

# Clark County, NV

FY 2024-2025

## Annual Action Plan



Opportunity Village – Betty's Village

**U.S. Department of Housing and Urban Development**

**Community Development Block Grant**

**Emergency Solutions Grant**

**HOME Investment Partnerships**

**Clark County, North Las Vegas, Boulder City, and Mesquite**

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## Executive Summary

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

#### 1. Introduction

The Annual Action Plan meets the United States Department of Housing and Urban Development (HUD) requirements for consolidating the application for several grant programs into one submission. As a designated entitlement jurisdiction, Clark County receives an annual allocation of federal funding intended to accomplish three main goals: Secure decent housing, provide a suitable living environment, and expand economic opportunities for low- and moderate-income persons. The Action Plan serves as the means to meet the application and submission requirements for three entitlement formula programs: Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG).

This 2024 Annual Action Plan addresses the activities of both the Clark County CDBG Urban County Program, which consists of Clark County, the City of Boulder City, and the City of Mesquite, and the Clark County HOME Consortium, which consists of Clark County and the City of North Las Vegas. In addition to these formal HUD consortia efforts, all jurisdictions within Clark County coordinate efforts through the Southern Nevada Consortium, through which the county, cities, and other stakeholders meet, communicate, share plans and projects, and sometimes pool funding.

In FY 2018, the City of North Las Vegas transitioned from being part of the Urban County Program to become an independent entitlement jurisdiction for CDBG and ESG funds. The city will remain part of the HOME Consortium with Clark County and will continue to coordinate on the Annual Action Plan, CDBG, and ESG as part of the Southern Nevada HUD Consortium.

#### 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.

Clark County, Boulder City, and Mesquite comprise the CDBG Urban County Program. Clark County is also the lead of the HOME Consortium which consists of Clark County and the City of North Las Vegas. These consortiums are referred to as the HUD Consolidated Plan (HCP) Consortium.

Clark County identified four priority areas to meet the greatest needs of residents. Priorities are based on responses to the approved 2020-2024 Consolidate Plan (Con Plan). Based on the Con Plan, the HCP Consortium will focus on the following goals for Fiscal Year 2024-2025:

- Provide Decent and Affordable Housing - New Construction of Multi Family and Single-Family Housing, Acquisition/Rehab/Resale or Rental of Single-Family Housing, Tenant Based Rental Assistance, Rehabilitation of Rental and Owner Housing, and Homebuyer Assistance.
- Prevent and End Homelessness
- Provide Community and Supportive Services
- Provide Community Facilities and Infrastructure

The HCP Consortium is working to end homelessness, reduce poverty, and ensure the availability of safe, high quality affordable housing.

The 2024 HUD Annual Action Plan Resources and Projects document in the Appendices identifies the organizations, projects/programs, funding source, and funding amount allocated for FY2024-2025 to meet the objectives and outcomes identified above.

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

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

In FY 2023-2024, the Clark County FY2020-2024 CDBG Capital Improvement Plan entered its fourth year with a few projects coming to completion and others advancing. Capital Improvement Projects that saw completion or progress in FY2023-2024 include the following:

- Nevada Partnership for Homeless Youth is in the final stages of completion for their Outreach, Volunteer & Operations (OVO) Center. This involved the partial demolition/renovation and new construction to double the size of an existing 2,200 Sq. Ft. facility to a 4,400 Sq. Ft. facility dedicated to strengthening NPHY's critical direct client services for homeless youth aged 12-21. The new facility will be known as the NPHY OVO Center. This is a "drop-in center"; they also operate 7 housing properties and 2 emergency shelters.
- Family Promise of Las Vegas is nearing the start of construction for the LV Family Navigation Center. New construction of an approximately 12,000 sq. ft. center including five (originally 10) transitional apartments along with program and administrative offices which will provide services to economically disadvantaged families with children of the (LMI) level. This will serve as a hub for families to access resources and emergency housing assistance. It will be FPLV's permanent operational home. Staff offices and dedicated spaces for onsite housing and program use will become a transformational model for serving the community.
- A few other projects have gained traction as far as the progression of their projects is concerned. Most, if not all, anticipating the start of construction within 2024. Projects such as Bridge

Counseling Associates, Inc. – Adult Transitional Housing and Youth Residential Treatment, Lutheran Social Services of Nevada (LSSN) – JOURNEY Senior Services Center, Nevada Health Centers – Expansion of MLK Health Center and the Parkdale Park and Pool Renovation.

During the fiscal year of 2023 – 2024 the city of North Las Vegas moved on with development of several projects. Donna Louise Phase 2, a new 48-unit affordable multifamily rental development, received a funding award in the amount of \$700,000. The PuraVida Senior Apartments was awarded \$300k in HOME funds. A combination of North Las Vegas HOME funds, Clark County Community Housing Funds will be used to develop 74 units of affordable senior housing. The Brinshore Multiuse project will be awarded \$500K in HOME funds to develop 76 units of affordable multifamily housing. Additionally, three eligible North Las Vegas families were assisted under the city's Single-Family Owner-Occupied Rehabilitation program for the rehabilitation of their homes.

The City of North Las Vegas is currently looking to support additional new affordable housing developments with \$2,500,000 in HOME mixed funds. As well as, \$2,000,000 in HOME mixed funds for an Acquisition, Rehabilitation, Rental program to be managed by a non-profit partner. Both funding sets are in application selection processes at the time of submission. Finally, we will make significant changes to the Homebuyer Assistance Program to expand the reach and benefits of the program to more eligible families in North Las Vegas. The City of North Las Vegas plans to set aside an amount not to exceed \$500,000 in off cycle projects and these funds are subject to the administrative requirements set forth in the Clark County Action Plan. All projects will be funded with a mixture of HOME federal, HOME state, and program income funding.

Within the Clark County HOME Consortium has worked with developers to increase the supply of affordable rental and owner-occupied housing in Clark County.

In Program Year 2023, Clark County HOME/AAHTF funds were used to support the completion of the 156-unit Lake Mead West project and the 60-unit Eastern Land/Golden Rule project. For affordable housing developments, there is a lag time between the allocation of funds and the construction and completion of units, so occupancy typically is not realized in the same year that funding is allocated. Meanwhile, the Clark County HOME Consortium also receives State HOME and Account Affordable Housing Trust Fund (AAHTF), which result in the production of many affordable housing units that are not counted in the numbers above as they are not Federal HOME funded projects.

In 2023, Clark County awarded \$12 million in Private Activity Bonds to CLSN/Ovation Development for the development of Torrey Pines Senior Apartments that will provide 190 new units targeting low-income seniors, and \$44,090,486.14 in Private Activity Bonds to the State of Nevada Housing Division for multifamily housing development and their single-family homebuyer program in Clark County. Clark County also awarded the Nevada Rural Housing Authority with \$5 million for their single-family homebuyer program, which focuses on providing assistance to low-income families in the rural areas of southern Nevada to purchase a home.

Clark County expended HOME/AAHTF funds on several new construction developments in 2023: Pebble and Eastern, 1501 LLC, and Buffalo Cactus. State HOME funds supported the development of Pebble and Eastern and A Place to Call Home. During the 2023 Program Year, 216 units of affordable multi-family housing were completed all of which were newly constructed units for families.

