



HOME-ARP ALLOCATION PLAN

Clark County, Nevada
Clark County Social Service
Community Resources Management
July 2025

HOME INVESTMENT PARTNERSHIPS
PROGRAM – AMERICAN RESCUE PLAN

Allocation Plan

Presented to: United States Department of Housing
and Urban Development (HUD)

**2nd Substantial Amendment to the
2021 Annual Action Plan v2.0**

HOME-ARP Allocation Plan – Clark County, Nevada

Consultation

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

Clark County Social Service (CCSS) reached out to the Southern Nevada Homelessness Continuum of Care (SNH CoC), first through a HOME-ARP PowerPoint presented at the monthly SNH CoC Board meeting on Thursday, January 13, 2022, at 2:00pm, with fifty (50) members in attendance. Clark County Social Service (CCSS) then conducted a survey to determine what participants believe are the priority needs in the community around the eligible activities identified. The survey link was emailed to 145 community partners including the Southern Nevada Regional Housing Authority, Silver State Fair Housing Council, Clark County Social Service, homeless service providers, domestic violence service providers, Clark County School District, the Metropolitan Police Department, and veterans' groups. The survey link was also posted on the HelpHopeHome website for public input and publicized: <https://helphopehome.org/public-input/>.

Clark County also conducted virtual meetings and phone interviews with more than 20 local agencies and service providers to provide current information regarding the needs/gaps in housing and service needs for all the qualifying populations.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Southern Nevada Homelessness Continuum of Care (SNH CoC)	CoC Governing Board serving Southern Nevada; an organization of about 100 service providers, from non-profits, faith-based, government agencies, and corporations that provide services for qualifying populations (QPs) throughout Southern Nevada. Providers in attendance at this meeting include the following: United Way of Southern Nevada, Catholic Charities, LV Metro Police Dept., Nevada Partnership for Homeless Youth, Nevada Homeless Alliance, S.A.F.E. Nest, Foresight Housing Partners, Clark County Social Service, City Representatives from Henderson, Las Vegas, North	Attended SNH CoC virtual meeting on 1.13.22- Power point presentation and link to survey provided	See survey results data for feedback received, beginning on page 13.

	Las Vegas and Boulder City. Southern Nevada Adult Mental Health Services, Southern Nevada Health District, Nevada HAND, Southern Nevada Regional Housing Authority, Veterans Administration, Clark County School District, Workforce Connections, U.S. Vets, Young Adults in Charge, True Beginnings, Destiny Church.		
145 emails were sent to community partners	<u>Homeless, Domestic Violence, Veteran, and various other service providers</u> that work with qualifying populations (QPs) including Clark County Social Service, Southern Nevada Regional Housing Authority, Silver State Fair Housing, Clark County School District, Metropolitan Police Department, Stakeholders from the City of Las Vegas, North Las Vegas, and Henderson.	Email with link to survey – Main email 01.20.22	See survey results data for feedback received, beginning on page 13.
HelpHopeHome Website	<u>CoC Governing Board</u> - Southern Nevada Homelessness Continuum of Care (SNH CoC)	Survey Link on public input landing page 01.19.22	See survey results data for feedback received, beginning on page 13.
Southern Nevada Regional Housing Authority (SNRHA)	<u>Public housing authority</u>	Virtual Meetings on 3.21.22 and 7.12.22	3.21.22 - SNRHA is looking forward to partnering with Clark County and leveraging funding to provide affordable housing opportunities for the community. Discussions have been held on various options with project-based vouchers (PBV) and jurisdictional set aside funding options. Executive Director was new at initial consultation; therefore, we reached out again. 7.12.22 - The Public Housing Authority (PHA) confirmed they have applied for PBVs and are working with HUD to reassess the voucher formula due to the crisis level needs in Clark County. Clark County has approx. 2.3M people and the PHA has 12,500 vouchers, when another jurisdiction with similar population has 46,000 vouchers. The PHA is working on establishing and growing partnerships with

			landlords and developers, working on incentive ideas and helping to understand the importance of investing in permanent affordable housing and services. SNRHA would like to partner with service providers and large employers to host job fairs. By providing wrap around services and jobs, this ultimately will lead to self-sufficiency. SNRHA.ORG
Nevada Equal Rights Commission (NERC)	<u>Public organization that addresses civil rights</u>	Meeting via phone call on 3.21.22	NERC feels the highest area of need for the community is access to fair and affordable housing. They are seeing a higher volume of complaints filed by the following populations: disabled, extremely low income, immigrant, families of color, female re-entry, single parent, single woman with children needing a safe place to live. The priorities NERC gave for the HOME-ARP funding are Permanent Supportive Housing (PSH), Supportive Services, Affordable housing- new or rehabilitated, Rental Assistance (TBRA), and Non-Congregate Shelters with supportive services . They also stated that landlords need to be trained on Fair Housing.
Silver State Fair Housing Council (SSFHC)	<u>Public organization that addresses fair housing</u>	Meeting via phone call on 3.30.22	SSFHC feels that more than anything else we need affordable housing , as well as security deposit assistance. Income source is not a protected class, and SSFHC is seeing a lot of people with a disability being priced out due to 3x rent rule. They are unable to qualify, along with single parent HH's and people of color. SSFHC would like to see that the 3x rule doesn't apply when a person is being assisted by rental assistance and/or supportive services. Example given is Veterans Affairs Supportive Housing (VASH) or Dept of Mental Health is assisting with rent and services but LL's refusing to rent to them because the income is not 3x rent. Educating landlords on fair housing practices is also needed. SSFHC also commended Clark County and its staff for thinking outside the box to come up with alternatives, and ways to address the issues/concerns regarding housing in Clark County. SSFHC feels if people can get stable

			housing, they can be successful in other areas like employment and parenting.
Project REAL	<u>Private/non-profit organization that addresses civil rights</u> – provides youth with rights and legal tools	Meeting via phone on 4.11.21	Project REAL feels that preventative services overall are lacking in Clark County. For example, providing basic knowledge of Tenant Rights and Responsibilities prevents homelessness, OR for Domestic Violence (DV), how to recognize signs before or signs of unhealthy relationships etc. See notes below for a DV -3 tier program model Project REAL shared from Orange County, CA. DV 3 tier program model tier 1 Emergency Shelter - tier 2 Long term shelter – tier 3 long term housing/lease to own. Property was donated to nonprofit by Orange County and the Non-Profit did the lease to own community - all DV survivors - They hold each other accountable and keep each other safe. This provider works with youth and states multiple times that prevention helps with sustainability. Youth should be educated on all types of life skills. Caseworkers should work with weeklies like Siegel Suites to provide supportive services to residents and work with the landlord to be a better partner in the community.
NHSSN- Neighborhood Housing Services of Southern Nevada	<u>Private/non-profit organization that addresses and provides fair housing</u> – provides affordable rental housing for low-moderate income individuals/families	Virtual meeting on 4.12.22	NHSSN said they need affordable housing units. There is a need for 3+ bedroom units. Many families are doubled/tripled up due to shortage of units and high rents. Municipalities need to involve Non-Profits in decision making because they are the boots on the ground. EVERYONE is being impacted right now. Not just those below 80% AMI. Those between 80-120 AMI are 1 incident away from demise.
HELP of Southern Nevada	<u>Homeless Service provider</u> that also provides resources and assistance to those <u>at risk of homelessness</u> and other supportive services	Phone interview meeting on 4.13.22	HELP feels that the greatest issue is lack of affordable housing for those below 50% AMI. If housing is available, it is poor quality housing. There needs to be a bridge program to transition clients from transitional housing to permanent. They are in a holding pattern due to cost and lack of available units. There is no Permanent Supportive Housing for youth. They (youth) are in desperate need of mental health services. This provider is seeing significant increase in homeless youth 16-24; this

