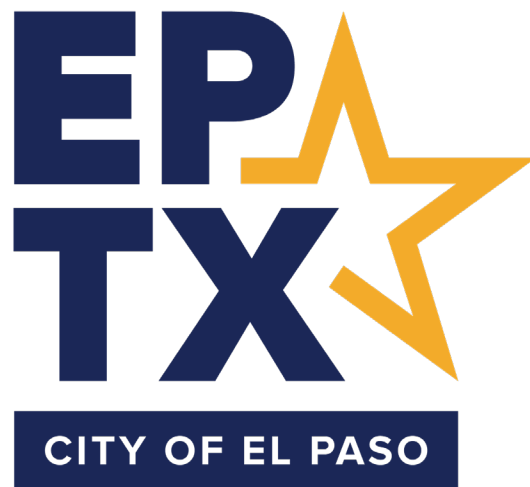


ANNUAL ACTION PLAN  
CITY OF EL PASO, TEXAS  
2021-2021



PREPARED BY THE DEPARTMENT OF  
COMMUNITY AND HUMAN DEVELOPMENT

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## **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

### **1. Introduction**

This 2021-2022 Annual Action Plan for entitlement grants from the Department of Housing and Urban Development (HUD) is focused on best leveraging the funding sources to provide the greatest impact for—and benefit to—low and moderate income El Pasoans.

This introduction provides a summary of the actions taken to produce the City of El Paso 2020-2025 Consolidated Plan and 2021-2022 Annual Action Plan as well as a summary of the priority needs established by the community. Community stakeholders engaged in numerous conversations and a Community Needs Assessment survey was deployed to establish the priority needs identified in the Needs Assessment section of the plan. The City of El Paso, Department of Community + Human Development (DCHD) partnered with the Housing Authority of the City of El Paso (HACEP) and HR&A Advisors to conduct a housing market needs assessment in 2018 that established priorities for investment in affordable housing across the region. That assessment, along with current demographic research, informed the Housing Market Analysis section of the plan. The Strategic Plan section is informed by the aforementioned efforts as well as the City of El Paso's 25 by 2025 Strategic Plan, the El Paso Regional Housing Plan, Resilient El Paso (the City's resilience strategy), and the Financial Empowerment Blueprint.

El Paso expects to receive the following entitlement grants during the planning period of 2020-2025 to contribute towards addressing priority needs of the community. Funding of specific projects under these grant resources are identified in this Annual Plan.

#### HUD Entitlement Grants included in this Plan:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Emergency Solutions Grant (ESG)

The 2021-2022 Annual Action Plan is the second of what will be five annual plans under the 2020-2025 Consolidated Plan. The Annual Plan establishes projects to be implemented over the next year to begin addressing priority needs in the community. All proposed projects and activities are intended to principally benefit residents of El Paso who have extremely low, low and moderate-incomes.

### **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Approximately 44% of households in El Paso meet the HUD definition of low to moderate income, meaning that they are at or below 80% of the Area Median Income (AMI) (ACS 2018 5-Year Estimates). It is primarily this population that the City seeks to assist in achieving housing stability, financial empowerment and overall increased quality of life. This population tends to experience more housing cost burden, less financial capacity, and are more likely to live in aging housing requiring repair and/or rehabilitation.

25% of El Paso households are housing cost burdened, meaning they spend more than 30% of their household income on housing costs (i.e. rent, mortgage, utilities, insurance). Of particular concern is the prevalence of severe housing cost burden for households at or below 30% AMI. 52% of these extremely low income households expend more than half of their income on housing costs. These individuals and families are likely forced to make difficult choices to meet their basic needs for food, shelter and warmth.

Homelessness in El Paso is currently at a manageable level, but may increase as a result of a growing housing affordability gap for households who can afford a rental or mortgage payment of no more than \$600/month. The ongoing economic challenges of the COVID-19 pandemic have exacerbated this situation, requiring a focus on preventing homelessness and ensuring that when it occurs, homelessness is rare, brief and non-recurring.

El Paso is also challenged with an aging housing stock in need of repair and rehabilitation. More than half of all housing units in El Paso were built before 1980 and are more likely in need of major repairs and lead paint abatement. However, these older units tend to be more affordable for lower income households who are more likely to require assistance in order to afford needed repairs. Lower income El Pasoans also present financial capacity issues in terms of bankability, credit worthiness, and limited capital for microenterprise development, making it more difficult for them to maintain quality housing choice.

It is for the preceding reasons that the City of El Paso prioritizes the following issues in this Plan above all others:

- Ensuring quality, affordable housing choice for all El Pasoans
- Preventing and responding to homelessness
- Empowering El Pasoans to become financially stable

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The figures in the attached table titled "2020-2025 Consolidated Plan - Annual Performance" for 2020-2021 are projections based on the actual projects being implemented under the 2020-2021 Annual

Action Plan and will be updated with actuals in the 2022-2023 Annual Action Plan. The figures for 2021-2022 are projections based on the projects to be funded under this current Annual Action Plan.

Successful implementation of the 2020-2021 and 2021-2022 Annual Action Plans will result in significant progress towards meeting the goals of the 5-Year Consolidated Plan (Con Plan). Nearly all goals show progress towards completion. Those goals that remain unaddressed should be made priorities as in the later years covered by the Con Plan.

The COVID-19 pandemic has placed a strain on the ability of the City and its subrecipients to meet expected goals for the current year. As such, the actual performance numbers for 2020-2021 may be significantly less than those currently projected in the table above. Many service providers have had to reduce client contact or had to eliminate it entirely for a certain portion of the year. Increased material costs and a slowing of supply chains has resulted in delays in public facility projects that may result in the City falling out of compliance with the HUD timeliness standards. A certain level of forgiveness was provided by HUD in relation to enforcement of the timeliness test in 2020, and with the pandemic still ongoing, the City is hopeful that HUD will show the same discretion in 2021.

2020-2025 Consolidated Plan Goals

Decent Housing Goals (DH)	5-Yr Goal	Annual Performance					Progress Towards Completion
		2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	
DH 1.1 Fair Housing Education	500 persons	60	60				24%
DH 1.2 FTHB Counseling & Education	600 persons	120	100				37%
DH 1.3 HOPWA Support Services	600 persons	63	68				22%
DH 2.1 Housing Rehabilitation Assistance	250 households	116	117				93%
DH 2.2 Rental Housing by Developers	75 units	16	-				21%
DH 2.3 Rental Housing by CHDOs	24 units	6	-				25%
DH 3.1 TBRA/Homeless Prevention	500 households	20	118				28%
DH 3.2 Rapid Rehousing	125 households	-	58				46%
DH 3.3 First Time Homebuyer Assistance	70 households	10	62				103%

Economic Opportunity Goals (EO)

EO 1.1 Financial Empowerment	500 persons	185	132				63%
EO 1.2 Microenterprise Technical Assistance	500 businesses	110	110				44%

Suitable Living Environment Goals (SL)

SL 1.1 Homeless, Emergency Shelter & Housing	7,500 persons	394	1,840				30%
SL 1.2 Street Outreach	1,000 persons	-	100				10%
SL 1.3 Mental & Medical Health Services	6,000 persons	1,226	1,420				44%
SL 1.4 Food Infrastructure & Access	10,000 persons	-	7,500				75%
SL 1.5 Children & Youth Services	7,500 persons	1,824	1,308				42%
SL 1.6 Seniors & Persons w/ Disabilities	2,000 persons	445	408				43%
SL 2.1 Public Facilities - Homeless Shelters	500 persons	-	-				0%
SL 2.2 Public Facilities - Mobility Infrastructure	10,000 persons	-	5,100				51%
SL 2.3 Public Facilities - Neighborhood	50,000 persons	7,500	7,065				29%
SL 2.4 Public Facilities - Healthcare	5,000 persons	5,000	2,126				143%
SL 2.5 Public Facilities - Mental Health	500 persons	-	-				0%
SL 2.6 Public Facilities - Parks & Open Space	60,000 persons	14,325	7,970				37%
SL 2.7 Public Facilities - Abused/Neglected Children	100 persons	-	933				933%
SL 2.8 Public Facilities - Senior Centers	1,000 persons	-	-				0%

**2020-2025 Consolidated Plan - Annual Performance**

**4. Summary of Citizen Participation Process and consultation process**

## Summary from citizen participation section of plan.

The City of El Paso conducted two public hearings on August 4th and 18th of 2020 to receive input on the Policies and Procedures for the 2021-2022 planning year. Those Policies and Procedures established the processes by which the City would produce recommendations to City Council for funding of programs for the 2021-2022 Program Year.

The department provided an application training for nonprofit and governmental agencies interesting in applying to be subrecipients of the City's allocated Entitlement Grant funds (CDBG, HOME, ESG and HOPWA), and posted newspaper ads announcing funding availability and the process for residents to request infrastructure improvements. Idea workshops, followed by design labs, were conducted in both of the targeted districts for small-scale infrastructure projects (Districts 1 and 8). All four of those meetings were conducted virtually as a result of the COVID-19 pandemic. The idea workshops provided a forum for residents to raise challenges/issues in their neighborhoods that infrastructure investments may be able to address. The follow up design labs then offered the opportunity for residents to discuss those challenges/issues with City departments and nonprofit agencies in order to identify the most effective and efficient infrastructure improvements to address those challenges.

For sections of this plan related to addressing homelessness in El Paso, including the Emergency Solutions Grant (ESG), The City of El Paso consulted with the El Paso Coalition for the Homeless, which is the Continuum of Care (CoC) Lead Agency, as well as the CoC Board. Sections of the plan informed through those consultations are: AP-10 Consultation, AP-55 Affordable Housing, AP-65 Homeless and Other Special Needs Activities, AP-90 Program Specific Requirements, and the ESG Written Standards (included as an attachment to this document). Draft ESG recommendations were presented at the regular CoC board meeting on April 8, 2021 to receive comment. See section AP-10 Consultation for a more detailed description of CoC coordination and consultation.

The City of El Paso has a Community Development Steering Committee that assists in evaluation of subrecipient proposals and provides comment on the Department of Community + Human Development's funding recommendations for the HUD Entitlement Grants. That Steering Committee is made up of appointees from each City and Council Representative and the Mayor. The steering Committee three times in early 2021 to host public meetings. The first meeting, in January, 2021, allowed for agencies that submitted large-scale public facility proposals to publicly present their proposed projects and answer questions from the Steering Committee and the public. The second meeting, in February 2021, was a similar public meeting to hear presentations on small-scale public facility proposals. Following those presentations, project evaluations were finalized by staff and Steering Committee members to inform the final funding recommendations that were presented, along with CDBG public services, ESG and HOPWA, at a final public Steering Committee meeting in March 2021. All of these meetings were also conducted virtually via Microsoft Teams, with full public access. See section AP-12 Participation of this document for additional meeting details.

The 2021-2022 Annual Action Plan (AAP) was introduced in draft form to City Council on May 11, 2021, and following a 30-day public comment, the AAP was brought back to Council on June 22, 2021 for final adoption.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

All public meetings for the development of this Annual Plan were conducted virtually via Microsoft Teams. Links to recordings of meetings are included in section AP-12 Participation of this document, where all public comment can be reviewed. In general, the received significant support for recommendations in this plan from the public, applicant agencies, the Community Development Steering Committee, the CoC Board and CoC Lead Agency, and the Mayor and City Council.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments received were accepted and considered in the formulation of the Plan.

## **7. Summary**

The previous sections are an all-encompassing summary of the 2021-2022 Annual Action Plan for the City of El Paso.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	EL PASO	Community and Human Development
HOPWA Administrator	EL PASO	Community and Human Development
HOME Administrator	EL PASO	Community and Human Development
ESG Administrator	EL PASO	Community and Human Development

**Table 1 – Responsible Agencies**

**Narrative (optional)**

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This introduction provides a summary of the actions taken to produce the City of El Paso 2020-2025 Consolidated Plan and 2021-2022 Annual Action Plan as well as a summary of the priority needs established by the community. Community stakeholders engaged in numerous conversations and a Community Needs Assessment survey was deployed to establish the priority needs identified in the Needs Assessment section of the plan. The City of El Paso, Department of Community + Human Development (DCHD) partnered with the Housing Authority of the City of El Paso (HACEP) and HR&A Advisors to conduct a housing market needs assessment in 2018 that established priorities for investment in affordable housing across the region. That assessment, along with current demographic research, informed the Housing Market Analysis section of the plan. The Strategic Plan section is informed by the aforementioned efforts as well as the City of El Paso’s 25 by 2025 Strategic Plan, the El Paso Regional Housing Plan, Resilient El Paso (the City’s resilience strategy), and the Financial Empowerment Blueprint.



El Paso expects to receive the following entitlement grants during the planning period of 2020-2025 to contribute towards addressing priority needs of the community. Funding of specific projects under these grant resources are identified in this Annual Plan.

HUD Entitlement Grants included in this Plan:

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**Consolidated Plan Public Contact Information**

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Email: [DCHDServices@elpasotexas.gov](mailto:DCHDServices@elpasotexas.gov)

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of El Paso's Department of Community and Human Development (DCHD) consults with community residents, multiple organizations, and community representatives in preparation to submit the Annual Action Plan as the City's application for HUD funding. The Draft Annual Action Plan was made available on the City's website at <https://www.elpasotexas.gov/community-and-human-development/forms-and-notice/>. Typically, the Draft Annual Action Plan would also be made available public libraries throughout the City; however, staff was unable to do so for this year's planning process as a result of the ongoing COVID-19 pandemic. Following the distribution of the Draft Annual Action Plan, the City provided a 30-day public comment period to allow for its citizens to provide their views and feedback. After this 30-day comment period, another public hearing was held at City Council where the final version of the Annual Action Plan was ultimately approved. The City also regularly communicates with various state and local groups, departments and organizations as part of the planning process.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

The City of El Paso's Department of Community and Human Development (DCHD) consults with various health and service agencies throughout the process of developing the Annual Action Plan, including the Housing Authority of the City of El Paso (HACEP). All meetings and consultations during the development of this Plan were conducted virtually to comply with CDC guidance regarding social distancing under the COVID-19 pandemic. HACEP was consulted on affordable housing portions of the Plan. The local Department of Public Health is the service provider for HOPWA programming and was coordinated with to establish goals and benchmarks for that program. The City has a service category for medical and mental health, allowing for service providers to submit proposals for programming under that CDBG-funded service category. Other service providers were invited to submit proposals with a focus on: housing rehabilitation; economic development; senior, youth and disabled services; and persons experiencing homelessness.

### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The City of El Paso coordinates with the El Paso Coalition for the Homeless (EPCH), lead entity for the El Paso Continuum of Care (CoC). EPCH provides technical assistance to applicant agencies and coordinates monthly meetings of the CoC which is comprised of homeless assistance providers, victim service

providers, faith-based organizations, governments, public housing agencies, school districts, social service providers, mental, behavioral and primary health entities, universities, veterans' services and housing assistance providers. The City participates in monthly meetings of the CoC and is represented on numerous CoC committees to include the Planning Committee, Coordinated Assessment Oversight Committee, the Performance and Benchmark's Committee and the HMIS oversight committee.

EPCH serves as the El Paso CoC networking entity and through its initiatives, activities and staff, ensures enhanced coordination between mainstream services and homeless assistance programs as defined in the ESG Program Rule.

The CoC continues its efforts to end and prevent homelessness in the El Paso area, highlighting their objectives and strategies in their Strategic Plan. Through its Strategic Plan, the CoC has identified five objectives to assure that funding is approached in an effective way and national best practices are implemented in the El Paso area to prevent homelessness and strengthen resources. Those objectives are:

- Increase leadership, cooperation, and civic engagement.
- Increase access to stable and affordable housing.
- Support effective pathways toward self-sufficiency and reduced vulnerability.
- Transform homeless services to Crisis Response System leading to improved health and safety.
- Advance health and housing stability.

The CoC utilizes resources to support chronically homeless individuals and families, families with children, veterans, unaccompanied youth, and persons who are at-risk of homelessness.

For example, the CoC encourages the creation of permanent housing for individuals and families that are chronically homeless, and regularly seeks to create partnerships with prospective organizations to increase the supply of affordable housing and social services. EPCH relies heavily on funding from HUD's CoC Program to create permanent housing for those considered Chronically Homeless, allocating more than 86% of its Annual Renewal Amount to Rapid Rehousing (RRH) and Permanent Supportive Housing, prioritizing Chronically Homeless households.

Furthermore, the 2020 Point in Time showed that 6.5% of individuals experiencing homelessness are veterans; and preventing and ending veteran homelessness is a priority of the CoC. The CoC coordinates with the American GI Forum, Endeavors, Texas Veterans Commission, and the El Paso Veteran Affairs (VA) Homeless Program to provide housing assistance, case management, employment search, and other quality services.

The Department of Veteran Affairs contributed significant COVID funding to veteran providers to provide basic needs as well as emergency housing in hotels, rapid rehousing and prevention assistance to veterans to promote safety and to reduce the spread of the virus among this priority population. This year the City, in collaboration with the City of El Paso Veterans Advisory Committee and the CoC's

Veterans Committee, was able to fund a veterans housing program that will provide a housing option to veterans who are primarily chronically homeless and are ineligible for other Veteran housing programs.

In addition to the annual resources and ESG COVID funds dedicated to preventing homelessness, significant funding through the CARES Act was allocated to prevent evictions in the El Paso community from both City and other government resources.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

Allocation of ESG funds

The City of El Paso consults with the CoC during the process of determining what distribution of ESG funds is allocated to each ESG component. DCHD considers the CoC's recommendation when allocating funding percentages to service components and presents the final funding recommendation for review and comment.

Development of Performance Standards and Evaluation of Outcomes

The City of El Paso participates in the CoC's Performance and Benchmarks committee to assist in the development and evaluation of community performance standards.

The City also requires its ESG subrecipients to meet the CoC Performance Standards to ensure that each program is consistent with the benchmarks established by the Performance and Benchmarks Committee in alignment with the HEARTH Act. The benchmarks are community-wide as all homeless assistance programs, including Supportive Services for Veteran Families (SSVF), Projects for Assistance in Transition from Homelessness (PATH), CoC, ESG, Homeless, Housing and Service Program (HHSP) and Family and Youth Services Bureau (FYSB), are expected to adhere to the benchmarks. To ensure this, the City has written into its contracts that ESG subrecipients are subject to evaluation and monitoring by the CoC on their performance against the established benchmarks

Develop funding + Policies and Procedures for the Administration of HMIS

The City of El Paso supports the EPCH's HMIS functions through an ESG set-aside for HMIS services. Services provided under this funding include HMIS training, helpdesk support, reconciliation of data, monthly report generation, and development of ESG CAPER reports for upload into the SAGE HMIS. The City of El Paso also contributes to the development and implementation of policies and procedures for the administration of HMIS through participation in the HMIS oversight committee meetings and the enforcement of policies with the City's ESG sub recipient agencies.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Housing Authority of The City of El Paso
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	HACEP drafted applicable sections of AP-60 Public Housing in order to ensure real time data and perspectives.
2	<b>Agency/Group/Organization</b>	EL Paso Coalition for the Homeless
	<b>Agency/Group/Organization Type</b>	CoC Lead Agency
	<b>What section of the Plan was addressed by Consultation?</b>	ESG and homeless-related sections of AAP
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	EPCH reviewed and provided data and comment on the above sections of the plan to provide data and ensure alignment of funding sources.

**Identify any Agency Types not consulted and provide rationale for not consulting**

The City of El Paso has made every reasonable effort to consult with agencies of all types through direct outreach, surveys, and public meetings and hearings.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	El Paso Coalition for the Homeless	Goal SL 1.1 Homeless, Emergency Shelter and Housing aligns with the Continuum of Care Plan.
El Paso Regional Housing Plan	City of El Paso	All decent housing strategies were informed by the El Paso Regional Housing Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Financial Empowerment Blueprint	City of El Paso	Economic and workforce development strategies are aligned with the Financial Empowerment Blueprint.
Resilient El Paso	City of El Paso	Resilient El Paso addresses the physical and social well-being of the community and our ability to withstand unexpected shocks as a community and as individual households. Many of the social service and public facility goals were informed by Resilient El Paso.
PHA 5-Year Plan	Housing Authority of the City of El Paso	Goals to increase the local stock of decent and affordable housing are aligned with the PHA 5-Year Plan.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The City of El Paso encouraged its residents to provide input throughout the 2021-2022 Annual Action Plan process. Through its adopted Citizen Participation Plan (CPP), the City sets forth policies and procedures to engage with low- and moderate-income individuals and residents of predominantly low- and moderate-income neighborhoods. That engagement provides the City with vital feedback on housing, infrastructure, public facilities and public service needs that are then addressed in the Consolidated Plan and Annual Action Plan.

As required by the CPP, a minimum of two public hearings were held at different stages in the planning process. Even through the COVID-19 pandemic, the City found innovative ways to communicate and engage with community partners and the general public. For example, the Department of Community and Human Development (DCHD) held its Idea Workshops and Design Labs (i.e., public hearings) through virtual communication platforms, such as Microsoft Teams, in which DCHD partnered with City Representatives to ensure that reasonable efforts were made to engage with constituents. Furthermore, going beyond established requirements, DCHD held several other public meetings, events and workshops training sessions (see below for more detail).

The City also incorporates into its planning process the Community Development Steering Committee, a board of citizen volunteers, who provide input and comment on program recommendations that are ultimately approved by City Council.

Lastly, as required by HUD, the City holds a final 30-day public comment period to collect any residual feedback from the public before the Final Annual Action Plan is approved by City Council and then submitted to HUD.



**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Public meeting was held virtually due COVID-19 health crisis.	Representative Peter Svarzbein wanted clarification on the process of how funding was allocated to facilities projects prior to the large scale and small scale we have now. Director Nicole Ferrini explained that large scale is not targeted and small scale funding is to the rotating districts every funding cycle.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public comment period 08/05/2020-08/16/2020	Non-targeted/broad community	N/A	None	N/A	
3	Public Meeting	Non-targeted/broad community	Public meeting was held virtually due COVID-19 health crisis.	None	N/A	
4	Newspaper Ad	Non-targeted/broad community  City Department, Non-Profit Agencies and Non-Municipal Government Entities	N/A	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
5	Public Meeting	Non-targeted/broad community  Residents of District #1 and District #8	N/A	N/A	N/A	
6	Public Meeting	Non-English Speaking - Specify other language: Spanish  Non-targeted/broad community  Residents of District #1 and District #8	N/A	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	CDBG Public Facilities training (morning session) on 47th Year application process on 08/25/2020	City Department, Non-Profit Agencies and Non-Municipal Government Entities	10	N/A	N/A	
8	CDBG Public Facilities training (afternoon session) on 47th Year application process on 08/25/2020	City Department, Non-Profit Agencies and Non-Municipal Government Entities	11	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	CDBG Public Facilities training (morning session) on 47th Year application process on 08/27/2020	City Department, Non-Profit Agencies and Non-Municipal Government Entities	13	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Public Meeting	Non-targeted/broad community Residents of District #8	18	The community was invited to a Idea Workshop (i.e., public meeting) to discuss ideas for CDBG public facilities projects, and so that DCHD staff could provide assistance with completing citizen request forms.	N/A	
11	CDBG Services training (morning session) on 47th Year application process on 09/23/2020	City Department, Non-Profit Agencies and Non-Municipal Government Entities	15	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
12	CDBG Services training (afternoon session) on 47th Year application process on 09/23/2020	City Department, Non-Profit Agencies and Non-Municipal Government Entities	9	N/A	N/A	
13	ESG training on 47th Year application process on 09/24/2020	City Department, Non-Profit Agencies and Non-Municipal Government Entities	13	N/A	N/A	
14	Newspaper Ad	Non-targeted/broad community  City Department, Non-Profit Agencies and Non-Municipal Government Entities	N/A	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
15	Newspaper Ad	Non-English Speaking - Specify other language: Spanish  Non-targeted/broad community  City Department, Non-Profit Agencies and Non-Municipal Government Entities	N/A	N/A	N/A	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
16	Public Meeting	Non-targeted/broad community Residents of District #1	DCHD staff was prepared and ready for community meeting; however, zero attendance caused meeting to end prematurely.	N/A	N/A	
17	Public Meeting	Non-targeted/broad community CD Steering Committee	10	Summary of comments can be heard through the provided URL.	N/A	<a href="https://web.microsoftstream.com/video/f6a54e1d-a46d-4564-aba3-a309c9a0b507">https://web.microsoftstream.com/video/f6a54e1d-a46d-4564-aba3-a309c9a0b507</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
19	Public Meeting	Non-targeted/broad community Residents of District #8	18	The community was invited to a Design Workshop (i.e., public meeting) to discuss ideas for CDBG public facilities projects, and so that DCHD staff could provide assistance with completing citizen request forms.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
20	Public Meeting	Non-targeted/broad community  Residents of District #1	3	The community was invited to a Design Workshop (i.e., public meeting) to discuss ideas for CDBG public facilities projects, and so that DCHD staff could provide assistance with completing citizen request forms.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
21	Training for Technical Advisory Review Panel on review of 47th Year CDBG Service apps on 11/17/2020	Technical Advisory Review (TARP) members	7	N/A	N/A	
22	Training for Technical Advisory Review Panel on review of 47th Year CDBG Services apps on 11/17/2020	Technical Advisory Review (TARP) members	3	N/A	N/A	
23	Public Meeting	Technical Advisory Review (TARP) members	3	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
24	Public Meeting	Non-targeted/broad community  CD Steering Committee	16	The community was invited the Steering Committee meeting (i.e., public meeting) where discussion over project proposals submitted under the 47th Year CDBG Public Facilities Large Scale Set-Aside. Summary of comments can be heard through the provided URL.	N/A	<a href="https://web.microsoftstream.com/video/5408ca3b-dd75-408f-9c0f-38a30ec35f7f">https://web.microsoftstream.com/video/5408ca3b-dd75-408f-9c0f-38a30ec35f7f</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
25	Public Meeting	Non-targeted/broad community  CD Steering Committee	9	The community was invited the Steering Committee meeting (i.e., public meeting) where discussion over project proposals submitted under the 47th Year CDBG Public Facilities Small Scale Set-Aside. Summary of comments can be heard through the provided URL.	N/A	<a href="https://web.microsoftstream.com/video/ec2bb843-a187-4885-a2ee-7ab47888cccf">https://web.microsoftstream.com/video/ec2bb843-a187-4885-a2ee-7ab47888cccf</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
26	Public Meeting	Non-targeted/broad community  CD Steering Committee	57	The community was invited the Steering Committee meeting (i.e., public meeting) where discussion over the 47th year CDBG, ESG and HOPWA funding recommendation. Summary of comments can be heard through the provided URL.	N/A	<a href="https://web.microsoftstream.com/video/82310986-8c27-46ba-bbad-7310e231777b">https://web.microsoftstream.com/video/82310986-8c27-46ba-bbad-7310e231777b</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
27	Public Meeting	Non-targeted/broad community  Continuum of Care (CoC) Board	9	Continuum of Care Board Chair, Shelby McCue, asked about allocation per component, including if additional funding should be added to homeless prevention. Nicole Ferrini, Chief Resilience Officer and DCHD Director, explained that allocations are based on quality of programs and the need to fill gaps in funding.	N/A	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
28	Public Meeting	Non-targeted/broad community	Public meeting was held virtually due to COVID-19 health crisis.	The following persons provided comments in support of the Annual Action Plan: Gilbert Raynard, client under the HOME minor repair program; Carol Bohle, Executive Director for the Coalition for the Homeless; Roger De Moor, Executive Director for Rebuilding Together El Paso; and Celia Garcia, Chief Operating Office of Social Service Programs for Project Amistad.	N/A	
29	Newspaper Ad	Non-targeted/broad community	N/A	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
30	Newspaper Ad	Non-English Speaking - Specify other language: Spanish  Non-targeted/broad community	N/A	N/A	N/A	
31	Public comment period 05/12/2021-06/11/2021	Non-targeted/broad community	N/A	None	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
32	Public Meeting	Non-targeted/broad community	Public meeting was held virtually due to COVID-19 health crisis.	Carol Bohle, the Executive Director the Coalition for the Homeless, expressed support for the Annual Action Plan with an emphasis on the homeless and housing programs that will be funded. City Representative Cissy Lizarraga asked how the 47th Year entitlement allocations compare to the 46th Year allocations; Nicole Ferrini, Chief Resilience Officer and Director of Community and Human Development, replied saying that the allocations for 46th Year and 47th Year were similar. City Representative Henry Rivera asked if City Council will receive updates in regards to the public facilities projects being funding under the Annual Action Plan; Nicole Ferrini stated that DCHD will continually provide City Council with status updates for these projects.	N/A	

**Table 4 – Citizen Participation Outreach**

## AP-15 Expected Resources – 91.220(c)(1,2)

### Introduction

The City of El Paso is applying to receive the following four entitlements grants, which are administered by US Department of Housing and Urban Development – Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Partnerships Investment (HOME), and the Housing Opportunities for Persons Living with HIV/AIDS (HOPWA). These grants and the funds that they leverage are used throughout the City to support a variety of public service, homeless and housing programs, and public facilities improvements. The grants leverage a variety of funds from local, private, other federal and state grants that double or triple the funds available to serve low-to-moderate income families and neighborhoods.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	6,454,631	500,000	0	6,954,631	20,487,254	The City received \$6,454,631 in CDBG entitlement funding, and expects to receive \$500,000 in CDBG RLF for the 2021-2022 Program Year. This program year will be the second year of the 2020-2025 Consolidated Plan. The CDBG entitlement allocation is a 1.06% increase from the prior year's award.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	2,631,084	1,800,000	0	4,431,084	12,825,691	The City projects to receive \$11,593,824 in HOME Entitlement and \$10,065,526 in HOME Program Income (PI) for the 2020-2025 Consolidated Plan period. For year 2, the City received an 1.07% increase in HOME entitlement funding, and expects to receive \$1,800,000 in program income.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	704,106	0	0	704,106	1,207,103	The City received \$704,106 in HOPWA Entitlement funding for the 2021-2022 Program Year, which will be the second year for the 2020-2025 Consolidated Plan. This year's allocation is a 12.28% increase in HOPWA entitlement funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	544,716	0	0	544,716	1,657,312	The City received \$544,716 in ESG Entitlement funding for the 2021-2022 Program Year, which will be the second year for the 2020-2025 Consolidated Plan. This year's allocation is a 1.26% decrease in ESG entitlement funding.
Other	public - federal	Public Services	12,863,795	0	0	12,863,795	30,393,702	This amount reflects the required project match and other leveraged funds that are bestowed through a variety of sources: other federal, state, local, private and in-kind.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The HOME Investment Program funds are leveraged with private state and local funds through the competitive 9% Low Income Housing Tax Credit (LIHTC). HOME funds will also be leveraged through a competitive RFP process for investors and CHDO's. There is no match requirement for the HOME program.