In 2022, Clark County created the Welcome Home Community Housing Fund (CHF) which allocated approximately \$104,000,000 in County funds for affordable housing. The initial outlay from this new program is expected to assist with the funding of approximately 30 affordable housing projects in Southern Nevada with an estimated 2,500 affordable housing units. All projects are in various stages of funding or are under construction. In 2023, additional funds were added to the CHF fund and Clark County opened a second funding round to allocate approximately \$60,000,00 in County funds to support the development of more affordable housing units; the funds for this round have not yet been awarded. The County is also using CHF funds to support a Community Land Trust, income restricted homeownership project that is in the development phase, as well as a \$20,000,000 funding round to support the production of permanent supportive housing units.

Emergency Solutions Grant (ESG) funds were used to provide an array of services to a total of 2,317 persons experiencing homelessness and those at risk of homelessness.

ESG-CV CARES Act funds were used to provide additional services to a total of 4,041 persons experiencing homelessness and those at risk of homelessness due to the COVID-19 pandemic. Rapid Rehousing ensured that 999 persons who lost their homes were quickly able to obtain permanent housing, 1,462 individuals were provided Emergency Shelter, and 1,580 individuals/families received Street Outreach.

CDBG-CV CARES Act funds were used to provide 431 individuals/families with emergency assistance, that included services in support of a rapid rehousing surge and health/hygiene services as well as limited rental assistance in response to COVID-19 to regain stability in permanent housing.

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

Summary from citizen participation section of plan.

The 2024 Annual Action Plan included many opportunities for citizen input and comment. In addition to announcements in the local newspapers concerning the availability of federal housing and community development funds, Clark County held public hearings regarding the allocation of federal funds.

Further, for Clark County, a permanent Citizen's Advisory Development Committee (CDAC) was involved in the review of HOME and ESG applications; CDAC received presentations and materials from each applicant and made selections for funding. Their recommendations strongly guided the County's funding decisions.

- Presentations on HOME/AAHTF: January 16, 2024

- Presentations on ESG to Ad Hoc Committee including CDAC and CoC Evaluation Working Group: 2/12 - 2/15/2024
- Presentations on HOME-ARP: February 6, 2024
- Funding recommendations meeting for HOME/AAHTF, HOME-ARP, and ESG: February 20, 2024

Citizens may provide their input at public hearings and during the public comment period. The County provides notice to the public regarding the hearings and comment periods through publication in the local newspaper, the Las Vegas Review Journal and El Tiempo. In addition, public hearings are also posted on the County's main website:

[https://www.clarkcountynv.gov/government/board\\_of\\_county\\_commissioners/county\\_meeting\\_agendas.php](https://www.clarkcountynv.gov/government/board_of_county_commissioners/county_meeting_agendas.php)

The following is a list of the public hearing and notices of comment periods that provided citizens the opportunity to have input on the 2024-2025 Action Plan:

- Recommendations made available for public review: March 19, 2024
- Notice comment periods: March 20, 2024, through April 19, 2024
- Public hearing: Tuesday, April 16, 2024

All notices were published in the Las Vegas Review Journal and in El Tiempo. The Action Plan was also made available for review on the Clark County's Community Resources Management website at [https://www.clarkcountynv.gov/residents/assistance\\_programs/community\\_resources\\_management/feeder\\_reports.php](https://www.clarkcountynv.gov/residents/assistance_programs/community_resources_management/feeder_reports.php)

## **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.

No comments received.

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

Clark County accepts all comments or views.

## **7. Summary**

This Action Plan for FY 2024-2025 includes projects with objectives and outcomes that address priority needs and help meet goals identified in the five-year Con Plan. In addition, the Plan includes the HOME, ESG, and CDBG funds that the County will receive in FY 2024-2025. This is the County's fifth year of the FY 2020-2024 Five-Year Consolidated Plan.

A “draft” of the FY 2024-2025 Annual Action Plan was placed on display on the County’s website at [https://www.clarkcountynv.gov/residents/assistance\\_programs/community\\_resources\\_management/federal\\_reports.php](https://www.clarkcountynv.gov/residents/assistance_programs/community_resources_management/federal_reports.php) The display period started on March 20, 2024, through April 19, 2024, for a 30-day public comment period.

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	CLARK COUNTY	
CDBG Administrator	CLARK COUNTY	Social Service/Community Resources Management
HOME Administrator	CLARK COUNTY	Social Service/Community Resources Management
ESG Administrator	CLARK COUNTY	Social Service/Community Resources Management

**Table 1 – Responsible Agencies**

**Narrative**

Clark County Social Service, Community Resources Management is responsible for the preparation of the Consolidated Plan, Annual Action Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER). The HUD Consolidated Plan meets the United States Department of Housing and Urban Development (HUD) requirements for consolidating the application for several grant programs into one submission. The programs include Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG). Clark County is the lead in the HOME Consortium, which consists of Clark County and the City of North Las Vegas. Clark County is also the lead in the CDBG Urban County Consortium, which includes Clark County, cities of Boulder City and Mesquite.

The planning period for this HCP Consortium Annual Action Plan is FY2024-2025 (July 1, 2024-June 30, 2025).

**Consolidated Plan Public Contact Information**

Questions concerning the FY2024-2025 Annual Action Plan should be directed to Natalie Cacho, Senior Grants Coordinator at:

Community Resources Management  
Clark County Social Service  
1600 Pinto Lane  
Las Vegas, NV 89106  
Mail to: [Natalie.Cacho@ClarkCountyNV.GOV](mailto:Natalie.Cacho@ClarkCountyNV.GOV)  
Phone: 702-308-0006

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

### **1. Introduction**

Clark County consults with multiple organizations and community representatives for preparation of the Action Plan for use of HUD grant funds. Per the Citizen Participation Plan, the County holds one public hearing during the 30-day public comment period to obtain citizen's views and to respond to comments and questions. The Public Hearing is held in conjunction with Clark County Board of Commissioner meetings.

The HCP Consortium Annual Action Plan is developed through a cooperative effort among all jurisdictions affected by the plan. There are currently two housing and community development consortia in Clark County: 1) the Urban County CDBG Consortium, consisting of Clark County and the Cities of Boulder City and Mesquite; and 2) the Clark County HOME Consortium, consisting of Clark County and the City of North Las Vegas. Each subrecipient is consulted by Clark County while researching and writing the plan. The City of Las Vegas and the City of Henderson are separate CDBG and HOME entitlement recipients and submit their own Consolidated Plans. However, Clark County and the other CDBG Urban County and HOME Consortium members continue to coordinate with these two entitlement jurisdictions.

All six jurisdictions (Clark County, City of Las Vegas, City of North Las Vegas, City of Henderson, City of Mesquite, and City of Boulder City) are members of the Southern Nevada HUD Consortium, which holds bi-monthly meetings to discuss issues, including the Consolidated Plan and community trends. The Consortium members share progress and elements of each of their Annual Action Plans. In addition to these jurisdictions, the Nevada Housing Division, the Southern Nevada Regional Housing Authority, and the Southern Nevada Homelessness Continuum of Care participate in the Southern Nevada HUD Consortium meetings.

Clark County makes the HCP Consortium Consolidated Plan available to all jurisdictions for their review and comment. The plans are consistent and outline similar goals for the five-year period.

