victimization. The process of resolving unsheltered homelessness is much more complicated and takes longer compared to that for people receiving crisis shelter. It is important to connect people to permanent housing with the right level of services to ensure their success. Housing options must be flexible, client-centered, easily accessible, and paired with support services necessary to help clients remain in housing for the long-term. Returning to homelessness after a housing placement is traumatizing for the families and an inefficient use of assistance resources.

Individuals and Families at Risk of Homelessness

Individuals and families at risk of homelessness may need housing assistance that could vary from eviction assistance, diversion assistance, or rent and utility assistance in addition to other types of supportive services. Households who need assistance with maintaining or regaining housing to prevent homelessness will benefit from targeted services. However, these services require specialized outreach and engagement services targeted to high-risk populations to ensure those at highest risk for homelessness are engaged with housing supports before experiencing literal homelessness. Services that may be needed to assist individuals and families at risk of homelessness include:

- Short-term subsidies to defray rent and utility arrearages for families that have received eviction or utility termination notices or are experiencing a hardship that may lead to homelessness
- Moving costs like security deposits and first and last month's rent to permit homeless families to move into their own apartment
- Case management services geared towards problem solving and rapid resolution for those experiencing, at-risk of, or emerging from homelessness
- Mortgage payments
- Legal and mediation services

Fleeing or attempting to flee domestic violence or human trafficking

There is only one independently organized shelter throughout Wichita Falls that assist domestic violence victims, and their family members. In addition to housing accommodations, there are varied additional services provided such as counseling and advocacy assistance. Domestic violence or human trafficking survivors often lack easy access to short-term shelter, as well as, quick access to medical and psychological services. In addition, there are only informal networks to connect survivors to job opportunities. Without economic independence, many survivors are caught in abusive relationships and the gains they make with traditional social services are not fully realized. To compound matters, when these gains are not fully realized or are later lost many victims will return to their abuser. The City also has a need for more individual and ADA accessible rooms since people fleeing violence can be of any genders, may be disabled, or may even have one or more children with them. Creating better and expanded access to short-term shelter and housing as well as increasing the supportive services available could help stabilize this qualifying population.

Residents living in housing instability or in unstable housing situations

Residents who have been previously homeless or are currently using some type of rental assistance may need the assistance to continue for a short or long period of time. Funding existing services and housing assistance programs is important to the housing stability of these individuals and families. In addition, Wichita Falls and the surrounding 11-county region has a lack of quality affordable housing available for residents in need causing cost burdens leading to housing instability. There is also a need to assist residents living in unstable housing situations to increase their income, build savings, and acquire assets through additional supportive services in the community.

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:

The City of Wichita Falls receives an annual allocation of approximately \$1.65 million in federal formula grant funding such as the Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME) Grant. The City utilizes this grant funding to assist families with obtaining affordable homes, supportive services, maintaining the safety and livability of owner-occupied homes, emergency shelter, public facility and infrastructure rehabilitation, and other services. These services can and often benefit qualifying populations. Although the City uses CDBG to fund public services, to the greatest extent possible, it is restricted and often hindered by the cap of 15% of the total CDBG grant amount from offering more services. While CDBG activities can provide needed services, such as childcare; delivered meals for the elderly and disabled; and homeless services, our limited grant amount coupled with the funding cap prevents the City from doing more. In addition, while CDBG funding greatly assists the City, it is insufficient to cover the needs of organizations serving both the needs of the homeless and those of the low-to-moderate income community as a whole.

The City participates in and consults often with the Continuum of Care (CoC), which is maintained at NORTEX Regional Planning Commission. NORTEX coordinates with the 11-county area that comprises Wichita Falls and the surrounding region. The CoC Program is designed to:

- Promote a region-wide commitment to the goal of ending homelessness

- Seek grants and provide funding for efforts by nonprofit providers to assist homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness
- Promote access to, coordinate, and effect utilization of programs by homeless individuals and families
- Sponsor self- sufficiency among individuals and families experiencing homelessness

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

The City of Wichita Falls, along with the Continuum of Care (CoC), the Homeless Coalition, and other agencies collaborate with non-profit organizations to analyze existing needs to assist in identifying funding gaps and other gaps in services. The Homeless Point in Time Count, organized by the Continuum of Care, annually assesses the characteristics of the homeless population in the 11-county region, which include Wichita Falls.