**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

For the 2021-2022 Program Year, the City accepted applications from City departments, non-profit agencies and non-municipal government entities for public facilities improvements that benefit low-to-moderate income residents and/or individuals. Improvements to publically owned land will occur when public facilities funding is awarded to either a City department or other government entity.

For year 2 of the 2020-2025 Consolidated Plan, the City of El Paso will deploy \$3,926,246 of CDBG funding to public facilities improvements. From this amount, \$1,000,000 will be used to address the need for access to suitable open space for recreational activities and mobility infrastructure for increased walkability and accessibility. The City will be funding three mobility infrastructure projects that will install wheelchair ramps and/or sidewalks in neighborhoods within City Representative District #1 and City Representative District #8. These projects will assist with the elimination of architectural barriers, and thus will encourage mobility and independence to individuals with severe disabilities. Another project, Tom Lea Lower Park Dog Run, will consist of the development of a dog run at Tom Lea Lower Park, which is located in Central El Paso, an area that currently does not have close access to such an amenity.

**Discussion**

See above.

## AP-20 Annual Goals and Objectives

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	DH 3.1 Tenant Based Rental Assistance/ Homeless Pr	2020	2024	Homeless	Citywide	DH 3.1 Tenant Based Rental Assistance/ Homeless Pr	HOPWA: \$557,100 HOME: \$492,829 ESG: \$99,297 Federal, State, Local and Private: \$342,523	Tenant-based rental assistance / Rapid Rehousing: 138 Households Assisted Homelessness Prevention: 48 Persons Assisted
2	DH 3.2 Rapid Rehousing	2020	2024	Homeless	Citywide	DH 3.2 Rapid Rehousing	ESG: \$144,733 Federal, State, Local and Private: \$1,294,087	Tenant-based rental assistance / Rapid Rehousing: 26 Households Assisted
3	DH 2.1 Housing Rehabilitation Assistance	2020	2024	Affordable Housing	Citywide	DH 2.1 Housing Rehabilitation Assistance	CDBG: \$521,451 HOME: \$767,097 Federal, State, Local and Private: \$109,500	Homeowner Housing Rehabilitated: 117 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	DH 2.2 Rental Housing by Developers	2020	2024	Affordable Housing	Citywide	DH 2.2 Rental Housing by Developers	HOME: \$1,624,025	Rental units constructed: 16 Household Housing Unit
5	DH 2.3 Rental Housing by CHDOs	2020	2024	Affordable Housing	Citywide	DH 2.3 Rental Housing by CHDOs	HOME: \$624,025	Rental units constructed: 6 Household Housing Unit
6	DH 3.3 First Time Homebuyer Assistance	2020	2024	Affordable Housing	Citywide	DH 3.3 First Time Homebuyer Assistance	CDBG: \$120,000 HOME: \$480,000	Direct Financial Assistance to Homebuyers: 15 Households Assisted
7	DH 1.1 First Time Homebuyer Counseling & Education	2020	2024	Affordable Housing	Citywide	DH 1.1 First Time Homebuyer Counseling & Education	CDBG: \$40,000 Federal, State, Local and Private: \$80,350	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
8	DH 1.3 HOPWA Support Services	2020	2024	Affordable Housing Public Housing Non-Homeless Special Needs	Citywide	DH 1.3 HOPWA Support Services	HOPWA: \$84,160	Public service activities other than Low/Moderate Income Housing Benefit: 68 Persons Assisted
9	SL 1.1 Homeless, Emergency Shelter and Housing	2020	2024	Homeless	Citywide	SL 1.1 Homeless, Emergency Shelter and Housing	CDBG: \$278,116 ESG: \$123,397 Federal, State, Local and Private: \$2,900,723	Homeless Person Overnight Shelter: 1059 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	SL 1.2 Street Outreach	2020	2024	Homeless	Citywide	SL 1.2 Street Outreach	ESG: \$99,159 Federal, State, Local and Private: \$99,159	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
11	SL 1.3 Mental and Medical Health Services	2020	2024	Mental and Medical	Citywide	SL 1.3 Mental and Medical Health Services	CDBG: \$198,115 Federal, State, Local and Private: \$729,486	Public service activities other than Low/Moderate Income Housing Benefit: 1420 Persons Assisted
12	SL 1.5 Children and Youth Services	2020	2024	Children and Youth	Citywide	SL 1.5 Children and Youth Services	CDBG: \$295,000 Federal, State, Local and Private: \$4,035,499	Public service activities other than Low/Moderate Income Housing Benefit: 1328 Persons Assisted
13	SL 2.2 Public Facilities- Mobility Infrastructure	2020	2024	Mobility Infrastructure	City Representative District 1 City Representative District 8	SL 2.2 Public Facilities -Mobility Infrastructure	CDBG: \$110,844	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5100 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	SL 2.3 Public Facilities - Neighborhood	2020	2024	Public Facilities	City Representative District 8	SL 2.3 Public Facilities - Neighborhood	CDBG: \$1,387,949	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7065 Persons Assisted
15	SL 2.4 Public Facilities - Healthcare	2020	2024	Public Facilities	Citywide City Representative District 7	SL 2.4 Public Facilities - Healthcare	CDBG: \$460,784	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2126 Persons Assisted
16	SL 1.6 Seniors & Person with Disabilities Services	2020	2024	Seniors and Disabled	Citywide	SL 1.6 Seniors & Person with Disabilities Services	CDBG: \$226,228 Federal, State, Local and Private: \$3,059,373	Public service activities other than Low/Moderate Income Housing Benefit: 408 Persons Assisted
17	SL 2.6 Public Facilities - Parks and Open Space	2020	2024		City Representative District 1	SL 2.6 Public Facilities - Parks and Open Space	CDBG: \$464,854	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7970 Persons Assisted
18	SL 2.7 Public Facilities for Abused/Neg Children	2020	2024	Public Facilities for Abused and Neg Children	Citywide City Representative District 8	SL 2.7 Public Facilities for Abused/Neg Children	CDBG: \$1,263,267	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 933 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
19	EO 1.1 Financial Empowerment	2020	2024	Non-Housing Community Development Financial Empowerment	Citywide	EO 1.1 Financial Empowerment	CDBG: \$100,000 Federal, State, Local and Private: \$54,416	Public service activities other than Low/Moderate Income Housing Benefit: 132 Persons Assisted
20	EO 1.2 Microenterprise Technical Assistance	2020	2024	Microenterprise Technical Assistance	Citywide	EO 1.2 Microenterprise Technical Assistance	CDBG: \$100,000 Federal, State, Local and Private: \$30,915	Businesses assisted: 110 Businesses Assisted
21	CDBG Program Administration	2020	2024	Administration	Citywide	CDBG Program Administration	CDBG: \$1,249,226	Other: 1 Other
22	Continuum Planning and Administration	2020	2024		Citywide	Continuum of Care Planning and Administration	CDBG: \$41,700 ESG: \$40,000	Other: 1 Other
23	ESG Program Administration	2020	2024	Administration	Citywide	ESG Program Administration	ESG: \$38,130	Other: 1 Other
24	HOPWA Program Administration	2020	2024	Administration	Citywide	HOPWA Program Administration	HOPWA: \$21,123	Other: 1 Other
25	HOPWA Sponsor Administration	2020	2024	Administration	Citywide	HOPWA Sponsor Administration	HOPWA: \$41,723	Other: 1 Other
26	Housing Program Administration	2020	2024	Administration	Citywide	Housing Program Administration	CDBG: \$97,097 HOME: \$443,108	Other: 1 Other

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	DH 3.1 Tenant Based Rental Assistance/ Homeless Pr
	<b>Goal Description</b>	<p>A total of \$557,100 HOPWA funds, \$99,297 ESG funds and \$492,829 HOME funds will be used to benefit 138 households (TBRA) and 48 persons (Homelessness Prevention) through the following activities:</p> <ul style="list-style-type: none"> <li>• City of El Paso Department of Public Health, TBRA; \$557,100 (HOPWA)</li> <li>• Project Vida, Homeless Prevention and Recovery Program; \$99,297 (ESG, HP) HP = 48 persons, 16 households</li> <li>• HOME TBRA; \$492,829 70 households assisted, including 20 households that are inclusive of a homeless veteran.</li> </ul>
2	<b>Goal Name</b>	DH 3.2 Rapid Rehousing
	<b>Goal Description</b>	<p>A total of \$144,733 ESG funds will be used to benefit 26 households through the following activities:</p> <ul style="list-style-type: none"> <li>• El Paso Human Services, Youth Homelessness Program; \$72,367 (ESG, RRH) RRH = 25 persons, 15 households</li> <li>• Project Vida, Homelessness Prevention and Recovery Program; \$72,366 (ESG, RRH) RRH = 33 persons, 11 households</li> </ul>

<b>3</b>	<b>Goal Name</b>	DH 2.1 Housing Rehabilitation Assistance
	<b>Goal Description</b>	A total of \$1,288,548 CDBG and HOME funds will be used to assist 117 units under the following activities: <ul style="list-style-type: none"> <li>• Volunteer housing rehabilitation: 85 units; \$238,548 (CDBG)</li> <li>• Single family owner occupied rehabilitation program: 32 units; \$282,903 (CDBG) + \$767,097 (HOME)</li> </ul>
<b>4</b>	<b>Goal Name</b>	DH 2.2 Rental Housing by Developers
	<b>Goal Description</b>	A total of \$1,624,025 HOME funds will be used to construct 16 units through this activity.
<b>5</b>	<b>Goal Name</b>	DH 2.3 Rental Housing by CHDOs
	<b>Goal Description</b>	A total of \$624,025 HOME funds will be used to construct 6 units through this activity.
<b>6</b>	<b>Goal Name</b>	DH 3.3 First Time Homebuyer Assistance
	<b>Goal Description</b>	A total of \$600,000 CDBG and HOME funds will be used to assist 15 units under this activity: <ul style="list-style-type: none"> <li>• 3 units; \$120,000 (CDBG)</li> <li>• 12 units; \$480,000 (HOME)</li> </ul>
<b>7</b>	<b>Goal Name</b>	DH 1.1 First Time Homebuyer Counseling & Education
	<b>Goal Description</b>	Project BRAVO, Inc. has been awarded \$40,000 CDBG funds to provide First Time Homebuyer counseling services to benefit 100 low/moderate income households.
<b>8</b>	<b>Goal Name</b>	DH 1.3 HOPWA Support Services
	<b>Goal Description</b>	A total of \$84,160 HOPWA funds will be used to provide supportive services to benefit 68 persons living with HIV/AIDS and their families.



9	<b>Goal Name</b>	SL 1.1 Homeless, Emergency Shelter and Housing
	<b>Goal Description</b>	<p>A total of \$278,116 CDBG funds and \$123,397 ESG funds will be used to benefit 1,059 persons through the following activities:</p> <ul style="list-style-type: none"> <li>• Center Against Sexual and Family Violence, Runaway and Homeless Shelter; \$99,058 (CDBG)</li> <li>• YWCA, YWCA Homeless Program; \$99,058 (CDBG)</li> <li>• El Paso Coalition for the Homeless, Homelessness Diversion Program; \$80,000 (CDBG)</li>   <li>• La Posada Home, Inc., La Posada Home Program; \$83,397 (ESG, ES) ES = 150 persons, 50 households</li> <li>• The Salvation Army, Red Shield Family Center; \$40,000 (ESG, ES) ES = 516 persons, 172 households</li> </ul>
10	<b>Goal Name</b>	SL 1.2 Street Outreach
	<b>Goal Description</b>	<p>A total of \$99,159 ESG funds will be used to benefit 100 persons / 100 households through the following activity:</p> <ul style="list-style-type: none"> <li>• Emergence Health Network, Homeless Street Outreach; \$99,159 (ESG, SO) SO = 100 persons, 100 households</li> </ul>
11	<b>Goal Name</b>	SL 1.3 Mental and Medical Health Services
	<b>Goal Description</b>	<p>A total of \$198,115 CDBG funds will be used to benefit 1,420 persons through the following activities:</p> <ul style="list-style-type: none"> <li>• Center Against Sexual and Family Violence, Mental Health Services for Survivors of Domestic Violence; \$99,057</li> <li>• Project Vida Health Center, Integrated Primary Health Care; \$99,058</li> </ul>

<b>12</b>	<b>Goal Name</b>	SL 1.5 Children and Youth Services
	<b>Goal Description</b>	<p>A total of \$295,000 CDBG funds will be used to benefit 1,328 person through the following activities:</p> <ul style="list-style-type: none"> <li>• Candlelighters of the El Paso Area Inc, Living Everyday Program; \$40,000</li> <li>• CASA of El Paso, Court Appointed Special Advocates; \$40,000</li> <li>• Child Crisis Center of El Paso, Respite and Urgent Residential Care for Children; \$40,000</li> <li>• Project Vida, After School Enrichment and Youth Program; \$40,000</li> <li>• Project Vida, Early Childhood Development; \$40,000</li> <li>• City of El Paso Parks and Recreation Department, Neighborhood Youth Outreach Program; \$30,000</li> <li>• YWCA, Youth Summer Program; \$65,000</li> </ul>
<b>13</b>	<b>Goal Name</b>	SL 2.2 Public Facilities- Mobility Infrastructure
	<b>Goal Description</b>	<p>A total of \$110,844 CDBG funds will be used to benefit 5,100 persons through the following mobility infrastructure improvements:</p> <ul style="list-style-type: none"> <li>• Wheelchair Ramps at Lakehurst Rd and Saratoga Dr; \$35,146</li> <li>• Sidewalks along Barney St; \$32,256</li> <li>• Sidewalks along Flower Dr; \$43,442</li> </ul>
<b>14</b>	<b>Goal Name</b>	SL 2.3 Public Facilities - Neighborhood
	<b>Goal Description</b>	<p>A total of \$1,387,949 will be used to benefit 7,065 persons through the following recreation center improvements:</p> <ul style="list-style-type: none"> <li>• YWCA, Joyce Jaynes Branch Renovation; \$1,387,949</li> </ul>
<b>15</b>	<b>Goal Name</b>	SL 2.4 Public Facilities - Healthcare
	<b>Goal Description</b>	<p>A total of \$460,784 will be used to benefit 2,126 persons each year through the following healthcare facility improvement:</p> <ul style="list-style-type: none"> <li>• Ascension DePaul Holdings of El Paso, Centro San Vicente Healthcare Center Renovation; \$460,784</li> </ul>

16	<b>Goal Name</b>	SL 1.6 Seniors & Person with Disabilities Services
	<b>Goal Description</b>	<p>A total of \$226,228 CDBG funds will be used to benefit 408 persons through the following activities:</p> <ul style="list-style-type: none"> <li>• County of El Paso, El Paso City-County Nutrition Program; \$49,057</li> <li>• Opportunity Center for the Homeless, Elderly Case Management; \$49,057</li> <li>• Paso Del Norte CDC, Applied Behavior Analysis; \$49,057</li> <li>• Project Amistad, Money Management and Social Services; \$49,057</li> <li>• City of El Paso Parks and Recreation Department, Disability Exercise Program: \$30,000</li> </ul>
17	<b>Goal Name</b>	SL 2.6 Public Facilities - Parks and Open Space
	<b>Goal Description</b>	<p>A total of \$464,854 CDBG funds will be used to benefit 7,970 persons through the following park improvement:</p> <ul style="list-style-type: none"> <li>• Tom Lea Lower Park Dog Run; \$464,854</li> </ul>
18	<b>Goal Name</b>	SL 2.7 Public Facilities for Abused/Neg Children
	<b>Goal Description</b>	<p>A total of \$1,263,267 CDBG funds will be used to benefit 933 persons each year through the following improvement to an public facility that primarily provides services to abused and/or neglected children:</p> <ul style="list-style-type: none"> <li>• El Paso Child Guidance Center, Center Renovation and Expansion; \$1,263,267</li> </ul>
19	<b>Goal Name</b>	EO 1.1 Financial Empowerment
	<b>Goal Description</b>	<p>A total of \$100,000 CDBG funds will be used to benefit 132 persons through the following activity:</p> <ul style="list-style-type: none"> <li>• YWCA, (Learn, Invest, Focus, Train) LIFT Program; \$100,000</li> </ul>
20	<b>Goal Name</b>	EO 1.2 Microenterprise Technical Assistance
	<b>Goal Description</b>	<p>A total of \$100,000 CDBG funds will be used to benefit 110 businesses through the following activity:</p> <ul style="list-style-type: none"> <li>• Project Vida, Microenterprise Technical Assistance Program; \$100,000</li> </ul>

21	<b>Goal Name</b>	CDBG Program Administration
	<b>Goal Description</b>	Funding is for 2021-2022 activities to provide program management and coordination: <ul style="list-style-type: none"> <li>• Program Administration: \$1,076,895</li> <li>• Indirect Costs: \$172,331</li> </ul>
22	<b>Goal Name</b>	Continuum Planning and Administration
	<b>Goal Description</b>	Funding is for 2020-2021 projects to provide planning, management and support for El Paso’s Continuum of Care. <ul style="list-style-type: none"> <li>• El Paso Coalition for the Homeless, CoC Planning and Administration; \$41,700</li> <li>• El Paso Coalition for the Homeless, HMIS Management; \$40,000</li> </ul>
23	<b>Goal Name</b>	ESG Program Administration
	<b>Goal Description</b>	Funding is for 2020-2021 projects to provide planning and management for the ESG program: \$38,130
24	<b>Goal Name</b>	HOPWA Program Administration
	<b>Goal Description</b>	Funding is for 2020-2021 projects to provide planning and management for the HOPWA program: \$21,123
25	<b>Goal Name</b>	HOPWA Sponsor Administration
	<b>Goal Description</b>	A total of \$41,723 of HOPWA funds will be used to support sponsor administration to benefit persons living with HIV/AIDS and their families.
26	<b>Goal Name</b>	Housing Program Administration
	<b>Goal Description</b>	Funding is for 2020-2021 projects to provide planning and management for the HOME and CDBG RLF program: <ul style="list-style-type: none"> <li>• HOME EN: \$263,108</li> <li>• HOME PI: \$180,000</li> <li>• CDBG RLF: \$97,097</li> </ul>

## AP-35 Projects – 91.220(d)

### Introduction

This section lists the projects that will be funded during the 2021-2022 Program Year with the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME) Grant, Emergency Solutions Grant (ESG) and the Housing Opportunities for Persons Living with AIDS (HOPWA) Grant.

### Projects

#	Project Name
1	DH 3.1 Tenant Based Rental Assistance & Homeless Prevention
2	DH 2.1 Housing Rehabilitation Assistance
3	DH 2.2 Rental Housing by Developers
4	DH 2.3 Rental Housing by CHDO's
5	DH 3.3 First Time Homebuyer Assistance
6	DH 1.1 First Time Homebuyer Counseling & Education
7	DH 1.3 HOPWA Support Services
8	SL 1.1 Homeless, Emergency Shelter and Housing
9	SL 1.3 Mental and Medical Health Services
10	SL 1.5 Children and Youth Services
11	SL 2.2 Mobility Infrastructure
12	SL 2.3 Public Facilities - Neighborhood
13	SL 2.4 Public Facilities - Healthcare
14	SL 1.6 Seniors & Person with Disabilities Services
15	SL 2.6 Public Facilities - Parks and Open Space
16	SL 2.7 Public Facilities for Abused/Neg Children
17	EO 1.1 Financial Empowerment
18	EO 1.2 Microenterprise Technical Assistance
19	Emergency Solutions Grant Activities
20	CDBG Program Administration
21	Continuum Planning and Administration
22	HOPWA City Administration
23	HOPWA Sponsor Administration
24	Housing Program Administration

**Table 7 - Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Allocation priorities are based on the results of a housing market and demographic analysis and survey conducted for the 2020-2025 Consolidated Plan, citizen requests, community housing needs, and recommendations by the Steering Committee. The main obstacle in addressing underserved needs is reduced funding, increased costs relating to public service programming and construction, and increased housing costs. The City of El Paso encourages its sub grantees to seek additional resources from other public and private sources to more robustly leverage limited federal entitlement funds.

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	DH 3.1 Tenant Based Rental Assistance & Homeless Prevention
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	DH 3.1 Tenant Based Rental Assistance/ Homeless Pr
	<b>Needs Addressed</b>	DH 3.1 Tenant Based Rental Assistance/ Homeless Pr
	<b>Funding</b>	HOPWA: \$557,100 HOME: \$492,829
	<b>Description</b>	This project will provide affordability to decent housing for those who are at-risk of being homeless.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<p>A total of 138 low-to-moderate income families will be assisted with tenant based rental assistance.</p> <ul style="list-style-type: none"> <li>• HOPWA TRBRA; 68 persons/households</li> <li>• HOME; 70 persons/households, including 20 households that are inclusive of a homeless veteran.</li> </ul>
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• City of El Paso Department of Public Health: \$557,100 (HOPWA) 701 Montana Avenue, El Paso TX 79902</li> <li>• Endeavors: \$233,424 (HOME) 1390 George Dieter Dr, Suite 140, El Paso TX 79936</li> <li>• Housing Authority of the City of El Paso (HACEP): \$259,405 (HOME) 5300 E. Paisano Dr, El Paso TX 79905</li> </ul>



	<b>Planned Activities</b>	<ul style="list-style-type: none"> <li>• Enable persons living with HIV/AIDS, and their families, to establish or better maintain a stable living environment in housing that is decent, safe and sanitary by providing long-term housing assistance through tenant-based rental assistance and permanent housing placement.</li> <li>• The El Paso Veterans Permanent Supportive Housing (PSH) proposal directly addresses the need to implement a plan that provides response and recovery services to Veterans impacted by COVID-19 by focusing on a Housing First evidence-based program that provides immediate access to permanent housing and support services to Veterans who are homeless.</li> <li>• A housing subsidy will be paid to the property owner directly by HACEP on behalf of a participating family.</li> </ul>
<b>2</b>	<b>Project Name</b>	DH 2.1 Housing Rehabilitation Assistance
	<b>Target Area</b>	Citywide City Representative District 1 City Representative District 8
	<b>Goals Supported</b>	DH 2.1 Housing Rehabilitation Assistance
	<b>Needs Addressed</b>	DH 2.1 Housing Rehabilitation Assistance
	<b>Funding</b>	CDBG: \$521,451 HOME: \$767,097 Federal, State, Local and Private: \$109,500
	<b>Description</b>	This project will provide safe, affordable and decent housing through the rehabilitation of existing single-family, owner-occupied dwellings.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	117 households (25 HOME, 7 CDBG RLF, 85 CDBG EN) will be assisted through single-family, owner-occupied rehabilitation.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• Citywide</li> <li>• City Representative District 1</li> <li>• City Representative District 8</li> </ul>

	<b>Planned Activities</b>	Single-family, owner-occupied housing rehabilitation for seniors and disabled homeowners, or homeowners at 60% of the Area Median Income (AMI) or below.
<b>3</b>	<b>Project Name</b>	DH 2.2 Rental Housing by Developers
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	DH 2.2 Rental Housing by Developers
	<b>Needs Addressed</b>	DH 2.2 Rental Housing by Developers
	<b>Funding</b>	HOME: \$1,624,025
	<b>Description</b>	This project will provide loans to construct safe, affordable and decent housing to increase and maintain the affordable rental housing stock.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	16 households earning under 60% Annual Median Income (AMI) will be supported through this project.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• Citywide</li> </ul>
	<b>Planned Activities</b>	Construction of rental units available for low to moderate income households.
<b>4</b>	<b>Project Name</b>	DH 2.3 Rental Housing by CHDO's
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	DH 2.3 Rental Housing by CHDOs
	<b>Needs Addressed</b>	DH 2.3 Rental Housing by CHDOs
	<b>Funding</b>	HOME: \$624,025
	<b>Description</b>	This project will provide safe, affordable and decent rental housing.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	6 households earning 60% Annual Median Income (AMI) or less will be supported through this program.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• Citywide</li> </ul>

	<b>Planned Activities</b>	New rental units to be constructed by Community Housing Development Organization (CHDO) for very low and low income tenants.
<b>5</b>	<b>Project Name</b>	DH 3.3 First Time Homebuyer Assistance
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	DH 3.3 First Time Homebuyer Assistance
	<b>Needs Addressed</b>	DH 3.3 First Time Homebuyer Assistance
	<b>Funding</b>	CDBG: \$120,000 HOME: \$480,000
	<b>Description</b>	This project will provide safe, affordable and decent housing by providing financial assistance to first time homebuyers.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 households will be assisted through this project.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>Citywide</li> </ul>
	<b>Planned Activities</b>	Provide first time homebuyers with a loan for down payment and closing costs assistance to make the overall home cost more affordable.
<b>6</b>	<b>Project Name</b>	DH 1.1 First Time Homebuyer Counseling & Education
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	DH 1.1 First Time Homebuyer Counseling & Education
	<b>Needs Addressed</b>	DH 1.1 First Time Homebuyer Counseling & Education
	<b>Funding</b>	CDBG: \$40,000 Federal, State, Local and Private: \$80,350
	<b>Description</b>	First Time Homebuyer Counseling and Education Program will provide citywide comprehensive housing counseling and education services to low- and moderate income families who are potential homebuyers.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 head of households will benefit from comprehensive housing counseling and education services targeted towards low- and moderate income families.

	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• Citywide</li> <li>• Project BRAVO, First Time Homebuyer Education Program 2000 Texas Ave, El Paso TX 79901; 8908 Old Country Dr, El Paso TX 79907</li> </ul>
	<b>Planned Activities</b>	First Time Homebuyer Counseling and Education Program will provide citywide comprehensive housing counseling and education services to low- and moderate income families who are potential homebuyers under the City's First Time Homebuyer Assistance Program or who are at-risk homeowners facing homelessness due to mortgage default and a possible home foreclosure. Services will consist of a homebuyer orientation class, personal financial literacy class, one-to-one and group housing counseling sessions, incubation counseling program to work through the challenges to home ownership or home preservation, homebuyer education seminar, loan origination services, and post-purchase education including mortgage default and foreclosure prevention counseling.
7	<b>Project Name</b>	DH 1.3 HOPWA Support Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	DH 1.3 HOPWA Support Services
	<b>Needs Addressed</b>	DH 1.3 HOPWA Support Services
	<b>Funding</b>	HOPWA: \$84,160
	<b>Description</b>	Provision of supportive services including, but not limited to, case management, counseling, referral services and resource identification for housing, health, and mental health services.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 68 low-to-moderate income families will be assisted with supportive services.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• Citywide</li> <li>• City of El Paso Department of Public Health, 701 Montana Avenue, El Paso TX 79902</li> </ul>

	<b>Planned Activities</b>	Enable low- income persons living with HIV/AIDS, and their families, to establish or better maintain a stable living environment in housing that is decent, safe and sanitary by providing supportive services. Supportive Services activities include case management, counseling and resource identification for housing, health and mental health services.
<b>8</b>	<b>Project Name</b>	SL 1.1 Homeless, Emergency Shelter and Housing
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	SL 1.1 Homeless, Emergency Shelter and Housing
	<b>Needs Addressed</b>	SL 1.1 Homeless, Emergency Shelter and Housing
	<b>Funding</b>	CDBG: \$278,116 Federal, State, Local and Private: \$964,148
	<b>Description</b>	These projects will provide increased availability and accessibility to a suitable living environment with homeless, emergency shelter and housing activities.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 393 presumed benefit individuals will be assisted from three activities.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• Center Against Sexual and Family Violence, Runaway and Homeless Shelter: \$99,058 580 Giles, El Paso TX 79915 (Admin)</li> <li>• YWCA, YWCA Homeless Program: \$99,058 201 E. Main Street, Suite 400, El Paso TX 79901; 3700 Altura Avenue, El Paso TX 79930 (Project)</li> <li>• El Paso Coalition for the Homeless, Homelessness Diversion Program: \$80,000 6044 Gateway East, Ste. 211, El Paso TX 79905</li> </ul>

	<b>Planned Activities</b>	Agencies will assist individuals and families that are experiencing homelessness by providing emergency shelter services. Emergency shelter services under these agencies include safe shelter, basic living needs (food & clothing), case management, financial assistance, and housing navigation. These programs have the ultimate goal of helping their clients achieve stable permanent housing.
9	<b>Project Name</b>	SL 1.3 Mental and Medical Health Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	SL 1.3 Mental and Medical Health Services
	<b>Needs Addressed</b>	SL 1.3 Mental and Medical Health Services
	<b>Funding</b>	CDBG: \$198,115 Federal, State, Local and Private: \$729,486
	<b>Description</b>	These programs will provide improved access to a suitable living environment by providing a comprehensive range of mental and medical health services for low-to-moderate income individuals and families.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 1,420 low-to-moderate persons will be assisted from two activities.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>Center Against Sexual and Family Violence, Mental Health Services for Survivors of Domestic Violence: \$99,057 580 Giles Road, El Paso TX 79915</li> <li>Project Vida, Integrated Primary Healthcare: \$99,058 3607 Rivera Ave, El Paso TX 79905 (Admin); 3612 Pera Ave, El Paso TX 79905</li> </ul>
	<b>Planned Activities</b>	Agencies will provide a wide variety of services that include preventive health care and education, primary health care, psychiatric evaluations, psychotherapy, and counseling. All services will be provided to low-to-moderate income clients to include vulnerable populations such as persons experiencing homelessness and victims of domestic violence.
10	<b>Project Name</b>	SL 1.5 Children and Youth Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	SL 1.5 Children and Youth Services

<b>Needs Addressed</b>	SL 1.5 Children and Youth Services
<b>Funding</b>	CDBG: \$295,000 Federal, State, Local and Private: \$4,035,499
<b>Description</b>	These programs will provide improved access to suitable living environments with a comprehensive range of services for children and youth through educational and personal development opportunities.
<b>Target Date</b>	8/31/2022
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 1,328 low-to-moderate children and their families will be assisted from seven activities.