			provider also stated that of the 150 beds they have for youth, 20% meet the definition of chronically homeless. By addressing the problem sooner rather than later, it would save youth from being chronically homeless adults in the long run. Mental health services are needed as well as medication management, and some are so mentally ill, they are not able to live on their own. Municipalities and other non-profits need to work together as partners because we are all here to serve the same people with the same issues. Seems that with the competition for funding in the recent years, it has created a bit of division between the nonprofits. HELP serves all populations with a wide range of programs for adults, families, and youth. They serve the hardest to serve- tri-morbid homeless and youth. HELP states if we are ever going to end homelessness, then we need to get youth before they are the future adult homeless. HELP's Executive Director provided reports regarding specific information on the populations served. SEE info in narrative portion, as it was used as current statistical data.
Family Promise (FPLV)	<u>Homeless Service provider</u> that also provides resources and assistance to those <u>at risk of homelessness</u> and other supportive services	Phone interview on 4.13.22	FPLV states that Affordable Housing is NEEDED, ASAP. Security deposit funding is a huge need. Under-employment is another issue. Many families are working full time and do not make enough to pay rent/utilities- child care etc. #1 need regarding supportive services is CHILD CARE- there is such a delay in the current availability it can take 2+ months to process the application and by that time the parent has already lost their job or has been unable to accept work due to the lack of childcare. There are so many casinos and hotels that have not re-opened since the COVID shut down. These could be rented or bought and used as shelter space - temporary housing. The Casino floors could be used as a resource center with computers and job training. The buffet restaurants can be used as a cafeteria. It's a shame we have space sitting empty with

			people being homeless on the street, in cars and doubling up due to astronomical rent prices in Clark County. This agency always serves the same populations- Single Mom, Dad, and Grandparent heads of household (HOH). Single Moms are always more impacted.
Catholic Charities of Southern Nevada (CCSN)	Homeless Service provider that provides various services to families/children for food, housing, and shelter	Phone interview on 4.13.22	CCSN feels that Permanent Supportive Housing is needed. However, there need to be buckets for PSH with specialized housing. CCSN is seeing a lot of medical drop-offs/inappropriate (which means in hospital gowns or having medical equipment in hand), seniors that are intellectually disabled, mental illness; Nevada Department of Corrections needs to have a better re-entry program. CCSN is seeing an increase of parolees that are discharged with no address. The funding is needed to serve the community. Barriers - Silos need to be avoided and collaboration is necessary and partnering with other agencies and municipalities. We all serve the same people. He also stated that Clark County not only needs to catch up with the growth, but we also need to move beyond it and plan for future growth. They are seeing an increase in seniors and clients deemed to have dementia/Alzheimer's. Veterans are also a steady stream but also noted there are other resources available for Vets.
Las Vegas Habitat for Humanity	Private/non-profit assisting low-income individuals into home ownership	Phone interview on 4.13.22	Habitat for Humanity feels we need affordable housing and enough supportive services to hit every need with Housing. Subsidy is generational and there are not enough tools for families to be self-sufficient. There is a need to preserve affordable housing within the community. Supportive service needs to be more multifaceted not one dimensional, figure out cause and need. Providers need to collaborate and work together to better serve the community. HABITAT needs LAND DONATED! They serve a particular population into home ownership but that is not for everyone. Habitat representative stated she felt the biggest impact is on

			those with less than 30% AMI and they have the least number of available units.
The Shade Tree (TST)	<u>Domestic violence organization</u> that provides safe shelter and services to <u>homeless</u> and abused men/woman and children in crisis. They serve victims of <u>domestic violence</u> , elder abuse, street violence, sexual assault/abuse, and <u>human trafficking</u>	Phone interview on 4.13.22	TST feels the greatest needs is affordable housing . One of the biggest barriers for their clients is getting approved. They have low income and being victims of DV, they may not have good credit or rental history. OR the waiting lists are extensive. The program they offer is 90 days; however, the waiting list for permanent housing may be 7-8 months or longer. Which in turn means the “temporary space for immediate safety” isn’t available. Chronic Homeless and those in shelters should qualify first. Supportive Services needed to eliminate barriers are vital documents, eviction assistance (expungement of evictions), credit repair, and criminal record assistance to remove minor offenses. This agency is seeing more human trafficking and families. Other homeless are victims of evictions.
JFSA – Jewish Family Service Agency (JFSA)	<u>Homeless Service provider</u> that provides various services to families/children for food, housing, and shelter	Phone interview on 4.14.22	JFSA feels the greatest need is AFFORDABLE HOUSING . Help with barriers could include: Having programs that are set up without obstacles. Having guidelines in place for policies/procedures. Previous funding didn’t have this and caused delays. Agencies are having to do lots of landlord outreach due to stigma and unit prices being so high. LL's do not want to accept clients with assistance. SUPPORTIVE SERVICES GAPS/NEEDS- having access to them. PSH is needed to ensure the clients are not in the same situation in a year or two. All Service providers are serving the same clients but are viewed as competitors due to funding being so competitive. Another area to consider is the length of the program for example and 12–24-months program may take 6-9 months to set up and staff. SSI waiting is an obstacle; RENT Control is needed in Clark County; Pet services - security deposits, emotional support animals; Furnishings, dishes etc. upon move in; Landlord education and Fair Housing. JFSA normally serves single adults (male); however, they are now seeing more

			families. Food Pantry grab and go are seeing more mid-age males (40-late 50s).
Boys and Girls Clubs of Southern Nevada (BGCSN)	<u>Social Service provider</u> that serves as a family resource center assisting with utility assistance, food, clothing, childcare, transportation services, job search and other services/resources as necessary	Phone interview on 4.14.22	BGCSN feels that the #1 need is Affordable Housing . They are seeing lots of issues with overcrowding due to evictions. Seniors are struggling due to being on a fixed income and having limited resources including mobility issues. Families with mixed citizen statuses are also having issues. This provider said they are seeing families in Rental Housing- landlords selling unit and family being put in homeless situation due to lack of available units. WAY more demand than available units.
East Valley Family Services	<u>Non-Profit Service provider</u> that serves <u>seniors, disabled</u> and families with shelter, food, medical and childcare services	Phone interview on 4.18.22	East Valley stresses the LACK of affordable housing . Housing was already a challenge but now it is impossible. There are more AT RISK of homelessness due to the market. Seniors are impacted. Staff member shared a personal story regarding a person in her office being of average income and not qualifying for an apartment and needed to get a co-signer because she couldn't meet the 2.5x of the rent. The time it takes to get people housed with current programs. They end up couch surfing or even moving out of state due to not getting housed here. Supportive services needed are the following: Childcare, Credit repair, Eviction forgiveness, Self-Sufficiency services, and PSH. Legislation - Rent control; Seniors are being imposed late fees on the 3rd, most seniors receive their checks on that day. So automatically the rent is \$50 higher. Most landlords don't care, they just want to make money. This provider said that Seniors are being more impacted. Rent increases are leaving them with less than \$20. She mentioned a particular senior that doesn't have money to pay for gas to get to her cancer treatment. Fortunately, EVFS has been able to provide them with gas cards.
Accessible Space Incorporated- ASI	Nationwide, <u>Non-profit</u> Housing Developer and <u>Service provider for persons with Physical Disabilities, as well as Seniors and Veterans</u>	Phone interview on 4.18.22	ASI feels that Clark County needs more PSH . They also need to have the ability to provide care for those in PSH. Supportive services are needed to meet the needs of the community. Need to find a way to get low to moderate income into

			homeownership. Those AT RISK of homelessness have doubled. Those at 120% AMI at risk of homelessness OR 80-120% AMI are 1 paycheck away from homelessness.
SafeNest	<u>Domestic and Sexual Violence Service provider</u>	Phone interview on 4.18.22	SafeNest feels that Clark County needs housing . Survivors of DV have vouchers but cannot find units. Clark County needs Shelter Beds for survivors and those fleeing and staff for them. Child Care is another gap. The only provider of services for Child Care has a huge back log. This provider stated that LVMPD responded to 68k DV calls last year and that only about 30k made it to court. They are seeing the same mix of clients, however there are more of them, and the cases are more violent. They are survivors of victimization. There needs to be more youth counseling services. Some are homeless due to the lack of units.
The Salvation Army (TSA)	<u>Homeless and Veteran service provider</u> that provides services for all qualifying populations including men, women, families, those with <u>disabilities</u> and <u>human trafficking</u> victims	Zoom meeting on 4.20.22	TSA feels the greatest need is Affordable Housing , to include alternative housing options: Rapid Rehousing programs clients need more time. Allowable rent amounts should be increased to reflect the current market. Clients need to be prepared for self-sufficiency with Employment training. The time allowed for assistance should be extended to 24 months. Shelters are overcrowded and in some cases are not an option for the client. Vocational Services, Assistance with obtaining vital documents, Childcare, and access to Health Care. Shelter services are badly needed. It takes 6-12 months to get through the waiting list for permanent housing – Families are especially impacted. TSA is seeing more families, teachers, and caregivers for seniors. The number of 1st time homeless is unbelievable. These are people who have been self-sufficient and don't understand navigating programs or there is a lack of programs for them. HIGH Rents and landlords increasing rent causing them to leave the unit.
St. Jude's Ranch for Children (SJRC)	<u>Homeless service provider</u> that works with abused/at risk children, young adults, and	Phone interview on 4.20.22	SJRC feels the greatest issue is lack of affordable housing for those with jobs. Services are needed for couples under 18