**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(l)).**

Regional level coordination takes place through several avenues, including the Southern Nevada Regional Planning Coalition (SNRPC), and its various committees, Southern Nevada Strong, the Southern Nevada Homelessness Continuum of Care (SNHCoC), and the Southern Nevada HUD Consortium Meetings. These organizations bring together all local governmental jurisdictions, along with the Regional Transportation Commission, the Clark County School District, the Metropolitan Police Department, Southern Nevada Adult Mental Health Services, and the Southern Nevada Regional Housing Authority, among others.

Local jurisdictions also work together with appropriate agencies on grant applications for non-entitlement funding, including Choice Neighborhoods, RAD, and other opportunities that become available each year.

Clark County brings the community together for quarterly Southern Nevada HUD Consortium Meetings to coordinate on regional issues related to HOME, CDBG, ESG/CoC, and cross-cutting federal regulations. The discussions relate to joint projects, coordination of grant applications, and emerging issues. A representative from the SNHCoC attends to enhance coordination. Representatives from the Nevada Housing Division and the Southern Nevada Regional Housing Authority attend on a regular basis. The broad-based participation in the Consortium meetings allows for an assessment of the regional impact of housing, homelessness, and community development policies and projects. The group occasionally invites special guests, such as elected officials' staff members, to communicate and collaborate across governmental levels.

- A variety of other groups provide opportunities for the various jurisdictions' governments to coordinate with outside entities in the promotion, production, and planning of affordable housing and homeless assistance. These groups include: State of Nevada Department of Business and Industry Special Advisory Committee on Private Activity Bonds: a committee that includes executives from the State Department of Business and Industry and the Executive Directors from the Nevada Association of Counties (NACo) and the Nevada League of Cities (NLC).
- Southern Nevada Area Population Projection and Estimation Committee (SNAPPE): a volunteer group that meets monthly to discuss population projections, discuss demographic trends, and hear from local experts on related topics. Southwest Gas, NV Energy, Las Vegas Valley Water District, and representatives from each jurisdiction's comprehensive planning departments participate in this group, including a representative of the Southern Nevada Consortium.

As part of the CDBG, HOME, and ESG application planning process, local agencies/organizations are invited to submit proposals for CDBG, HOME, and ESG funds for eligible activities. These groups participate in the planning process by attending the Community Development Advisory Committee meetings, public hearings, and submission of funding applications.

**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.**

Southern Nevada was ahead nationally in creating a local regional collaboration on homeless issues, while respecting the individual jurisdictions. The initial regional framework designed by the Southern Nevada Regional Planning Coalition (SNRPC) in 2003 took an updated structure that incorporated the rules and regulations enacted in the HEARTH Act and the Continuum of Care (CoC) Program in 2009. The SNRPC Committee on Homelessness and CoC were merged into one cohesive structure in 2014, known as the Southern Nevada Homelessness Continuum of Care (SNHCoC), governed by its Board (SNHCoC Board). The SNHCoC updated its governance charter in 2024, restructuring its membership, board, and associated committees.

Clark County Social Service provides support for the activities of the SNHCoC. The SNHCoC Board identifies homeless issues and gaps in services, coordinates the allocation of funds, and develops and evaluates HELP HOPE HOME, Southern Nevada's Regional Plan to End Homelessness (Regional Plan). An Executive Committee focuses on routine administrative business matters. Activities of the SNHCoC Board include strategic planning, annual homeless census/point-in-time count, regional coordination, shelter planning, the Community Management Information System/Homeless Management Information System (CMIS/HMIS), system evaluation, HEARTH Act implementation, and other activities. Members include Clark Deputy County Manager Clark County, Director of Neighborhood Services for the City of Las Vegas, Assistant City Manager North Las Vegas, Director of Community Development & Services City of Henderson, Youth Action Board, Lived X Consultants, Physician Professor Touro University Nevada, Senior Regional Planner for Regional Transportation Commission of Southern Nevada, Executive Director ImpactNV, Director of Education & Outreach Nevada Housing Coalition, Vice President of Social Services of Catholic Charities of Southern Nevada, Manager of Housing & Justice Systems of Silver Summit HealthPlan, CRRC Program Coordinator for U.S. Department of Veteran Affairs, Assistant Director of Southern Nevada CHIPs. The SNHCoC empowers working groups to address mandates and/or topics of critical importance. Members of working groups represent a cross-section of community stakeholders determined to end homelessness, including well-versed, experienced representatives from public and private agencies, who bring a wealth of experience in public policy/administration, homeless services, domestic violence, and sub-populations of homeless.

The SNHCoC Program Committee oversees the planning, operations, and activities of the CoC annual application and reporting. They develop updates and ensure compliance with the Regional Plan through monitoring of performance measures and outcomes; review/recommend CoC projects; submit of the CoC consolidated application; implement the HEARTH Act; and perform any other activities under the CoC. Clark County and the cities are active participants in the SNHCoC . All meetings are open to the public and posted on the SNHCoC website; providers and interested parties are encouraged to volunteer for appropriate sub working groups representing specific populations. The Program committee in partnership with the HMIS Steering Committee ensures the annual point-in-time count is conducted per HUD guidelines and results are analyzed and reported to the appropriate entities.

The Southern Nevada Housing and Homeless Plan includes all the jurisdictions in Southern Nevada and outlines goals and strategies to guide local governments in funding, developing, and supporting homeless services. This plan is incorporated by reference in all jurisdictions' Consolidated Plans.

Clark County Community Resources Management (CRM) currently serves on the Moving-On Sub working Group of the Coordinated Entry Services Working Group. Moving On identifies clients that are ready to “move-on” from supportive housing programs to retain housing stability on their own with skills and resources necessary for permanency. They no longer must rely on case management assistance. The Moving-On Sub working Group is developing tools to assess readiness and creating a referral system for units for this population.

**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**

All ESG recipients in the CoC's geographic area have representation on the SNHCoC. ESG is a standing item on monthly meeting agendas, and ESG grantees provide information on allocation of ESG funds, work with the SNHCoC to develop performance standards and report on subrecipient monitoring. The SNHCoC also reviews the ESG Written Standards and provides the funding priorities to the ESG allocations committees, which are then approved by the respective governance. All ESG subrecipients are required to participate in the CMIS/HMIS and the data gathered is shared with monitoring entities. ESG grantees work with the SNHCoC to ensure collaboration, non-duplication of services, and maximum use of resources. Clark County collaborates with a subcontractor that monitors projects assisted by ESG and CoC funds.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

1	<b>Agency/Group /Organization</b>	Southern Nevada Regional Housing Authority
	<b>Agency/Group/Organiz ation Type</b>	Housing PHA Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The HCP Consortium discussed the future of the housing authority for the development of affordable housing and the maintenance of its existing housing stock with the SNRHA Executive Director and staff. The HCP Consortium also used the information gathered by Southern Nevada Strong in its focus groups with public housing residents and Housing Choice Voucher holders to inform this plan. The HCP Consortium will continue to work with SNRHA on PBV and HCV priorities for homeless households and individuals. SNRHA is a regular participant in the Continuum of Care along with the HCP Consortium.
2	<b>Agency/Group/ Organization</b>	Clark County Social Service