	<p><b>Location Description</b></p>	<ul style="list-style-type: none"> <li>• Candlelighters of the El Paso, Living Everyday Program: \$40,000 1400 E. Hardaway St, Suite 206 El Paso, TX 79903</li> <li>• CASA of El Paso, Court Appointed Special Advocates: \$40,000 221 N. Kansas St, Suite 1501, El Paso TX 79901</li> <li>• Child Crisis Center, Respite and Urgent Residential Care for Children: \$40,000 2100 N. Stevens St, El Paso TX 79930</li> <li>• Project Vida, After School Enrichment and Youth Program: \$40,000 3616 Pera Ave, El Paso TX 79905 (Admin); 3607 Rivera Ave, El Paso TX 79905; 3718 Alameda Ave, El Paso TX 79905</li> <li>• Project Vida, Early Childhood Development: \$40,000 3616 Pera Ave, El Paso TX 79905; 51 N Hammett St, El Paso TX 79905</li> <li>• City of El Paso Parks and Recreation Department, Neighborhood Youth Outreach Program: \$30,000 Cooley Elementary, 107 N. Collingsworth Street, El Paso TX 79905; Douglass Elementary, 101 S. Eucalyptus Street, El Paso, TX 79905; Roberts Elementary, 341 Thorn Avenue, El Paso, TX 79932; Stanton Elementary, 5414 Hondo Pass Drive, El Paso TX 79924; Ysleta Elementary, 8624 Dorbandt Circle, El Paso TX 79907</li> <li>• YWCA Youth Summer Program: \$65,000 3700 Altura Ave, El Paso TX 79930</li> </ul>
	<p><b>Planned Activities</b></p>	<p>Agencies will provide a comprehensive range of services to include licensed child care; dropout and gang prevention; sports and recreation; educational programs; after-school tutoring programs; self-esteem building; respite and urgent residential care; and special services for children with cancer and their siblings, and also for children in the court system.</p>
<p><b>11</b></p>	<p><b>Project Name</b></p>	<p>SL 2.2 Mobility Infrastructure</p>



<b>Target Area</b>	City Representative District 1 City Representative District 8
<b>Goals Supported</b>	SL 2.2 Public Facilities- Mobility Infrastructure
<b>Needs Addressed</b>	SL 2.2 Public Facilities -Mobility Infrastructure
<b>Funding</b>	CDBG: \$110,844
<b>Description</b>	
<b>Target Date</b>	8/31/2022
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 5,100 will be assisted from three activities.
<b>Location Description</b>	<ul style="list-style-type: none"> <li>• Wheelchair Ramps at Lakehurst Rd and Saratoga Dr, District #1: \$35,146 Intersections along Lakehurst Rd and Saratoga Dr around Centennial Dr and Thorn Ave, El Paso TX, 79912</li> <li>• Sidewalks along Barney Street, District #8: \$32,256 Barney St between French Pl and Kyles St, El Paso TX, 79905</li> <li>• Sidewalks along Flower Dr, District #8: \$43,442 Along Flower Dr between Huerta St and Buena Vista St, El Paso TX, 79905</li> </ul>

	<b>Planned Activities</b>	<ul style="list-style-type: none"> <li>• <u>Wheelchair Ramps at Lakehurst Rd and Saratoga Dr – District 1:</u> Project entails the installation of ADA ramps at 12 corners (or 12 individual directional ramps) along Lakehurst Rd and Saratoga Dr. allowing pedestrians (specifically individuals using mobility devices) to use the sidewalks and have access to City services.</li> <li>• <u>Sidewalks along Barney St – District 8:</u> Project entails the installation of 170 linear feet of sidewalk and curb cuts on three corners (three directional ramps). The new sidewalk section is along north section of Barney St between Kyles st and French PL The ramps would be at the intersection of Kyles St and Barney and French Pl and Barney st allowing pedestrians (specifically individuals using mobility devices) to use the sidewalks and have access to City services.</li> <li>• <u>Sidewalks along Flower Dr – District 8:</u> Project entails the installation of 365 linear feet of sidewalk and curb cuts at one intersection. The new sidewalk section is along north section of Flower Dr between Buena Vista St and Huerta St. The ramps would be at the intersection of Huerta and Flower Dr. allowing pedestrians (specifically individuals using mobility devices) to use the sidewalks and have access to City services.</li> </ul>
12	<b>Project Name</b>	SL 2.3 Public Facilities - Neighborhood
	<b>Target Area</b>	City Representative District 8
	<b>Goals Supported</b>	SL 2.3 Public Facilities - Neighborhood
	<b>Needs Addressed</b>	SL 2.3 Public Facilities - Neighborhood
	<b>Funding</b>	CDBG: \$1,387,949
	<b>Description</b>	This project will provide availability and accessibility for a suitable living environment by improving a neighborhood facility.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 7,065 persons will be assisted by one activity.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• YWCA Joyce Jaynes Branch Renovation, District 8: \$1,387,949 1600 Brown Street, El Paso TX 79902</li> </ul>

	<b>Planned Activities</b>	<ul style="list-style-type: none"> <li>YWCA Joyce Jaynes Branch Renovation – District 8: project will address the highest priority needs of this 42,387 sq. ft., three-story facility. This includes: replace facility roof; replace evaporative coolers with AC package units; replace elevator; replace network cabling throughout facility; replace program area floors; install multi-purpose modular computer stations; centralized front desk entrance; replace old emergency door exits; renovate restrooms in both levels; renovate classrooms and program spaces; fitness/weight room renovation; replace pool tile on deck and in pool.</li> </ul>
13	<b>Project Name</b>	SL 2.4 Public Facilities - Healthcare
	<b>Target Area</b>	Citywide City Representative District 7
	<b>Goals Supported</b>	SL 2.4 Public Facilities - Healthcare
	<b>Needs Addressed</b>	SL 2.4 Public Facilities - Healthcare
	<b>Funding</b>	CDBG: \$460,784
	<b>Description</b>	This project will provide availability and accessibility for a suitable living environment by improving a healthcare facility.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 2,126 persons each year will benefit from one healthcare facility project.
<b>Location Description</b>	<ul style="list-style-type: none"> <li>Ascension DePaul Holdings of El Paso, Centro San Vicente Healthcare Center Renovation Project, District 7: \$460,784 8061 Alameda Avenue, El Paso, TX 79915 Note: Although this project is located in District 7, the services provided by this agency are offered Citywide.</li> </ul>	

	<b>Planned Activities</b>	<ul style="list-style-type: none"> <li>• <u>Ascension DePaul Holding of El Paso, Centro San Vicente Healthcare Center Renovation Project - District 7</u>: project will consist of renovating 8,066 of square feet at Centro San Vicente's main clinic located at 8061 Alameda Ave. The target areas for renovation under this project include laboratory, patient registration, three wait areas: registration, pharmacy and laboratory, and bathrooms. More specifically, renovations will be comprised of demolition and build-up of walls, framing, replacement the old stained tiles, installation of new baseboards, drywall and painting of walls, installation of glass doors, composites, (rough carpentry and millwork), air ducting and ventilation, data/telephone installation, security cameras, fire alarm and smoke detectors. Additionally, this includes costs for direct project oversight of any necessary building permits and contractor fees. The proposed scope of work will allow for an increase in the number of new unique patients registered and served. Equally as important, the new environment will be more aesthetically pleasing and will help to improve staff morale and increase patient satisfaction, especially post the COVID pandemic.</li> </ul>
<b>14</b>	<b>Project Name</b>	SL 1.6 Seniors & Person with Disabilities Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	SL 1.6 Seniors & Person with Disabilities Services
	<b>Needs Addressed</b>	SL 1.6 Seniors & Person with Disabilities Services
	<b>Funding</b>	CDBG: \$226,228 Federal, State, Local and Private: \$3,059,373
	<b>Description</b>	These programs will provide improved access to a suitable living environment by providing a continuum of care that includes a comprehensive range of services and safety net services for seniors and persons with disabilities.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 408 persons low-to-moderate families will be assisted from four activities.

	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• County of El Paso, El Paso City-County Nutrition Program: \$49,057 6314 Delta Drive, El Paso TX 79905 (Admin); 600 S. Ochoa Street, El Paso TX 79901</li> <li>• Opportunity Center for the Homeless, Elderly Case Management: \$49,057 1208 Myrtle Avenue, El Paso TX 79901</li> <li>• Paso Del Norte CDC, Applied Behavior Analysis: \$49,057 1101 E. Schuster Avenue, El Paso TX 79902</li> <li>• Project Amistad, Money Management and Social Services: \$49,057 3210 Dyer Street, El Paso TX 79930</li> <li>• City of El Paso Parks and Recreation Department, Disability Exercise Program: \$30,000 9031 Viscount Blvd, El Paso TX 79925</li> </ul>
	<b>Planned Activities</b>	<p>Agencies will provide a wide variety of services to persons aged 62 and older and persons with disabilities to form a collaborative approach to a continuum of care. Since these populations often experience similar needs, most of these programs are targeted toward both seniors and adults with disabilities. Services to seniors include representative payee services, stipend volunteer opportunities, homebound meals, therapy by licensed therapists to bring about positive developmental and behavior changes, and safe and appropriate citywide recreation activities. Services to persons with disabilities include homebound meals, advocacy training for parents of children with disabilities, and safe and appropriate citywide recreation activities.</p>
15	<b>Project Name</b>	SL 2.6 Public Facilities - Parks and Open Space
	<b>Target Area</b>	City Representative District 1
	<b>Goals Supported</b>	SL 2.6 Public Facilities - Parks and Open Space
	<b>Needs Addressed</b>	SL 2.6 Public Facilities - Parks and Open Space
	<b>Funding</b>	CDBG: \$464,854
	<b>Description</b>	This project will provide availability and accessibility to a suitable living environment by improving parks and open space.

	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 7,970 persons will benefit from one park project.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>Tom Lea Lower Park Dog Run, District 1: \$464,854 1203 E Schuster Ave, El Paso TX, 79902</li> </ul>
	<b>Planned Activities</b>	<ul style="list-style-type: none"> <li><u>Tom Lea Lower Park Dog Run - District 1</u>: project will include new 6' high chain link fence; new gate for pedestrian access (2); new gate for maintenance access (1); new sidewalk at the entrance of the dog run, to provide accessibility from the existing parking lot to the new dog run; new drinking fountain pet friendly; new bench with concrete pad (2); trash receptacle (1); and mutt mitt dispensers (2).</li> </ul>
16	<b>Project Name</b>	SL 2.7 Public Facilities for Abused/Neg Children
	<b>Target Area</b>	Citywide City Representative District 8
	<b>Goals Supported</b>	SL 2.7 Public Facilities for Abused/Neg Children
	<b>Needs Addressed</b>	SL 2.7 Public Facilities for Abused/Neg Children
	<b>Funding</b>	CDBG: \$1,263,267
	<b>Description</b>	This project will provide availability and accessibility to a suitable living environment by improving a facility that primarily serves.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 933 persons each year will benefit from one healthcare facility project.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>El Paso Child Guidance Center Renovation and Expansion, District 8: \$1,263,267 2701 E. Yandell Drive, El Paso TX, 79903 Note: Although this project is located in District 8, the services provided by this agency are offered Citywide.</li> </ul>

	<b>Planned Activities</b>	<ul style="list-style-type: none"> <li>El Paso Child Guidance Center Renovation and Expansion – District 8: renovation and expansion improvements to provide additional counseling offices, ADA-compliant restrooms, hallways and entrances, and additional office space for therapy and psychiatric care.</li> </ul>
17	<b>Project Name</b>	EO 1.1 Financial Empowerment
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	EO 1.1 Financial Empowerment
	<b>Needs Addressed</b>	EO 1.1 Financial Empowerment
	<b>Funding</b>	CDBG: \$100,000 Federal, State, Local and Private: \$54,416
	<b>Description</b>	This project will provide increased availability and accessibility to economic opportunities through job training, job coaching and education.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 132 low-to-moderate persons will be assisted from one activity.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>YWCA LIFT Program: \$100,000 1600 Brown St, El Paso TX 79902; 3700 Mattox St, El Paso TX 79925</li> </ul>
	<b>Planned Activities</b>	Agencies will provide individuals with job readiness training, including computer literacy, and job coaching in order to prepare participants for employment and other economic opportunities.
18	<b>Project Name</b>	EO 1.2 Microenterprise Technical Assistance
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	EO 1.2 Microenterprise Technical Assistance
	<b>Needs Addressed</b>	EO 1.2 Microenterprise Technical Assistance
	<b>Funding</b>	CDBG: \$100,000 Federal, State, Local and Private: \$30,915
	<b>Description</b>	This project will provide increased availability and accessibility to economic opportunities.
	<b>Target Date</b>	8/31/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 110 businesses will be assisted from this activity.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>Project Vida Community Development Corporation (PVCDC): \$100,000 3607 Rivera Ave, El Paso TX 79905; 1721 Lee Trevino Dr #B-1, El Paso TX 79935</li> </ul>
	<b>Planned Activities</b>	<p>The Microenterprise Technical Assistance Project administered by Project Vida Community Development Corporation (PVCDC) will collaborate with ACCION Texas to provide technical assistance to those that are either classified as a Microenterprise or are in the process of developing a Microenterprise, to improve their business skills and access to capital. PVCDC will oversee education and outreach activities and, will provide a list of community resources for loan assistance. Education activities include:</p> <ul style="list-style-type: none"> <li>How to Expand an Existing Business</li> <li>How to Start a New Business</li> <li>Marketing and Sales Development</li> <li>Advertising and Promotion Development</li> <li>Business Research and Planning</li> <li>General Business Management</li> <li>Capital Formation and Business Loans</li> <li>Computerization for a Microenterprise</li> </ul>
19	<b>Project Name</b>	Emergency Solutions Grant Activities
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	DH 3.1 Tenant Based Rental Assistance/ Homeless Pr DH 3.2 Rapid Rehousing SL 1.1 Homeless, Emergency Shelter and Housing SL 1.2 Street Outreach ESG Program Administration



<b>Needs Addressed</b>	DH 3.1 Tenant Based Rental Assistance/ Homeless Pr DH 3.2 Rapid Rehousing SL 1.1 Homeless, Emergency Shelter and Housing SL 1.2 Street Outreach ESG Program Administration
<b>Funding</b>	ESG: \$544,716 Federal, State, Local and Private: \$3,800,108
<b>Description</b>	Street outreach, emergency shelter operations, homelessness prevention for at-risk persons, rapid rehousing for homeless persons and HMIS services. Additionally, the City will use 7% for administrative costs.
<b>Target Date</b>	8/31/2022
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	872 at-risk or homeless persons, or 364 households, will be assisted from these activities.

	<p><b>Location Description</b></p>	<ul style="list-style-type: none"> <li>• El Paso Coalition for the Homeless - 6044 Gateway Blvd. East, Suite 211, El Paso TX 79905 \$40,000 (HMIS) HMIS = 5 ESG-funded agencies</li> <li>• El Paso Human Services - 1001 Montana Ave, El Paso TX 79902 \$72,367 (Rapid Rehousing) RRH = 25 persons, 15 households</li> <li>• Emergence Health Network - (Project) 1600 Montana Ave, El Paso TX 79902 \$99,159 (Street Outreach) SO = 100 persons, 100 households</li> <li>• La Posada Home – 1020 N. Campbell, El Paso TX 79902 \$83,397 (Emergency Shelter) ES = 150 persons, 50 households</li> <li>• Project Vida, Inc. (Admin) - 3607 Rivera Ave, El Paso TX 79905 \$99,297 (Homelessness Prevention), \$72,366 (Rapid Rehousing); \$171,663 total HP = 48 persons, 16 households; RRH = 33 persons, 11 households</li> <li>• The Salvation Army - 4300 East Paisano Dr, El Paso TX 79905 \$40,000 (Emergency Shelter) ES = 516 persons, 172 households</li> <li>• ESG Administration - 801 Texas Ave, El Paso TX 79901 \$38,130</li> </ul> <p>Street Outreach/Emergency Shelter - \$222,556 = 41%; Homeless Prevention/Rapid Rehousing/HMIS/Admin - \$322,160 = 59%</p>
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	<b>Planned Activities</b>	<ul style="list-style-type: none"> <li>• El Paso Coalition for the Homeless is the administrator of the local HMIS, a HUD required integrated internet-based database which records and stores client-level information on the characteristics and service needs of homeless persons. This system is utilized by homeless assistance providers to create a more coordinated and effective housing and service delivery system.</li> <li>• El Paso Human Services, Youth Homelessness Program – program will address ending youth homelessness in El Paso, Texas. By providing suitable housing through Rapid Re-housing assistance and support services for homeless youth, ages 18-24 which include individuals and families, former foster youth and LGBTQ youth.</li> <li>• Emergence Health Network, Homeless Street Outreach - program is designed to assist individuals who are residing on the streets of El Paso and link them to a full range of services that will lead to self-sufficiency and permanent housing.</li> <li>• La Posada Home, Inc., La Posada Home Program will provide emergency shelter to families escaping domestic violence. La Posada Home will utilize Housing First approach by rapidly placing and stabilizing client in permanent housing and by providing services without any preconditions regarding income, work effort, sobriety, or any other factor.</li> <li>• Project Vida Inc., Homelessness Prevention &amp; Recovery Program – program will provide individuals and families, case management, and homelessness prevention assistance to persons at-risk of becoming homeless and rapid rehousing assistance to persons and families who are experiencing homelessness.</li> <li>• The Salvation Army, Red Shield Family Center – shelter program will provide food, shelter and supportive services designed to stabilize the client’s physical, psychological and financial situation and ultimately place them in permanent housing with the skills and resources to remain independent.</li> </ul>
20	<b>Project Name</b>	CDBG Program Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	CDBG Program Administration
	<b>Needs Addressed</b>	CDBG Program Administration

	<b>Funding</b>	CDBG: \$1,249,226
	<b>Description</b>	This project will fund program management and coordination activities for the CDBG.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Community and Human Development, 801 Texas Avenue (City 3), El Paso TX 79901
	<b>Planned Activities</b>	This project will fund program management and coordination activities for CDBG.
21	<b>Project Name</b>	Continuum Planning and Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Continuum Planning and Administration
	<b>Needs Addressed</b>	Continuum of Care Planning and Administration
	<b>Funding</b>	CDBG: \$41,700
	<b>Description</b>	This project will fund program management and coordination for Continuum of Care planning activities.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	El Paso Coalition for the Homeless, 6044 Gateway Blvd. East, Suite 211, El Paso TX 79905
<b>Planned Activities</b>	Through this activity, the El Paso Coalition for the Homeless will provide support to homeless service providers.	
22	<b>Project Name</b>	HOPWA City Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	HOPWA Program Administration
	<b>Needs Addressed</b>	HOPWA Program Administration

	<b>Funding</b>	HOPWA: \$21,123
	<b>Description</b>	This project will provide program management and coordination for the HOPWA Program.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Community and Human Development, 801 Texas Avenue (City 3), El Paso TX 79901
	<b>Planned Activities</b>	This project will provide program management and coordination for the HOPWA Program.
<b>23</b>	<b>Project Name</b>	HOPWA Sponsor Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	HOPWA Sponsor Administration
	<b>Needs Addressed</b>	HOPWA Sponsor Administration
	<b>Funding</b>	HOPWA: \$41,723
	<b>Description</b>	This project will fund management and coordination activities for the HOPWA Project Sponsor.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	City of El Paso Department of Public Health, 701 Montana Avenue, El Paso TX 79902
	<b>Planned Activities</b>	This project will fund management and coordination activities for the HOPWA Project Sponsor.
<b>24</b>	<b>Project Name</b>	Housing Program Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing Program Administration
	<b>Needs Addressed</b>	Housing Program Administration

<b>Funding</b>	CDBG: \$97,097 HOME: \$443,108
<b>Description</b>	This project will provide program management and coordination activities for housing activities funded through HOME EN, HOME PI and CDBG-RLF.
<b>Target Date</b>	8/31/2022
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
<b>Location Description</b>	Community and Human Development, 801 Texas Avenue (City 3), El Paso TX 79901
<b>Planned Activities</b>	This project will provide program management and coordination activities for HOME EN, HOME PI and CDBG RLF housing activities.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Assistance provided through the four entitlement grants will be offered throughout the City of El Paso. The various types of CDBG, HOME and ESG programs and projects will serve persons residing within city limits. HOPWA will extend beyond City limits by providing rental assistance and supportive services to persons who reside within El Paso County limits.

All public service programs under the CDBG and ESG grants are offered Citywide, while HOPWA accepts clients that reside within El Paso County limits that encompasses the City of El Paso. Clients receiving assistance are required to provide data to verify low-to-moderate income status or they must validate that they are of presumed benefit.

For CDBG public facilities, two of the seven projects are located in City Representative District #1, one public facilities project is located in City Representative District #7, and the remaining four projects are located within City Representative District #8. Two public facilities projects have been awarded to non-profit agencies who provide services Citywide, and, as a result, these agencies will utilize the same methods as public service agencies to establish low-to-moderate income status. One public facilities projects is to primarily benefit adults with severe disabilities, a presumed benefit population, by improving mobility infrastructure through the installation of wheelchair ramps. For the remaining four public facilities projects, the 2011-2015 American Community Survey (ACS) was used to identify areas within city limits that are low-to-moderate income and therefore qualify for CDBG-funded improvements. Under the CDBG Volunteer Housing Rehabilitation program, the two non-profit agencies who have been awarded funding will check for CDBG-eligibility as they vet requests by homeowners to receive assistance for minor home repairs.

The following "Geographic Distribution" table shows the geographic distribution of CDBG, HOME, ESG and HOPWA funds for the City of El Paso's 2021-2022 program year.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Citywide	62
City Representative District 3	
City Representative District 5	
City Representative District 1	6
City Representative District 6	
City Representative District 7	4
City Representative District 8	28
City Representative District 2	

Target Area	Percentage of Funds
City Representative District 4	
Priority Housing Areas	

**Table 8 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

Most of the City’s HUD-funded programs and services are offered Citywide in an effort to fairly and justly serve the City’s low-to-moderate population without disregarding those from certain areas of El Paso.

For CDBG public facilities, \$1,263,267 has been awarded to the El Paso Child Guidance Center Renovation and Expansion project, which is located in District #8 and was initially funded under the 45th CDBG program. Due to the ongoing pandemic, the City decided to remove this project from the 45th Year Annual Action Plan so that funds could be redirected to support the City’s response to COVID-19. For this reason, this project is now being awarded 47th Year funding.

At the request of City Council and after review of the CDBG final allocation, \$1,200,000 of CDBG funding will be used for public facilities improvements and minor housing repair in the two targeted City Representative Districts that have been established for this program year – City Representative District #1 and City Representative District #8. The remainder of CDBG public facilities funding was set-aside for large scale improvements in which project proposals were accepted Citywide. Five project proposals were received under the large scale public facilities category. Ultimately, one of the two projects awarded funding is located in District #7, while the other project is located within one of the two targeted districts, District #8.

Attached in the Unique Appendices are maps of the two districts (District #1 and District #8) in which projects that qualify under the area benefit category are located. Also included is a citywide map showing the low-to-moderate areas within the City of El Paso that are eligible to receive CDBG funding.

**Discussion**

See above.



## AP-55 Affordable Housing – 91.220(g)

### Introduction

The City of El Paso's affordable housing priorities are to increase the supply of affordable rental housing for low to moderate income households and expand homeownership opportunities. The El Paso Regional Housing Plan has identified a growing gap in rental housing affordable for El Paso households earning \$30,000 and below. While the City does not foresee the completion of construction of new affordable units under HOME funding for the upcoming year, a Request for Proposals will be released in the Spring of 2021 that is aimed at creating and/or rehabilitating approximately 165 new affordable units. The City is also restructuring its Single Family Owner Occupied Rehabilitation (SFOO Rehab) Program and First Time Home Buyer (FTHB) Program in order to increase the number of households assisted. Both of these programs, which have historically been implemented by the Department of Community and Human Development, are now planned to be subawarded to local nonprofit organizations with greater capacities to serve the community. For the 2021-2022 program year, the City will seek to increase the availability of affordable housing through the following activities:

- Rehabilitation of 117 single family owner occupied units, including minor repair and rehabilitation of 0 affordable rental housing units
- Homebuyer assistance for 15 First Time Homebuyers
- The City is allocating funds to issue an RFP for development of affordable multi-family rental housing. However, the build out of these units is not expected to be completed in this program year.
- Homelessness Prevention, short-to-medium term rental assistance to 48 persons/16 households
- Rapid rehousing rental assistance to 26 households
- Tenant Based Rental Assistance to 138 households, including 68 persons/households who will be assisted under HOPWA TBRA

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	26
Non-Homeless	240
Special-Needs	68
Total	334

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	180
The Production of New Units	22
Rehab of Existing Units	117
Acquisition of Existing Units	15
Total	334

**Table 10 - One Year Goals for Affordable Housing by Support Type**

Annual Action Plan  
2021

## Discussion

The City will issue the following NOFA's for 2021-2022

- Rehabilitation/Minor Repair/Reconstruction NOFA - \$1,000,000 a total of 32 households will be assisted through this NOFA

In past years, the City has operated these programs internally. This year the City will competitively sub-award these funds to local non-profits to administer.

Additionally, the City will provide for the reporting period the following housing and housing education programs through its CDBG, HOME and HOPWA grants:

- Volunteer Housing Rehabilitation - the City has awarded \$238,548 in funding to Rebuilding Together (\$138,548) and Fisherman of Hope (\$100,000) who assists low income, elderly and disabled homeowners with repairs to their home, at no cost to them. This year's two targeted districts for this program are District 1 and District 8.
- First Time Homebuyer Program - the City will set-aside \$600,000 for down payment and closing cost assistance for low-to-moderate income families.
- First Time Homebuyer Counseling Program - in conjunction with the First Time Homebuyer Program, the City also sets aside \$40,000 annually to fund a First Time Homebuyer Counseling Program to provide comprehensive housing counseling and homebuyer education services to eligible clients. The counseling and education program provided by El Paso Community Action Program, Project Bravo, Inc., a HUD approved non-profit counseling agency, provides homeownership training, housing counseling and foreclosure prevention to ensure families are able to attain and maintain an affordable home.
- HOPWA TBRA program - provides Tenant Based Rental Assistance to low-income persons with HIV/AIDS. The amount of assistance is determined on a case-by-case basis. This year 68 persons with HIV/AIDS and their families will to benefit from this program.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Housing Authority of the City of El Paso (HACEP) is the local public housing agency and the second largest in the state of Texas. Its mission is to provide and increase the supply of safe, decent, sanitary and affordable housing for assisted families at or below 80% of median income by maintaining the Housing Authority's housing stock and ensuring that private rentals under the Section 8 – Housing Choice Voucher (HCV) Programs meet HUD Housing Quality Standards. HACEP owns and manages over 19,267 units of assisted housing including housing choice vouchers (HCV). A categorical description follows:

- 391 conventional Public Housing units which includes 269 scattered site dwellings
- 500 Section 8 New Construction (project-based) dwellings
- 1,192 non-subsidized dwellings
- 50 USDA-subsidized units for migrant workers
- 60 202 units for the elderly
- 15 HOME units for the elderly
- 1,003 low-income housing tax credit units (LIHTC)
- 6,037 Housing Choice Vouchers (HCV) / Section 8 assistance
- 6,489 Project Based Rental Assistance (PBRA)/LIHTC Units
- 288 Project-based vouchers

### **Actions planned during the next year to address the needs to public housing**

- The City addresses the needs of public housing residents by offering homeownership preparation counseling and training to Public Housing, PBRA, and HCV-Homeownership Program Clients. Financial homebuyer assistance is provided to qualifying HACEP tenants.
- The City will continue to support the HACEP efforts to obtain funds for housing-related renovations or new construction.
- The City will continue to review, and approve as appropriate, Consolidated Plan certifications of consistency for HACEP projects and proposals and annual plan/five-year plan submissions.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

During the ongoing reporting period, the City encouraged qualifying graduates of the HACEP Public Housing, Project-Based Rental Assistance and Housing Choice Voucher Homeownership Assistance program to participate in homeownership by assisting them with Housing Counseling and Homebuyer Assistance through numerous local programs.