	families. Providing transitional living, housing, and support services		expecting or with child. There are 3700 persons/families in need of Housing that are part of qualifying populations (QPs). There is a need for youth specific PSH, as well as prevention and community services. Unfortunately, there is a lot of couch surfing, or hotel/motel nights paid on their own. Emergency Shelter and Bridge Housing needed; placement and wrap around services for families in Coordinated Entry queue. Tenant-based rental assistance (TBRA) needs supportive services /case management. Barriers - No after care funding- Preventive action needed to prevent re-occurrence of homelessness. Child Care needed for job search. They are seeing more young families from other states- California, Arizona; Single Moms DV family disruption.
Hookers for Jesus (HFJ)	Non-Profit Service provider that provides shelter and services for those victims fleeing sex trafficking	Phone interview on 4.20.22	HFJ sees sex trafficking victims or those at risk that need Emergency Shelter placement and they are full, which means no escape. Supportive services are needed for families leaving sex trafficking. Often the mom/victim is pregnant or has children/teens. They all need services especially mental health due to the trauma. They also need childcare services to obtain jobs and/or job training. Urban League is only agency offering childcare, but the wait list is so long. They have and are still seeing unusual shifts due to COVID. They are seeing more exploitation underground; new jobs are trafficking videos. There are more female traffickers than ever, although there are not recordable stats due to the strange times with COVID. They see high intake volume during the holidays. These victims need to be around other survivors for support.
Ovation	Private affordable housing developer that partners with Coordinated Living of Southern Nevada to develop affordable senior/disabled housing with onsite services	Phone interview on 4.21.22	Clark County is short 85k units for those under 60% AMI. But Ovation feels that PSH is the piece to deal with for ongoing supportive services and case management. Programs are needed and they are critical and almost nonexistent for the QPs. Capital is needed to build these projects because they don't pencil. Rental Subsidy - PBV or

			other TBRA would help. Funding for services- case management some may need 24/7 care managers. There has always been a gap between affordable units and available units. COVID exacerbated it. Most seniors are not able to afford Low-Income Housing Tax Credit (LIHTC) rents without a voucher or rental assistance. The FMRs are too low and do not work with Market Rate units either. PHA needs to increase the FMR for the area.
Nevada Partnership for Homeless Youth (NPHY)	<u>Non-Profit service provider</u> that provides services to <u>Homeless Youth</u> , services include Housing/Shelter, Education & Employment and Health & Wellness	Phone interview on 4.27.22	NPHY feels that Clark County needs to have a diverse Housing Stock - Not a one size fits all, for example group homes, townhomes, duplexes for all populations (mental health, youth, and vets). Severe shortage of Mental Health supportive services - Residential based services and medical placement. Clark County needs to have a balanced approach if shelter beds are added, then we need to add permanent beds. Clients need to have somewhere to go through the process. 1. They are seeing more young people with heightened mental health issues and drug abuse. 2. Unaccompanied youth due to family instability, DV fleeing and overall breakdown of the family.
Veterans Administration - Services	Provides all services for the Veteran population and their families	Phone interview 5.26.22	This VA office feels the biggest issue right now is lack of emergency housing, long term permanent housing , assisted living – aging population with health declining; limited resources to remain safe in their own homes. The VA is seeing newly homeless that have decent (50k-60k) income but are having to move due to sale or non-lease renewal.
US Vets	Provides supportive services/ <u>homeless services for Veterans</u>	Phone interview 6.9.22	US Vets says the greatest need is housing; Affordable Housing – Permanent Supportive Housing – Service enriched housing. After-care services are also needed. Supportive Services need to be incorporated throughout process from shelter to independent living. This provider is seeing a little bit of everything - 1 st time homeless young families but the top 2 are chronically homeless and mental health issues.

Las Vegas Metro Police (LVMPD)	Police Agency working with all members of the community; including <u>homeless, those at risk of homelessness, those fleeing domestic violence/human trafficking</u>	Phone interview 1.10.23	LVMPD feels the biggest obstacles are lack of units and criteria to get people housed. Need new or rehabbed units, Permanent Supportive Housing, and Supportive Services with less barriers. Priority for local residents. LVMPD is seeing more need in the following areas those with disabilities including mental health and medically fragile; and families needing housing and/or shelters with supportive services, such as transportation and job services. Transportation for those in outlining areas to services in the city, for example Laughlin to Vegas for services.
Clark County Social Service (CCSS)	<u>Public agency</u> that addresses needs of <u>all four qualifying populations</u> through direct service programming and/or referrals.	Surveys 1.25.23	<i>Even though the Community Resources Management unit of Clark County Social Service is drafting and submitting this allocation plan, CCSS feels it is important that its other direct client service units also contributed to the consultation/survey results which are included below.</i>

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

Clark County Social Service conducted an anonymous survey via a link that was available on the HelpHopeHome landing page for public comment. An email was sent to 145 community partners including service providers and affordable housing developers. There were 34 responses to this survey and the survey asked the following questions:

Which population do you work with?

1. **Homeless as defined in Section 103(a) of the McKinney Vento Homeless Assistance Act U.S.C 11302(a)**
2. **Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary.**
3. **In other populations where, providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a) would prevent the family's homelessness or would serve those with the greatest risk of housing instability.**
4. **Veterans and families - **NOTE veteran family member must meet one of the preceding criteria.**
5. **None of the Above**

- 16 of the respondents identified themselves as working with Homeless.
- 4 of the respondents identified themselves as working with At-Risk of Homelessness.
- 3 of the respondents identified themselves as working with those Fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.

- 9 of the respondents identified themselves as working with other populations where providing supportive services or assistance, would prevent the family from homelessness or serve those with the greatest risk of housing instability.
- No one identified themselves as working with Veteran or Veteran families.
- 2 of the respondents identified themselves as None of the above

What do you believe are the unmet needs or gaps in housing and/or services in Clark County?

- 15 responses stated the greatest need or biggest gap is Affordable Housing
- 8 responses stated Permanent Supportive Housing/Supportive Housing
- 3 responses stated Preventative Services
- 3 responses stated Assistance for Rent/Mortgage, Utilities, and Food
- 2 responses specified services for Homeless/At-Risk of Homelessness
- 2 responses specified services for Youth/Adolescent populations
- 1 response specified land acquisition / banking

Other comments from respondents include the following:

- Short term transitional housing for adolescents
- Housing for persons with less than 30% AMI
- Family housing with 2+ bedrooms
- Senior housing
- Emergency confidential housing for persons fleeing Domestic Violence
- Specific Housing and Services for victims of Sex trafficking
- Preventive Services for all qualifying populations
- Services for single pregnant woman over 24 years old
- More versatile housing options, flex use for prevention, education and workforce services for youth and young adults
- Innovative housing programs dependent on performance-based funding and programs that focus on behavioral health as the root cause of homelessness
- More shelters, more youth-centered programs
- Affordable market that is amenable to federal FMR, strategies to increase building inventory, tenant education

Please rank your top 5 Affordable Housing Priorities of the following list based on a scale of 1 to 5 (where 1 is the highest need/unmet need or gap in housing/services to 5 being the lowest need).