<p><b>Agency/Group/ Organization Type</b></p>	<p>Housing                  Services-Housing                  Services-Children                  Services-Elderly Persons                  Services-Persons with Disabilities                  Services-Persons with HIV/AIDS                  Services-Homeless                  Services-Health                  Other government - County                  Regional organization</p>
<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment                  Homelessness Strategy                  Homeless Needs - Chronically homeless                  Homeless Needs - Families with children                  Homelessness Needs - Veterans                  Homelessness Needs - Unaccompanied youth                  Non-Homeless Special Needs                  Anti-poverty Strategy</p>
<p><b>How was the Agency/Group /Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Clark County Social Service was consulted regarding the needs and issues facing low-income households, particularly those with special needs and who are experiencing homelessness. CCSS provides staff for the Southern Nevada Homelessness Continuum of Care and the SNH CoC Board and Working Groups. CCSS is seeking solutions to moving individuals experiencing homelessness through the Continuum of Care to self-sufficiency and was consulted about the role of affordable housing in these efforts. CCSS was also consulted regarding the needs and issues facing persons with HIV/AIDS and their families, using the Ryan White Comprehensive Needs Assessment 2018 to identify needs.</p>



3	<b>Agency/Group/ Organization</b>	Silver State Fair Housing Council
	<b>Agency/Group/ Organization Type</b>	Service-Fair Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group /Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Silver State Fair Housing provides Fair Housing services to Southern Nevada and receives funding through Clark County. The number of complaints is tracked, and their input was essential in the Regional Analysis of Impediments which is a part of the Consolidated Plan. The HCP Consortium will continue to work with Silver State Fair Housing Council to ensure fair housing issues are addressed in Southern Nevada.
4	<b>Agency/Group /Organization</b>	United Way of Southern Nevada

<p><b>Agency/Group /Organization Type</b></p>	<p>Services-Housing                  Services-Children                  Services-Elderly Persons                  Services-Persons with Disabilities                  Services-Persons with HIV/AIDS                  Services-Victims of Domestic Violence                  Services-Homeless                  Services-Health                  Services-Education                  Services-Employment                  Services-Victims                  Regional organization                  Business and Civic Leaders</p>
<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment                  Homelessness Strategy                  Homeless Needs - Chronically homeless                  Homeless Needs - Families with children                  Homelessness Needs - Veterans                  Non-Homeless Special Needs                  Economic Development                  Market Analysis                  Anti-poverty Strategy</p>

	<p><b>How was the Agency/Group /Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>CCSS staff participate on the United Way's Emergency Food and Shelter Program (EFSP) Board, which allocates food and shelter funds to homeless and non-homeless services agencies. Discussions at those meetings provide important input into the identification of gaps in the service system and priority needs in the community. The United Way also provides Community Connect, an online platform to assist with using community demographics and statistics on education, financial stability, health, and well-being for the purposes of planning and project development.</p>
<p>5</p>	<p><b>Agency/Group /Organization</b></p>	<p>Southern Nevada Regional Planning Coalition (SNRPC) Committee on Homelessness (COH)</p>

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<p><b>Agency/Group /Organization Type</b></p>	<p>Housing                  PHA                  Services-Housing                  Services-Children                  Services-Elderly Persons                  Services-Persons with Disabilities                  Services-Persons with HIV/AIDS                  Services-Victims of Domestic Violence                  Services-Homeless                  Services-Health                  Services-Education                  Services-Employment                  Service-Fair Housing                  Services-Victims                  Other government - Local                  Regional organization                  Planning organization                  Business and Civic Leaders                  School District, VA, LVMPD</p>
<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Needs Assessment                  Homelessness Strategy                  Homeless Needs - Chronically homeless                  Homeless Needs - Families with children                  Homelessness Needs - Veterans                  Homelessness Needs - Unaccompanied youth                  Market Analysis                  Anti-poverty Strategy</p>

	<p>The Southern Nevada Regional Planning Coalition's (SNRPC) mission is to bring together all public jurisdictions to coordinate regional planning in a seamless fashion while respecting each member's autonomy. This requires promoting intergovernmental cooperation and trust built on careful planning and accountability, thus enhancing the quality of life in Southern Nevada.</p>
6	<p>Southern Nevada Health District</p>
<p><b>Agency/Group /Organization Type</b></p>	<p>Health Agency Other government - County Regional organization</p>
<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment Lead-based Paint Strategy</p>
<p><b>How was the Agency/Group /Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The SNHD posted resources regarding lead exposure in Southern Nevada on its web site at: <a href="https://www.southernnevadahealthdistrict.org/search_gcse/?q=lead+paint#gsc.tab=0&amp;gsc.q=lead%20paint%20article&amp;gsc.sort=A">https://www.southernnevadahealthdistrict.org/search_gcse/?q=lead+paint#gsc.tab=0&amp;gsc.q=lead%20paint%20article&amp;gsc.sort=A</a> study suggested that lead paint exposure appears to be an insignificant issue for unincorporated Clark County, where housing stock is newer. The age of the home is a probable indicator of lead-based paint hazards. Due to the age of the housing stock in much of unincorporated Clark County, lead-based paint is not the primary source of lead exposure. Potential sources are household items, such as cooking pots and vinyl blinds, as well as imported candies, plastic toys, and metal jewelry. Should Clark County choose to undertake projects that require lead-paint, the County will take the appropriate measures.</p>

7	<b>Agency/Group /Organization</b>	Nevada Housing Division
	<b>Agency/Group /Organization Type</b>	Housing Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group /Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The State of Nevada Department of Business and Industry Housing Division (NHD) administers the Single-Family, Mobile Home and Multi-Family Mortgage Programs, the State Low-Income Housing Tax Credit (LIHTC) Program, and the State Affordable Housing Trust Fund (AHTF). NHD also distributes the State allocation of HOME funds and monitors its use. NHD also manages the sale of Private Activity Bonds for each jurisdiction. These bonds and tax credits have been responsible for the development of thousands of units of affordable housing in Southern Nevada. The HCP Consortium works with NHD to identify areas of greatest need and rely on the division for updated housing data, particularly through their apartment surveys.
8	<b>Agency/Group /Organization</b>	Southern Nevada Homelessness Continuum of Care
	<b>Agency/Group /Organization Type</b>	Housing Services-Homeless Regional organization Planning organization Business and Civic Leaders

<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Needs Assessment                      Homelessness Strategy                      Homeless Needs - Chronically homeless                      Homeless Needs - Families with children                      Homelessness Needs - Veterans                      Homelessness Needs - Unaccompanied youth                      Market Analysis                      Anti-poverty Strategy</p>
<p><b>How was the Agency/Group /Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The Southern Nevada Homelessness Continuum of Care (SNH CoC) Board is the official board acting on behalf of the Continuum of Care to take care of all related business requiring direction and/or formal actions and furthering the mission to end homelessness in Southern Nevada. They empower the CoC Evaluation Working Group (EWG), which consists of experienced representatives from public and private agencies, who bring a wealth of experience in public policy/administration, homeless services, domestic violence, and other sub-populations of homelessness. The CoC EWG oversees the planning, operations, and activities of the CoC. Together with the MWG (Monitoring Working Group), they develop the updates to, and ensure compliance with, the regional 10-year strategic plan to end homelessness through: monitoring of performance measures and outcomes, conducting the services and housing gaps analysis, planning for the PIT, reviewing / recommending potential CoC projects, submission of the CoC application, HEARTH implementation, and any other activities under the CoC.</p>