Due to the pandemic, as part of its effort to prevent the spread of COVID-19, HACEP discontinued most of its activities and programs. However, the following services were provided:

- Delivery of food pantries to the doorsteps of residents in elderly communities.
- Delivery of personal protective items to the doorstep of residents in elderly communities.
- Transportation for elderly residents to go grocery shopping.
- Transportation for elderly residents to receive the first and second COVID-19 vaccines.
- By appointment only, referrals to supportive services for elderly residents.
- The Housing Choice Voucher program assists clients who are technologically challenged or need reasonable accommodations at the HACEP's central office lobby by appointment in order to assist them in applying for housing and to upload required eligibility documents.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Housing Authority of the City of El Paso does not fall under a troubled PHA designation.

**Discussion**

HACEP will continue to focus on its Annual Plan in the following areas to better serve its residents:

- Implementation of Rental Assistance Demonstration (RAD) Conversion of Public Housing portfolio;
- Identification of management's needs to enable HACEP staff to continue of providing exceptional customer service to its clients;
- Provide services to children, youth, and families to engage them in productive, healthy activities that promote physical and emotional well-being, community involvement, positive social interaction, good school attendance, and grades;
- Develop additional partnerships to augment activities for children and youth to explore careers;
- Prior to assisting children with services that will prepare them at an early age to develop the skills and knowledge to become self-sufficient, it is important to teach them the importance of values as a member of a family and community;
- Reduce drug and alcohol abuse through youth and family programs;
- Preserve and improve housing stock through numerous activities, including modernization, rehabilitation, new construction, and acquisition;
- Identify resources through local partnerships in addressing homelessness;
- Provide equal housing opportunities to all applicants/residents;
- Involve the Council of Presidents, housing programs residents, and Section 8 - HCV participants on the preparation of the agency plan;
- Provide training to staff and commissioners to fully understand and take advantage of

- opportunities under QHWRA of 1998 to better serve residents and the community; and
- Identify, develop, and leverage services to enable low-income families to become self-sufficient.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The CoC Governance Charter, developed by the Continuum of Care (CoC) and its member agencies, is used to guide programs and initiatives to achieve overall community goals that aim to end homelessness. The Plan is in alignment with federal strategic initiatives as well as the HEARTH Act of 2009. The City utilizes funding from several sources in contributing to CoC activities, specifically designed to prevent and end homelessness so that homelessness, when it does occur, is rare, brief and non-recurring.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

##### ESG

For the 2021 year, the City is allocating approximately 18% of the ESG Program entitlement to Street Outreach Activities to provide direct services to unsheltered individuals and families. This funding will ensure homeless individuals and families, to include chronically homeless, are connected to any necessary services.

##### Community Effort

For the ongoing 2020-2021 program year, ten teams within the CoC undertake aggressive outreach on the streets and other locations where homeless persons congregate to identify and engage persons that routinely sleep on the streets or other places not meant for human habitation. The outreach teams engage the assistance of homeless and formerly homeless individuals in conducting street outreach and work closely with local law enforcement for this purpose, including the Crisis Intervention Team initiative, a collaboration between the El Paso Police Department and Emergence Health Network, the local mental health authority.

The CoC has implemented the federally-mandated Coordinated Entry (CE) system and adopted the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) as the standardized assessment tool for all those experiencing homelessness, including those on the streets. The assessment varies depending on the population being assessed, such as individuals, families and youth. Street Outreach teams are requested to link unsheltered homeless persons to CE operators for assessment and referral purposes. Typically, the CE team is accessible at three strategically-located access points and also through 2-1-1 Texas Information Referral Hotline. However, due to COVID-19, CE services have limited the referral hotline, only. All persons are assessed for services and housing options using the standardized tool which also prioritizes those hardest to serve.

The CoC collaborates with churches, civic organizations, and business associations to spread awareness of available and existing programs and routinely works with street outreach staff. The CoC requires all funded programs to make services accessible and available to all persons regardless of race, color, religion, gender, sexual orientation, age, familial status or disability. All housing programs in the CoC are required to submit their eligibility criteria to the CoC Lead for use with CE.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City El Paso addresses the emergency shelter and transitional housing needs of homeless persons by allocating Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) funding to different emergency shelter and transitional housing programs. For the 2021-2022 program year a total of \$269,791 in CDBG funds and \$123,397 in ESG are being allocated to support the activities of emergency shelters in the community. The funding supports key projects directed to served chronically homeless persons, families, individuals and victims of domestic violence.

### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The CoC employs the following strategies to ensure all participants enrolled in programs are connected with the necessary services to achieve stability and maintain their housing:

- Retains a Resource Facilitator with the responsibility of educating agencies regarding the scope of services within the region as well as providing training to caseworkers regarding this process
- Requires programs to utilize a benefits specialist who assists households in determining those for which they are eligible
- Coordinates with social service agencies to assist homeless households in accessing mainstream benefits
- Works with projects and the community to identify specific non-employment income, including expedited access to SSI and SSDI through SOAR
- Collaborates with entities focused on employment

Furthermore, the City of El Paso and the CoC allocate funding to support rapid rehousing and permanent supportive housing programs. The focus of these programs is to ensure families and individuals experiencing homelessness have access to housing and support services that will help them transition quickly into housing, gain stability and prevent the recurrence of homelessness.

### Emergency Solutions Grant (ESG)

The Emergency Solutions Grants Program is designed to be part of a CoC to enable homeless individuals and families to move toward independent living as well as to prevent homelessness.

A total of \$506,586 in Emergency Solutions Grant funds are being allocated in Program Year 2021-2022 to the following six agencies that provide services benefiting a wide range of homeless populations, as described below. A portion equal to 7% of the total ESG allocation will be withheld for the City's administration costs of the ESG program.

1. El Paso Coalition for the Homeless –Homeless Management Information System (HMIS)
2. El Paso Human Services – Youth Homelessness Rapid Rehousing Program
3. Emergence Health Network – Homeless Street Outreach Program
4. La Posada – La Posada Home
5. Project Vida – Homelessness Prevention & Recovery Program
6. The Salvation Army - Red Shield Family Shelter – Emergency Shelter, Homelessness Prevention and Rapid Rehousing Program



The FY2020 CoC Competition for direct awards from HUD for Homeless Programs in the amount of \$2,931,703 will provide funding for Permanent Supportive Housing, Rapid Rehousing, Joint Transitional Housing – Permanent Housing-Rapid Rehousing (TH PH-RRH), Coordinated Entry and Homeless Management Information System (HMIS) in El Paso during the upcoming year as follows:

- Permanent Supportive Housing \$1,204,502
- Rapid Rehousing \$1,261,571
- TH PH-RRH \$127,423
- Coordinated Entry \$202,000
- HMIS \$136,207

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

Under no circumstances should a person be discharged from any public facility with directions to seek housing or shelter in an emergency shelter. Careful discharge planning is required to ensure suitable accommodations are found when permanent housing interventions may not be available. At a minimum, the client should receive active and diligent case management from an appropriate service provider until permanent housing, with or without supportive services, is in place. If the client refuses services, and or aid with placement, this should be documented along with all case management efforts. If possible, outreach efforts should continue to see to the welfare of the client and reconnect him or her with services and housing.

El Paso institutions and the CoC have been implementing this policy by ensuring that those persons who are already homeless when entering an institution are not returned to the streets or shelters in any manner that is unsafe to themselves or others. El Paso's County Hospital, University Medical Center, has social service and discharge planning procedures that include identifying a patient's housing status and what services the patient is likely to need upon discharge from inpatient care. Hospital social workers and other staff meet regularly to review and develop individualized plans for meeting these discharge needs, including how to retain existing housing and how to access housing opportunities. For patients who identify themselves as homeless upon admission with no desire or prospects to return to permanent housing, in addition to referrals to the CE system, hospital staff follows written policies from the CoC Discharge Committee covering various area shelters and their specific criteria for the following: medical conditions accepted, pre-discharge contact, time of discharge, transportation, clothing, medications, and wound care supplies.

Training is routinely provided to the El Paso Police Department and Sheriff's Department regarding

shelter and housing opportunities available to those experiencing homelessness. County officials also track those persons entering jail who are clients of Emergence Health Network and try to ensure their treatment and medications continue. Efforts continue to divert mentally ill individuals from jail and to ensure continuity of care for mentally ill persons exiting jail and returning to community-based mental health care. For those exiting the jail system, the County's Re-Entry Program participates in the CE assessment and referral process and ensures that each individual receives this service and is either identified for a housing intervention or is placed in the community queue pending availability.

Through CE, citizens at risk of becoming homeless are assessed to determine whether they qualify for homelessness prevention programs available through the El Paso CoC. The CoC has homeless prevention and housing stabilization services available to connect participants with energy assistance programs, childcare subsidy programs and food pantries to ensure additional resources are available to sustain the household.

The Texas Rio Grande Legal Aid, Inc. – Legal Clinic for the Homeless (TRLA LCH) uses its resources to remove legal impediments the homeless of El Paso encounter when trying to obtain housing, employment and public benefits. For persons facing eviction, TRLA LHC offers a number of services that can halt or mitigate the eviction, such as representation on an appeal of the eviction, and post-eviction action such as compelling landlords to release security deposits back to their tenants.

## **Discussion**

See above.

**AP-70 HOPWA Goals– 91.220 (I)(3)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	68
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	68

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

Historically, El Paso’s stock of lower-cost, quality housing has been an asset for the region. The lower cost of housing has allowed households with modest incomes to afford quality housing and helped to attract businesses to the region. In recent years housing has shifted from an asset to a challenge for the region. Housing affordability is an increasing burden on residents as they struggle to afford rent or access homeownership. At the same time, development along the edges of the region coupled with disinvestment in existing neighborhoods is undermining the economic strength of the region. El Paso faces a rapidly growing shortage of affordable rental housing for households earning less than \$30,000 a year. Currently The El Paso region faces a shortage of approximately 3,300 rental housing units. That number is projected to expand to 15,600 as the number of households earning \$30,000 or less increases and the supply of affordable rental housing decreases as rents rise. Despite affordable home values, homeownership in El Paso is declining. The number of homeowners earning less than \$40,000 a year fell by 9,000 from 2010 to 2016. The primary barrier to homeownership in the El Paso region is not the ability of households to afford the cost of a mortgage but the availability of assets for a down payment, low credit, and lack of access to the banking system.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

To eliminate barriers and provide high quality affordable housing, the following are positive effects of public action:

1. The El Paso Regional Housing Plan adopted by City Council lays out a strategy to ameliorate the barriers to affordable housing. That strategy includes the following:
  - Housing Trust Fund: Dedicate additional City and County funding sources to affordable housing projects.
  - Public Land Sale Policy: Establish a Request-for-Proposals process to sell infill sites in priority areas at a discount in exchange for affordable housing production, or other public benefits. Dedicate local funding to assemble sites for development in priority areas.
  - 9% Low Income Housing Tax Credit Local Support Criteria: Revise local criteria to promote mixed income housing with deeper affordability in priority areas.
  - 4% Low Income Housing Tax Credit Funding: Invest locally-controlled public funding for projects using 4% LIHTC to increase the production of affordable rental housing in partnership with the Housing Authority
  - Down Payment Assistance: Strengthen the pathway to homeownership by coordinating the City’s existing down payment assistance program with the Housing Finance Corporation’s mortgage program.

- Financial Counseling: Establish a new financial counseling program in partnership with community development organizations, philanthropic organizations, and banking institutions to reduce the unbanked population and expand access to housing finance.
- 2. DCHD has set-aside CDBG funding to assist the City of El Paso in providing Fair Housing education, outreach, and informational services on the requirements and protections of the Fair Housing Act.
- 3. DCHD sets aside funding each year for a Volunteer Housing Rehabilitation program where up to \$4,999 CDBG funds are used in combination with applicant funding, donations and volunteers to provide housing rehabilitation for the elderly and/or disabled. This has proved to be a great way to increase housing rehabilitation within the City and assist people to remain in their homes longer at no cost to the homeowner.

**Discussion:**

There are negative effects of public policy on the City's ability to increase affordable housing stock. The State of Texas makes the creation and maintenance of a Housing Trust Fund increasingly difficult. By making linkage fees illegal, the State has made financing for the development of affordable housing a far greater challenge than in other States. In light of that challenge, the City is working through the legislative process to champion an increase in Low Income Housing Tax Credits (LIHTCs) that would allow for more than two LIHTC developments per year in El Paso. Local policy is also creating a negative effect on the City's ability to increase affordable housing stock. The City's development policy effectively subsidizes construction of new, artificially affordable single family homes on the fringes of the City by not capturing sufficient revenue from that development to support necessary infrastructure expansion. This policy is resulting in disinvestment in affordable homeownership units in more centrally located neighborhoods, as well as a migration of population from the core of the city to the outskirts. The City has created a Housing Strategy which identifies Priority Housing Areas in the center of the City for incentivizing development of affordable and market rate housing.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

This section will outline actions that are not part of any specific category.

### **Actions planned to address obstacles to meeting underserved needs**

Access to affordable housing is a growing concern in El Paso. The City, through its recently created El Paso Regional Housing Plan, is actively researching strategies to invest additional dollars into affordable housing rehabilitation and new construction. Establishment of a Housing Trust Fund is one avenue being researched, while coordination with and alignment of existing programs (public, private and non-profit) should increase access to affordable housing.

### **Actions planned to foster and maintain affordable housing**

The City of El Paso plans to foster and maintain affordable housing for its residents by providing a variety of affordable housing programs to assist with the preservation, construction and purchase of affordable housing that has been discussed elsewhere in this report (AP-55 Affordable Housing). In addition, the City will take advantage of appropriate opportunities to support the development or rehabilitation of multi-family, mixed income and mixed use housing projects that have an affordable component. The City has also created a Joint Housing Task Force to guide implementation of the El Paso Regional Housing Plan. The Task Force will advise on program, policy and funding options to support affordable housing options for all El Pasoans.

### **Actions planned to reduce lead-based paint hazards**

Although there are no indications of a significant problem with lead poisoning in El Paso, it still does occur. Consequently, the City of El Paso Health Department, other public health agencies, and private sector health care providers, have continued to emphasize a “community level intervention” that consists of training and education prevention activities, screening, surveillance, risk management and primary prevention. Until lead poisoning has been completely eliminated, the City of El Paso’s public health agencies will continue to devote much of their lead-poisoning prevention resources to case management services for poisoned children. In addition, the City of El Paso will continue to utilize its federal funding in the abatement of lead-based paint in houses that were built prior to 1978.

Lead-Based Paint hazard inspections and mitigation is a standard practice for renovation of residential structures. Contractors and subcontractors are required to comply with all provisions on the detection and elimination of lead-based paint hazards set forth by HUD Regulation 24 CFR Part 35 – Lead-Based Paint Poisoning Prevention in Single Family Owner Occupied dwellings. The City of El Paso maintains and updates procedures in its federally-funded housing renovation programs to ensure it is in compliance with all regulations.

Additionally, the State Department of Health's Toxic Substances Control Division must be informed of all Lead Based Paint activities and must perform an inspection during the construction phase. Only State-certified Lead Firms can perform lead-based paint abatement, interim controls and clearances.

As required by Subpart 35.130, the City provides the lead hazard information pamphlet entitled "Protect Your Family from Lead in Your Home" to every household of an owner-occupied dwelling unit, as well as the LBP testing results, and Risk Assessments, Project Designs and Clearance reports. Also, property owners receiving Home Renovation Assistance are informed of the dangers of Lead Poisoning and are urged to test children under six years of age living for elevated blood lead levels.

The City continues to improve the methods and procedures for identifying and eliminating Lead Based paint hazards in housing built prior to 1978 that is being processed for renovation through the City's Housing Programs Division. Housing programs staff in the Department of Community & Human Development continuously receive training on implementation, inspection, design and federal reporting requirements; all staff members have been trained in Lead Safe Practices, and two staff members have received additional training in Risk Assessment. The City has also formed a partnership with the El Paso County Health and Environmental Department to facilitate dissemination of information, testing, and formation of policies and procedures for implementation of the Lead Hazard Control Grant Program. Furthermore, many qualified contractors performing rehabilitation work through the City's Housing Rehabilitation Program have received training in Lead Safe Practices. The City's goal is to have 100% participation by all qualified contractors.

### **Actions planned to reduce the number of poverty-level families**

A substantial proportion of El Paso residents are considered very low-income, with the City's poverty rate greater than 20% (higher than the rate at the State level). While El Paso has a lower cost of living as compared to other cities in the United States, that fact does not sufficiently mitigate challenges related to pursuing increased quality of life or prosperity. High levels of poverty exacerbate other environmental and social challenges within the El Paso community. When exploring shocks and stresses impacting El Paso it's critical to consider amplification of impact within specific high poverty areas.

Simultaneous to the assembly of the Comprehensive Housing Strategy, the City will convene a facilitated exchange among community partners committed to achieving functional zero homelessness within targeted populations across the region. Output from the exchange will include alignment of policy and funding resources toward programs that serve as a mechanism to identify those experiencing homelessness; provide access to shelter for those in need; enhance crisis response services providing improved health and safety; and increase capacity for permanent housing and ongoing case management. Critical to the success of the initiative will be to conduct an analysis of gaps and barriers in terms of existing programs, policy and funding sources.

In an effort to help reduce the number of persons living at or below the poverty level, the City will allocate \$1,029,134 CDBG funds, 15% percent of the annual CDBG entitlement plus the projected

program income, to assist in improving the living conditions for this population by offering an array of public services. The City will grant sub-contracts with City departments, non-profit organizations and non-municipal government entities to provide services in the following areas: children and youth services; services for homeless persons and families; mental and medical health services; services for seniors and persons with disabilities; and first time homebuyer counseling and education. The different services provided will help expand the opportunities for families living in poverty. For example, services such as after school and recreation programs will help low-income children improve their wellbeing and gain valuable skills that will allow them to break the cycle of poverty. Other programs such as the First Time Homebuyer Counseling and Education program will help low-income families become prepared to take the next step and own their first home.

Another priority goal of the City is to create and retain jobs for low-to-moderate income persons and provide job-training opportunities. \$200,000 has been set-aside for Economic Development activities. Project Vida Community Development Corporation (PVCDC) has been awarded \$100,000 in CDBG funding to administer an economic development microenterprise technical assistance program. PVCDC will provide technical assistance to microenterprise owners or persons developing a microenterprise to improve their business skills and access to capital, and to help create and retain jobs for low-to-moderate income persons. The YWCA has been awarded \$100,000 in CDBG funding to administer a job-training opportunities to provide intensive needs assessment, computer literacy and job readiness training to the unemployed or underemployed residents.

### **Actions planned to develop institutional structure**

The City continually strives to develop its institutional structure and create more effective community response mechanisms to maintain and improve the quality-of-life for all of its residents. The City continues to maintain and improve its institutional structure and continue to facilitate partnerships between other City Departments, community-based organizations, governmental or public organizations (such as HACEP and local public school and college districts), neighborhood and civic associations, residents, businesses, churches and others in the private sector to efficiently link resources and carry out joint planning and program activities. In addition to existing partnerships, the City endeavors to pursue new opportunities to participate in various local initiatives that seek to improve the quality-of-life for residents of El Paso whenever possible.

The City benefits from partnerships with organizations that are service-oriented, such as non-profit and government entities, who are engaged in the direct delivery of services. Partnerships such as these help with the implementation of City-sponsored projects and activities. The City will continue to promote and cultivate partnerships and collaborations with many non-profit agencies and government entities in the community for the direct delivery of services through projects and activities that address Consolidated Plan priorities. In regards to public facilities improvements, emphasis will continue to be placed on encouraging public facility projects that benefit low- and moderate-income neighborhoods and individuals in cooperation with other City Departments and non-profit agencies. The City will also



continue to support and participate in economic development related activities through partnering with two local non-profit agencies that will provide a microenterprise technical assistance to small business owners and job training opportunities for low to moderate income individuals.

**Actions planned to enhance coordination between public and private housing and social service agencies**

The City relies substantially upon the non-profit community through partnerships and grant agreements for the delivery of services and to carry-out various projects and activities. Agencies are funded through the following CDBG public services categories: Children and Youth Services; Homeless, Emergency Shelter and Housing; Medical and Mental Health Services; and Services to Seniors and Persons with Disabilities; Economic Development; and Volunteer Housing Rehabilitation. For the 2021-2022 program year, twenty-two (22) different programs offered by City departments, non-profit and non-municipal government entities will provide services to individuals of all ages, with various needs, as the result of continued CDBG funding. From those who have been awarded funding, fifteen (15) of the seventeen (17) subrecipients are non-profit agencies. Furthermore, a total of six (6) non-profit agencies will also provide street outreach, emergency shelter, homelessness prevention, rapid rehousing activities and HMIS services by utilizing ESG funds; while one (1) City department will provide tenant based rental assistance and supportive services through the HOPWA grant.

The City will continue to coordinate with public and private service agencies to ensure that local, state and federal funds are used effectively to eliminate the different gaps in service. Coordination will be achieved through active participation in committees, collaborative initiatives, and project meetings.

**Discussion:**

See above.

## AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

### Introduction:

This section includes information on specific programs that is not included in other sections.

### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	516,861
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>516,861</b>

### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City does not expect to use other forms of investment than those identified as eligible under the HOME Program: equity investments, interest-bearing loans or advances, non-interest bearing loans or advances, deferred payment loans, grants and interest subsidies.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Subrecipients shall comply with all guidelines for the resale and recapture of HOME funds as indicated in CFR 92.254.

In lieu of subjecting assistance to first-time homebuyers to resale restrictions in the HOME regulations, the City imposes a recapture provision. In accordance with 92.254 (a)(5)(ii)(A)(2), a reduced HOME investment amount is amortized as a loan or a deferred payment loan over a period of up to 30 years. Loans are amortized at a minimum 3% interest. Non-interest bearing, second-lien deferred loans in the amount of the HOME subsidy will be made due upon sale, transfer, or lease of the property. The recaptured funds will be treated by the City as program income, which is income that is required to be utilized to assist other HOME eligible activities.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The HOME-assisted housing must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion. The per unit amount of HOME funds and the affordability period that they trigger are described more fully in the explanations of resale and recapture at the end of this section. See Unique Grantee Appendices for Resale and Recapture Guidelines.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

1. For single-family (1 to 4 family) owner-occupied housing, when lending HOME/CDBG funds to rehabilitate housing, refinancing is allowed only if it excludes a lien created as a result of an extension of "home equity" credit under Section 50, Article XVI, Texas Constitution; and refinancing is necessary to reduce the overall housing costs to the borrower and make the

housing more affordable. The City must have a first lien after refinancing. The amount being refinanced is in the form of a loan at the owner-occupant's qualifying interest rate for the rehabilitation loan. The total of the refinancing loan and the rehabilitation loan shall not exceed the maximum loan to after rehabilitation value of 120%.

2. For multifamily projects, refinancing is an eligible cost when lending HOME/CDBG funds to rehabilitate multi-family units if refinancing is necessary to permit or continue affordability under 24 CFR 92.252. In such cases, the minimum affordability period shall be 15 years. The City will refinance existing debt if, at a minimum, the project demonstrates that rehabilitation is the primary eligible activity. More than 50% of the total HOME/CDBG funds must be for eligible rehabilitation soft and hard costs. The City reviews management practices to determine that disinvestment in the property has not occurred, that the long term needs of the project can be met and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated. The amount being refinanced is in the form of a loan at the owner's qualifying interest rate for the rehabilitation loan. The total of the refinancing loan and the rehabilitation loan shall not exceed the maximum loan to after rehabilitation value of 120%.

HOME/CDBG funds are eligible for refinancing multifamily projects that will maintain current affordable units and/or for projects that will create additional affordable units HOME/CDBG funds cannot be used to refinance multifamily loans made or insured by any Federal program.

### **Emergency Solutions Grant (ESG) Reference 91.220(I)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Please refer to Unique Appendices for ESG Written Standards.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The County of El Paso is the operator of the El Paso Continuum of Care's (CoC's) Coordinated Entry (CE) system and provides strategically-located access points to assist those at risk of becoming homeless or experiencing homelessness. Persons in need of housing receive a full assessment to determine need and priority and are matched and referred to appropriate programs and services. The CE team is typically accessible in three locations across the community and also through 2-1-1 Texas Information Referral Hotline. However, due to COVID-19, CE services have limited the referral hotline, only. Messages are returned within 24 hours. In addition, 2-1-1 provides "warm" referrals during off hours as part of the coordinated entry initiative. The CoC has adopted an HMIS-based universal assessment tool, the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) as the standardized assessment tool for all those experiencing homelessness, including those on the street. The assessment varies depending on the population being assessed; homeless

individuals, families and youth and those at-risk. Street Outreach teams link unsheltered homeless to CE operators for assessment and referral purposes. All persons are assessed for services and housing options using the standardized tool, which: 1) prioritizes those hardest to serve, especially the chronically homeless, 2) identifies who should be recommended for housing and support based on acuity, and 3) prioritizes those clients based on need. The assessment captures basic information to determine program eligibility and is used in conjunction with the HMIS intake survey. Referrals are focused on housing interventions which utilize Permanent Supportive Housing opportunities when available as well as Rapid Re-housing programs offered through entities receiving City, State or Federal funding for these programs. When necessary or appropriate, a referral is made to an emergency shelter and/or transitional program. The CoC's Coordinated Assessment Oversight Committee (CAOC) provides oversight of the system and its usage. The City of El Paso has a designated seat at the CAOC and participates in the committee's meetings.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The City of El Paso's Department of Community and Human Development (DCHD) solicits ESG proposals from public and private nonprofit organizations, including faith-based organizations, via a Notice of Funding Availability (NOFA) process advertised in the local newspaper. DCHD also disseminates the ESG NOFA through e-mail distribution lists and the City's Website. The NOFA includes a tentative schedule where interested applicants can review all pertinent deadlines. The first step of the process is to submit a Letter of Intent (LOI) to determine project eligibility and agency capacity. Only applicants that submit eligible projects are invited to submit a complete application packet. Eligible applicants are then invited to a training workshop where they are provided with complete application packets designed to solicit information for the City to make a fair analysis of the proposed project. A deadline is given for submission of applications to the City's Department of Community and Human Development. Late or incomplete applications are not considered for funding.

Once received, all applications are reviewed by DCHD staff and a Technical Advisory Review Panel (TARP). The TARP consists of a DCHD staff person, an applicant from a different service category, a member from another funding entity, a Subject Matter Expert (SME) and a Community Development Steering Committee member. DCHD staff will make every effort to establish TARPs with the composition described, however, substitutions may be made. TARP members are selected by DCHD staff, with a primary focus on selecting individuals with knowledge in, and experience with, community programs and who have no relationship to any of the applicant agencies in the service category. All TARP members are required to sign a Conflict of Interest Disclosure Affidavit. If a conflict of interest exists, DCHD staff will make the necessary rearrangements to ensure a fair review of the applications. As a next step, the TARP performs a detailed technical review of each eligible proposal. This review includes an analysis of past agency performance, proper completion of the application, project concept and projected outcomes. The TARP scores and provides comments on

each proposal using the ESG Application Score Sheet included with the ESG application. Applications with a preliminary score of less than 75% are not eligible to advance to oral presentations, the next stage of the application process. Applicants whose proposals receive a preliminary score of 75% or higher are invited to give a presentation to the TARP. Presentation meetings are open to the public. After the presentations, the TARP meets to finalize their scoring of proposals. TARP scores and comments are then utilized to inform an ESG budget recommendation established by DCHD. The ESG budget recommendation developed by DCHD is then presented to the Community Development Steering Committee, a citizen advisory board appointed by City Council, for review and comment. The recommended ESG budget is then presented to City Council, along with comments received from the Steering Committee. As a final step, the City Council provides final approval of the ESG budget.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of El Paso consults with the General Membership of the EPCH that consists of approximately 65 homeless assistance agencies. The membership includes a number of formerly homeless individuals who contribute to policy and funding decisions. The Planning Committee is a volunteer committee of CoC Board tasked with strategic planning, gap analysis, advocacy and education. The City of El Paso serves on this committee. Additionally, the EPCH advises the City and ESG subrecipients on overall community performance of the ESG programs.

5. Describe performance standards for evaluating ESG.

All agencies awarded ESG funds are evaluated on the CoC's community-wide performance standards. CoC's reporting and evaluation standards for ESG & CoC programs were developed in collaboration with stakeholders, providers, and CoC & ESG Program recipients and approved by the CoC Board. The reporting and evaluation requirements are as follows:

- All ESG & CoC recipients must enter client level information in HMIS, capturing all of HUD's Data Standards.
- Programs are evaluated quarterly using HMIS data for performance and a monitoring report is provided.
- The performance categories to be monitored and evaluated through this process align with HUD System Performance Measures and are as follows:
  - Length of Stay or program participation
  - Returns to Homelessness
  - Increase in Earned, Other and Total Income
  - Exits to Permanent Housing
- Positive Housing Outcomes (Street Outreach)

- Length of Time – Start Date to Move-In (Rapid Rehousing)
- Unsheltered Engagement Rate
- Data completeness, accuracy and timeliness are reviewed monthly and included in the quarterly monitoring report
- Through the Performance and Benchmarks committee, the CoC works with underperforming programs to develop a Peer Improvement Plan. After implementation of the Peer Improvement Plan the CoC re-evaluates the programs every 30-60 days for a 12-month period.
- Underperforming programs are those that have not met three benchmarks for four consecutive quarters.
- Programs continuing to perform below standards or that are not compliant for 12 months are reported to the City DCHD, as ESG Recipient, for ESG-funded programs or CoC Board for CoC-funded programs.