Permanent Supportive Housing/Supportive Housing
 Supportive Services
 Tenant Based Rental Assistance (TBRA)
 Purchase and Development of Non-Congregate Shelter
 Multifamily Rental New Construction
 Multifamily Rental Rehabilitation

Acquisition and Rehab for Rental
Acquisition and Rehab for Resale
Single Family Rehab
Critical or Emergency Home Repair
Homeownership Assistance
Single Family New Construction

The survey results are listed below in the actual order of importance from top (being highest priority) to bottom (being lowest priority).

1. Permanent Supportive Housing/Supportive Housing
2. Supportive Services
3. Tenant Based Rental Assistance (TBRA)
4. Multifamily Rental New Construction
5. Purchase and Development of Non-Congregate Shelter
6. Multifamily Rental Rehabilitation
7. Acquisition and Rehab for Rental
8. Critical or Emergency Home Repair
9. Homeownership Assistance
10. Single Family Rehab
11. Single Family New Construction
12. Acquisition and Rehab for Resale

Additional information you believe would be helpful in the development of the allocation plan for the HOME- ARP funding. Comments listed below are exactly quoted from survey response.

- The community needs a current needs assessment and gaps analysis that addresses the COVID-19 challenges and increasing rise in rents. Without current data, we are not speaking to the needs of the community in this current environment. There is also a need to engage people with lived experience, communities that have been disproportionately impacted by COVID, and service providers to understand capacity needs and gaps. Let's hope this 4-question survey is not the only mechanism being used for community engagement for the HOME-ARP Plan.
- Keeping people in housing is key! We need more affordable housing units. Our units are very limited in our community.
- Conduct a Homelessness Impediments study
- Prioritize developments that are ready to start except for funding.
- A student-body wide survey with 4,500 respondents indicated that within the last year, 12% of the UNLV student body, or approx. 3,600 students, experienced housing insecurity as a barrier that hindered their performance in classes and overall pursuit of degrees. UNLV established the HOPE Scholars Program in 2016 to assist unaccompanied homeless youth and has a proven track record of successfully graduating scholars at rates better than the institution's own averages, but our capacity is outpaced by this reported need. Recognizing that both institutions serve the Las Vegas community and there are many students transferring from one to another or dual enrolled, we have engaged in discussions with CSN about establishing additional support structures for their students experiencing this challenge as well as the possibility of establishing a clear transfer

program for students experiencing (or at risk of) homelessness. To realize this goal, we need the capacity to support the anticipated number of students. We believe a portion of these funds should be used to help fill a major gap in addressing housing insecurity in our community: post-secondary students. The two groups that reported the greatest need at UNLV for housing assistance were juniors (23%) and seniors (25%). There are typically assumptions made about the resources that college students have available to them, but this local data - as well as national data from the HOPE Center for College, Community, and Justice - indicate that college students are struggling with homelessness at shockingly high rates.

- Determining the qualifying areas of need.
- More programs for disabilities
- Training and Mental health programs. People need to know their value and be able to see how to sustain housing or a job, etc.
- Seek ways to leverage HOME ARP funds with other public funding programs like project-based Section 8, Faircloth to RAD, agency service funding for supportive services
- Giving extenuating circumstance consideration
- Value new applicants AND high performing nonprofits.
- Material and labor continue to increase. With standing inventory, nonprofits can acquire rehab and rent to help fill the gap of affordable housing. We currently own and manage 160 + units of which are scattered throughout the valley dedicated to LMI renters. It works and with the help of partnering nonprofits, they can help by integrating supportive services. 2nd funds to develop quickly if nonprofit has land allocated toward affordable housing. 3rd - equalize the playing field and allow nonprofits first opportunities for donation of land. Purpose over politics
- Funding for transitional living is a desperate need in the LV valley
- Prevention measures can save a LOT of money and make the funds going towards direct & immediate solutions a LOT more equitable.
- Using agencies that have a proven track record.
- recognition of the impact of mental health needs on homelessness
- Life skills program designed to help people emerge from generational poverty.
- With Rental assistance you keep families stable and prevent Homelessness
- Time is of the essence.
- Support and Involve New/Upcoming Developers Like Lake Mead West Apts.
- Let's prioritize the type of housing we have been historically lacking based on need. Flex use for supportive services and flex use for frontline organizational needs.
- Permanent Supportive Housing, Supportive Services, Affordable housing -new or rehabilitated, Rental Assistance (TBRA) and Non-Congregate Shelters with supportive services.
- Immediate housing with supportive services for people that have their first mental health episode and cannot return to their previous housing.
- We have one of the highest rates for homelessness in youth and young adults. Programs and facilities specializing in this population are a major need for our community.
- Housing Problem Solving and solution-focused discussions to help individuals and families remain stably housed rather than them entering the homeless system due to lack of resources would make a big difference in the numbers of people experiencing homelessness in Southern Nevada.

- It would be helpful to have funding to support the development of staffing across agencies, so service skill level and income could have a minimal uniformity from provider to provider. It is challenging to retain quality staff with lower pay and few incentives.

Although not used as part of or in place of the HOME-ARP consultation, it is worth noting in Spring 2022, the Southern Nevada Homelessness Continuum of Care (SNH CoC) embarked in a participatory and inclusive process to determine appropriate priorities that would work to build a healthy system of care. Centering the voices of clients and the providers was essential to looking beyond the numbers and really understanding our community's story. There were four client-level listening sessions conducted in March at different provider locations across the community: Catholic Charities, Lutheran Social Services of Nevada, Shannon West Homeless Youth Center, and the Courtyard. A thematic analysis allowed the SNH CoC to determine overarching similarities to determine common insights across groups. It was encouraging to see the provider's survey results above aligning with the client feedback. These findings were compared against quantitative reports such as system modeling and Homeless Management Information System (HMIS) utilization data to ensure a data-driven process. In the end, there were 16 priorities developed and grouped by 7 specific HUD System Performance Measures to help guide decision-making and the allocation of resources across stakeholders. Of these priorities, there were some that aligned with HOME-ARP consultation and feedback responses, to include:

- Within Measure 1 – Length of Time Homeless: Expand rapid rehousing projects (such projects are reliant on the availability of affordable housing units in the community).
- Within Measure 2 – Exit Homelessness to Permanent Destinations: Increase the number of permanent supportive housing resources.
- Within Measure 3 – Number of Homeless Persons: Increase community inventory for safe and affordable housing.

Consultation and feedback have demonstrated high priority to supportive housing and supportive services. While the term Permanent Supportive Housing has sometimes been used interchangeably with Supportive Housing depending on the audience (CoC-funded homeless service providers, affordable housing developers, nonprofit organizations, community partners, etc.), the overarching theme has been the vast need for affordable units for supportive housing (housing with supportive services). The consultation and feedback have been very helpful to inform a preference of applicant affordable housing developers for units that serve extremely low-income households (defined as households whose incomes do not exceed 30% of the median family income for the area). However, because of the infeasibility of expanding upon the existing Coordinated Entry referral process and appropriately including all QPs, the method of prioritization will be project-specific prioritized wait lists for QP applicants. There will be no limitations enacted for eligibility pertaining to HOME-ARP projects.

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:

- ***Date(s) of public notice: 2/16/2023***

- **Public comment period: start date - 2/20/2023 end date - 3/7/2023**
- **Date(s) of public hearing: 3/7/2023**
- **Date(s) of public notice: 7/21/2025 (Substantial Amendment)**
- **Public comment period: start date – 7/21/2025 end date – 8/5/2025 (Substantial Amendment)**

Describe the public participation process:

The draft plan was published on the Community Resources Management page of the Clark County, Nevada website on 2/16/23 reflecting the 2/20/23-3/7/23 comment period. Public Notice indicating the public comment period of 2/20/23-3/7/23 appeared in the Las Vegas Review Journal, the local newspaper covering the Las Vegas area, on 2/21/23; it also appeared in El Tiempo, the weekly Spanish publication provided by the Las Vegas Review Journal on 2/22/23. The Public Notice provided the amount of funding received for the region, as well as the range of activities that Clark County may undertake (all eligible funding categories for HOME-ARP). The Public Notice also explained that the Allocation Plan could be found on Clark County's Community Resources Management page of the Clark County, Nevada website at:

[https://www.clarkcountynv.gov/residents/assistance_programs/community_resources_management/home_investment_partnerships_\(home\).php](https://www.clarkcountynv.gov/residents/assistance_programs/community_resources_management/home_investment_partnerships_(home).php)

Any public comment could be submitted in writing or by phone. The Public Notice also provided the date, time, and location for the Public Hearing that was scheduled for 3/7/23.