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Southern Nevada Homelessness Continuum of Care	The goals of the Continuum of Care to address homelessness and the prevention of homelessness are adopted in full by the HCP Consortium. LINK: <a href="https://helphopehome.org/">https://helphopehome.org/</a>
Southern Nevada Strong Regional Plan	Southern Nevada Strong	The Southern Nevada Strong Regional Plan was created as a vision to successfully manage growth and plan for the future of Southern Nevada. The Plan is a blueprint that identifies strategies and priorities to create sustainable communities that promote a higher quality of life for all Southern Nevada residents. The plan was developed with extensive input from the public and adopted by Southern Nevada’s local governments in 2015. <a href="https://www.southernnevadastrong.org/plan/">https://www.southernnevadastrong.org/plan/</a>
CC Maryland Parkway Transit Oriented Development	Clark County	The overarching goal for the Maryland Parkway corridor is to spur transit-oriented development (TOD) in the Las Vegas Valley after years of study. The TOD Plan will evaluate the development around station areas along the corridor, designed for bus rapid transit (BRT), but flexible enough to evolve to any other mode of high-capacity transit. The RTC, along with the City of Las Vegas and Clark County, will conduct the plan to help deliver equitable TOD along Maryland Parkway, and provide a model for the region. <a href="https://www.rtcnv.com/maryland-parkway/">https://www.rtcnv.com/maryland-parkway/</a>
Southern Nevada Coordinated Transportation Plan	Regional Transportation Commission	The Southern Nevada Coordinated Public Transit-Human Services Transportation Plan (Coordinated Transportation Plan) aims to enhance mobility for seniors, people with disabilities, and low-income individuals. The federally required plan brings together public, private, and non-profit transportation and human service providers and includes the following elements: Inventory of existing transportation services; Identification of transportation needs, duplication of services, and regional service area gaps; Assessment of existing and potential funding sources; and Goals, strategies, and an action plan. <a href="https://www.rtcnv.com/projects-initiatives/transportation-planning/coordinated-transportation-plan/">https://www.rtcnv.com/projects-initiatives/transportation-planning/coordinated-transportation-plan/</a>



Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
HELP HOPE HOME: Regional Plan to End Homelessness	Clark County Social Service Southern Nevada Homelessness Continuum of Care	Comprehensive assessment of homelessness and plan to fill gaps and end homelessness. LINK: <a href="https://helphopehome.org/">https://helphopehome.org/</a>
Clark County Comprehensive Plan (Including Housing)	Clark County Comprehensive Planning Department	Clark County's Department of Comprehensive Planning provides a Federal Lands Element of the County's Comprehensive Plan. The Federal Lands Report identifies policies that provide direction to Clark County relative to impacts from actions on and near federal lands. About ninety percent of the land area in Clark County is administered by six federal agencies. The Report is consistent with the provisions of the Southern Nevada Public Lands Management Act of 1998 and the Clark County Conservation of Public Land and Natural Resources Act of 2002 and will inform potential use of these lands for projects. <a href="https://www.clarkcountynv.gov/government/departments/comprehensive_planning_department/index.php">https://www.clarkcountynv.gov/government/departments/comprehensive_planning_department/index.php</a>
North Las Vegas Comprehensive Master Plan	North Las Vegas Planning and Zoning Department	North Las Vegas Planning and Zoning produces the Comprehensive Master Plan, which is a long-term, general policy plan for the physical development of North Las Vegas. <a href="https://www.cityofnorthlasvegas.com/business/planning-and-zoning/advanced-planning">https://www.cityofnorthlasvegas.com/business/planning-and-zoning/advanced-planning</a>
Comprehensive Economic Development Strategy (CEDS)	Las Vegas Global Economic Alliance	The Southern Nevada Comprehensive Economic Strategy is the result of a collaborative effort between the Las Vegas Global Economic Alliance (LVGEA) and over 300 stakeholders in Southern Nevada. This document will guide decisions made by the LVGEA as it sets about the task of diversifying Southern Nevada's economy and laying the foundations for long-term economic stability. <a href="https://lvgea.org/lvgea-releases-updated-comprehensive-economic-development-strategy-for-southern-nevada/">https://lvgea.org/lvgea-releases-updated-comprehensive-economic-development-strategy-for-southern-nevada/</a>

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
SNRHA 5 Year Plan 2022-2026	Southern Nevada Regional Housing Authority	This Agency Plan contains the FY2022 Annual Plan which provides information regarding the establishment of goals, objectives, policies, and procedures required to achieve the Authority’s overall mission. The Authority plans to update the five-Year Plan at least once every five years or more as deemed appropriate during the annual planning process. <a href="https://www.snrha.org/docs/SNRHA-FY2022-Annual-Plan-Draft.pdf">https://www.snrha.org/docs/SNRHA-FY2022-Annual-Plan-Draft.pdf</a>
Southern Nevada Regional Analysis of Impediments	Clark County	The RAI outlines the impediments to fair housing choice identified in Southern Nevada and contains recommendations to overcome these impediments. Both the Action Plan and RAU use housing and demographic data, as well as citizen and stakeholder outreach, to determine housing needs and barriers. The overall goal for the RAI is to eliminate housing discrimination.

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

**Narrative**

Over the years, each jurisdiction has funded a variety of public service, housing, and community facility projects, through the housing authority and social service organizations, which benefit housing authority residents. The interaction and support between the jurisdictions and the Southern Nevada Regional Housing Authority will result in the elimination of duplicate services.

Any capital improvements, demolition, or disposition of public housing developments are reviewed by the appropriate jurisdictions through interactions with governmental agencies for permitting, zoning, and funding.

## **AP-12 Participation - 91.401, 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 Clark County Community Development Advisory Committee (CDAC) is the primary conduit for citizen input into the Consolidated Plan and Annual Action Plans as the members represent the community in all its diversity and interests. Fourteen (14) town advisory boards, five (5) citizens' advisory councils, and fourteen (14) representatives at-large appointed by the Board of County Commissioners are responsible for ensuring that the needs of the community are expressed and adequately reflected in Consolidated Plan activities. All meetings of CDAC are held at times that allow working CDAC members to attend and all meetings are open to the public. The Boulder City Council and Mesquite City Council each appoint a representative to the CDAC as non-voting liaisons for their respective cities. Boulder City and Mesquite meet the citizen participation requirements by conducting at least one City Council public hearing during each program year.

CDAC members review all HOME applications and make recommendations to the Board of County Commissioners based on the needs in the community. ESG applications are reviewed by the Continuum of Care Evaluation Working Group (CoCEWG). Applications for the ESG and HOME program were submitted through ZoomGrants. The CDAC members were all given access to the site and reviewed applications online, as well as scoring the applications online. For FY2024-2025, the CDAC members attended an orientation meeting and heard presentations from Clark County staff regarding the funding programs and county statistics.

All CDAC meetings were held in-person this year. On January 16, 2024, and February 6, 2024, HOME grant applicants made presentations to the CDAC members and took questions from the group. CDAC members then went online to score. If they lacked the capability to score online, the County provided technical assistance, as needed, for scoring. We had one CDAC member receive assistance with scoring the online applications. Clark County staff helped the CDAC member by printing out all the online applications and meeting with him in-person to go over the applications.

On February 20, 2024, CDAC members met to evaluate applications based on scoring and ranking and developed their recommendations to the Board of County Commissioners. As part of the scoring process, CDAC members developed contingency plans for funding increases or reductions for both the HOME and ESG program allocations.

On Tuesday, March 19, 2024, the Chair of CDAC presented the recommendations to the Board of County Commissioners through a public hearing process. At that meeting, the Board voted to accept the recommendations as presented.