### **HOPWA - Program Specific Requirements**

#### *HOPWA Application Process Overview*

DCHD, grantee and administrator of the HOPWA grant, utilizes the department’s public services application process to grant HOPWA funding. The process begins with an advertisement in the local papers, both in English and Spanish, notifying the community of the availability of funds and applicable deadlines. Interested agencies are invited to submit a Letter of Intent (LOI) and are screened for eligibility. Those agencies found eligible to apply will be invited to submit a complete application. To assist with the application review process, the DCHD established a Technical Advisory Review Panel (TARP). The team consists of a DCHD staff person, a member of another funding entity (e.g., Paso Del Norte Health Foundation, United Way), an applicant from a different service category and a Subject Matter Expert (SME) and a Steering Committee Member. After DCHD Staff determines the eligibility of each application, the TARP performs a detailed technical review of each eligible proposal. This review includes past agency performance, proper completion of the application, and errors and inconsistencies in the proposal. The TARP scores each proposal using the HOPWA Application Scorecard. Applicants receiving a score of 75% or better are invited to give a presentation to the TARP. After the presentations, the TARP meets to discuss and develop a final budget recommendation. The budget recommendation developed by the TARP is then presented to the Steering Committee for review and recommendation to City Council.

#### *2021-2022 HOPWA Application Process*

For the 2021-2022 cycle, DCHD granted an automatic renewal to the 2020-2021 recipient of HOPWA funds. This policy was implement in effort to assist with administrative limitations faced due to the COVID-19 pandemic. The City of El Paso’s Department of Public Health, sole applicant of the HOPWA program, was recommended for funding for this cycle. This will be the fifth year that the Department of Public Health administers the HOPWA program.

## Attachments



## **Citizen Participation Comments**

### **CITIZEN PARTICIPATION FOR 2021-2022 ANNUAL ACTION PLAN**

On May 11 2021, The Department of Community and Human Development introduced at El Paso City Council the City's 2021-2022 Annual Action Plan, which details the numerous social service programs and public facility and housing improvements the City plans to support through funding from the US Department of Housing and Urban Development (HUD).

On May 12 2021, a public notice that initiated a 30-day public comment period and provided details of the 2021-2022 AAP was published in both English and Spanish in two newspapers, the El Paso Times (published in English) and El Diario (published in Spanish) and the City's website (<http://www.elpasotexas.gov/community-and-human-development/forms-and-notice>). In this notice, the public was asked to contact the Department of Community and Human Development via email or phone if they had any questions or would like to comment on the projects contained within the 2021-2022 AAP.

Following the 30-day public comment period, El Paso City Council approved the 2021-2022 Annual Action Plan on June 22, 2021.

**NO COMMENTS WERE RECEIVED DURING THE PUBLIC COMMENT PERIOD FOR THE  
2021-2022 ANNUAL ACTION PLAN.**

**Refer to section AP 12 of the Annual Action Plan for a summary of the comments received, if any, at  
the City Council meeting.**

GRANTEE UNIQUE APPENDICES  
CITY OF EL PASO, TEXAS  
2021-2022 ANNUAL ACTION PLAN



Prepared by the Department of  
Community and Human Development

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Appendix A – HUD Letter on Fiscal Year 2021 Allocations

Appendix B – Summary of Comments and Views

Appendix C – Geographic Distribution

Appendix D – Emergency Solutions Grant (ESG) Written Standards

Appendix E – HOME Resale and Recapture Guidelines



ASSISTANT SECRETARY FOR  
COMMUNITY PLANNING AND DEVELOPMENT

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-7000

February 25, 2021

The Honorable Oscar Leeser  
Mayor of El Paso  
300 N Campbell Street  
El Paso, TX 79901-1402

Dear Mayor Leeser:

I am pleased to inform you of your jurisdiction's Fiscal Year (FY) 2021 allocations for the Office of Community Planning and Development's (CPD) formula programs, which provide funding for housing, community and economic development activities, and assistance for low- and moderate-income persons and special needs populations across the country. Public Law 116-260 includes FY 2021 funding for these programs. Your jurisdiction's FY 2021 available amounts are as follows:

Community Development Block Grant (CDBG)	\$6,360,895
Recovery Housing Program (RHP)	\$0
HOME Investment Partnerships (HOME)	\$2,631,084
Housing Opportunities for Persons With AIDS (HOPWA)	\$704,106
Emergency Solutions Grant (ESG)	\$544,716

Individuals and families across the country are struggling in the face of four converging crises: the COVID-19 pandemic, the resulting economic crisis, climate change, and racial inequity. Through these bedrock programs, CPD seeks to develop strong communities by promoting integrated approaches that provide decent housing and suitable living environments while expanding economic opportunities for low- and moderate-income and special needs populations, including people living with HIV/AIDS. We urge grantees to strategically plan the disbursement of grant funds to provide relief for those affected by these converging crises and help move our country toward a robust recovery.

Based on your jurisdiction's CDBG allocation for this year, you also have \$31,804,475 in available Section 108 borrowing authority. Since Section 108 loans are federally guaranteed, this program can leverage your jurisdiction's existing CDBG funding to access low-interest, long-term financing to invest in Opportunity Zones or other target areas in your jurisdiction.

Because the funds are not appropriated by Congress, Housing Trust Fund (HTF) formula allocations will be announced at a later date under separate cover.

HUD continues to emphasize the importance of effective performance measurements in all its formula grant programs. Proper reporting in the Integrated Disbursement and Information System (IDIS) is critical to ensure grantees comply with program requirements and policies, provide demographic and income information about the persons that benefited from a community's activities, and participate in HUD-directed grantee monitoring. Your ongoing attention to ensuring complete and accurate reporting of performance measurement data continues to be an invaluable resource with regard to the impact of these formula grant programs.

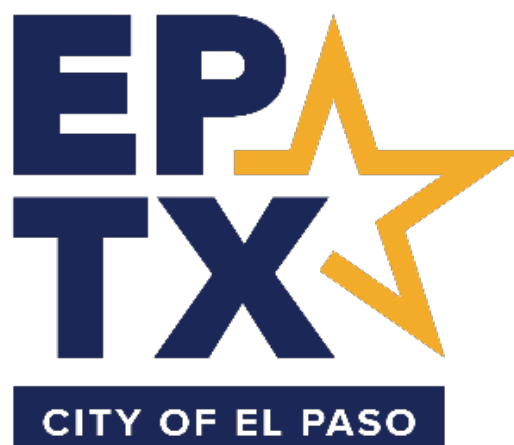
The Office of Community Planning and Development is looking forward to working with you to promote simple steps that will enhance the performance of these critical programs and successfully meet the challenges that our communities face. If you or any member of your staff have questions, please contact your local CPD Office Director.

Sincerely,



James Arthur Jemison II  
Principal Deputy Assistant Secretary  
for Community Planning and Development

FUNDING REQUEST LIST  
CITY OF EL PASO, TEXAS  
2021-2022 ANNUAL ACTION PLAN



PREPARED BY THE DEPARTMENT OF COMMUNITY AND  
HUMAN DEVELOPMENT

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# REFEERENCE GUIDE

Categories
Public Facilities – Large Scale Improvements
Public Facilities – Small Scale Improvements
Volunteer Housing Rehabilitation

Representative District Codes
1 = City Representative Svarzbein
2 = City Representative Annello
3 = City Representative Hernandez
4 = City Representative Molinar
5 = City Representative Salcido
6 = City Representative Rodriguez
7 = City Representative Rivera
8 = City Representative Lizarraga
CW = Citywide

Request Codes
C = Citizen
D = City Department
GE = Government Entity
O/A = Organization/Agency
PH = Public Hearing
P = Petition Attached
REP = City Representative

**PROJECTS RECOMMENDED FOR 47TH YEAR FUNDING**

<b>LARGE-SCALE IMPROVEMENTS</b>		<b>DIST.</b>	<b>REQ.</b>	<b>CDBG Award</b>
1	El Paso Child Guidance Center Renovation and Expansion - 2701 E. Yandell Dr, 79903 - renovation and expansion improvements to provide additional counseling offices, ADA-compliant restrooms, hallways and entrances, and additional office space for therapy and psychiatric care. Requested by Cathy Gaytan, Executive Director for El Paso Child Guidance Center, with petition with 109 signatures attached.	8	C, O/A	Total Project Cost: \$1,403,631  Amount Awarded: \$1,263,267  Agency Match (10%): \$140,364
2	YWCA Joyce Jaynes Branch (JJ) Renovation - 1600 Brown St, 79902 - project will address the highest priority needs of this 42,387 sq. ft., three-story facility. This includes: replace facility roof; replace evaporative coolers with AC package units; replace elevator; replace network cabling throughout facility; replace program area floors; install multi-purpose modular computer stations; centralized front desk entrance; replace old emergency door exits; renovate restrooms in both levels; renovate classrooms and program spaces; fitness/weight room renovation; replace pool tile on deck and in pool. Requested by Dr. Sylvia Acosta, CEO for YWCA, with 96 signatures attached, 44 responses received throughout feedback phase, and 17 citizen request forms submitted.	8	O/A, P	Total Project Cost: \$1,542,165  Amount Awarded: \$1,387,949  Agency Match (10%): \$154,216
3	Centro San Vicente Healthcare Center Renovation - 8061 Alameda Ave, 79915 - project will consist of renovating 8,066 of square feet at Centro San Vicente's main clinic located at 8061 Alameda Ave. The target areas for renovation under this project include laboratory, patient registration, three wait areas: registration, pharmacy and laboratory, and bathrooms. More specifically, renovations will be comprised of demolition and build-up of walls, framing, replacement the old stained tiles, installation of new baseboards, drywall and painting of walls, installation of glass doors, composites, (rough carpentry and millwork), air-ducting and ventilation, data/telephone installation, security cameras, fire alarm and smoke detectors. Additionally, this includes costs for direct project oversight of any necessary building permits and contractor fees. The proposed scope of work will allow for an increase in the number of new unique patients registered and served. Equally as important, the new environment will be more aesthetically pleasing and will help to improve staff morale and increase patient satisfaction, especially post the COVID pandemic. Requested by Sr Ellen Kron, CEO for Ascension DePaul Holding of El Paso, with 45 signatures attached, and 57 responses from website survey.	7	O/A, P	Total Project Cost: \$511,982  Amount Awarded: \$460,784  Department Match (10%): \$51,198

<b>SMALL-SCALE IMPROVEMENTS</b>		<b>DIST.</b>	<b>REQ.</b>	<b>CDBG Award</b>
1	Wheelchair Ramps at Lakehurst Rd and Saratoga Dr - Intersections along Lakehurst Rd and Saratoga Dr around Centennial Dr and Thorn Ave, 79912 - project entails the installation of ADA ramps at 12 corners (or 12 individual directional ramps) along Lakehurst Rd and Saratoga Dr. allowing pedestrians (specifically individuals using mobility devices) to use the sidewalks and have access to City services. Requested by Julio Perez, ADA Coordinator for the City of El Paso, with two emails of support from citizens who represent the United Advocacy of El Paso, Grupo Dignidad Igualdad y Oportunidad, Volar, the Coalition for Texans with Disabilities.	1	D	\$ 35,146.00
2	Tom Lea Lower Park Dog Run - 1203 E Schuster Ave, 79902 - new 6' high chain link fence; new gate for pedestrian access (2); new gate for maintenance access (1); new sidewalk at the entrance of the dog run, to provide accessibility from the existing parking lot to the new dog run; new drinking fountain pet friendly; new bench with concrete pad (2); new surface throughout. Combination of sod and pea gravel; irrigation modifications as needed. Requested by Ben Fyffe, Director for El Paso Cultural Affairs and Recreation, with one citizen request form submitted by City Representative District #1 Peter Svarzbein for this project.	1	REP, D	\$ 464,854.00
4	Sidewalks along Barney Street - Barney St between French Pl and Kyles St, 79905 - project entails the installation of 170 linear feet of sidewalk and curb cuts on three corners (three directional ramps). The new sidewalk section is along north section of Barney St between Kyles st and French PL The ramps would be at the intersection of Kyles St and Barney and French Pl and Barney st allowing pedestrians (specifically individuals using mobility devices) to use the sidewalks and have access to City services. Requested by Julio Perez, ADA Coordinator for the City of El Paso, with two emails of support from citizens who represent the United Advocacy of El Paso, Grupo Dignidad Igualdad y Oportunidad, Volar, the Coalition for Texans with Disabilities.	8	D	\$ 32,256.00
5	Sidewalks along Flower Dr - Along Flower Dr between Huerta St and Buena Vista St, 79905 - project entails the installation of 365 linear feet of sidewalk and curb cuts at one intersection. The new sidewalk section is along north section of Flower Dr between Buena Vista St and Huerta St. The ramps would be at the intersection of Huerta and Flower Dr. allowing pedestrians (specifically individuals using mobility devices) to use the sidewalks and have access to City services. Requested by Julio Perez, ADA Coordinator for the City of El Paso, with two emails of support from citizens who represent the United Advocacy of El Paso, Grupo Dignidad Igualdad y Oportunidad, Volar, the Coalition for Texans with Disabilities.	8	D	\$ 43,442.00

<b>VOLUNTEER HOUSING REHABILITATION</b>		<b>DIST.</b>	<b>REQ.</b>	<b>CDBG Award</b>
1	Rebuilding Together El Paso - Offer minor repairs to the elderly or disabled homeowners.	1,8	O/A	\$ 138,548.00
2	Fisherman of Hope - Offer minor repairs to the edlerly or disabled homeowners.	1,8	O/A	\$ 100,000.00



## ELIGIBLE PROJECTS NOT RECOMMENDED FOR 47TH YEAR FUNDING

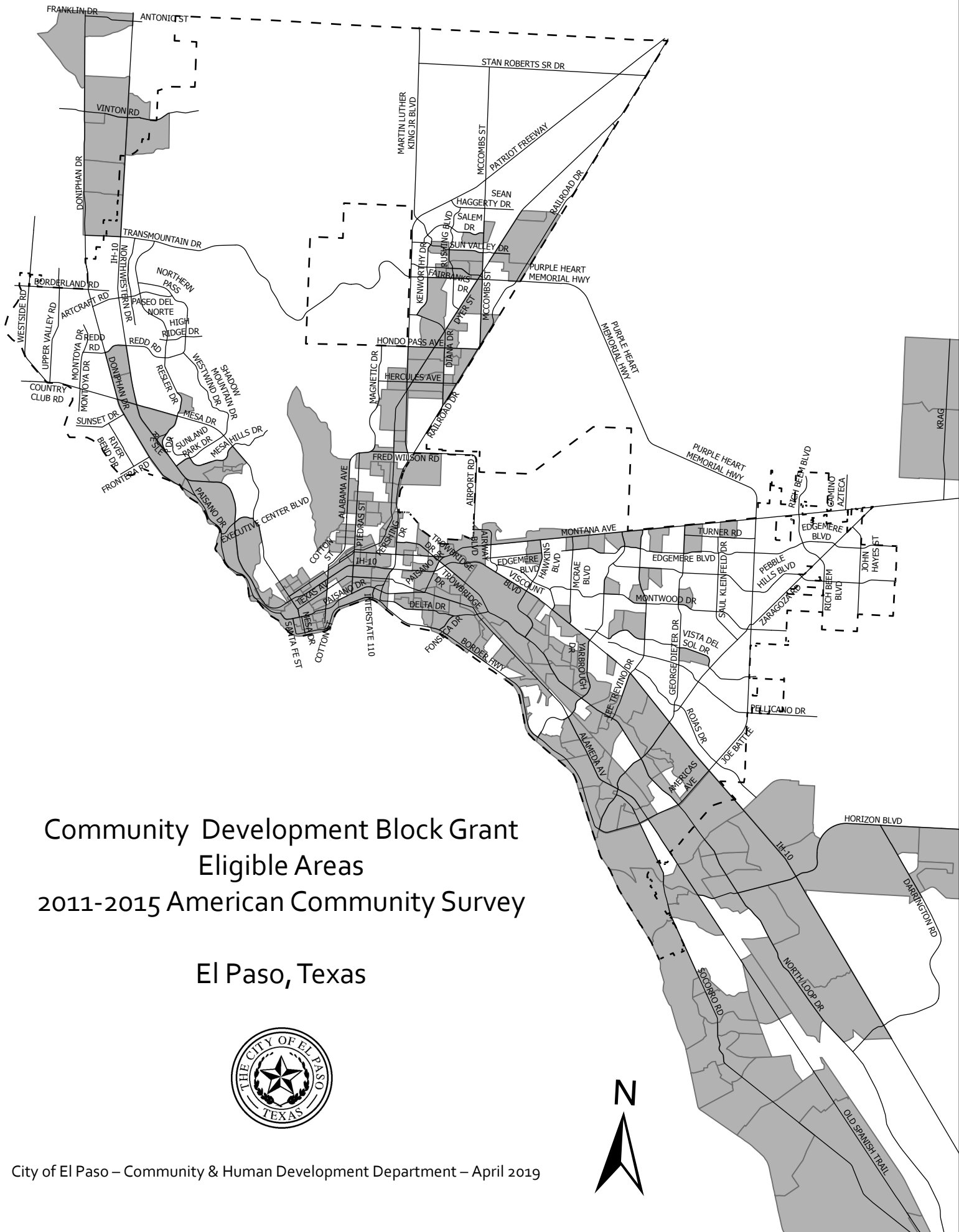
LARGE-SCALE IMPROVEMENTS		DIST.	REQ.
1	JP Shawver Park Improvements - 8100 Independence Dr, 79907 - replacement of tennis and basketball courts at J.P. Shawver Park. Scope of work includes: Demolition of 2 existing basketball courts; demolition of 2 existing tennis courts; removal of existing chain link fence; construction of 2 new basketball courts (post-tensioned concrete); construction of 2 new tennis courts (post-tensioned concrete); new chain link fence (approx. 550 L.F.); retrofit existing light fixtures. Requested by Ben Fyffe, Director for El Paso Cultural Affairs and Recreation, with 16 responses received throughout feedback phase. <b>Not enough funds to fulfill this request.</b>	7	D
2	Mountain View Park Improvements - 8400 Diana Dr, 79904 - irrigation modifications as needed; concrete sidewalk; new rockwall enclosure; playground equipment 2-5 age group; playground equipment 5-12 age group; new swing set; safety surface throughout: combination of engineered wood fiber and rubber surface; replace four benches; replace two trash receptacles. Requested by Ben Fyffe, Director for El Paso Cultural Affairs and Recreation, with 17 responses received throughout feedback phase. <b>Not enough funds to fulfill this request.</b>	2	D
3	Rae Gilmore Recreation Center Improvements - 8501 Diana Dr, 79904 - roof repairs/recoat; upgrade HVAC system; restrooms renovation; new interior pain throughout; repair and paint stucco on exterior walls; replace main entrance doors with automatic ADA compliant doors; new flooring throughout. Requested by Ben Fyffe, Director for El Paso Cultural Affairs and Recreation, with 16 responses received throughout feedback phase. <b>Not enough funds to fulfill this request.</b>	2	D

SMALL-SCALE IMPROVEMENTS		DIST.	REQ.
1	Amenity on St. Vrain side of Houston Park - kiosk (i.e., outdoor stage/pavilion). Electrify (for low-wattage illumination; electric guitar; electronic keyboard; microphone, small amp). Provide covered seating on two sides of kiosk. Requested by Nelson Bank, 316 E. Rio Grande Ave, Apt. 23 79902. <b>Did not receive application for request.</b>	8	C
2	Washers and dryers on the men's side and new plumbing in bathrooms at The Salvation Army Family Center. Requested by Nora A. Lozano Ponce, 4300 E. Paisano Dr 79905. <b>Did not receive application for request.</b>	8	C
3	Permanent soccer goal posts and supporting lighting in the green park area and free wi-fi at Thorn Park. Requested by Freddy Klayel-Avalos, 6339 Franklin Vista Dr, 79912. <b>Did not receive complete application for request.</b>	1	C
5	Improvements at Delta Park to provide a leveled walking path (similar to Saipan Ledo Park on Durazno) that has the distance marked (i.e. 1/2 mile, 3/4mile, etc), as well as seating with shade accessible to seniors, and shade over the playground. Requested by Cynthia Renteria, 139 Tobin Place/354 Francis St 79905. <b>Did not receive complete application for request.</b>	8	C
6	Take existing 1,200 sq.ft warehouse space at Desert Spoon Food Hub located within the low-income and underserved Rio Grande district, at 1714 Yandell, El Paso, Texas, to a shared-use commercial and teaching kitchen. Requested by Adriana Clowe, 1714 Yandell Dr 79902. <b>Did not receive application for request.</b>	8	C
7	Restroom/shower and laundry area improvements at The Salvation Army Family Center. Requested by Patricia Garcia, 11054 Mirage Ct 79936. <b>Did not receive application for request.</b>	8	C
8	Restrooms and laundry area improvements at The Salvation Army Family Center. Requested by Jennifer Lopez, 2932 Monroe Ave 79930. <b>Did not receive application for request.</b>	8	C
9	Restrooms and laundry area improvements at The Salvation Army Family Center. Requested by Martha Hernandez, 4704 Sue Hall Dr 79905. <b>Did not receive application for request.</b>	8	C
10	Restrooms and laundry area improvements at The Salvation Army Family Center. Requested by Victoria Mulheron, 3005 Wyoming Ave 79903. <b>Did not receive application for request.</b>	8	C
11	Our request is for picnic tables with seating and a shade canopy to be installed in the concrete area at the northwest corner of Tula Irobali Park (north of the basketball court). Requested by Pablo Lopez, 303 E. Sixth Ave #1 79901. <b>Did not receive complete application for request.</b>	8	C
12	Add benches around the track and small green infrastructure for ponding at Delta Park. Requested by Quirino Villa, 405 Kyle St 79905. <b>Did not receive complete application for request.</b>	8	C

13	Walkable paths to Mundy Park, which is center of neighborhood (Prospect and Yandell intersect at one corner, and also are two park fronting streets), especially crosswalks to the park itself; park improvements including lighting between benches for people who walk around the park, possibly a walking path on the inside edge of the sidewalk, and a futsal court if we can find the right location in the park; bench and planted area built around the rock feature on the park's southwest edge; other possible improvements include electricity for events, better water fountains. Requested by Sito Negron, 501 Randolph Dr 79902. <b>Did not receive application for request.</b>	8	C
14	Sunset Heights PSB Reservoir location: Futsal court on top and walking paths and nature preserve surrounding. Requested by Sito Negron, 501 Randolph Dr 79902. <b>Did not receive application for request.</b>	8	C

### INELIGIBLE PROJECTS

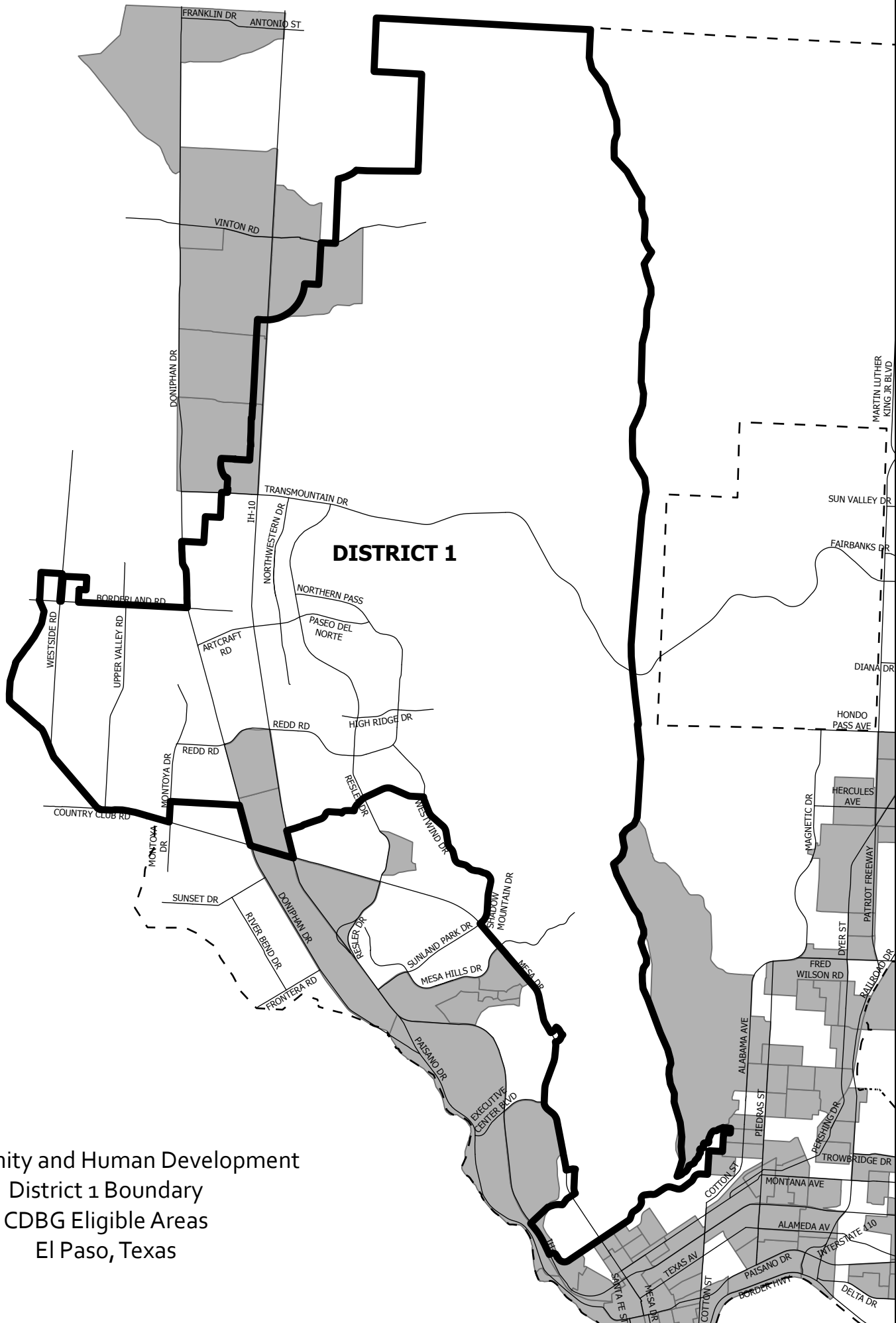
	SMALL-SCALE IMPROVEMENTS	DIST.	REQ.
1	Lighting enhancements. Replenish park vegetation. Reseed grass. Repair/replace sprinkler system. Construct a safer cliff area at the southern tip of park. Larger, better quality, and more quantities of trash receptacle options. Re-mortar the crumbling rock wall at the front of the park entrance. Give attention to smaller areas up and down Rim Rd. along park escarpment; re-planting more vegetation, seeding of wild flowers. Extra funds to further enhance the Slope Stabilization Project along the southern cliff of the park facing Schuster Ave. Requested by Cathleen Banda, 2118 N. Saint Vrain St 79902. <b>Ineligible service area.</b>	1	C
2	Replacement of the electrical utility poles on Francis Street, which are very old, splintery, some look unstable. Requested by Cynthia Renteria, 139 Tobin Place/354 Francis Street 79905. <b>Ineligible; maintenance is generally ineligible.</b>	8	C
3	Address the issue of pooling water at the intersection of Tobin and Dunne. Requested by Cynthia Renteria, 139 Tobin Place/354 Francis Street 79905. <b>Ineligible service area.</b>	8	C
4	Request canopy shade to cover baseball bleachers, new bathrooms, parking area in Field #4 and Canopy shade for playground. Requested by Sylvia Carreon, 925 Richard Dr 79907. <b>Project location is not in one of the two targeted districts.</b>	6	C
5	Small dog park/ dog run to be constructed at Paul Harvey Park at north end of the park near Fiesta Dr. Requested by Nora Rosa, 604 Castile Ave 79912. <b>Ineligible service area.</b>	8	C



# Community Development Block Grant Eligible Areas 2011-2015 American Community Survey

El Paso, Texas





**DISTRICT 1**



Community and Human Development  
 District 1 Boundary  
 CDBG Eligible Areas  
 El Paso, Texas



**DISTRICT 8**



Community and Human Development  
District 8 Boundary  
CDBG Eligible Areas  
El Paso, Texas

# **CITY OF EL PASO**

**DEPARTMENT OF COMMUNITY HUMAN DEVELOPMENT**

## **Emergency Solutions Grant (ESG)**

**WRITTEN STANDARDS: POLICIES AND PROCEDURES**

Department of Community and Human Development

In consultation with the

El Paso Coalition for the Homeless

**Updated March 2021**



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## **I. Program Summary**

### **A. Purpose**

The Emergency Solutions Grant (ESG) provides federal funds to assist individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. ESG funds are available for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and data collection through the Homeless Management Information System (HMIS); as well as administrative activities. The ESG program is authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 – 11378).

### **B. Program Written Standards**

Subrecipients are required to comply with the Department of Community and Human Development (DCHD) minimum standards for providing ESG assistance and when established, those standards relevant to ESG that are required by their Continuum of Care (CoC). The following minimum program standards are required for delivering the ESG program as outlined in CFR 576.400 (c)(3):

#### **1. Evaluating Eligibility for Assistance**

Subrecipients are required to participate in and comply with their CoC coordinated entry process including utilizing Coordinated Entry (CE) tools and protocols. Domestic Violence subrecipients may choose to utilize a different system for victims of domestic violence.

The minimum eligibility process will include an initial phone or in person screening to determine whether or not the applicant meets one of HUD's categorical definitions of homeless or at risk of homelessness by CE staff using the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) assessment tool to determine housing need and priority. CE Staff will refer to appropriate program. Once participant arrives at appropriate program an eligibility determinations must be documented in client files and preferably through third-party documentation. Intake worker observation or participant self-certification can be used when due diligence by staff and client is documented in the file indicating third-party verification is unavailable.