As part of the HOME-ARP amendment process, Clark County complied with HUD Notice CPD-21-10 and all related requirements. In accordance with these guidelines, Clark County published the proposed second substantial amendment and ensured a 15-day public comment period prior to its submission.

The "draft" of the amended plan was made available to the public from Monday, July 21, 2025 to Tuesday, August 5, 2025. The notice was published in the Las Vegas Review Journal. The amended HOME-ARP Allocation Plan was also made available for review and comment on the Clark County's Community Resources Management website at: https://www.clarkcountynv.gov/residents/assistance_programs/community_resources_management/federal-reports.

Describe efforts to broaden public participation:

Many efforts were made to include the public in the consultation and priority-setting processes. A presentation was made at the January 13, 2022, SNC CoC Board meeting to request participation in the community needs assessment survey. Survey links were shared via provider email address lists as well as on the SNH CoC's website HelpHopeHome.org. Another presentation was made at the February 9, 2023, SNC CoC Board meeting to inform on the HOME-ARP allocation plan progress and to provide notice and invite public comment during the public comment period as well as at the March 7, 2023, Board of County Commissioners meeting. The Public Notice was published in both English and Spanish newspaper publications and the draft Allocation Plan and Substantial Amendment to the 2021 Annual Action Plan was made available in both English and Spanish on the Community Resources Management page of the Clark County, Nevada website.

Summarize the comments and recommendations received through the public participation

process either in writing, or orally at a public hearing:

There were no comments or recommendations received in writing before or during the public hearing. There was one individual who spoke during the public hearing. A woman experiencing homelessness who is known to Social Service spoke about her current living situation and her struggles.

No comments or recommendations have been received for the second substantial amendment to the HOME-ARP Allocation Plan.

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

The commenter is well known by the Board of County Commissioners, as she participates in public comment periods at most meetings and has done so for quite some time. She is currently receiving services at Clark County Social Service. She did not have any recommendations for the allocation plan.

Clark County accepts all comments or views.

Needs Assessment and Gaps Analysis

Homeless Needs Inventory and Gap Analysis Table

	Homeless										
	Current Inventory					Homeless Population				Gap Analysis	
	A	B	C	D	E	F	G	H	I	J	K
	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 Units (B-F)	# of Units (D-G)
Emergency Shelter	439	138	1485+ 503 overflow	1485+ 503 overflow	61						
Transitional Housing	44	35	715	715	324						
Permanent Supportive Housing	393	144	1693	1693	1542						
Other Permanent Housing	0	0	26	26	20						
Sheltered Homeless						156	2236	410	172		
Unsheltered Homeless						5	2813	161	22		
TOTALS	876	317	4422	4422	1947	161	5049	571	194		
Current Gap										+156	-1342

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

Please note that this table does not account for youth or RRH. The RRH data in the HIC is only based on actual utilization, so may not demonstrate true capacity vs. need. **Also note that for the specific housing types of PSH and other PH, the gap in family units is actually 17 units (144 family units available/161 family HHs in need). The gap for PSH and other PH for HH w/o children is 3,330 (1,719 adults-only units available and 5,049 adults-only HHs in need).**

Housing Needs Inventory and Gap Analysis Table

State of Nevada:



Data Source: 1. National Low Income Housing Coalition (NLIHC) Gap Report, April 2022

Clark County:

According to the National Low Income Housing Coalition (NLIHC) Gap Reports from 2020, 2021, and 2022 the Las Vegas – Henderson-Paradise, NV area is listed as having the most severe shortage of rental affordability for extremely low-income households among the 50 largest metropolitan areas. 86% of households with income at or below ELI (30%) are severely cost burdened, and 49% of households with income between 31% and 50% AMI are severely cost burdened.

Source: KTNV 13 action news (3/2/22)

“Cost of living in Vegas may never be the same. According to Rent.com rental prices have increased by nearly 30% in the last year, with some having increases from 33-40%.”

Source: Lied Institute of RE Studies (Nevada Housing Market Update Dec 2021)

For Sale Housing: “Prices increased 7.2 percent year over year in the Las Vegas metropolitan area.” “Summerlin has the highest price per square foot at \$247. North Las Vegas has the lowest price per square foot at \$228.”

“Average new listing prices for single-family homes were up 20.2 percent in the Las Vegas metropolitan area.” Avg. “New” \$517K (SFR), \$396K (Condo); Avg “Existing” \$491K (SFR), \$290K (Condo).

“Single-family home sales spent an average of about 60 days on the market.”

Condos appreciated at a higher rate than SFR’s.

Avg. price of existing homes in 5 lowest priced zip codes in Las Vegas MSA:

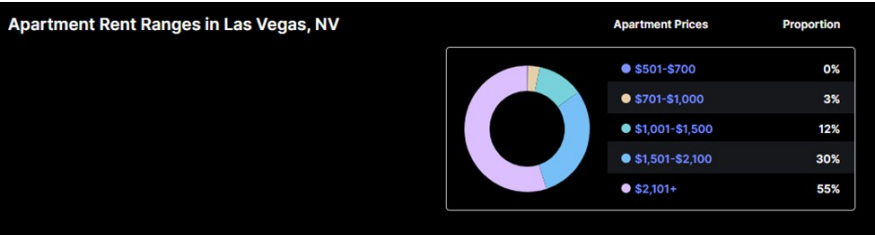
- 89030 (\$243K)
- 89115 (\$290K)
- 89104 (\$310K)
- 89156 (\$315K)
- 89122 (\$316K)

Source: rent.com

Average Rents in Las Vegas (updated 3/7/2022):

- | | | |
|-------------|---------------|----------------------|
| • Studio | \$812/Month | +7% Annual Increase |
| • 1 Bedroom | \$1,411/Month | +20% Annual Increase |
| • 2 Bedroom | \$1,604/Month | +20% Annual Increase |
| • 3 Bedroom | \$1,952/Month | +28% Annual Increase |

Average Rent Ranges in the Las Vegas Area.



Note: Since some of the above data was collected, home prices and rents have stabilized, and in some cases, even begun to decline. However, the affordability gap is so large that this has had minimal impact on the need for more affordable housing.

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

According to the 2022 Southern Nevada annual Homeless Census or Point-in-Time count (PIT), 5,645 persons were experiencing homelessness during the one-day period of the PIT and 51% were in unsheltered situations HUD recognizes unsheltered homelessness as rising across the nation.

As of December 15, 2022, there are 4,015 clients on the community queue waiting for a housing referral. Of these, 1,035 people are presumed to meet the definition of chronic homelessness. The majority of people on the queue are adults without children while there are 360 families and 324 youth, 24 and younger. 151 people self-report that they are a Veteran.

Homeless as defined in 24 CFR 91.5

According to the 2022 Southern Nevada annual Point-In-Time Count (Homeless Census), 5,645 persons were experiencing homelessness during the time of the point-in-time count. Most homeless individuals identified as White/Caucasian at 52%, and Black/African American at 37%. Other races breakdown at 5.4 % Native Hawaiian or Other Pacific Islander, 2.2% Asian, 1.8% Multiple Races, and 1.7% American Indian or Alaskan Native. Fifteen (15%) identified as Hispanic/Latino.

The estimated number of chronically homeless individuals (those with a disabling condition and at least a continuous year or episodes equaling 12 months in 3 years of homelessness) is 42% of the total homeless population. Of the 74% survey respondents who reported one or more disabling conditions, 33% reported experiencing mental illness, 36% reported as currently experiencing alcohol or drug abuse, 2% had HIV or AIDS related illnesses, and 2% reported a recent history of domestic violence, with another 10% identifying as Veterans. These subcategories are not mutually exclusive.