This Annual Action Plan was developed in accordance with the County's Citizen Participation Plan. A "draft" of the FY 2024-2025 Annual Action Plan was placed on display on the County's website at [https://www.clarkcountynv.gov/residents/assistance\\_programs/community\\_resources\\_management/federal\\_reports.php](https://www.clarkcountynv.gov/residents/assistance_programs/community_resources_management/federal_reports.php)

A notice was published in the local newspaper, Las Vegas Review Journal and El Tiempo on March 20, 2024, notifying the public of a 30-day public comment period (March 20, 2024, through April 19, 2024) for the 2024-2025 Annual Action Plan and April 16, 2024, Public Hearing for the consideration of and adoption of the Plan. The notice included the review/comment period, locations where the document was available. To broaden citizen participation, the County placed the Draft FY 2024 Annual Action Plan on its website and used social media to solicit public comments. The Public Hearing was held at the Clark County Board of County Commissioners meeting and was posted on the County's website at <https://clarkcountynv.gov/agendas> and Nevada Public Notice at <https://notice.nv.gov/>.

## 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	Phone Interviews - Surveys	Homeless	HomeBase homeless focus groups held at Catholic Charities, HELP of Southern Nevada, Nevada Partnership for Homeless Youth, Salvation Army.	Many comments received and integrated into the Southern Nevada Gaps Analysis.		<a href="http://www.helpohome.org">www.helpohome.org</a>
2	Public Meeting	Non-targeted/ broad community	Board of County Commissioners, North Las Vegas  City Council, Boulder City Council, Mesquite City Council	No comments received.		<a href="http://www.clarkcountynv.gov">www.clarkcountynv.gov</a>
3	Phone Interviews - Surveys	Consumers and providers of HIV/AIDS services	Nevada Integrated HIV Prevention and Care Plan 2017-2021.  HIV Services Client Survey	See Assessment	See Assessment	<a href="http://dpbh.nv.gov/uploadedFiles/dpbh.nv.gov/content/Programs/HIV/NV%20Integrated%20HIV%20Prev%20Care%20Plan%202017-2021.pdf">http://dpbh.nv.gov/uploadedFiles/dpbh.nv.gov/content/Programs/HIV/NV%20Integrated%20HIV%20Prev%20Care%20Plan%202017-2021.pdf</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)
4	Phone Interviews - Surveys	Homeless	The entire county was canvassed by teams of volunteers. In the weeks following the street count, a survey was administered to persons experiencing unsheltered homelessness to profile their experience and characteristics.	Homeless 2022 Point-In-Time Count and Survey	See 2022 Homeless Point-In-Time Count and Survey	<a href="https://helphopehome.org/">https://helphopehome.org/</a>
5	Phone Interviews - Surveys	Non-targeted /broad community	Roadmap to resilience transit service changes more than 4300 comments received	2021 Accomplishment report	2021 Accomplishment report	<a href="#">Accomplishment Reports - About the RTC (rtcsonv.com)</a>
6	Phone Interviews - Surveys	Non-targeted /broad community	756 responses (745 - English, 11 - Spanish) Best performing sources: Eblasts and Geo-Targeted Facebook Ad	TOD Community Survey Final Report July 2020	TOD Community Survey Final Report July 2020	<a href="https://assets.rtcsonv.com/wp-content/uploads/2020/05/16164506/Final-TOD-Community-Survey-Report-Revised.pdf">https://assets.rtcsonv.com/wp-content/uploads/2020/05/16164506/Final-TOD-Community-Survey-Report-Revised.pdf</a>

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

Clark County Social Service receives three grants from the U.S. Department of Housing and Urban Development (HUD):

- Community Development Block Grant (CDBG);
- Emergency Solutions Grant (ESG); and,
- Home Investment Partnerships Program (HOME)

The HCP Consortium anticipates receiving an annual allocation of CDBG, HOME, and ESG funds from HUD over the remaining year of this five-year plan for activities that provide decent housing, suitable living environments, and expanded economic opportunities for its residents. These funds are intended to help meet priority needs identified throughout the County. The following section summarizes the major sources of funding available to carry out housing and community objectives.

The funding levels shown in the draft Plan are estimated amounts. All proposed activities' budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

## Anticipated Resources

The allocation amounts listed in the table below are estimates and will be adjusted once actual HUD allocations are received.

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	\$8,367,981	\$0	\$0	\$8,367,981	\$8,367,981	Grants awarded on a formula basis for housing & community development. Primarily, recipients must be low to moderate-income (up to 80% AMI) or reside in a low/ moderate-income area. Clark County will receive an award of \$8,367,981. Clark County awards 3% of amount to Boulder City and Mesquite. All Program Income is obligated to projects as it is received in IDIS. There is no prior year carry forward funds as all funds were allocated to projects.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction	\$4,693,841	\$0	\$388,758	\$5,082,599	\$5,082,599	HOME funds are leveraged by State of Nevada HOME and Low-Income Housing Trust Funds. North Las Vegas receives a portion of HOME/LIHTF as part of the HOME Consortium.



		Multifamily rental rehab New construction for ownership TBRA						
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$707,992	\$0	\$0	\$707,992	\$707,992	Grants are awarded to non-profit agencies to provide homeless prevention services to families and individuals at risk of becoming homeless. These services include rental assistance, security deposits, relocation and stabilization, and utility assistance. Our non-profit partners will also provide street outreach services to individuals and families living on the streets in the outlying areas of Clark County. These services will include referrals to other services and programs in the community, transportation assistance, etc. There is no prior year carry forward funds as all funds were allocated to projects.
Other Affordable Housing Trust Funds	public - state	Housing	\$4,004,906	\$0	\$317,010	\$4,321,916	\$4,321,916	The Clark County HOME Consortium expects to continue to receive State LIHTF which is used to provide the matching funds required by the HOME Program. HOME funds also leverage monies from the Federal Home Loan Bank in San Francisco through its Affordable Housing Program.
Other State of Nevada	public - state	Housing	\$675,482	\$155	\$0	\$675,637	\$675,637	The Clark County HOME Consortium expects to continue to receive State LIHTF which is used to provide the matching

HOME Funds									funds required by the HOME Program. HOME funds also leverage monies from the Federal Home Loan Bank in San Francisco through its Affordable Housing Program.
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**Table 2 - 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**

All jurisdictions covered under the Consolidated Plan use federal resources to leverage public and private sector resources to carry out housing and community development activities. Clark County and North Las Vegas work to use their private activity bonds for affordable multifamily housing production or affordable single-family mortgages/MCCs. HOME funds are also leveraged through the Low-Income Housing Tax Credit program administered by the State of Nevada. Many of these projects also receive County HOME/AAHTF funding as leveraged grants. Clark County has used discounted Bureau of Land Management (BLM) land under the Southern Nevada Public Lands Management Act (SNPLMA) for affordable housing purposes and will continue to do so.

Annually, Clark County awards approximately \$3 million in general funds through the Outside Agency Grant program, funding a variety of social service programs from homeless services, youth programs, senior services, and assistance for victims of domestic violence.

The Clark County HOME Consortium expects to continue to receive State Account for Affordable Housing Trust Funds (AAHTF) which is used to provide the matching funds required by the HOME Program. The Clark County HOME Consortium is expected to receive \$4,004,906 in State AAHTF funds and \$675,482 in State HOME funds to assist the projects outlined in the 2024 Annual Action Plan. In 2024, Clark County will also reallocate remaining HOME funds and program income to use for current year projects.