Re-evaluations of eligibility for continued receipt of homelessness prevention and rapid re-housing assistance are required—every three (3) months for prevention and annually for rapid re-housing. Minimally, each re-evaluation of eligibility must verify that the client household does not have an annual income that exceeds thirty (30%) percent of HUD determined median family income for the service area **and** the household continues to lack sufficient resources and support networks needed to retain housing without ESG assistance. If a client household informs, but is not required to notify the Subrecipient of a change in income or other circumstances that may affect eligibility, there is no immediate effect on the program participant's eligibility and assistance can continue at the discretion of the Subrecipient until the next required re-evaluation.

- 2. Targeting and Providing Essential Services Related to Street Outreach** Subrecipients are required to target unsheltered homeless individuals and/or families whose primary nighttime residence is a public or private place not meant for human habitation. It is recommended that preference be given to those special populations who are most vulnerable to being harmed by living in unsafe and unprotected places, i.e. victims of domestic and other forms of violence, youth, families with children, disabled, elderly, etc.

Engagement activities must include an initial assessment of needs and eligibility in order to prioritize the type and source of assistance required with safety and urgent health needs being the highest priority. Emergency health services, including mental health, can be funded with ESG only to the documented extent that other non-ESG funded appropriate health services are inaccessible or unavailable within the service area. Based on need and assessment, qualifying individuals and/or families will be offered essential services beyond emergency health and other crisis intervention assistance that include case management, transportation, and housing stabilization. Whenever feasible, rapid re-housing will be a priority over the provision or referral to emergency shelter or transitional housing.

- 3. Emergency Shelter Operations**

***Admission***

Subrecipients are required to have standardized screening and intake criteria in writing for determining eligibility for admission to emergency shelter. The criteria must be in compliance with Fair Housing Law and cannot force involuntary family separation by denying family admission based on the age of a child less than 18 years. The admission process requires an initial assessment to determine the homeless status of the applicant based on HUD's four categorical definitions of homeless (24 CFR 576.2) and meeting other Subrecipient determined eligibility criteria. The assessment process and tools must meet CoC CE System requirements (24 CFR 576.400(d)). All shelters that receive federal ESG funds to serve either families or individuals it must accept all families and individuals, without exception.

***Diversion from Shelter***

Based on screening results, individuals and families should be diverted when appropriate to the most stable housing available including supportive or subsidized permanent housing using the Housing First or Rapid Re-housing service models.

***Essential Services and Referral***

Emergency shelter participants must have access to essential services either through direct service delivery by the Subrecipient and/or provision of information and referral to other service providers. Essential services include: case management; child care; education services, employment assistance and job training; outpatient health services; legal services; life skills training; mental health services; substance abuse treatment

services; transportation; services for special populations and mainstream income and health benefits where appropriate.

***Length of Stay and Discharge***

Provision of essential services and shelter must be available for homeless individuals and families for at least the time period during which the ESG funds are provided. Limitations on individual and family shelter stays as defined by the El Paso CoC Governance Charter must be identified in writing in the Subrecipients' policies and procedures governing shelter operations.

***Safety and Accommodations for Special Populations***

Any shelter facility that receives ESG assistance for conversion, major rehabilitation, renovation or operations is required to meet all federal, state and local government safety, sanitation and accessibility standards including compliance with the safety, sanitation and privacy requirements contained in 24 CFR 576.403.

Subrecipients are required to develop and implement written procedures and communication tools/materials that ensure persons of any particular race, color, ethnicity, religion, sex, age, national origin, familial status, or disability who may qualify for shelter and essential services are aware of and have access to such facilities and assistance. Reasonable accommodations for persons with disabilities must be available in order to ensure disabled participants have an equal opportunity to utilize the shelter and receive essential services. Greater levels of accessibility may be required for some shelters in compliance with The Americans with Disabilities Act.

Subrecipients are also required to have written procedures in place that ensure access to shelter facilities, assistance and services for limited English proficiency (LEP) persons. It is highly recommended that Subrecipients develop and implement an agency Language Access Plan following guidelines provided in the Fair Housing Guide for Shelter and Transitional Housing Providers which can be accessed at [www.epchomeless.org](http://www.epchomeless.org).

For additional information you can go to [www.hudexchange.info](http://www.hudexchange.info)

Individuals or families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking must have access to a safe setting and have their identity protected. Subrecipients are required to implement procedures to ensure confidentiality of records pertaining to any individual who is provided family violence prevention, treatment or other services. Subrecipients must also certify that the address of a family/individual violence shelter will not be made public without permission of the shelter agency.

Subrecipient emergency shelter policies and procedures must:

- Prohibit disclosing personally identifying victim information to any third party without consent of the victim;
- Ensure victim consent is reasonably time-limited, written and specific as to whom information will be shared;

Identify and utilize a comparable HMIS data base to collect program data that will prevent the disclosure of personally identifying victim information; **and**

- Include confidentiality policies and procedures that require staff to refrain from discussing client information in public and ensure client records are secure and only accessible to authorized staff.

**4. Assessing, Prioritizing and Reassessing Needs for Essential Services Related to Emergency Shelter**

Subrecipients are required to have a written standard assessment process and tool(s) that are applied to all eligible recipients of shelter essential services. Prioritization for services must align with the EP CoC Governance Charter. When developed, Subrecipients are required to comply with their services area(s) CoC assessment and prioritization requirements as described in the EP CoC Governance Charter, including verifying and documenting eligibility.

Shelter essential services include: case management; child care; education services; employment assistance and job training; outpatient health services; legal services; life skills training; mental health services; substance abuse treatment services; transportation; and services for special populations. Provision of services should be determined based on client need and in alignment with Subrecipient's targeted populations.

Provision of essential services and shelter must be available to shelter residents for at least the time period during which the ESG funds are provided.

**5. Coordination Among Homeless Assistance Providers, Mainstream Service Providers and Housing Providers**

The El Paso CoC is a community-based homeless assistance program planning network whose responsibilities include the promotion of access to and effective utilization of homeless and mainstream programs. Subrecipients are encouraged to be active members of their respective CoC and contribute to the identification, development and coordination of resources that will promote and increase the efficiency and effectiveness of the community's crisis response system.

Subrecipients must coordinate and integrate, to the extent possible, their ESG-funded assistance with other programs serving homeless and at-risk of homelessness people within their service area (refer to 24 CFR 576.400). Documentation of such coordination will minimally include written CoC verification of review and support of the Subrecipient's plan for utilizing ESG funds as part of the Subrecipient's funding application.

**6. Determining and Prioritizing Eligibility for Homeless Prevention and Rapid Re-housing Assistance**

Determination of eligibility for homeless prevention requires an in-person assessment (in compliance with EP CoC CE process) to verify that applicants meet HUD’s categorical definition for imminent risk of homelessness, homeless under other federal statutes, fleeing/attempting to flee domestic violence, or at-risk of homelessness **and** have an annual income at 30% or below of area median income. Homeless status and income eligibility must be documented in client files through third-party verification unless written justification is provided showing that due diligence was conducted substantiating that third-party was not available/accessible. Additionally, the assessment must indicate that prevention assistance would likely allow the applicant to regain stability in their current permanent housing or access other permanent housing and achieve stability.

Homelessness prevention may be provided to individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in § 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. The El Paso CoC does not have prioritization standards for prevention assistance.

Determination of eligibility for rapid re-housing requires an initial assessment to verify that clients meet HUD’s categorical definition for literally homeless or fleeing/attempting to flee domestic violence and are literally homeless. Homeless status must be documented in client files in accordance with HUD documentation standards with preference given to third-party verification where available. Households with no income are eligible for rapid re-housing.

Prioritization for rapid re-housing must comply with the EP CoC Governance Charter. When appropriate, local prioritization should also align with HUD’s homeless strategic plan goals for ending chronic homelessness, homelessness among Veterans, and families with children and youth homelessness.

**7. Determining Client’s Share of Rent and Utility Costs**

Subrecipients must comply with the existing EP CoC Governance Charter for determining client’s required share of rent and utility costs. Per the EP CoC Governance Charter, subrecipients can choose to not require any client contribution toward rent or utility costs.

Utility assistance is limited to 12 months and can be used to pay the cost of utility deposits, utility arrears, and gas, electric, water and sewage services. Assistance can only be provided if the utility account is in the name of a member of the client household or there is documented proof of household responsibility for utility payments. Utility arrears assistance for homeless prevention requires a shut off notice and for rapid re-housing must result in utilities being turned on at the new permanent housing location.

**8. Determining Duration and Amount of Rental Assistance Provided to Client** The duration of rental assistance is limited to twenty-four months within a 3-year time period. Short-term assistance can be provided up to three (3) months and medium-term assistance is limited to twenty-four (24) months. The amount of rent assistance

provided must be the least amount needed to stabilize clients in their permanent housing. Per the EP CoC Governance Charter, subrecipients have the discretion to further set a maximum number of months that a client may receive rental assistance and the maximum dollar amount of assistance. The process for determining such conditions must be applied consistently for all households within each ESG funded program, incorporated into the Subrecipient's ESG policies and procedures and communicated in advance to eligible clients.

Rent arrearage assistance is defined as: past due rent owed to a current or previous landlord. If arrears are owed to a previous landlord, these arrears may be paid, but only when there is documented evidence that payment of those arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing. Payment of arrears is restricted to a one-time payment for up to 6 months

**9. Determining Type, Amount, and Duration of Housing Stabilization and/or Relocation Services Provided to Client**

Type of Housing Stabilization and/or Relocation Services is limited to financial assistance costs and service costs, subject to the general conditions and restrictions identified under 24 CFR 576.103 and 576.104. Security deposits are limited to no more than 2 month's rent. A last month's rent must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period. Utility payments are limited to up to 24 months per client, per service, including up to 6 months of arrears, per service. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period. Temporary storage fees associated with moving costs are limited to up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance.

ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.



Mediation services are allowable, provided that the mediation is necessary to prevent the program participant from losing the permanent housing in which the client currently resides. Legal services must be necessary to resolve a legal problem that prohibits the client from obtaining permanent housing or will like result in the client losing the permanent housing in which they currently reside. Credit repair does not include the payment or modification of a debt.

Financial assistance cannot be provided to a client who is receiving the same type of assistance through other public sources or to a client who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

The Subrecipient may set a maximum dollar amount that a client may receive for each type of financial assistance and may set a maximum period for which a client may receive any of the types of assistance or service. However, except for housing stability case management, the total period for which any client may receive assistance must not exceed 12 months during any 3-year period. The limits on the assistance apply to the total assistance an individual receives, either as an individual or as part of a family.

### **C. HMIS Data Collection**

All data on persons served and all activities funded with ESG must be entered into the El Paso Coalition for the Homeless (EPCH) HMIS or a comparable database, only available to Victims of Domestic Violence and Legal Providers. The purpose of the HMIS is to record and store client-level information about the numbers, characteristics, and needs of homeless and at risk homelessness persons who receive program assistance. Additional information about the HMIS requirements is provided in this manual.

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases approved by the EP CoC which provide aggregate information and data consistent with HMIS data collection and reporting requirements. Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

#### Data entry requirements for shelters are:

Emergency or transitional shelters, day or mass shelters, or hotel/motel vouchers are required to collect data and report outcomes using the EP CoC HMIS, Clarity HS.

All data required to be collected, is collected at project entry; and the duration of each stay can be accurately aggregated to calculate each client's total length of stay in the project.

Subrecipients must be able to determine who and how many people were served by a shelter or shelter type for any given night, based on HMIS data.

Data entry requirements for street outreach are:

Street Outreach data collection involves recording, in HMIS, contacts with each person served. A contact is defined as the date of an interaction between a street outreach worker and unsheltered homeless individuals and/or families whose primary nighttime residence is a public or private place not meant for human habitation. A contact must be recorded any time a client is met. Engagements must also be recorded. An engagement consists of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. The date of engagement should be entered into HMIS at the point when the client has been engaged by the street outreach worker.

For additional, detailed information about the reporting requirements, refer to the HMIS Operation Manual found at: <https://www.hudexchange.info/programs/hmis/>.

**D. Coordination and Consultation with Continuum of Care**

HUD requires collaboration between ESG recipients/subrecipients and CoC in planning, funding, implementing and evaluating homeless assistance and homelessness prevention programs locally. Subrecipients are required to be active participants in their respective CoC and comply with Program Standard #5—*Coordination Among Homeless Assistance Providers, Mainstream Service Providers and Housing Providers*.

Subrecipients are expected to coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by their CoC and/or service area. These programs include (24 CFR 576.400 and 24 CFR 91.100(d)(e)) but are not exclusive to:

- Supportive Housing Program, Shelter Plus Care Program, Section 8 Moderate Rehabilitation Program for SRO Program for Homeless Individuals (Now known as CoC Programs)
- Veterans Affairs Supportive Housing
- Education for Homeless Children and Youth Grants for State and Local Activities
- Grants for the Benefit of Homeless Individuals
- Healthcare for the Homeless
- Programs for Runaway and Homeless Youth
- Projects for Assistance in Transition from Homelessness
- Services in Supportive Housing Grants
- Emergency Food and Shelter Program
- Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program



- Homeless Veterans Reintegration Program
- Domiciliary Care for Homeless Veterans Program
- VA Homeless Providers Grant and Per Diem Program
- Health Care for Homeless Veterans Program
- Homeless Veterans Dental Program
- Supportive Services for Veteran Families Program
- Veteran Justice Outreach initiative
- As well as mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible, such as:
  - Public housing programs
  - Housing programs receiving tenant-based or project-based assistance
  - Supportive Housing for Persons with Disabilities
  - HOME Investment Partnerships Program
  - Temporary Assistance for Needy Families
  - Health Center program
  - State Children’s Health Insurance Program
  - Head Start
  - Mental Health and Substance Abuse Block Grants
  - Services funded under the Workforce Investment Act

## **II. Client Eligibility**

### **A. Assessment**

All applicants must be assessed to determine eligibility for receipt of ESG funded services and assistance in accordance with *Program Standard #1—Evaluating Eligibility for Assistance*. Client assessment and determination of ESG eligibility includes the cost of staff time to complete an intake and/or assessment, either as a sole provider or through a coordinated entry process even if it’s determined from the evaluation the applicant is not eligible for ESG program assistance. When ESG funds are used to provide CE, a Subrecipient is encouraged to utilize ESG funding with non-ESG funding in proportionate to the percentage of clients who are determined ESG eligible versus those referred to other programs. Other service costs associated with applicants determined to be ineligible for ESG assistance are not allowable including follow-up and case management.

### **B. Household Composition**

Homeless or at-risk of homelessness households who meet one or more of HUD determined categorical homeless definitions or criteria are eligible to receive program assistance. Household composition includes an individual living alone, family with or without children, or a group of individuals who are living together as one economic unit. In all cases a household must lack sufficient resources and support networks necessary to obtain or retain housing without the provision of ESG assistance in order to be program eligible.

The type of ESG assistance for which an eligible household qualifies is determined by the stability of their current housing or their homeless status.

### **C. Categorical Homeless Definitions and Criteria**

Eligible applicants for program services must meet one of the following categorical definitions of homeless or criteria for being at-risk of homelessness:

**Category 1: Literally homeless**--a household that lacks a fixed, regular, and adequate nighttime residence, meaning:

- Living in a primary nighttime residence that is a public or private place not designed for or ordinarily used for as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground); **or**
- Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); **or**
- Exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering the institution.

**Category 2: Imminent risk of homelessness**--a household that will imminently lose their primary nighttime residence, provided that:

- The residence will be lost within 14 days of the date of application for homeless assistance; **and**
- No subsequent residence has been identified; **and**
- The household lacks the resources or support networks needed to obtain other permanent housing.

**Category 3: Homeless Under Other Federal Statutes**-- Unaccompanied youth under 25 years of age, or family who do not otherwise qualify as literally homeless or imminent risk of homelessness, but who:

- Are defined as homeless under Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); **and**
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; **and**
- Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; **and**
- Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED),

illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

**Category 4: Fleeing, or attempting to flee, domestic violence**-- a household who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; and
- Has no other residence; **and**
- Lacks the resources or support networks to obtain other permanent housing.

#### **D. Criteria for At Risk of Homelessness Qualification**

Applicants for program services for at-risk individuals or households must meet the following definition of At Risk of Homelessness:

- Have an annual income at or below 30% of median household income for the area; and
- Do not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; **and** meet one of the following conditions:
- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; **or**
- Is living in the home of another because of economic hardship; **or**
- Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; **or**
- Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; **or**
- Lives in an SRO or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than one and a half persons per room; **or**
- Is exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); **or**
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the City of El Paso's approved Consolidated Plan.

A youth who does not qualify as homeless under the above eligibility criteria, is eligible if they:

- Qualify as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A))m section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); **or**
- Qualify as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

## **E. Criteria for Chronically Homeless Qualification**

*Chronically homeless* means:

(1) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

(i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; **and**

(ii) Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; **or**

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Evidence of chronically homeless individuals must be kept in the program participant file in order to demonstrate that an individual or family met the definition of “chronically homeless” at the point of entry into a program.

## **F. Income Determination and Requirements**

### **1) Income Eligibility**

Homelessness Prevention assistance requires applicants to be at or below 30% AMI at time of intake. Rapid Re-Housing Assistance does not have income eligibility requirements at the time of intake; however, to qualify for continuation of rapid re-housing assistance, an applicant must have an annual income at or below 30% AMI at the time of re-evaluation. There are no other initial income eligibility requirements to receive program services.

### **2) Calculating Gross Annual Income**

Annual Income is the gross amount of income anticipated to be received by a household during the coming year based on the household’s circumstances at the time of program intake and assessment. Annual Income determination is consistent with the Housing Choice Voucher definition of annual Income found at 24 CFR 5.609.

When determining the annual income of a household to establish eligibility for ESG assistance, Subrecipient must count the income of all adults in the household, including nonrelated individuals, within the limitations imposed by 24 CFR 5.609. Not everyone living in the unit is considered a member of the household for the purposes of determining a

household's income. Excluded persons include: foster children, foster adults, live-in aides, children of live-in aides and an unborn child. A child subject to a shared-custody agreement should be counted as a household member if the child resides with the household at least 50 percent of the time.

Income generated by an asset, such as the interest on a savings or checking account is considered household income even if the household elects not to receive it. For example, though an applicant may elect to reinvest the interest or dividends from an asset, the interest or dividends are still counted as income anticipated to be received during the coming 12 months. Asset income is discussed in 24 CFR 5.609. Income producing assets include: bank accounts; life insurance policies; lump sum additions (legal settlement, refund, etc.); personal property held as investments; retirement/pension funds; trusts; assets disposed of for less than fair market value; and stocks, bonds or mutual funds.

## **G. Eligibility Documentation and Recordkeeping**

Subrecipients must establish written intake procedures that include requirement of written documentation verifying eligibility for program services in accordance with the following preferred order of documentation:

**Third-party Verification**—source documents provided by an outside source.

Third party documentation is the preferable form of verification and includes but is not exclusive to written statement or document from employer, landlord, public benefit worker, or agency service provider. Written verification sent directly to program staff or via the applicant is preferred.

**Intake/Case Manager Worker Observation**—documented by ESG staff.

Staff documentation may include oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the program intake worker/case manager. Use of oral statements is allowable when third- party documentation is not available.

**Participant Self-certification**—applicant signed document certifying eligibility.

Self-certification requires a written and signed document by the individual or head of household seeking assistance attesting to the eligibility facts for which they are certifying. A third party may be designated by a participant to sign documents on their behalf when they are unable to do so. If needed, Subrecipient must provide access to language interpretation services and assistive devices necessary for participants to understand the documents they are certifying.

Self-certification documentation is only used when documented staff efforts verify that third- party or worker observation documentation is not available. However, lack of third- party documentation must not prevent an individual or household from being immediately admitted to emergency shelter, receiving street outreach services or immediately accessing domestic violence/victim service shelter and assistance.

Documentation verifying eligibility must be available in client files or if kept electronically, available upon request. See the appendices in this manual for examples of appropriate documentation of applicant eligibility.

## **III. Allowable Program Service Components and Activities**

### A. Service Components and Homeless Eligibility

ESG funds can pay for five program service components: Street Outreach; Emergency Shelter; Homelessness Prevention; Rapid Re-housing; and HMIS. The following chart shows which service components are available for homeless and/or at-risk households.

Component	Serving	
	Those who are Homeless	Those who are At-Risk of Homelessness
1) Street Outreach	✓	
2) Emergency Shelter	✓	
3) Homelessness Prevention		✓
4) Rapid Re-housing	✓	
<b>Collecting Data</b>		
5) Homeless Management Information System (HMIS)	✓	✓

**NOTE:** Housing counseling for renters is an eligible activity under the ESG program. However, housing counseling must be provided by a HUD-certified Housing Counselor who works for an agency approved to participate in HUD’s Housing Counseling program. Housing counseling is defined as independent, expert advice to address the consumer’s housing barriers and to help achieve their housing goals, including homeownership. The content and process of housing counseling must meet the standards of the HUD Housing Counseling Program. Additional information can be found at [www.hudexchange.info/programs/housing-counseling/](http://www.hudexchange.info/programs/housing-counseling/). Services to program participants such as rental housing information, placement and referral services, or landlord recruitment and/or support, do not constitute housing counseling and may be carried out by Subrecipient’s staff.

### B. Street Outreach

Street outreach is service delivery for the specific purpose of reaching out to unsheltered homeless people; connecting them with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care. Street outreach must be provided in accordance with Program Standard #2—*Targeting and Providing Essential Services Related to Street Outreach*.

Individuals defined as unsheltered must meet the criteria for: Category 1, literally homeless; or Category 4, fleeing/attempting to flee domestic violence (where the individual or household also meet the criteria for category 1); and are:

- living on the streets (or other places not meant for human habitation); **and**
- unwilling or unable to access services in emergency shelter.

#### 1) Essential Services

##### **Engagement Services**

Engagement Services are activities to locate, identify, and build relationships with unsheltered homeless people to offer immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and other housing programs. Eligible costs include:

- Conducting an initial assessment of applicant needs and eligibility;



- Providing crisis counseling;
- Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries;
- Actively connecting and providing information and referrals to needed services; **and**
- Cell phone costs of outreach workers.

### ***Case Management***

Case Management activities to assess housing and service needs and arrange, coordinate and/or monitor the delivery of individualized services. Eligible costs include:

- Assessment and intake including using coordinated entry;
- Conducting initial evaluations including, verifying and documenting eligibility;
- Counseling;
- Developing/securing/coordinating services;
- Helping obtain Federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers; **and**
- Developing an individualized housing stabilization plan that leads to the attainment of stable permanent housing.

### ***Emergency Health***

Emergency health services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. An example of customary emergency health services is outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g.; streets, parks, and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility. Eligible costs include:

- Assessing health problems and developing treatment plans;
- Assistance in understanding health needs;
- Providing directly or assisting to obtain appropriate emergency medical treatment; **and**
- Providing medication and follow-up services.

### ***Emergency Mental Health***

Emergency mental health services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community; i.e.; outpatient treatment of urgent mental health conditions by licensed professionals in community-based setting (e.g.; streets, parks, and campgrounds) to those eligible participants unable or unwilling to access emergency shelter or an appropriate health care facility. Eligible costs include:

- Crisis intervention;
- Prescription of psychotropic medications;
- Explanation about the use and management of medications; **and**
- Combinations of therapeutic approaches to address multiple problems.

### ***Transportation***

Travel expenses incurred by outreach workers, social workers, medical professionals or other service agency employees during the provision of allowable street outreach services are eligible costs. They include:

- Transporting unsheltered people to emergency shelters or other service facilities;
- Public transportation for participants;
- Mileage allowance for outreach workers using their own vehicles to visit program participants;
- Purchasing or leasing a vehicle for use in conducting outreach activities, including the cost of gas, insurance, taxes, and maintenance for the vehicle; **and**
- Costs of staff to accompany or assist program participants to use public transportation.

## 2) Services for Special Populations

Services for special populations are essential services that have been tailored to address the special needs of homeless youths, victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers, domestic violence shelters, and other organizations that serve persons who meet the HUD homeless definition and have special needs. Eligible costs include:

- Engagement;
- Case Management;
- Emergency Health Services;
- Emergency Mental Health Services; **and**
- Transportation.

## C. Emergency Shelter

Emergency shelter means any appropriate facility that has the primary use of providing temporary or transitional shelter for the homeless in general or for specific populations of the homeless and the use of which does not require occupants to sign leases or occupancy agreements\*. Emergency Shelter must be provided in compliance with Program Standard #3—*Emergency Shelter Operations* and Program Standard #4—*Assessing, Prioritizing and Reassessing Needs for Essential Services Related to Emergency Shelter*. ESG funds can be used to provide essential services; renovation; and shelter operations.

Emergency shelter types may include:

- **Day Shelters:** temporary daytime accommodations and services for individuals and families who meet the definition of literally homeless as described under Client Eligibility and are sleeping on the streets, lack a fixed, regular and adequate nighttime shelter and/or are living in an emergency shelter.
- **Transitional Shelters:** emergency shelter projects with a primary purpose to provide temporary or transitional shelter and essential services to all eligible clients in general and/or for specific populations of the homeless. They do not require occupants to sign leases or occupancy agreements\*. Some transitional shelter programs have a comprehensive service focus and participants may stay for longer than 3 or 6 months.
- **Mass Shelters:** high volume, high turnover, emergency shelters where multiple individuals and/or family households sleep in a large room with multiple beds.
- **Hotel/Motel Vouchers:** used as emergency shelter in those areas and times when no



emergency shelter is available.

**\*NOTE:** Occupancy agreements do not refer to a participant's agreement to shelter facility rules and expectations of behavior (e.g., code of conduct).

### **1) Essential Services**

Emergency shelter essential services are services to homeless families and individuals in emergency shelters. Program applicants meeting the definition of homeless in Categories 1, 2, 3, and 4 are eligible for emergency shelter services.

Eligible uses for funds within the Emergency Shelter Essential Services category include:

#### ***Case Management***

Case Management activities assess, arrange, coordinate, and monitor individualized services developed for program participants. Eligible costs include:

- Using coordinated entry;
- Conducting initial evaluations including, verifying and documenting eligibility;
- Counseling;
- Developing, securing and coordinating services and obtaining Federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers;
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; **and**
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

#### ***Child Care Costs***

The cost of child care is eligible if the child is under the age of 13, or disabled children under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates. Eligible costs include:

- Childcare costs;
- Providing meals and snacks; **and**
- Comprehensive and coordinated sets of appropriate developmental activities.

#### ***Education***

Education is instruction or training to enhance participants' ability to obtain and maintain housing, consumer education, health education, substance abuse prevention, literacy, ESL, GED preparation and various life skills. Eligible costs include:

- Screening, assessment, and testing;
- Individual/group instruction;
- Tutoring;
- Books, supplies, and instructional materials;
- Counseling; **and**
- Referral to community resources.

### ***Employment Assistance and Job Training***

Job Assistance services help participants to secure employment and placement in job training programs. Eligible costs include:

- Classroom, online, and/or computer instruction;
- On the job instruction;
- Job finding and skill building;
- Reasonable stipends to program participants in employment assistance and job training programs;
- Books and instruction materials;
- Employment screening; assessment or testing;
- Structured job seeking support;
- Special training and tutoring; including literacy training and pre-vocational training;
- Counseling or job coaching; **and**
- Referral to community resources.

### ***Outpatient Health***

Outpatient Health Services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Eligible costs include:

- Assessing health problems and developing treatment plans;
- Assistance in understanding health needs;
- Providing directly or assisting to obtain appropriate medical treatment, preventive medical care, health maintenance services, including emergency medical services;
- Providing medication and follow-up services; **and**
- Providing preventive and non-cosmetic dental care.

### ***Legal services***

Legal advice and representation are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. This would include necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing. Legal issues would include child support, guardianship, paternity, emancipation, legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and resolution of outstanding criminal warrants. Eligible costs include:

- Hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service;
- Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling; **and**
- Filing fees and other necessary court costs.

Legal services to address immigration, citizenship, and mortgage issues including retainer fee arrangements, and contingency fee arrangement are **not** eligible costs.

### ***Life Skills Training***

Life Skills Training teaches critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness. Allowable services must support the program participant to function independently in the community. They include:

- Budgeting resources;
- Managing money;
- Managing a household;
- Resolving conflict;
- Shopping for food and needed items;
- Improving nutrition;
- Using public transportation; **and**
- Parenting.

### ***Mental Health Services***

Mental Health Services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Services are direct outpatient treatment of mental health conditions by licensed professionals. Eligible costs include:

- Crisis intervention;
- Individual, household, or group therapy sessions;
- Prescription of psychotropic medications and explanation about the use and management of medications; **and**
- Combinations of therapeutic approaches to address multiple problems.

### ***Substance Abuse Treatment***

Substance Abuse Treatment is an eligible activity to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Services must be provided by licensed or certified professionals, and be designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs. Eligible costs include:

- Client intake and assessment;
- Outpatient treatment for up to 30 days;
- Group and individual counseling; **and**
- Drug testing

### ***Transportation***

Costs of travel by program participants to and from medical care, employment, childcare or other facilities that provide eligible essential services are eligible. Staff travel costs incurred to support provision of essential services are also allowable. Eligible costs include:

- Public transportation for participants;
- Mileage allowance for service workers using their own vehicles to visit program

participants; **and**

- Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes, and maintenance for purchased or leased vehicles.