There were 161 households with at least one adult and one child, comprised of 516 people. Twenty-eight (28) or 4% of these households are chronically homeless. There were 5,049 households without children, comprised of 5,102 individuals, that make up 90% of the total counted; 2,335 or 46% of these adults were also experiencing chronic homelessness. Of youth up to the age of 24, there were 294 Unaccompanied Youth Households totaling 304 persons. Twenty-three (23) were households led by parenting youth comprised of 63 persons. There were 25 households with only children, comprised of 27 people under the age of 18, 15 or 5% of these youth households were chronically homeless.

Two percent (194 individuals) of those reported in our Southern Nevada Homeless Census reported a recent history of domestic violence; 157 were in Emergency Shelter, 15 were in Transitional Housing, and 22 were unsheltered.

The Southern Nevada PIT Count indicates the total number of persons experiencing homelessness is decreasing. While these decreases are a positive development, the number of homeless individuals and

households continue to be problematic, with the number of unsheltered homeless being one of the highest in the nation.

At Risk of Homelessness as defined in 24 CFR 91.5

Those at risk of homelessness and other populations are one situation away from being homeless due to the severe shortage of rentals and increased population.

According to the National Low Income Housing Coalition (NLIHC) Gap Report 2022 the Las Vegas – Henderson-Paradise, NV area is listed as having the most severe shortage of rental affordability for extremely low-income households among the 50 largest metropolitan areas. Eighty-six percent (86%) of households with income at or below ELI (30%) are severely cost burdened, and 49% of households with income between 31% and 50% AMI are severely cost burdened. In Clark County there is a shortage of 66,123 affordable units available to extremely low-income households at 30% area median income and below, and a shortage of 86,134 affordable and available units for households at 50% of area median income.

Population change is one of the other most pressing issues facing Southern Nevada. The jurisdictions in the region have seen incredible population growth since 2000. The City of North Las Vegas more than doubled in size in 17 years, while the City of Mesquite grew by 86% and the City of Henderson and Clark County both grew by more than 50%.

Population growth has been increasing at a rate that affordable housing production cannot keep up, leading to an increase in housing costs that leave many people living in substandard conditions, cost burdened, and at risk of homelessness.

Clark County's CARES Housing Assistance Program (CHAP) served residents who had financial impact directly related to COVID-19 and were past due on rent; the program served households at 30%/50%/80% AMI. Many clients were facing eviction or had already had eviction proceedings in process. In looking at Homeless Management Information System (HMIS) data for this program, 43,568 clients were served in calendar year 2022, with household members ages 0-17 (42%), 18-24 (8%), 25-44 (34%), 45-61 (12%), and 62+ (3%). Race demographics were roughly comprised of American Indian, Alaska Native, or Indigenous (<1%), Asian or Asian American (2%), Black, African American, or African (68%), Native Hawaiian or Pacific Islander (2%), White (27%). The majority of clients were female, not disabled, non-veteran, and non-Hispanic or Latino.

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

According to the Nevada Coalition to END Domestic and Sexual Violence Report, there were 26,966 victims served in Nevada during 2021; of that number 21,619 were residents of Clark County. Service providers provided 84,846 total bed nights in 2021 and 509 requests for shelter were unmet. These numbers have significantly increased from the 2020 report and information provided during consultation from service providers. Providers indicated during the 2020 pandemic lockdown, all forms of Domestic and Sexual Violence were underreported due to victims being unable to report or flee safely. The domestic violence shelters and service providers indicated that there continues to be a great need for permanent affordable

housing. Housing stability is very closely tied to victim safety, and as a result, there is a significant housing gap for victims of domestic abuse, dating violence, sexual assault, trafficking, and stalking.

As of December 28, 2022, there were a total of 81 household on the DV-specific community queue, 36 adults without children and 45 families. In the past year, 8.9% of the housing assessments completed for individuals living in unsheltered situations indicated they were at-risk for being involved in human trafficking situations. *Please note that the number of people reporting domestic violence for unsheltered situations is dependent upon survey extrapolation formulas and may be artificially low due to under-reporting or under-representation of this population who engaged in the survey during the annual Point-in-Time census.*

According to the most recent human trafficking hotline data from 2020, Nevada now ranks highest for the number of human trafficking cases. Not only does Nevada lead with a rate of 7.38 per 100k but the gap between Nevada and number two Mississippi is greater than any other gap in the top 10 states.

There is a growing need to serve victims of human trafficking in Clark County. This form of hidden violence makes it hard to fully understand the number of victims; however, the data and information available identifies a rising number of victims, predominately children and women. The SNH CoC has worked with local experts to better understand the intersection of human tracking and homelessness. The experts have worked with outreach teams to develop questions that will assess if someone is at-risk or involved in a trafficking situation. Additionally, the housing assessment tools determine risk of trafficking situations.

People experiencing homelessness are at an increased risk for exploitation and human trafficking. The data available at the local level is limited; however, in the recently published 'Southern Nevada Homelessness Continuum of Care - An Assessment of Youth Needs', The Embracing Project reported serving an average of 300 youth, 24 and younger, who are survivors of violence, sexual exploitation and sex trafficking. This form of hidden violence makes it hard to fully understand the number of victims; however, the data and information available identifies a rising number of victims, both children and adults. In 2021, 103 child victims, and 140 adult victims were identified in Clark County- Southern Nevada. So far in 2022 from January through June, there were 44 child victims and 77 adult victims. These numbers do not reflect reports or investigations conducted independently by other agencies.

Trafficked youth live in fear of those who have forced them into sex trafficking, so they are reluctant to tell their story or testify in court. As a result, prosecution rates are low in the State of Nevada and victims often end up being sent to juvenile detention center to keep them temporarily safe or these children become unaccompanied minors living on the streets of our community.

Sources:

<https://impact-nv.org/human-trafficking>

<https://www.missingkids.org/theissues/trafficking#bythenumbers>

https://socialwork.asu.edu/sites/default/files/2022-08/child_sex_trafficking_-_las_vegas_infographic_june_2020_0.pdf

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

Data from multiple local, state, and national organizations illustrate that households that have annual incomes at 30% AMI or less and those who are severely cost burdened are at significantly greater risk of homelessness. In 2020, the number of households in Nevada at risk of homelessness was 107,524, according to the National Alliance to End Homelessness. Of those, 64,314 households were extremely low-income, severely cost burdened renter households and 43,210 were living doubled up.

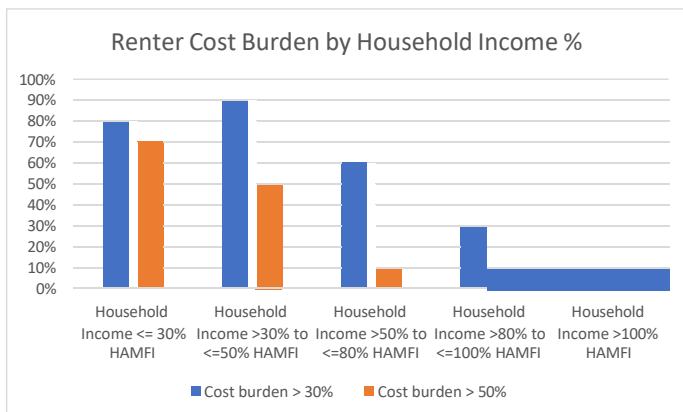
Comprehensive Housing Affordability Strategy (CHAS) pre-COVID data (2015-2019) shows that 12.9% of households were at 30% AMI or below; 11.4% were between 30%-50% AMI; and 18.1% were between 50%-80% AMI.

The following chart shows the household income distribution by owners and renters for Clark County.

Income Distribution Overview	Owner	Renter	Total
Household Income <= 30% HAMFI	26,430	69,080	95,510
Household Income >30% to <=50% HAMFI	32,290	57,045	89,335
Household Income >50% to <=80% HAMFI	62,705	79,420	142,125
Household Income >80% to <=100% HAMFI	43,305	41,055	84,360
Household Income >100% HAMFI	256,520	115,675	372,195
Total	421,250	362,270	783,525

Data for: Clark County; Nevada (huduser.gov/PORTAL/datasets/cp.html)

Year Selected: 2015-2019 ACS



While cost burden is a significant problem for households at 80% AMI and below, it is particularly difficult for those at 50% AMI and below, especially those on fixed incomes, which would include most elderly people and people with disabilities. The chart Renter Cost Burden by Household Income Percent shows that extremely low income (30%) households are, unsurprisingly, the most cost burdened at both 30% and 50% of their income being used to pay their housing costs. Renter households overall have more

housing problems, no matter what race or ethnicity. While there are 26,725 owner households at 50% AMI and below severely cost burdened (paying 50% or more for housing costs) there are 74,600 renter households at 50% AMI and below that are severely cost burdened. Generally, low- and very low-income households and large families are disproportionately affected by overcrowding and overcrowding is more prevalent among renters than owners. These households are the most at risk of becoming homeless.