The CoC noted the following strengths and gaps in the City’s institutional delivery system:

- Strengths:
 - High level of coordination and consultation amongst nonprofit service organizations.
- Gaps:
 - Lack of transportation and job services.
 - Need for increased mental health and substance abuse services.
 - Lack of rental assistance.
 - Need for more alcohol/drug treatment facilities.
 - Insufficient resources for mortgage and utility assistance, counseling, and financial services.
 - No tracking of data for chronically homeless men and women who reside under the bridges and in the woods.
 - Need for more coordinated case management system.
 - Limited number of shelters and little to no resources for the elderly and disabled.
 - Need more shelters and affordable housing.
 - Need transitional housing.
 - Burdensome regulations and qualifications for those needing assistance.
 - Burdensome rental qualifications for renters seeking affordable housing.

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:

A previous history of homelessness is the chief reason why households often fall into homelessness when they are in a place of housing instability. Generally, homeless assistance is a last resort for households in extreme poverty because these households have few resources and limited connections to others who could offer temporary, emergency support. Additionally, when other care systems such as 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 assistance. Data to identify how people are falling into homelessness must drive and target prevention strategies and policies to address these issues.

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 support. People are considered to be "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 they lack the resources or support networks to remain in housing.

Identify priority needs for qualifying populations:

HOME-ARP qualifying populations often have many competing needs. The needs overlap, but also vary amongst these populations. The following information covers the priority needs for each of the qualified populations.

Domestic Violence Populations

The City of Wichita Falls identifies and prioritizes families or individuals fleeing domestic or dating violence. This high-risk population needs increased safety measures to minimize the risk of returning to unsafe residential environments. This qualified population has a critical need for temporary shelter for safe harboring and supportive services to help them transition to permanent supportive housing. These families and individuals also need supportive services to assist them like the legal advocacy, childcare, employment services, and case management. There is a distinct need of ADA accessible and individual rooms to accommodate individuals of any gender, and families.

Veterans

Many veterans are tasked with overcoming the burdens of war by themselves. Veterans are a qualifying population that must qualify in one of the four primary categories. Many veterans suffer from disabilities, mental health issues, and often find themselves homeless due to a lack of knowledge regarding existing resources or a lack of access caused by transportation and other problems. The City is exploring an NCS project to assist this population in the future to make them a priority. In the meantime, the City will use other funds to increase access to transportation and fund infrastructure initiatives to help alleviate a lack of physical access to the greatest extent possible.

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 gaps in services and programs needed to provide shelter, housing, and services were determined using data from multiple sources. The level of need for unsheltered and sheltered 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.

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:

As with HOME funds, the City will use HOME-ARP funds to promote public/private partnerships as a vehicle for preserving and expanding the stock of affordable homes. HOME-ARP funds may be leveraged with private and public funding sources to support activities for supportive services, tenant-based rental assistance, and the development of non-congregate shelters. The City will continue to support eligible activities through nonprofit partners to assist very low-income households and qualifying populations. HOME-ARP funds will be awarded to nonprofit or for-profit organizations, based on the merit of proposals or applications received prior to or during the grant implementation period. For development activities and supportive services, greater preference is given to proposals or applications that have other sources of equity and financing and are in line with the City's priorities.

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:

The City of Wichita Falls will not allocate funds to a subrecipient or contractor to administer the entire HOME-ARP grant. The City has planned to invest in a subrecipient NCS project that will aid one or more qualifying populations, but administrative funds will remain with the City of Wichita Falls.