### ***Services for Special Populations***

Services for Special Populations means otherwise eligible essential services that are tailored to address the special needs of homeless youth, victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers, domestic violence shelters and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking. Also eligible are services provided to persons living with HIV/AIDS in emergency shelters. Eligible costs include:

- Case management;
- Childcare;
- Education services;
- Employment assistance and job training;
- Outpatient Health services;
- Legal services;
- Life Skills training;
- Mental health services;
- Substance abuse treatment services; **and**
- Transportation.

## **2) Shelter Facility Rehabilitation, Conversion and Renovation**

Rehabilitation, conversion or renovation projects are ineligible Costs. HUD encourages Communities to focus their efforts on keeping individuals and families housed and house those who are homeless rather than build and maintain shelter facilities.

## **3) Shelter Operations**

Shelter operations are costs to operate and maintain emergency shelters and provide other emergency lodging when appropriate. Eligible Costs include:

- Minor or routine maintenance;
- Rent;
- Security;
- Fuel;
- Equipment;
- Insurance;
- Utilities;
- Food;
- Furnishings;
- Supplies necessary for the operation of the emergency shelters; **and**

- Hotel/Motel voucher, only for families and individuals where no emergency shelter is available.

**4) Assistance Required under “URA”**

Subrecipient must ensure they have taken all reasonable steps to minimize the displacement of persons or commercial entities as a result of a project assisted with ESG funds. No tenant occupant of housing that is converted into an emergency shelter may be required to relocate temporarily for a project assisted with ESG, or be required to move to another unit in the same building/complex. When a tenant is required to move because of a project assisted with ESG under conditions that trigger the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act (42 U.S.C. 4601- 4655), the tenant should be treated as permanently displaced and offered relocation assistance and payments consistent with the Act. Any person who disagrees with Subrecipient’s determination concerning whether the person qualifies as a displaced person or the amount of relocation assistance offered, may file a written appeal of that determination with Subrecipient under 49 CFR 24.10. A low-income person who disagrees with the determination may submit a written request for review of that determination to the nearest HUD field office. Subrecipient must keep records documenting compliance with the displacement, relocation, and acquisition requirements of the ESG program. See 24 CFR 576.408.

**D. Essential Services Comparison between Outreach and Shelter** Services through the street outreach component are not the same as services provided through emergency shelter systems. The chart below compares appropriate services for each component.

Comparison of Essential Services	
Street Outreach (Unsheltered Homeless)	Emergency Shelter Services (Sheltered)
Engagement	----
Case Management	Case Management
----	Childcare
----	Education Services
----	Employment Assistance/Training
Emergency Health Care	Outpatient Health Services
----	Legal Services
----	Life Skills Training
Emergency Mental Health Care	Mental Health Services
Services for Special Populations	Services for Special Populations
----	Substance Abuse Treatment
Transportation	Transportation

**E. Homelessness Prevention and Rapid Re-housing**

Homelessness Prevention Services are intended to prevent persons who are housed from becoming homeless by helping them regain stability in their current housing or other permanent housing. Eligible participants must be at imminent risk of homelessness, homeless under other federal statutes, fleeing/attempting to flee domestic violence or meet the criteria for being at-risk of homelessness and have annual incomes at or below 30% of area median income. Rapid re-housing services are intended to help

eligible participants who are literally homeless, including fleeing/attempting to flee domestic violence, to transition from the streets or shelter as quickly as possible into permanent housing and achieve housing stability. Eligible participants for either service component must lack the resources or support networks to help them retain or obtain other appropriate, stable housing. Eligibility determination and prioritization must comply with Program Standard #6—*Determining and Prioritizing Eligibility for Homelessness Prevention and Rapid Re-housing Assistance*.

Eligible activities for both service components include housing relocation and stabilization services and short- and medium-term rental assistance. These activities must comply with Program Standard #7—*Determining Client’s Share of Rent and Utility Costs* and Program Standard #8—*Determining Duration and Amount of Rental Assistance Provided to Client*.

If a client was first assisted under homelessness prevention and then became homeless, Subrecipient must exit the client from the homelessness prevention component and enter the individual or household into the rapid re-Housing component.

### 1) Homelessness Prevention and Rapid Re-housing Comparison

The chart below shows the differences between Homelessness Prevention and Rapid Re-Housing service components.

	Homelessness Prevention	Rapid Re-Housing
Eligible Participants	<b>Category 2</b> – Imminent Risk <b>Category 3</b> – Other Federal Statutes <b>Category 4</b> – Fleeing/Attempting to Flee Domestic Violence and has no other residence <b>OR</b> <b>At-Risk of Homelessness</b>	<b>Category 1</b> – Literally Homeless <b>OR</b> <b>Category 4</b> – Fleeing/Attempting to Flee Domestic Violence and has no other residence.
Purpose	<ul style="list-style-type: none"> <li>To <u>prevent</u> persons who are housed from becoming homeless</li> <li>To help such persons <u>regain stability</u> in their current housing or other permanent housing</li> </ul>	<ul style="list-style-type: none"> <li>To help homeless persons living on the streets or in an emergency shelter <u>transition</u> as quickly as possible into permanent housing, and then</li> <li>To help such persons <u>achieve stability</u> in that housing</li> </ul>
Reassessment	<ul style="list-style-type: none"> <li>Every 3 months</li> <li>Must have income at <u>or below 30%</u> AMI, AND</li> <li>Lack resources and support network</li> </ul>	<ul style="list-style-type: none"> <li>Every 12 months</li> <li>Must have income <u>at or below 30%</u> AMI, AND</li> <li>Lack resources and support network</li> </ul>
Eligible Activities	Housing Relocation and Stabilization Services and Financial	Housing Relocation and Stabilization Services and Financial
	Short- and Medium-Term Rental Assistance	Short- and Medium-Term Rental Assistance

### 2) Housing Relocation and Stabilization Financial Assistance

ESG funds may be used to pay landlords, utility companies and other third

parties for the following housing related costs:

- **Rental application fee** charged by the landlord to all applicants;
- **Security deposit**, equal to or not more than 2 month's rent;
- **Last month's rent**, paid to landlord at the time security deposit and first month's rent are paid. The amount must not exceed one month's rent and is included in participant's total rental assistance amount;
- **Moving costs**, including truck rental, hiring a moving company, and temporary storage fees. Storage fees may be up to 3 month's rent, providing costs are not incurred until after program participation begins and before move-in. Moving costs may not include arrearage temporary storage fees;
- **Standard utility deposit** (gas, electric, water, sewer) required by the utility company for all customers;
- **Standard utility payments** (gas, electric, water, sewer) up to 24 months during any 3- year period, including up to 6 months of arrearages per service. Utility account must be in the name of a member of the client household or there is other verification of the household's responsibility for the utilities.
- **Payment of utility arrearages** for a previous address require that the utility account be in the name of a member of the client household or other verification of the household's responsibility for payment. Payment cannot exceed \$1,500 and must have verification in the client's file from the utility company confirming that, once payment is received, the utility company will provide utilities to the client. Staff are encouraged to assist clients in negotiating a payment plan or payment forgiveness for any amount exceeding the \$1500. Payment of utility arrearages for Homelessness Prevention participants requires a current shut of notice.

Subrecipient may develop a written policy regarding to whom the landlord and utility companies will refund security and utility deposit payments. Any policy must be applied consistently for all program participants. Any deposit funds returned to Subrecipient is program income and must be documented as match.

Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments. Financial assistance refers to: rental application fees, security deposits, last month's rent, utility deposits, utility payments and moving costs.

### 3) Housing Relocation and Stabilization Services

ESG funds may be used to provide the following services:

- **Housing search and placement** including assessment of client housing barriers, needs, and preferences; housing search and landlord recruitment, assistance with rental applications and agreements, ensuring housing compliance with habitability and other housing related requirements;
- **Housing Stability Case Management\*** including client eligibility and service needs assessment, development of individualized housing and service plans, conducting



required re-evaluations and follow-up, and coordinating access to other federal, state and local benefits;

- **Mediation** services to prevent the tenant from losing their housing including mediation between tenant and landlord, household members, neighbors or others impacting the tenant's housing stability;
- **Legal Services** pertaining to certain legal matters as identified in 24 CFR 576.102(a)(1)(vi) that are necessary to resolve in order for program participant to obtain or maintain stable housing; **and**
- **Credit Repair** including credit counseling, household budgeting, money management, obtaining credit reports and resolving credit related barriers to housing stability.

#### 4) Short- and Medium-Term Rental Assistance

A participant can be provided up to 24 months of rental assistance during any 3-year period. Rental assistance may include payment of rent arrearages for tenant or project based housing. Duration of rental assistance must minimally comply with program standards including:

- **Short-Term Assistance** is for up to 3 months' rent;
- **Medium-Term Assistance** is more than 3 months, no more than 24 months; **and**
- **Payment of Arrearages** must be a one-time payment of up to 6 months' rent, including late fees. If arrears are owed to a previous landlord, these arrears may be paid, but only when there is documented evidence that payment of those arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing.

Subrecipient must comply with the El Paso CoC Governance Charter minimum standards regarding rental assistance. Subrecipient may establish their own written requirements beyond these standards upon review and approval by El Paso CoC Board. Any Subrecipient determined requirements must be applied consistently for all program participants within each ESG-funded program and be available to the public as a written policy.

Rental Assistance can be either tenant-based or project-based. Tenant-based rental assistance allows program participants to select a housing unit. If the participant chooses to move to another location within the service area, the rental assistance can go with them to the new unit. Project-based rental assistance requires the Subrecipient or a contracted agency to identify permanent housing units that meet ESG requirements. Subrecipient enters into a rental assistance agreement with the owner to reserve the unit and provides the unit at a subsidized rent to eligible program participants.

Under rapid re-housing a Subrecipient may provide tenant-based rental assistance to a program participant that chooses a unit in which the Subrecipient has an ownership interest. However, the Subrecipient cannot exclusively direct a program participant to a unit it owns, nor can it carry out the initial evaluation to determine eligibility for the assistance. The Subrecipient would need to provide documentation that the program participant had a choice of other units. A Subrecipient must receive a HUD approved waiver to provide project-based assistance for a unit where the Subrecipient has ownership interest (refer to Section VI, Part C for more detail). A waiver is also required to provide homelessness prevention rent assistance to a participant residing in a unit owned by the Subrecipient. Waiver requests must be submitted to the El Paso CoC Board for review and submission to HUD.



Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

## **5) Rental Agreement and Lease**

Short- and medium-term rental assistance requires both a rental assistance agreement between the Subrecipient and landlord **and** a lease between the program participant and landlord. Subrecipients are required to make rental assistance payments only to a landlord with whom Subrecipient has entered into a rental assistance agreement. The rental assistance agreement sets out the terms under which rental assistance will be paid. A rental assistance agreement is a separate document from the rental lease. There is no requirement that the term of the lease coincide with the term of the rental assistance agreement as long as they are both in effect during the time ESG-funded rental assistance is provided. (The exception is that no current lease is needed for payment of rent arrears.)

A rental assistance agreement must set forth the terms under which rental assistance will be provided, including the following requirements:

- The landlord shall give the agency a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant;
- Payment due date, grace period, and late payment penalty requirements will be the same as documented in the program participant's lease;
- If the rental assistance is tenant-based or project-based;
- If the Subrecipient incurs late payment penalties, it is the sole responsibility of the agency to pay those penalties, using non-ESG funds;
- If the Subrecipient requires the program participant to pay a portion of the monthly rental cost, the amount of rent to be paid by each party;
- The amount to be paid by the Subrecipient for payment of rent arrears, number of months covered, any other terms and conditions of the payment, and certification the program participant is eligible and landlord has provided sufficient evidence of the rent arrears and that payment of such arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing.

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely to pay rent arrears. The lease must be between the landlord and program participant and signed by both parties. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

For program participants living in housing with project-based rental assistance, the lease must have an initial term of one year.

If the grantee provides rental assistance to a program participant in a unit it owns, the grantee must request a waiver of the rental assistance agreement requirement. The

waiver is necessary because the rental agreement must be between the Subrecipient and housing owner and it is not possible for the Subrecipient to create such an agreement with itself. Waiver requests must be submitted to the El Paso CoC Board for review and submission to HUD.

Subrecipient must terminate the rental assistance agreement and provide no further rental assistance payments if: the program participant moves out of the leased housing unit; the lease terminates and is not renewed; or the program participant becomes ineligible to receive ESG rental assistance.

## **6) Rent Reasonableness Determination**

Subrecipient must determine whether the gross rent of a particular unit is a reasonable rent in comparison to rent for other comparable unassisted units. To make this determination, Subrecipient must consider 1) the location, quality, size, unit type, and age of the contract unit; and 2) any amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease. The unit's gross rent must be comparable to the rent reasonableness rent for the unit to be considered for rental assistance. Subrecipient must determine the review method(s) they will use to establish the rent reasonableness standards for their area (e.g.; A list of comparable rents can be compiled by using a market study of rents charged for units of different sizes or by reviewing advertisements for comparable rental units). To learn how public housing authorities establish rent reasonableness for the Housing Choice Voucher program, review Chapter 9 of the HUD Housing Choice Voucher Program Guidebook. The link to the Guidebook is in the appendices of this manual.

Comparable rents vary over time with market modifications. Rent Reasonableness standards must be reviewed periodically and adjusted to align with these rent market changes. The Rent Reasonableness review completed for each unit must be documented in the client case file. A sample rent reasonableness form is included in the ESG forms.

## **7) Fair Market Rent (FMR) Requirement**

HUD establishes FMRs to determine rent ceilings for HUD-funded rental assistance programs. HUD publishes the FMR schedule annually for 530 metropolitan areas and 2,045 non-metropolitan county areas. The link to HUD's FMR index is included in the appendices in this manual.

Gross rent for units in which ESG provides rental assistance must be the same or less than the FMR for that location. If Subrecipient's service area includes more than one county, Subrecipient must use the appropriate FMR for the county in which the assisted rental unit is located. The applicable FMR data should be copied and placed in the client file to document the FMR for that participant's unit size and geographic area.

## **8) Calculating Gross Rent**

Whether a household is seeking to maintain its current housing or relocate to another unit to avoid homelessness, or exiting homelessness into new permanent housing, the process for determining acceptable rent amounts is the same: the gross rent (rent plus appropriate utility allowance) must 1) be no greater than the Fair Market Rent set by HUD and 2) fit within the limitations resulting from a rent reasonableness analysis. The rent for the unit being assisted with program funds cannot exceed the lesser of the FMR or the rent reasonableness standard. If the gross rent for the unit exceeds either the rent

reasonableness standard or FMR, the Subrecipient is prohibited from using ESG funds for any portion of the rent, even if the household is willing and/or able to pay the difference.

Fair Market Rent and rent reasonableness requirements do not apply when a program participant receives only financial assistance or services. This includes rental application fees, security deposits, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

A utility allowance is a projection of the cost of utilities the client will pay monthly while renting their unit. Subrecipient must determine the amount of utility allowance to be used in the calculation of gross rent. The local public housing authority maintains a utility allowance chart which considers the number of bedrooms and types of utilities in a unit (e.g.; gas and/or electric, water, sewer, and trash). Any utilities included in the rent payment must not also be included in the utility allowance calculation. Telephone, cable or satellite television service, and internet service are not counted as utility costs.

$$\begin{array}{r} \text{To calculate the gross rent of a unit:} \\ \text{total contract rent amount of the unit} \\ + \\ \text{Allowable fees required for occupancy under the lease (excludes late and pet fees)} \\ + \\ \text{monthly utility allowance established by local public housing authority} \\ = \\ \text{Gross Rent Amount} \end{array}$$

**Example:**

A case manager wants to rapidly re-house a mother and son and has identified a 2-bedroom unit at a rent of \$1,200 per month, not including utilities. The utility allowance for that size and type of unit is \$150. Therefore, the gross rent is \$1,350. A check of three similar units in the neighborhood reveals that the reasonable rent is \$1,400 for that area of the city. However, the FMR for the jurisdiction is \$1,300. This means the household cannot be assisted with ESG rental assistance in this unit because the gross rent exceeds the FMR.

Once a housing unit is determined to meet the FMR and rent reasonableness requirements, program funds may be used to pay for the actual utility costs. The utility allowance calculation is only used to determine whether the unit meets the FMR standard.

**9) Eligibility Re-certification**

Reassessments are required for homelessness prevention and rapid re-housing participants. Homelessness prevention reassessments are required every three months and must verify that a household continues to have an annual income at or below 30% of area median income and lacks the resources or support to retain or obtain appropriate permanent housing. Rapid re-housing assessments are required at least once per year to verify that a household's income is at or below 30% area median income and they lack the resources and support networks to retain or obtain appropriate permanent housing. If a client informs, but is not required by the Subrecipient to notify staff of a change in income or other circumstances that may affect eligibility, there is no immediate effect on the client's eligibility and assistance can continue until the next required re-evaluation.

## 10) Housing Stability Case Management

ESG funds may be used to pay the cost of assessing, arranging, coordinating and monitoring the delivery of individualized housing stabilization services\* to a program participant already in permanent housing (not to exceed 24 months) or to assist a program participant to overcome immediate barriers to obtaining housing (not to exceed 30 days). Subrecipients are encouraged to provide case management to all clients receiving homelessness prevention and rapid re-housing services. Clients receiving short- and medium-term rental assistance are required to be case-managed and have a housing stability service plan. Case management includes the following services:

- Using a coordinated entry process (upon the CoC's development or approval of this system);
- Conducting initial evaluation, including verification and documentation of eligibility;
- Developing, securing and coordinating services;
- Obtaining federal, state, and local benefits;
- Monitoring and evaluating participant's progress in the program;
- Developing an individualized housing stability service plan; **and**
- Conducting re-evaluations of participant's eligibility and types and amounts of assistance needed.

### F. Homeless Management Information System (HMIS)

#### 1) Reporting Requirements

ESG funded client and activity data must be entered into the HMIS (Clarity Human Services) or alternative database for clients who are victims of violence. Data entry and reporting expectations include:

- Timely, accurate and complete data entry into the HMIS ;
- Acquiring and documenting informed written consent from program participants;
- Protecting program participants' confidentiality;
- Using the HMIS as a tool to analyze data to inform and improve the delivery of services.

Subrecipients are required to input data within 4 days of client entry and 4 days of client exit and are expected to reconcile program data by the 5<sup>th</sup> day following the end of each month in accordance with HMIS Participation Standards. A year-end report is also required ten (10) days after the close of the City's ESG Program fiscal year. At the discretion of the City and the Coalition, and in accordance with the MOU dated May 17, 2017 between the City and the Coalition, other reports are generated to provide adequate program utilization and performance information.

ESG funds are used for the following the HMIS costs, to the extent available, that would ordinarily be paid by the subrecipients:

- The costs of using the coordinated entry process, but not the costs of developing or operating the system;
- Staff costs related to the operation and usage of the HMIS;

- computer hardware and software costs including purchase of HMIS software licenses;
- Space and equipment costs related to the HMIS; **and**
- Costs related to monitoring and reviewing data quality, data analysis and reporting.

## 2) Victim Services Data Collection

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable database that provides aggregate information and data consistent with HMIS data collection requirements.

Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

## 3) Performance Measures and Follow-Up Contact

In alignment with the federal and state strategic plans to end homelessness, the El Paso CoC has established performance measures that require the collection of housing status data at the time of program exit.

- Increased housing stability as measured by the percentage of total program participants served who reside in permanent housing at time of exit from program; **and**
- Increased housing stability as measured by the percentage of program participants who at program exit reside in permanent housing and maintain permanent housing for six months from time of exit.

The Community Benchmarks included in Appendix B of this document. The outcome measurements are in addition to reporting of required universal data elements that track client characteristic and service data.

Reporting of the two performance measures will be provided in the year-end report and is client household-based, not funding source. In other words, measurement will occur at time of client's program exit whether or not the program is exclusively ESG or partially ESG funded.

Locating and following up with clients can be challenging. Strategies that have shown the best results include the following:

- ✓ Follow-up is provided by the case manager or staff with whom the client knows and has worked with;
- ✓ Informing the client at time of intake/assessment of the need and value of follow-up and requesting their permission to contact them and/or other identified contacts after they exit the program;

Securing multiple points of contact for the client prior to their exit such as a friend, family member, employer, landlord or someone who the client is likely to stay in touch with

- ✓ Development of MOUs with other agencies such as TXDHHS, Housing Authorities, etc. to determine the housing status of clients.

Regardless of the method of follow-up utilized, Subrecipients must obtain client permission to contact others through a signed release of information.

✓ during the six month period; and

## **G. Ineligible Activities and Assistance**

Ineligible activities that cannot be funded with ESG include, but are not exclusive to:

- replacement of existing mainstream resources;
- payments made directly to program participants;
- payments on a mortgage or land contract;
- payment of rent for eligible individuals or families for the same period of time and for the same cost types being assisted through any other federal, state, or local housing subsidy program;
- payments on credit card bills or other consumer debt, including child support or garnishments;
- provision of cash assistance;
- payment of costs of discharge planning programs in mainstream institutions such as hospitals, nursing homes, jails, or prisons; **and**
- payment for religious activities (**Note:** While organizations that are religious or faith-based are eligible to receive ESG funds, religious activities must be conducted separately, in time and location, from ESG-funded activities and participation must be voluntary for program participants).

## **IV. Housing and Facility Standards**

### **A. Occupancy Standards**

Occupancy standards provide consistent criteria for determining the size of the permanent housing unit for which the household is eligible and thus, the amount of assistance to be provided.

Subrecipient may choose to use the occupancy guidelines set by the Housing Choice Voucher Program, 24 CFR 982 Subpart I: 982.401(d), or develop their own standards. Subrecipient must develop a written policy outlining their occupancy standards requirements and use those standards consistently.

There may be circumstances where it is not appropriate for two persons to share a bedroom. As examples, these occur when the household includes:

- Persons of different generations, persons of the opposite sex, and unrelated adults;
- A live-in care attendant who is not a member of the household; or
- Members with medical problems who need privacy or space for medical equipment.



## **B. Habitability Standards**

All housing units supported with program funds must meet HUD Habitability Standards. Habitability Standards are different from the Housing Quality Standards (HQS) used for HOME and HOME TBA programs. Because the HQS criteria are more stringent than the Habitability Standards, Subrecipients should use Habitability Standards for rental assistance funded with ESG, but housing also needs to be compliant with local housing codes relating to occupancy, health, and safety standards outlined in the HQS criteria.

### **1) Permanent Housing**

Minimum habitability standards for permanent housing include requirements for:

- structure and materials;
- personal space and security;
- interior air quality;
- water supply;
- sanitary facilities;
- heating and cooling operating equipment;
- natural and electrically produced light;
- area for food preparation;
- safe and sanitary project maintenance; **and**
- fire safety.

For households moving into a new unit, the unit must meet habitability standards before the lease is signed and the household moves in. For households already residing in a unit, the unit must meet habitability standards before financial or rental assistance can be provided.

### **2) Shelters**

In addition to established housing codes, habitability standards for shelters in which ESG funds are used for conversion, major rehabilitation or renovation include requirements for the following:

- structure and materials;
- access to and within the shelter;
- personal space and security;
- interior air quality;
- water supply;
- sanitary facilities;
- heating and cooling operating equipment;
- natural and electrically produced light;
- area for food preparation;
- safe and sanitary facility maintenance; **and**
- fire safety/smoke detectors.



### **C. Lead-Based Paint Requirements**

Federal lead-based paint requirements apply any time federal funds are used for housing assistance and the living space or unit was built prior to 1978. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R apply to all shelters assisted with ESG funding and all housing occupied by program participants.

Subrecipient must provide the lead hazard information pamphlet to any resident who will be residing in a unit built before 1978. The tenant must receive the pamphlet before moving into the unit. If Subrecipient can document the tenant received the pamphlet previously, Subrecipient is not required to provide it again.

For units older than 1978 which will house one or more children under the age of 6, landlord and tenant must complete a Lead-Based Paint Disclosure form. The form describes any known current or previous lead-based paint hazards, and documents tenant's receipt of records and the lead hazard information pamphlet. Additionally, a visual lead-based paint assessment must be completed by a person trained in this inspection process. The inspection may be completed in conjunction with the habitability inspection if the inspector is qualified. At Intake, it should be noted on the Application Form if there will be any child in the household younger than 6 years. This information should be provided to the habitability inspector prior to their examination of the proposed rental unit.

Essential service activities, such as, counseling, case management, street outreach, referrals to employment, etc., are exempt and excluded from the lead-based paint inspection requirements.

### **D. Environmental Review**

Subrecipient and its contractors shall not rehabilitate, convert, or renovate a shelter or prospective shelter until HUD has performed an environmental review under 24 CFR part 50 and Subrecipient has received HUD approval to continue. Subrecipient shall supply all available, relevant information necessary for HUD to perform any environmental review required by 24 CFR Part 50. Subrecipient must carry out mitigating measures required by HUD or select alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS).

Environmental reviews must also be completed for any project-based housing assistance paid with ESG funding.

## **V. Client Confidentiality**

### **A. General Requirements**

All information about the applicant/client is confidential. Disclose information only for the purpose of determining program eligibility, providing benefits, or investigating possible violation of federal, state and local regulation(s) associated with ESG delivery and never in a setting where members of the public can hear the conversation.

Subrecipients must have policies and procedures that ensure all client information and records are secure and confidentially maintained. Subrecipients' officers, employees and agents must be aware of and comply with Subrecipients' confidentiality policies and procedures.

### **B. Electronic Confidentiality**

Electronic collection of client information requires procedures for ensuring confidentiality. The following guidelines apply to the use of a computer:

- The computer terminal(s) used must be located in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible in viewing client records.
- The computer monitor must be cleared (or a screen saver activated) immediately after accessing a client record.
- The computer terminal must be on a "locked" mode or turned off if the terminal is unattended.
- Access to the HMIS program shall be given to authorized staff persons and only insofar as access is necessary for performing the work required for the ESG program.

### **C. Victims of Domestic Violence**

Subrecipient must implement procedures to ensure confidentiality of records pertaining to any individual who is provided family violence prevention or treatment services. Victim information cannot be disclosed to any third party without consent of the victim.

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain a comparable database which provide aggregate information and data consistent with HMIS data collection and reporting requirements. Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

Subrecipient must instruct all staff that the address of a domestic violence provider's shelter location will not be made public without permission of the provider.

### **D. Release of Information**

Client information (including identifying the person is a client) should not be released without written authorization from the client. A Release of Information form must be completed by the applicant at the time of intake.

Client refusal to provide such authorization cannot be the basis for denying program services to otherwise eligible clients.

Release forms must be time-limited and specific as to with whom and what information will be shared.

## **VI. Termination, Grievance and Conflict of Interest Policies**

### **A. Termination or Denial of Assistance**

Subrecipient must have written denial, termination, and grievance policies and procedures. The policies and procedures should be readily available to program participants either in writing or by posting them in a public place. Copies and explanation of the policies and procedures be provided directly to any client when denial, termination or other action affects the client's ability to receive assistance. The notice must provide the specific reason(s) for the action and provide a process the applicant can follow to request a review of the decision.

If Subrecipient is terminating rental assistance to the program participant, they must immediately notify the landlord of the date rental assistance for their tenant will end.

Termination from assistance does not prevent Subrecipient from providing further assistance, later, to the same household or individual if they are determined eligible for such assistance.

### **B. Grievance and Appeals Process**

Subrecipient is required to have an established process for addressing client grievances for decisions, including termination or reduction of benefit, denial of benefit or other grievance. At a minimum, the process must include the following components:

- Informs the participant/applicant of the policy and/or policy must be posted in an area specific by the policy and in general locations in which a client/applicant is expected to be;
- Informs the participant/applicant that they may contest any Subrecipient or subrecipient's decision that denies (for any reason) or limits eligibility of participant/applicant and/or terminates or modifies any benefits;
- Allows any aggrieved person a minimum of thirty days within which to request an administrative review;
- Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
- Informs City of El Paso DCHD of the request for administrative review within 10 days of receiving the request;
- Informs the applicant/participant and City of El Paso DCHD in writing of the final determination and basis for the decision within ten days of the determination.

Any person or persons designated by Subrecipient can complete the administrative review, other than the person who made or approved the decision under review or a subordinate of this person.

Subrecipients must make accommodations for clients who have language or disability barriers that would prevent them from participating in the appeals process.

The City of El Paso DCHD retains the right to require modification of any review or appeals process that in its determination does not meet basic principles for notification, instruction, time allowance, impartiality, access and other necessary components.

### **C. Conflict of Interest**

#### **1) Organizational**

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or household's acceptance or occupancy of emergency shelter or housing owned by Subrecipient or an affiliated organization. A Subrecipient is prohibited from conducting a participant's intake assessment to determine program eligibility if the participant resides in housing where the Subrecipient has ownership interest. Subrecipient would need to find another independent organization that is also an ESG grantee to do the intake assessment and ensure that all program participants are eligible even if the Subrecipient has a waiver of the conflict of interest requirements. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by HUD. If a Subrecipient wishes to apply for a waiver, they should contact the City of El Paso DCHD homeless program coordinator or manager for guidance in submission of a waiver request which must be approved by the City of El Paso who will then submit to HUD. See 24 CFR 576.404(a).

Subrecipient must keep records to show compliance with ESG program organizational conflicts-of-interest requirements.

#### **2) Individual**

For the procurement of goods and services, Subrecipient must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations).

Persons for whom the Conflict of Interest requirements apply include any person who is an employee, agent, consultant, officer, or elected or appointed official of the Subrecipient agency. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the Program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one- year period following his or her tenure.