There are approximately 498,000 households with children that are low- and extremely low-income paying more than 50% of their income for their housing. This means that any unforeseen financial difficulties, such as an illness or job loss, can push these families onto the streets in short order. Single parent, female-headed households are particularly vulnerable with 136,668 such households living in poverty. An additional 52,477 male headed households with children present are also living in poverty. These households as well as formerly homeless families and individuals who are receiving rapid re-housing assistance need access to permanent affordable housing, affordable childcare, educational opportunities, mental health services, and domestic violence/trafficking prevention.

Instability and increased risk of homelessness are associated with a lack of financial, mental, emotional, and physical resources. These missing resources lead to frequent moving, living in the home of another, living in a hotel or motel, and/or living in severely overcrowded housing. Many individuals who are exiting an institution (jail, mental health facility) or a system of care (foster care) are at increased risk of homelessness. Other areas that could impact instability are prolonged unemployment, deteriorated housing, domestic violence, mental illness, drug or alcohol addictions, death of a family member, abandonment by spouse, non-receipt of child support, medical expenses and/or other unanticipated emergency expenditures. All of these factors may contribute to household instability and increase the risk of homelessness.

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):

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Programs exist for childcare assistance, mental health services, and all of the other services described as being in high need in this plan. However, the resources are limited and often households cannot access the resources due to those limitations. Clark County has increased its master leasing to 75 units to help transition households off the streets with supportive services but is limited by the number of landlords willing to work with the county and non-profits, the high cost, and limited budgets. Clark County has even funded an 80-bed facility for homeless who need assisted living prior to transitioning them into group or institutional settings. Unfortunately, the needs are so high that these units do not meet it. Further, the number of group homes willing to take extremely low-income clients is limited. Finally, medical respite is limited to the Respite Care Center, with only 38 beds available for the community.

Service providers reported in their consultations that finding a rental unit for their clients has been more difficult than ever with a tight rental market and an increase in rents of over 20% year over year. Further, property owners are often not willing to work with a client exiting homelessness, especially if they have a checkered rental history.

There is a system gap for seniors who need assisted living but are undocumented. As an undocumented alien, they are not eligible for medical coverage which means that group homes and assisted living facilities will not accept them as clients. This is particularly noticed when these clients enter the hospital and then cannot be placed in a more permanent situation due to their lack of health coverage.

At Risk of Homelessness as defined in 24 CFR 91.5

Again, there are limited resources for supportive services like childcare assistance or affordable childcare for underemployed individuals so they can afford to remain in their housing. The waiting lists are long for the existing affordable housing units, and it takes years to build new units. Further, the cost of new units has risen by 40% in the last 2 years alone, making new development of affordable housing even more difficult.

The one-on-one consultations showed that many service providers in the region are aiming to fill the need for rental assistance as well as supportive services to help those who may be at risk of homelessness. However, those resources are becoming scarcer as the Pandemic response dollars are expended and programs end for rental assistance.

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

SafeNest and Safe House provide most of the domestic violence, stalking, and human trafficking shelter in southern Nevada, although The Shade Tree also provides shelter for these survivors as well as homeless women with and without children. Signs of HOPE provides services for survivors of dating violence and sexual assault. Providers have indicated that supportive services are needed to help clients with getting qualified for safe housing, including assistance with security and pet deposits.

Preventive educational services are very scarce to help individuals recognize the signs of unhealthy relationships before domestic violence occurs. There is a gap in the system for youth leaving trafficking who are under 18. St. Jude's Ranch for Children is currently building the Healing Center which will be supportive housing in cottages located on their Boulder City St. Jude's Campus. Construction is underway and this need will finally be addressed for the community.

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

The region has an overarching unmet need for additional affordable housing. While Clark County has invested \$120 million in general funds through its Community Housing Fund, which will help ameliorate the issue, it will still only bring 2,139 new units and 976 rehabilitated units for a community with a deficit of over 86,000 units.

The State's fair housing agency is seeing an increase in complaints from disabled, extremely low-income immigrants, families of color, female re-entry, and single women with children. The State's fair housing agency is seeing disabled individuals being priced out of rental units because they are unable to afford security deposits or unable to show that they earn three times the rent to qualify for a rental unit.

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

Non-profit organizations that provide support services to low-income households are being utilized at their maximum capacity. The difficulty in providing services is a lack of agencies and organizations to implement service programs, and the lack of resources to provide services to all those in need. If supportive housing is to be provided to special needs groups, then greater efforts must be made to obtain necessary resources and support effective non-profit organizations.

The population of severely mentally ill continues to increase leaving many severely mentally ill persons homeless and without support or treatment. The non-profit providers of mental health services have not been able to fill the gap in services due to the extent of the problem.

While many homeless service providers provide education, access and referrals to appropriate health and behavioral health services as needed, fewer providers offer those services directly. Only 4 providers offer allied or supporting health services such as dentistry, optometry, and nutrition, and zero providers surveyed offer medical respite care. Accessing treatment services is extremely difficult, involving complicated applications and long wait times. Eligibility criteria, for mental health services in particular, often requires a referral from an emergency shelter, enrollment in the program, an assessment, a diagnosis, or the ability for self-care. In addition, service sites are limited so transportation is often a problem.

The following outlines the gaps in services and what is needed to improve access to the system and its services.

1. Affordable housing, permanent supportive housing, supportive housing, assisted living
2. Continue to expand case management capacity
3. Rental assistance and housing subsidies to supplement monthly rent payments
4. Childcare Assistance
5. Financial management and literacy programs
6. Mental health services
7. Medical respite

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 Clark County HOME Consortium will not further identify other populations at greatest risk of housing instability within the QPs already described.

Identify priority needs for qualifying populations:

The data and the consultation process supported prioritizing affordable housing development, permanent supportive housing development, and supportive services around childcare assistance, domestic violence & trafficking prevention and interventions, youth services, and mental health services for all four qualifying populations. The data collected shows that those with the lowest income are most at risk for homelessness and housing instability. Without additional affordable housing units, it will be next to impossible for individuals and families to exit homelessness. The regional PIT data showed that additional Rapid Rehousing units, Bridge housing, and NCS, had a positive impact on the overall number of people experiencing homelessness over the past year. Providing supportive services like case management and housing navigation services will also provide all four qualifying populations with support to prevent or end homelessness and housing instability.

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

The gaps in services and level of need were determined using local data from the Housing Inventory Count (HIC), Point-in-Time (PIT) count, Consolidated Plan (Con Plan), and Homeless Management Information System (HMIS), as well as from local and state data from National Association to End Homelessness (NAEH), National Low Income Housing Coalition (NLIHC), and Comprehensive Housing Affordability Strategy (CHAS).

HIC, PIT, Con Plan, and HMIS data illustrates the gaps in available units versus number of individuals needing units, as well as the vast need for affordable housing and supportive services for people of all QPs. State and national data illustrates the great need for affordable housing units for extremely-low, very-low, and low-income households.

The data sources have supported the needs that the consultation and survey participants have described. All of the data and participation information have substantially contributed to the Clark County HOME Consortium HOME-ARP Allocation Plan.

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:

The Clark County HOME Consortium (Clark County and North Las Vegas) will solicit applications for funding through a competitive Request for Proposals (RFP) to eligible participants and interested parties once the HOME-ARP Allocation Plan is approved. The RFP will announce the availability of the HOME-ARP funds, outline the priorities in this Allocation Plan, and highlight the qualifying populations that are to be served through those activities. Interested parties can submit applications by identifying a project and/or services that address eligible uses and populations as outlined in the RFP. Detailed information will be provided to applicants through the grant management system ZoomGrants.