Clark County has, and will continue, to leverage federal funds on Affordable Housing (AH) projects built on land donated by Clark County and low-cost federal Bureau of Land Management (BLM) land pursuant to the Southern Nevada Public Lands Management Act (SNPMA).

Lastly, the matching requirements for ESG Program funds will be met by the non-profit organizations receiving ESG Program funds and will come from private donations, other federal and state funding, and volunteer time.

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

Section 7(b) of the Southern Nevada Public Land Management Act (SNPLMA) allows the direct sale of Bureau of Land Management (BLM) land to local jurisdictions, the State of Nevada or housing authorities at a heavily discounted price for the development of AH. Clark County has reserved over 500 acres, or 40 sites ranging from 2.5 to 40-acres, of BLM land for AH pursuant to this provision.

**Discussion**

Clark County has identified several sites under its ownership that are appropriate for AH and are in the process of acquiring additional land to address the critical shortage of AH. Though these are early-stage projects, it is anticipated that Federal funding, such as from the HOME program, may be leveraged into these projects.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Decent and Affordable Housing	2020	2024	Affordable Housing Non-Homeless Special Needs		Affordable Housing	HOME: \$4,693,841	Rental units constructed: 569 Household Housing Unit; 216 Senior units, 293 Low-income family units, 10 units for adults with brain injuries and 50 units for QPs.
2	Prevent and End Homelessness	2020	2024	Homeless		Homelessness	ESG: \$707,992	Homelessness Prevention: 300 unaccompanied youth, 500 DV victims, 1,000 households  Street Outreach: 100 households
3	Provide Community and Supportive Services	2020	2024	Non-Homeless Special Needs Non-Housing Community Development			CDBG: \$10,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Provide Community Facilities and Infrastructure	2020	2024	Non-Homeless Special Needs Non-Housing Community Development		Community Facilities, Infrastructure, Improvements	CDBG: \$8,357,981	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 53000 Persons Assisted

Table 3 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Provide Decent and Affordable Housing
	<b>Goal Description</b>	Clark County and North Las Vegas, as the HOME Consortium, will focus 2024 HUD HOME, State HOME, and LIHTF funds on new construction of affordable housing.
2	<b>Goal Name</b>	Prevent and End Homelessness
	<b>Goal Description</b>	Clark County and Boulder City will use ESG and CDBG funds to support programs that prevent homelessness and provide street outreach. Supportive wraparound services will also be provided. HOME/LIHTF funds will be used for Tenant Based Rental Assistance for homeless families.
3	<b>Goal Name</b>	Provide Community and Supportive Services
	<b>Goal Description</b>	Boulder City will provide needed community and supportive services for low to moderate income people with special needs. This may include, but is not limited to, transportation assistance, and rental and utility assistance to prevent homelessness.

<b>4</b>	<b>Goal Name</b>	Provide Community Facilities and Infrastructure
	<b>Goal Description</b>	Clark County will work on implementation of its 5-Year CDBG Capital Improvement Plan. Clark County will allocate FY2020-2024 CDBG funds for Nevada Partnership for Homeless Youth (NPHY) Outreach, Volunteer and Operations (OVO) Center, Accessible Space, Inc., Hastings House Capital Improvements, Clark County Parks & Recreation, Parkdale Park Basketball/Pool Renovation, Nevada Health Centers - Expansion of Nevada Health Centers' Martin Luther King Health Center, Lutheran Social Services of Nevada, JOURNEY Senior Services Center, Bridge Counseling Associates, Inc., Bridge Adult Transitional Housing and Youth Residential Treatment Project, Jewish Family Services Agency – Building Purchase, Family Promise of Las Vegas, The Family Promise of Las Vegas Family Navigation Center, Clark County Parks & Recreation, Nevada Partners, Inc.. Youth Empowerment Center and Hospitality Workforce, Culinary Academy – Workforce Training Center Expansion, and Clark County Dept. of Juvenile Justice Sunrise Multi-Generational Community Center. Boulder City will undertake community facility projects while Mesquite will work on Enhancement of the existing Woodbury Park to a community Skate/Pump track park. Removal of approx. 1.20 Acres of grass for water conservation and add fill, fencing, cement, and asphalt. Installation of a pump track, skate/bike park, benches, security cameras and drinking fountains.

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

#	Project Name
1	ESG 2024-2025 Emergency Solutions Grant - Clark County
2	Clark County Administration HOME FY2024-2025
3	Clark County HOME Multifamily New Construction and Acquisition and Rehabilitation FY2024-2025
4	CDBG Administration FY2024-2025
5	Clark County CDBG Capital Projects FY2024-2025
6	Mesquite CDBG Woodbury Skate Park (MS)
7	Boulder City CDBG Projects (BC)
8	Boulder City CDBG Public Service Projects (BC)
9	Clark County HOME Set-Aside for Off-Cycle Initiatives & TBRA FY2024-2025
10	North Las Vegas HOME Projects FY2024-2025

**Table 4 – Project Information**

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

Clark County HOME funded projects are located both in unincorporated Clark County and in areas that have not traditionally had affordable housing or are not CDBG eligible, as well as in incorporated areas of Clark County. Clark County prefers to support the dispersal of affordable housing throughout the community. The majority of CDBG activities funded by Clark County take place within the CDBG eligible census tracts. Projects in Boulder City and Mesquite focus on providing services to populations presumed to be lower income, such as seniors and the disabled or take place within CDBG eligible Census tracts.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	ESG 2024-2025 Emergency Solutions Grant - Clark County
	<b>Target Area</b>	Clark County
	<b>Goals Supported</b>	End homelessness
	<b>Needs Addressed</b>	Homeless Prevention
	<b>Funding</b>	ESG: estimated \$576.711



<p><b>Description</b></p>	<p>ESG funds are allocated to homeless prevention. Direct service activities are carried out by nonprofit agencies that are subrecipients of ESG funds. Homeless Preventions services are to be provided by Emergency Aid of Boulder City (\$36,368), Family Promise of Las Vegas (\$75,000), Lutheran Social Services of Nevada (\$70,770), SAFE House (\$81,000), St. Jude’s Ranch for Children (\$125,000), The Cupcake Girls (\$40,191), The Salvation Army (\$94,191), and Vegas Stronger (\$54,191). <b>Emergency Aid of Boulder City</b> provides financial assistance and food to those in need in the Boulder City area. This program will provide rental and utility assistance as well as nutritional support through their food pantry. <b>Family Promise</b> provides rental assistance and supportive services to families and individuals at-risk of homelessness in an effort to keep them housing and move them towards self-sufficiency. Family Promise partners with 19 interfaith congregations to provide meals, hospitality, and other services. Participants in this program regularly meet with a Family Promise caseworker to develop a plan and identify other needed resources. <b>Lutheran Social Services of Nevada’s</b> Homeless Prevention CC 2024-2024 Program will support ongoing homeless prevention efforts throughout the County. In addition to rental and utility assistance, LSSN will also offer intensive case management and assistance with application fees, moving costs, and utility and security deposits to clients of this program. Clients of this program will also receive case management and other stabilization services. <b>S.A.F.E. House</b> provides victims of domestic violence and their children with an immediate safe housing, basic needs which include case management, medical and counseling services, and compassionate support and guidance to help them move towards a safe and self-sufficient life. <b>St. Jude’s Ranch</b> in Boulder City, Nevada, has been providing services to traumatized, homeless youth for almost 50 years. Programs run by St. Jude’s include: Therapeutic Residential Program, Community Foster Care, Pregnant and Parenting Teens Program, Transitional Living Program, Early Head Start/Early Intervention Program, Crossings, New Crossings, Child Focus, and Behavior Health Services. The SJRC Homeless Prevention program will provide rental and utility assistance and provides participants with intensive case management and other essential services such as job readiness, life skills counseling, transportation, and clothing assistance. The <b>Cupcake Girls</b> is new to the ESG program. They have provided education and outreach, advocacy, case management and other services to survivors of sex trafficking. Providing homeless prevention services will be a new program for this organization and will serve to increase the stability and self-sufficiency of their participants. The <b>Salvation Army</b> Homeless Prevention program assists families and individuals with housing stabilization services, utility assistance, and case management. In addition to this program the Salvation Army also offers afterschool programs for youth, parent education and child abuse prevention services, veteran’s supportive services, and services for victims of human trafficking. <b>Vegas Stronger</b> is new to the ESG program but was an active community partner in Operation Home. This organization strives to reduce homeless by addressing its root causes, substance use disorder and mental illness. This project will provide rental assistance, housing relocation and stabilization services to empower those at risk of homelessness.</p>
<p><b>Target Date</b></p>	<p>6/30/2025</p>