Upon the written request of City of El Paso DCHD, HUD may grant an exception to the provisions of this paragraph on a case-by-case basis. Subrecipients wishing an exception must submit requests to City of El Paso DCHD for review and forwarding to HUD. There is no guarantee that an exception will be approved.

## **VII. Fair Housing**

### **A. Affirmative Outreach**

Subrecipient must communicate and make known that use of ESG funded facilities, assistance and services are available to all on a nondiscriminatory basis. Subrecipient must develop and implement affirmative outreach written procedures and communication tools and materials to inform persons without regard to race, color, ethnicity, religion, sex, age, national origin, familial status, or disability, how to obtain access to facilities and services. If it appears the procedures Subrecipient intends to use to accomplish this will not reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those activities and services, Subrecipient must establish additional procedures to ensure those persons are made aware of assistance opportunities. Outreach efforts must comply with Program Standard #3—*Emergency Shelter Operations (Safety and Accommodations for Special Populations)*.

Reasonable accommodations for persons with disabilities must be available in order to ensure disabled participants have an equal opportunity to utilize housing, including shelters, and receive essential services. Greater levels of accessibility may be required for some shelters in compliance with The Americans with Disabilities Act.

## **B. Nondiscrimination**

Subrecipient is required to comply with all state and federal statutes relating to nondiscrimination. Subrecipient may not take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent housing or provide services
- Make housing or services unavailable
- Deny a dwelling or service
- Set different terms, conditions or privileges for rental of a dwelling or obtaining services
- Provide different housing services or facilities or different services
- Falsely deny that housing is available for inspection or rental or that services are available
- Deny anyone access to a facility or service.

### **C. Limited English Proficiency**

The Federal government has issued a series of policy documents, guides and regulations describing how Subrecipient and subrecipient should address the needs of citizens who have limited English proficiency (LEP). The abbreviated definition of persons with limited English proficiency is those who: have difficulty reading, writing, speaking, or understanding English, and do not use English as their primary language.

Subrecipient must have an LEP policy document that describes the actions Subrecipient took to identify LEP populations in their service area and define actions they will take to provide language assistance and address language barriers. The policy must also state how and how often staff will receive training about assisting LEP persons, how the level of success of the policy will be identified and how changes will be made if needed.

Subrecipients should create a written Language Access Plan (LAP) to provide a framework to ensure all program information is available in languages other than English. Subrecipients who serve few LEP persons may choose not to establish a LAP; however, the absence of a written LAP does not release Subrecipient's obligation to ensure LEP persons have access to programs or activities. Links to more information about Limited English Proficiency requirements are provided in the appendices "Applicable Rules and Regulations".

## **VIII. Recordkeeping**

### **A. Client File Documentation**

Sufficient records must be established and maintained to enable City of El Paso DCHD and HUD to determine whether ESG requirements are being met. Subrecipient must make sure any subrecipients assisting Subrecipient with the ESG program also maintain appropriate and complete records.

Documentation of client eligibility and services received must be maintained in printed or electronically-saved client case files, including files for applicants found to be ineligible. File documentation will be the basis of City of El Paso DCHD monitoring to ensure Subrecipient is in compliance with program requirements and HUD regulations.

At the minimum, client files must contain the following, if applicable to Subrecipient's service to the program participant:

- Verification of use of coordinated entry;
- Signed Release of Information;
- Intake form and assessment of household needs;
- homeless or at risk of homelessness verification;
- Evidence applicant has no subsequent housing options and lacks sufficient resources to retain housing, but is not homeless;
- Rent Reasonableness documentation;
- Habitability Standards verification;
- Lead-based            Paint            visual  
assessment;
- Signed                    Lease

Agreement;

- Signed Rental Assistance Agreement;
- Verification of client income and assets;
- Amount and type of essential emergency shelter services provided;
- Re-evaluations of eligibility;
- Housing Plan and housing assistance provided;
- Verification of outstanding rent arrears;
- Case notes;
- Evidence of referrals;
- Documentation of payments made on client's behalf; **and**
- Written notice of program termination.

#### **B. Electronic Files**

Client file documents and signatures or policy documents can maintained in an electronic format and made available to City of El Paso DCHD and HUD in a paper form, as requested for compliance monitoring purposes.

#### **C. Records Retention**

Subrecipients shall retain all program records pertinent to client services and expenditures paid with ESG funds in a manner consistent with the requirements of federal law. Currently, program records including client files must be retained for five (5) years. Fiscal records, which include books, documents, papers, plans, and agency records that document all program expenditures, a longer period as may be required due to any audit, controversy or litigation arising out of, or relating to, program use.

#### **D. Available Forms**

Program forms and reference documents are available for download from the City of El Paso DCHD web site. Subrecipient may use these standard forms or acceptable equivalents when administering its ESG funded program. Any alternate form must collect all data requested on the standard form. City of El Paso DCHD encourages the use of the standard forms for consistency and ease of monitoring and compliance.

### **IX. Financial Management**

#### **A. Administration**

The City of El Paso DCHD can use up to 7.5% for administrative costs. Administrative costs are those costs associated with the general management of the grant. Administrative costs are charged to grant cost centers based on an approved indirect cost rate in accordance with 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (also known as the “Super Circular”).



## **B. ESG Required Match**

The DCHD will require Subrecipients to provide matching contributions in amounts equals to (100%) of the amount of funds allocated to the subrecipient, as outlined by federal HUD regulations. All Subrecipients are must adhere to 24 CFR 576.201 and 2 CFR 200.306.

### **Match requirement**

- 1.** Cash Match
- 2.** In-Kind Contributions - real property, equipment, or goods
- 3.** In-Kind Contributions - services

Subrecipients awarded funds must match the total amount allocated with no less than 100% percent cash and/or in-kind contributions from other sources and used for ESG expenditures. Match contribution may only be used for costs eligible for ESG activities. In addition to the Match Requirement Budget completed by Subrecipients at the application process, our department will require a letter on the agency's letterhead prior to the signing/release of contracts once Subrecipients are allocated funding the match letter must include the following:

- The letter must be written on the organization's letterhead;
- Clearly document a firm financial commitment to 100% match;
- Include the amount, source and expected time of match contribution;
- Signed by an authorized person, i.e. Director, Board Chairperson;
- Conditioned upon the approved City Council allocation;

### **Program Income**

Regulations 24 CFR 576.201(f) outline how program income may be used as match.

### **Cash Match**

(1) Subrecipients may use funds from any source, including any other Federal, state, local, and private sources, provided that the funds are not statutorily prohibited to be used as match. However, Recipients/ subrecipients are prohibited from using ESG Program funds as match.

(2) Subrecipients must demonstrate that any funds used as match are eligible to be used as match for the ESG Program. Each funding source has its own requirements governing whether it can be used to match Federal funding. The recipient/selectee is responsible for confirming that the source of match used is eligible as determined by the regulations and rules governing it.

### **In-kind (non-cash) Contributions**

For in-kind match, there must be a description of the in-kind match that clearly demonstrates that it will be used toward the allocated program.

(1) Subrecipients using in-kind contributions may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the subrecipients would have to pay for them with grant funds, the costs would be eligible.

(2) During the term of the grant, the Subrecipients must maintain and make available for inspection records documenting the value of real property, equipment, goods, or services.



## **C. Funds Disbursement**

### **1) Reimbursement, Reporting and Program Income**

The City of El Paso DCHD make payments on a reimbursement basis only. Subrecipients must submit monthly Reimbursement Request with all valid invoices or other supporting documentation. Budget line items reported and requested for reimbursement must be for the same line items in the contract budget, unless amended. Subrecipients are required to fully expend all program funds by the end of the program year. City of El Paso DCHD will review Subrecipient ESG spending on a monthly basis and may deallocate a portion of Subrecipient's ESG funds if Subrecipient cannot ensure that funds will be spent by the end of the expenditure period.

The Income directly generated by this Program, not including other grant funding or community fund-raising, is considered Program Income and subject to all the requirements of the Subrecipient Contract and Title 24 CFR Section 570.500 (a) and any other applicable Federal regulations. If the Subrecipient generates Program Income for a project only partially assisted by the City of El Paso DCHD, will be pro-rated to reflect the actual percentage of Program Income attributable and reported on the monthly reimbursement request then deducted from the reimbursable expenditures.

### **2) Budget Revisions and Budget Amendments**

The transfer of funds within ESG Activity Category, line items are permissible provided they are equal to or less than twenty percent (20%) of the total amount of the Subrecipient Contract. A Budget Revision Report is submitted with the submission of Reimbursement Request Report. If the transfer of funds is over the permissible 20% cap they are subject to pre-approval of the Director.

Transfer of funds between ESG Activity Categories, are a long process and only permitted through a contract amendment. Are subject to the pre-approval of the City of El Paso DCHD Director.

b. The transfer must not change the scope or objective of the Program funded under the Subrecipient Contract and;

c. Amendments to the Subrecipient Contract must be requested in writing and need to be accompanied by all the necessary supporting documentation.

d. Requests for Subrecipient contract amendments during the last 45 days of the contract period, are not permitted.

### **3) Reimbursement Payments**

In order for Subrecipients to be reimbursed by the City's the Office of the Comptroller department, they must set up as a Vendor for the City. Completion of the following is necessary: a Vendor Information form, a IRS W-9, a Conflict of Interest questionnaire and a Direct Deposit Sign-up form. Please contact the Purchasing & Strategic Sourcing Department for assistance or more information at (915) 212-1185.

## **X. Monitoring**

### **A. Process**

City of El Paso DCHD will monitor Subrecipient's program administration once a year or sooner if circumstances dictate a more frequent review is needed. Fiscal monitoring will be conducted annually based on a risk assessment unless an earlier review is warranted. Subrecipient will be notified two weeks in advance of the monitoring visit and informed of what documents and records will be reviewed and any required staff or Board interviews. After the monitoring visit, City of El Paso DCHD will provide Subrecipient with a written monitoring report inclusive of any findings, concerns or comments. Subrecipient must provide timely corrective action to findings and failure to do so may result in the withholding and/or return of ESG funds or other possible remedies as described in the contract with the City.

### **B. Subrecipient Monitoring of Subrecipient**

Subrecipients shall perform onsite monitoring of their subrecipients at least once during the program year. Subrecipient must maintain and provide access to subrecipient written monitoring procedures and reports as requested by City of El Paso DCHD. All subrecipients must comply with all program rules and regulations as noted in the Subrecipients Contract, Attachment 1: Program Scope.

### **C. Records Access**

Subrecipients and its subgrantees shall permit The City of El Paso, State of Texas, the federal government, and the duly authorized representatives of such entities access to, and the right to copy, all program client and fiscal records for such purposes as research, data collection, evaluations, monitoring, and auditing. At the sole discretion of City of El Paso, access to records shall include the removing of records from Subrecipient's office. Access to records is not limited to the required retention period, but last as long as the records are retained.

Subrecipient must provide citizens, public agencies, and other interested parties with reasonable access to records regarding any uses of ESG funds the Subrecipient received during the preceding five years.

(Remainder of page left blank intentionally)

## **XI. Acronyms and Definitions**

### **A. Acronym List**

Acronyms commonly used are:

CFR	Code of Federal Regulations
COC	Continuum of Care
DCHD	Department of Community and Human Development
HS	Department of Human Services
ESG	Emergency Solutions Grant
FMR	Fair Market Rent
HH	Household
HMIS	Homeless Management Information System
HPRP	Homelessness Prevention and Rapid Re-Housing Program
HQS	Housing Quality Standards
HUD	United States Department of Housing and Urban Development
IDIS	Integrated Disbursement and Information System
SRO	Single Room Occupancy
TTA/T &TA	Training and Technical Assistance
URA	Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970
VA	Veteran’s Administration

### **B. Definitions**

**Domestic Violence**: this definition includes domestic violence, dating violence, sexual assault, stalking, attempting to cause, or intentionally, knowingly or recklessly causing or placing another in fear of imminent serious physical injury or emotional, mental or verbal abuse, and using coercive or controlling behavior. This does not include other criminal acts such as violence perpetrated by a stranger, neighbor, acquaintance or friend, unless those persons are family members, intimate partners or household members.

**HMIS**: means Homeless Management Information System. El Paso CoC uses Clarity Human Services as their HMIS; however, for Domestic Violence Shelters use a comparable database (see “HMIS” section of this manual).

**Housing Counseling:** Independent, expert advice customized to the need of the consumer to address the consumers' housing barriers and achieve their housing goals and must include the following process: intake; financial and housing affordability analysis; an action plan, except for reverse mortgage counseling; and a reasonable effort to have follow-up communication with the client when possible. The content and process of housing counseling must meet the standards outlined in the regulations that govern HUD's Housing Counseling Program including but not limited to 24 CFR Part 5, 24 CFR Part 214, and HUD Handbook 7610.1REV 5. Homeownership counseling and rental counseling are types of Housing Counseling.

**Recipient:** the state entity receiving funds directly from HUD through an executed grant agreement for the Emergency Solutions Grant Program also referred to as the City of El Paso

**Shelter:** "Emergency shelter," means any facility whose purpose is to provide temporary shelter for the homeless including congregate shelters, hotels/motels paid for by charitable organizations, or federal, state and/or local government programs, which do not require occupants to sign leases or occupancy agreements.

**Subrecipient Agency:** Community Action Agencies or other qualified entities that receive funding from the Recipient, the City of El Paso, and provides direct client services. Subrecipient agencies may contract direct client services to subrecipients.

**Subrecipient(s):** Subrecipients are entities that, by contract with the Subrecipient agency, provide ESG direct client services and receive funding directly from the Subrecipient agency. In its agreements with Subrecipient agency, subrecipients will comply with all requirements for the Emergency Solutions Grant.

**Support Network:** examples include family, friends and faith-based or other social networks.

**Temporary Living:** residing in a facility for fewer than 90 days

**Unaccompanied Youth:** unaccompanied youth are less than 25 years of age and homeless under other Federal statutes **and:**

- (A) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- (B) Have experienced persistent instability as measured by two moves or more in the preceding 60 days; **and**
- (C) Can be expected to continue in such status for an extended period due to special needs or barriers.

## Appendix I: Applicable Rules and Regulations

All the following as may be amended from time to time:

1. 24 CFR 5 subpart F: [Occupancy Requirements for Section 8 Project-Based Assistance](#)
2. 24 CFR part 91: [Consolidated Submissions for Community Planning and Development Programs](#)
3. 24 CFR part 576: [Emergency Solutions Grant Program](#)
4. 24 CFR part 121: [Homeless Management Information System \(HMIS\)](#)
5. 24 CFR part 982: [Fair Market Rent and Rent Reasonableness](#)
6. HMIS Data Standards Manual: <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>
7. HMIS Policies and Procedures: <http://www.epchomeless.org/wp-content/uploads/2021/03/EPCH-HMIS-Policies-Procedures-FINAL-1.pdf>
8. Lead-Based Paint: <http://www2.epa.gov/leadand> 24 CFR part 35
9. Lead-Based Paint pamphlet: [http://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_11875.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_11875.pdf)
10. Annual Median Income: <https://www.hudexchange.info/resource/5079/esg-income-limits/>
11. [https://www.hudexchange.info/resource/3679/hud-income-limits/](https://www.hudexchange.info/resource/3679/hud-income-limits/HUD-Resource-Exchange/) HUD Resource Exchange: <https://www.hudexchange.info/esg/>
  - ESG program guidance
  - Federal regulations
  - Tools and technical assistance
  - Listserv opportunities
  - Frequently Asked Questions
12. FAQ Housing Counseling: <https://www.hudexchange.info/resource/5194/housing-counseling-new-certification-requirements-faqs/>
13. Personal Responsibility and Work Opportunity Reconciliation Act of 1996: <http://www.gpo.gov/fdsys/pkg/PLAW-104publ193/content-detail.html>
14. Housing Choice Voucher Guidebook: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/hudclips/guidebooks/7420.10G](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/guidebooks/7420.10G).
15. Limited English Proficiency federal interagency website can be found at: <http://www.lep.gov/> and guidance can be found at: <https://www.hud.gov/offices/fheo/promotingfh/FederalRegistepublishedguidance.pdf> and FAQs can be found at: [https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/promotin\\_gfh/lep-faq](https://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotin_gfh/lep-faq).
16. CFRs cited are amended from time to time and can be found at: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=%2Findex.tpl>
17. OMBs cited are amended from time to time and can be found at: [http://www.whitehouse.gov/omb/circulars\\_default](http://www.whitehouse.gov/omb/circulars_default)

Appendix II: 2020-2021 Community Performance Benchmarks

**Performance Committee**

**2020-2021 Community Performance Benchmarks**

<b>PROGRAMS</b>	<b>SO</b>	<b>ES</b>	<b>TH</b>	<b>PSH</b>	<b>RR H</b>
<b><u>Minimizing length of Homeless</u></b>					
Average Length of Homeless Episode (Days)	NA	60	180	>180	NA
<b><u>Length of time once eligible to be housed</u></b>					
Average Length of Time (days) from Start Date to Move-In Date	NA	NA	NA	30	30
<b><u>Households and Homeless Status</u></b>					
Exiting or Remaining Homelessness	2%	3%	4%	2%	2%
<b><u>Increase in Income</u></b>					
Increase in Earned Income	1%	5%	60%	10%	30%
Increase in Other Income	5%	5%	25%	50%	30%
Increase in Total Income	6%	10%	85%	60%	60%
<b><u>Exit Destinations</u></b>					
Permanent Housing Destination	40%	85%	85%	90%	NA
Positive Housing Outcome ES, TH	60%	NA	NA	NA	NA
<b><u>Street Outreach Only</u></b>					
30% of Engagements - an engagement results in a deliberate client assessment or beginning of a case plan.					
<b><u>Coordinated Entry</u></b> - 100% Acceptance Rate for all programs					
<b><u>HMIS Data Timeliness</u></b>					
Complete data within 4 days after client intake and exit	4 days	4 days	4 days	4 days	4 days

## Appendix III: ESG-CV Requirements and Guidelines

In response to the COVID-19 pandemic, ESG-CV programs are required to abide by the following requirements and guidelines. Please refer to Notice CPD-20-08 for complete guidance.

### Emergency Shelters

Shelters funded through ESG-CV must establish COVID-19 safety protocols in alignment with federal, state and local recommendations. Someone who presents at an ESG-funded shelter with respiratory symptoms (e.g., cough) should not be turned away solely because of their health symptoms. In coordination with the local health authority, shelters must establish isolation and quarantine protocols for clients in need of such services. Shelters funded by ESG-CV must establish referral pathways to other shelter or housing if the shelter is at maximum capacity. Shelters funded by ESG-CV are strongly discouraged from implementing a maximum length of stay when a discharge will result in program participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection. Any ESG-funded shelter that is considering closing or not accepting new residents must immediately notify the local CoC, public health authority, and emergency management officials.

### At-Risk of Homelessness

ESG-CV funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the 'homeless' definition in 24 CFR 576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the 'at risk of homelessness' definition, or who meet the criteria in the 'homeless' definition at 24 CFR 576.2 and have an annual income below 50 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR 576.105, the short- and medium term rental assistance requirements in 24 CFR 576.106, and the written standards and procedures established under 24 CFR 576.400.

### Short-Term and Medium-Term Rental Assistance

24 CFR 576.106(a)(2), where medium-rent is defined as "for more than 3 months but no more than 24 months of rent" is waived and an alternative requirement is established where medium term is established as for more than 3 months but no more than 12 months. Program cannot not provide more than 12 months of assistance.

### Rent Reasonableness and Fair Market Rate

24 CFR 576.106(d), where the requirements prohibit rental assistance where the rent for the unit exceed the Fair Market Rent established by HUD, as provided under 24 CFR Part 888, is waived so long as the rent complies with HUD's standards of rent reasonableness, as established under 24 CFR 982.507.

### Housing Stability Case Management and Provision of Supportive Services

24CFR 576.401(e)(1). HUD is waiving the requirement where housing stability case managers may not meet less than once per month with each program participant receiving homelessness prevention or rapid-rehousing assistance. Program are may provide Housing Stability Case Management as needed and appropriate to the client. However, program must not require case management participation, treatment or perform any other prerequisite activities as condition for receiving assistance.

**City of El Paso- Department of Community and Human Development**

801 Texas Ave., 3<sup>rd</sup> Floor  
El Paso, Texas 79901  
(915) 212-0138, FAX (915) 212-0089  
[www.ElPasotexas.gov](http://www.ElPasotexas.gov)



**HOME Investment Partnership Program (HOME)  
Resale / Recapture Guidelines**

**The City of El Paso Recapture Policy (24 CFR 92.254(a)(5)(ii)(A)(1-9))**

The City of El Paso First Time Homebuyers (FTHBs) that receive loans for direct down payment, closing cost, principal buy down assistance and/or a reduction of the sales price to below the market value to make the unit(s) affordable will meet the affordability period if they remain in the home for the full required period of affordability as determined by the amount of assistance received (five to 15 years). The actual required period of affordability will be based on the total amount of the direct HOME assistance provided as noted below. The effective date of the beginning of the required period of affordability is the date all completion data is entered into IDIS (See: 92.2 Definitions, "Project Completion") and as documented by a fully executed Closing Disclosure (CD), a copy of which has been placed in each individual homebuyer's and/or homeowner's file. Should there be instances where a CD is not executed (e.g. the first mortgage loan is carried by the City or another entity) substitute the name of the document(s) replacing the CD.

<u>HOME Program Assistance Amount</u>	<b>Minimum Required Affordability Period In Years</b>
\$1,000 - \$14,999.99	5 years
\$15,000 - \$40,000	10 years
Over \$40,000	15 years
New construction of rental (regardless of amount invested)	20 years

The federal assistance will be provided in the form of an amortized loan, deferred payment loan (DPL) and/or a forgivable deferred payment loan (FDPL) over a period up to 30 years. Loans are amortized at 3% interest. Non-interest bearing, second-lien deferred loans in the amount of the HOME subsidy will be made due upon sale, transfer, or lease. The assistance will be secured by a HOME Written Agreement, fully executed and dated by all applicable parties and a Deed of Trust, both of which will be recorded in the land records of El Paso County. Under "Recapture", if the home is sold prior to the end of the required affordability period (the homebuyer or the property owner may sell to any willing buyer at any price) a portion of the net sales proceeds from the sale, if any will be returned to the City to be used for other HOME-eligible activities. The recaptured funds will be treated by the City as program income and must be used for another HOME-eligible activity. The portion of the net sales proceeds that is returned to the City is equal to the amount of HOME funds invested in the property less the amount for each full year that the residence was occupied by the homebuyer or property owner as their principal residence. Any funds remaining after the distribution of the net sales proceeds to all lien holders, including the City, will be returned to the homebuyer or homeowner. In the event of a sale, short sale or foreclosure, the amount recaptured will be limited to the amount of "net sales proceeds" available at the time of such occurrence. Additional information pertaining to e Recapture Provisions is detailed in the written policies and procedures of

the City.

If there are insufficient funds remaining from the sale of the property and the City recaptures less than or none of the recapture amount due, the City must maintain data in each individual file that provides the amount of the sale and the distribution of the funds. This will document that:

1. There were no net sales proceeds; or
2. The amount of the net sales proceeds was insufficient to cover the full amount due; and that
3. No proceeds were distributed to the homebuyer/homeowner.

Other than the actual sale of the property, if the homebuyer (or homeowner) breaches the terms and conditions for any other reason, e.g. no longer occupies the property as their principal residence, the full amount of the subsidy (cannot be prorated) is immediately due and payable. The City must immediately repay its HOME Treasury Account, from non-federal funds, for the full amount of the assistance provided whether or not it can recoup any or all of the funds from the homebuyer (or homeowner).

Although the City of El Paso's primary method of enforcement is Recapture, we are also including, as recommended by HUD, the Resale Provisions as well. Should a situation occur where only Resale can be used, our documents will contain the required provisions, as follows:

**City of El Paso Resale Policy** (24 CFR 92.254(a)(5)(i))

The resale deed restriction (or covenant) will be utilized for HOME-assisted units which: 1) the homebuyer does not receive direct down payment, closing cost, principal buy down assistance, or a reduction of the sales price to make the unit(s) affordable from the City or other entity; or 2) the City has elected to use the Resale Provisions instead of the Recapture Provisions.

The Resale Provision ensures that a HOME-assisted property remains affordable during the entire affordability period. The affordability period is based on the amount of HOME funds invested as a development subsidy that is either left in the deal at closing or is repaid to the City, or to the CHDO, Sub-recipient, State and/or State Recipient, as applicable, by the first mortgage lender at closing, or the City as elected to use the Resale rather than Recapture to assure the unit is affordable to a household at or below 80% AMI for the El Paso metropolitan statistical area. The effective date of the beginning of the required period of affordability is the date all completion data is entered into IDIS. (See: 92.2, Definitions, "Project Completion") and as documented by the fully executed CD, a copy of which has been placed in each homebuyer's or homeowner's file (project owner's file, if a rental). If there are instances where a CD is not executed (e.g. the first mortgage loan is being carried by the City or another entity) substitute the name of the document(s) replacing the CD. The homebuyer or homeowner may sell the property after the

expiration of the required affordability period without any restrictions.

The Resale provision goes into effect when the home is sold during the affordability period. At the time of sale, the following provisions will be in effect:

1. In instances where the home has been rented or leased, refinanced or the Initial homebuyer (or homeowner) is no longer physically occupying the Property as their principal residence, the entire amount of the HOME Assistance provided shall be immediately due and payable to the City.

2. If the property does not meet the affordability requirements for the compliance period, the entire amount of the HOME investment must be repaid to the City's HOME Treasury Account. 24 CFR 92.504(c)(1)(ii); and HOME Fires – Vol. 5 No. 2, June 2003; Section 219(b) of the HOME statute; and 92.503(b)(1)

Resale requires the initial homebuyer or homeowner, if applicable, (and/or subsequent homebuyers if home was previously sold during the required period of affordability), to sell the home to a low-income family at an affordable price as defined below:

A. A low-income family is defined as a family whose total income from all sources at the time of purchase from the initial (or subsequent) homebuyer (or homeowner) does not exceed 80% of the area median income, adjusted for household size as defined by HUD, under the Part V income definition that is applicable for each program activity at the time of closing.

\*The contract for sale of the home must include a provision requiring the family acquiring the Home to be income-eligible as qualified by the City prior to acquiring the property.

B. The initial homebuyer or homeowner, if applicable, (sellers) or a subsequent Homebuyer or homeowner, if applicable, must list the property at or below the City's determined affordable sales price.

**Fair Return and Appreciated Value** (24 CFR 92.254(a)(5)(i)):

1. The determination of Fair Return shall be the sum of:
  - a. Down payment and closing costs paid from the initial homebuyer's cash at purchase;
  - b. Seller's (initial homebuyer's) closing costs at sale
  - c. Principal payments only made by the initial homebuyer(s) in excess of the amount required by the mortgage.
  - d. Documented capital improvements in excess of \$500.
2. Fair Return is paid to the initial homebuyer(s) at sale once the first mortgage debt is paid and all other conditions to the initial written agreement are met.
3. In the event there are no funds for Fair Return, then Fair Return does not exist.
4. In the event there are partial funds for Fair Return, then Fair Return shall remain in

force to the extent funds are available.

Appreciated Value is:

- a. The Affordable Sales Price
- b. Less the First Mortgage Debt
- c. Less Fair Return
- d. Equals Appreciated Value

1. If Appreciated Value is zero or less than zero, than no Appreciated Value exists.

2. Appreciated Value is shared with the initial homebuyer(s) based on the City of El Paso's initial investment of HOME funds as follows:

- a. The initial homebuyer's out of pocket investment of down payment and closing costs divided by the City's HOME investment equal the percentage of Appreciated Value that shall be paid to the initial homebuyer or homeowner;
- b. The balance of Appreciated Value remaining shall be paid to the City.

All of the above requirements will be included and described in the subordinate Deed of Trust filed in the El Paso County Recorder's Office by the City, housing developer, subrecipient, state recipient, contractor or consortium, as applicable.

The City reserves the right to end the affordability period upon the occurrence of, but not limited to, any of the following events: foreclosure, transfer in lieu of foreclosure or assignment of an FHA incurred mortgage to the U. S. Department of Housing and Urban Development (HUD).

The original housing developer, CHDO, sub-recipient, contractor, state recipient, consortium or the City may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure to preserve affordability. If any of the aforementioned actions are taken, subsequent sale to a HOME income-eligible low-income homebuyer is required. All of the City's original HOME terms and conditions must be reinstated, in writing and the remaining term of the required period of affordability remains in effect. A new Written Agreement, Promissory Note and Deed of Trust must be executed by all applicable parties and recorded in the last records of El Paso County. A copy of all documents, including evidence that they have been properly recorded must be maintained in the file.

However, if the City provides additional HOME assistance to the new homebuyer (e.g., a direct subsidy (as defined above) the City must reinstate the remaining term of the initial required period of affordability AND add to that term, the new required period of affordability based on the amount of the direct subsidy provided to the new homebuyer. The additional HOME investment must be treated as an amendment to the original project. Consequently, the additional HOME investment may result in an extension of the

original period of affordability.

Example:

- a) Initial Resale required period of affordability = 10 years
- b) Property sold in year two (2)
- c) Based on the amount of direct assistance provided to the new homebuyer(s) the required period of affordability is five (5) years
- d) New required period of affordability = 13 years (8 years remaining on initial resale required affordability period plus 5 years for new period of affordability)
- e) This project now becomes subject to the 'RECAPTURE' provisions and the City would list the Recapture terms as noted above under the "Recapture Policy" in its Written Agreement with the new homebuyer or homeowner, as applicable.