Scoring criteria will be developed to encourage the maximum benefit for all eligible QPs identified in this allocation plan through efficiency and/or leveraging with other funding sources. Projects or programs providing supportive services in conjunction with affordable housing to accommodate the need for “Permanent Supportive Housing” will be encouraged. The scoring criteria for the solicitation will not prioritize one or more of the eligible QPs, or a subpopulation of a QP, for development of affordable housing or supportive services; however, preference will be given for applicants who propose to develop affordable housing for extremely low income QP participants (30% AMI or below). The RFP will allow for a 60-day response time. All eligible RFP applications will be reviewed by a community review committee, which will make recommendations to the Clark County Board of County Commissioners (BCC) for final action.

Describe whether the PJ will administer eligible activities directly:

The Clark County HOME Consortium will administer eligible activities directly, to include issuing the Request for Proposals (RFP), developing project agreements, processing subrecipient payments, managing documentation, etc.

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:

Not applicable; no portion of HOME-ARP administrative funds were provided to a subrecipient or contractor prior to the submission or pending acceptance of the HOME-ARP allocation plan.

Use of HOME-ARP Funding

The following table indicates the amount of HOME-ARP funding the Clark County HOME Consortium has allocated for eligible activities resulting from consultation and gap analysis. Amendments will be processed during the HOME-ARP period of performance as needed to ensure the funding continues to assist all QPs in a timely manner.

The second substantial amendment reflects an additional allocation of HUD funds totaling \$22,209 and includes a reallocation of funds across previously approved activities.

	Funding Amount		Percent of the Grant	Statutory Limit
Supportive Services	\$ 3,699,015		25%	
Acquisition and Development of Non-Congregate Shelters	\$ 0		0%	
Tenant Based Rental Assistance (TBRA)	\$ 0		0%	
Development of Affordable Rental Housing	\$ 8,877,635		60%	
Non-Profit Operating	\$ 0		0 %	5%
Non-Profit Capacity Building	\$ 0		0 %	5%
Administration and Planning	\$ 2,219,408		15 %	15%

Total HOME ARP Allocation	\$ 14,796,058			
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Commented [GG1]: Updated numbers to include the \$22,209 additional funding.

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

The Clark County HOME Consortium will ensure that the community review committee is aware of the feedback from our consultation and survey participation, the required inclusion of all eligible QPs for any proposed projects, and all HOME-ARP eligible activities, as well as data on housing gaps and service needs in the community when reviewing and scoring RFP applications. With the most stated need being supportive housing in the form of affordable housing and supportive services, CDAC members will have this in mind when making funding recommendations in preparation for presentation to the Board of County Commissioners (BCC). The RFP and application scoring will emphasize all QPs as eligible participants and will also encourage the rehabilitation and/or repurposing of the existing built environment to bring units online quicker and for a lower cost while exceeding HUD Housing Quality Standards (HQS). Because of the high cost of affordable housing development, a majority of the HOME-ARP funds (60%) will be allocated to the development of affordable rental housing. Since supportive housing requires supportive services, that category makes up 25% of the allocation total which can be paired with development projects. Combined, this allocation will result in permanent supportive housing with wrap-around services, consistent with the greatest need identified in our consultation process and gap analysis.

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:

In looking at our community's Housing Inventory Count and Point-in-Time data, the demographic information on each of our QPs, as well as in compiling all the consultation and survey data around greatest needs, it is evident that the development of affordable housing units with supportive services will be the best use of the HOME-ARP funding. An increase in affordable housing unit inventory will result in positively impacting those facing homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, low-income households who could increase their housing stability with services or assistance, and veteran families who have a veteran family member meeting one of the above-mentioned criteria.

In Clark County, for households comprised of adults without children, there is a large gap in units with over 1300 units needed. Because we know many of our QPs need supportive housing to work toward self-sufficiency and ongoing housing stability, the need for the development of affordable supportive housing units rises to the top of our community's housing priorities.

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:

In Clark County, the estimated cost of developing affordable housing is currently \$300K-\$350K per unit for new supportive housing projects. We estimate a rehab/repurpose of an existing unit could be approximately half that amount, though that is highly variable depending on the amount of work needed to bring units to a level above the minimum required HUD HQS standards.

The following table outlines the estimated number of new affordable housing units and households that will benefit from HOME-ARP funding, based on cost assumptions and the prescribed allocation of funds by the Clark County HOME Consortium. While the HOME-ARP funding will assist with the development of new affordable rental units, those units will remain affordable to QP households for at least 15 years after development and will continue to serve households long after the initial development is complete.

Activity Goal – Clark County HOME Consortium	Development of Affordable Rental Housing	Supportive Services	Notes
Estimated Number of New Affordable Housing Units	27-55		Based on \$175K/unit for rehab/repurpose and \$350K for new construction.
Estimated Number of QP Households Benefitted by Supportive Services		241	Based on average \$8K/QP household for first 5 years (55 units) plus additional \$8k/other QP household

The above estimates would yield 27-55 units if funding the entire project amounts with HOME-ARP funds. However, the Clark County HOME Consortium anticipates affordable housing developers will leverage additional funding sources to maximize the number of affordable housing units, using HOME-ARP as one element of their gap funding/financing stack for their projects. If LIHTCs or other sources for gap financing are utilized, the affordability period should exceed 20 years.

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:

If HOME-ARP funds are used to fully fund eligible projects, the goal would be between 27-55, depending on the mix of rehabilitation and new development projects. The confirmed priority need in Clark County is for an increase of affordable housing units with supportive services. Development of additional units and provision of supportive services for those at highest risk of homelessness will have a substantial impact toward addressing our community's housing gaps and will ultimately reduce the number of those experiencing homelessness or at risk of homelessness among all QPs.

Preferences

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

homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

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

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

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

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

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

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ’s HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Template:

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

The Clark County HOME Consortium will utilize HOME-ARP funds to serve all QPs; however, the RFP application and scoring process will encourage affordable supportive housing development projects that will serve all qualifying populations and prioritize extremely low-income households as defined as those whose incomes do not exceed 30% of the median family income for the area.

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:

According to HUD as well as the National Low Income Housing Coalition (NLIHC), extremely low-income households (30% AMI or below) are the most severely cost burdened and are at the greatest risk of homelessness. The need for affordable supportive housing for these households was stated repeatedly during consultation and echoed in the collected data. Any projects funded with HOME-ARP dollars will serve all QPs; however, preference will be given to extremely low-income QP households when applicant program participants are prioritized on program waiting lists. Aiming assistance at those at highest risk of homelessness will help address the community's greatest housing gap and will help those served to work toward self-sufficiency and housing stability.

Referral Methods

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):

Clark County has determined that a waiting list of applicants from all qualifying populations that prioritizes extremely low-income households, as defined as those whose incomes do not exceed 30 % of the median family income for the area, will be utilized for HOME-ARP projects. This method is being chosen because of the limitations surrounding coordinated entry referrals and to ensure that an equitable referral process for all eligible QPs to HOME-ARP projects would not conflict with the existing community queue and coordinated entry referral system. Because the existing Coordinated Entry system is designed to prioritize all individuals experiencing homelessness based on vulnerability and it would not be conducive to expand the existing CES to accept all HOME-ARP QPs, prioritized waitlists will be utilized.

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):

N/A - To ensure all QPs have access to referrals to HOME-ARP projects, Clark County will utilize prioritized waitlists for HOME-ARP projects.

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 - To ensure all QPs have access to referrals to HOME-ARP projects, Clark County will utilize prioritized waitlists for HOME-ARP projects.

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 - To ensure all QPs have access to referrals to HOME-ARP projects, Clark County will utilize prioritized waitlists for HOME-ARP projects.

Limitations in a HOME-ARP rental housing or NCS project

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

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

Template

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

The Clark County HOME Consortium will not be limiting eligibility for HOME-ARP projects to a particular qualifying population or specific subpopulation of a QP. All qualifying populations will be served.

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 Clark County HOME Consortium does not intend to implement any limitations; all qualifying populations will be served.

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

N/A – The Clark County HOME Consortium does not intend to complete any refinancing activity with HOME-ARP funding.