Use of HOME-ARP Funding

Funding Category	Funding Amount	Percent Allocated	Statutory Percent Limit
Acquisition and Development of Non-Congregate Shelter (NCS)	\$700,000.00 (Allocated) \$714,872.00 (Unreserved for NCS Project)	90%	N/A
Development of Affordable Rental Housing	\$0.00	0%	N/A
Tenant-Based Rental Assistance	\$0.00	0%	N/A
Supportive Services	\$0.00	0%	N/A
Non-Profit Operating	\$0.00	0%	5%
Non-Profit Capacity Building	\$0.00	0%	5%
Administration & Planning	\$157,208.00	10%	15%

Funding Additional narrative, if applicable:

The table above shows the HOME-ARP budget, which indicates the amount of HOME-ARP funding that is allocated for each eligible HOME-ARP activity type including administrative and planning costs within HOME-ARP statutory limits. The City has chosen to invest the money in a subrecipient NCS project. Two entities approached the City with NCS plans. One had a more defined path forward, which was funded. The City placed the additional funding beyond the allocated NCS Project and Administration & Planning amounts into an unreserved NCS Project line. This will allow the City to invest in either a second NCS project or allocate further funds to the ongoing NCS project with an expected amendment next program year.

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 has identified activities that will assist families and individuals of the most vulnerable qualified populations. The gap analysis shows that there is a need to strengthen the City's crisis response system to identify those experiencing homelessness, prevent homelessness when possible, connect people with housing quickly, and provide services when needed. However, even with the addition of HOME-ARP funds the City still has limited funding to create a lasting impact on the community. One of the major gaps in the City's homeless inventory is emergency shelter for people fleeing domestic and dating violence or human trafficking. People experiencing a housing crisis while fleeing an unsafe situation need to find a place to stay quickly. Access to this type of housing is a current gap in the system. Emergency shelter and interim housing can help to fill this gap to strengthen the crisis response system. Unlike other existing funding sources, like HOME grants, the HOME-ARP grant provides an opportunity to assist households with temporary supportive housing through the acquisition and development of non-congregate shelters. These types of shelters will not only help those experiencing homelessness, but they will prioritize families or individuals who are fleeing, or attempting to flee, domestic violence and sexual assault. Many of the families or individuals who receive assistance to mitigate homelessness or to flee violent circumstances require wrap-around services with their housing because of the compounding challenges they face. The City will continue to support organizations that provide supportive services to help program participants achieve self-sufficiency. Among the most vulnerable qualified populations in jeopardy of housing instability are families and individuals who have challenges with housing affordability.

HOME-ARP Production Housing Goals

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

The City of Wichita Falls does not intend to use HOME-ARP funds to support affordable housing.

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:

The City of Wichita Falls does not intend to use HOME-ARP funds to produce new rental housing.

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:

During and after the housing crisis caused by the COVID-19 pandemic, HOME-ARP qualifying populations in Wichita Falls need support to improve their resilience. These vulnerable families and individuals experience compounded obstacles, including housing cost burden or living in poor housing conditions. Because of this, the City will use HOME-ARP to help house or keep these families/individuals housed through a non-congregate shelter.

Based on the need and gap analysis, the City will prioritize families and individuals that are those who are fleeing or are attempting to flee domestic violence, dating violence, or human trafficking. The City only has one shelter to house these individuals and our City has noted a significant upward trend in this type of violence. The facility currently does not have sufficient ADA accessible rooms or single rooms to house the number of families and differently gendered individuals completely separate from each other.

It is important to give these individuals and families an option other than the streets, where they would be more susceptible to acute health concerns, further physical or sexual assault, and drug and alcohol abuse. Further, without a good option to leave, many individuals and families make the choice to stay with their abuser or quickly return to them. This makes them one of the most vulnerable populations and in need of specialized and intense services. In addition, many of the individuals fleeing have post-traumatic stress responses or fear of people of other genders, making it highly important to provide separate housing quarters for increased safety.

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:

To improve the quality of life for program participants, the City will support activities that prioritize families and individuals who are the most vulnerable within the qualified populations. This will include people with disabilities, single individuals, and families fleeing domestic violence, dating violence, and human trafficking. Currently, the City has a gap in single-room occupancy shelters for individuals of different genders, and ADA accessible rooms in the existing shelter serving this purpose.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

The City did consider a project that would benefit veteran households, but determined the project was not yet ready for investment. In order to provide additional time the City determined it was in the best interest of qualifying populations to hold NCS funds in reserve to attempt to fund this NCS project with a future amendment to this allocation plan.

The City intends to fund programs using other programmed funds to support community goals where there is overlap with qualifying populations.

HOME-ARP Refinancing Guidelines

The City of Wichita Falls does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.