<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeless Prevention services are estimated to benefit 300 unaccompanied youth, 500 victims of domestic violence (men, women, and children), and 1,000 homeless adults and their families, including children, will receive homeless prevention services.
<b>Location Description</b>	Countywide
<b>Planned Activities</b>	Homeless prevention, case management, supportive services
<b>Project Name</b>	ESG 2023-2024 Emergency Solutions Grant - Clark County
<b>Target Area</b>	Clark County
<b>Goals Supported</b>	End Homelessness
<b>Needs Addressed</b>	Street Outreach
<b>Funding</b>	ESG: estimated \$66,182
<b>Description</b>	ESG funds are allocated to Street Outreach in the rural/outlying areas of Clark County. Direct services will be carried out by a non-profit agency as a subrecipient of ESG funds. These services will be provided by Vegas Stronger (\$66,182). <b>Vegas Stronger</b> is new to the ESG program but was an active community partner in Operation Home. Through this street outreach program, Vegas Stronger will engage homeless individuals in Blue Diamond, Indian Springs, and other outlying areas of Clark County to provide early intervention and referral services. The outreach team will conduct site visits at various locations including but not limited to encampments, food banks, recovery groups, parks, and other well-known sites for individuals and families experiencing homelessness.
<b>Target Date</b>	6/30/2025
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Street Outreach services will benefit an estimated 100 homeless individuals and families in rural or outlying areas of Clark County. These individuals will receive referrals to services, transportation, case management, and other services based on their unique needs.
<b>Location Description</b>	Countywide
<b>Planned Activities</b>	Street Outreach services, case management, referrals, transportation assistance
<b>Project Name</b>	ESG 2024-2025 Emergency Solutions Grant - Clark County
<b>Target Area</b>	Clark County
<b>Goals Supported</b>	End Homelessness
<b>Needs Addressed</b>	Administration and HMIS
<b>Funding</b>	ESG: estimated \$65,100
<b>Description</b>	Administration budget is \$53,100 and HMIS (Bitfocus, Inc.) is \$12,000.
<b>Target Date</b>	6/30/2025

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The administration is an allowable expense under ESG of 7.5% of the award amount. These funds may be used to cover Clark County salary, trainings, or other activities necessary to support the success of the program.  There will also be funds set aside to cover any associated costs of the alternative HMIS database for our domestic violence providers
	<b>Project Name</b>	ESG 2024-2025 Emergency Solutions Grant - Clark County
	<b>Target Area</b>	Clark County
<b>2</b>	<b>Project Name</b>	Clark County HOME Administration FY2024-2025
	<b>Target Area</b>	Clark County, North Las Vegas, Boulder City and Mesquite
	<b>Goals Supported</b>	Provide Decent and Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$469,384
	<b>Description</b>	Funds to administer the HOME Program. Clark County-\$395,853; North Las Vegas-\$73,531
	<b>Target Date</b>	6/30/2028
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Administration (21A)
<b>3</b>	<b>Project Name</b>	Clark County HOME Multifamily New Construction and Acquisition and Rehabilitation FY2024-2025
	<b>Target Area</b>	Clark County, North Las Vegas, and Henderson
	<b>Goals Supported</b>	Provide Decent and Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$4,224,457 Affordable Housing Trust Funds: \$4,004,906 State of Nevada HOME funds: \$675,482 Prior Year Remaining/PI: \$5,407,007

<p><b>Description</b></p>	<p>Clark County will fund the following projects: <b>Help of Southern Nevada</b> was awarded \$1,000,000 in funds to assist with the joint development/new construction of 48 - studio units and 2 - one-bedroom units of Permanent Supportive Housing (PSH) for residents who have experienced homelessness. All of the units will be designated for those at or below 30% AMI. This project will be located on Boulder Hwy. south of East Tropicana Blvd. in the unincorporated area of Clark County. <b>Nevada H.A.N.D.</b> was awarded \$1,000,000 in funds to assist with the new construction of a proposed 60-unit apartment project designed for senior occupancy. The project would contain 36 – one-bedroom units and 24 – two-bedroom units. All units are between 30% and 50% AMI. This project will be located on W. Carey Ave. and N. Martin Luther King Blvd. in the City of North Las Vegas. <b>Accessible Space, Inc.</b> was awarded \$1,830,790 in funds to assist with the new construction of a proposed 10-unit apartment project designed for occupancy of adults with brain injury. The project would contain 10 – studio units in which all units are 30% AMI. This project will be located on E. Owens Ave. and Betty Lane in the unincorporated area of Clark County. <b>Wisconsin Partnership for Housing Development</b> was awarded \$800,000 in funds to assist with the new construction of a proposed 36-unit apartment project designed for senior occupancy. The project would contain 30 – one-bedroom units and 6 – two-bedroom units. All units are between 30% and 60% AMI. This project will be located on Needles Hwy and Rio Vista Drive in the unincorporated area of Clark County. <b>McCormack Baron Salazar, Inc.</b> was awarded \$1,500,000 in funds to assist with the new construction of a proposed 192-unit apartment project designed for senior occupancy. The project would contain 180 – one-bedroom units and 12 – two-bedroom units. All units are between 30% and 60% AMI. This project will be located on Main St and E. Tonopah Ave. in the City of North Las Vegas. <b>George Gekakis, Inc.</b> was awarded \$1,800,000 in funds to assist with the new construction of a proposed 188-unit apartment project designed for family-occupancy. The project would contain 56 – one-bedroom units, 67 – two-bedroom units, and 65 – three-bedroom units. All units are between 30% and 80% AMI. This project will be located on the corner of Volunteer and Giles pie in the City of Henderson. <b>NRP Lone Star Development, Inc.</b> was awarded \$1,000,000 in funds to assist with the new construction of a proposed 105-unit apartment project designed for family-occupancy. The project would contain 10 – one-bedroom units, 20 – two-bedroom units, 55 – three-bedroom units, and 20 – four-bedroom units. All units are between 50% and 60% AMI. This project will be located on N. Pecos Road and E. Centennial Pkwy. in the City of North Las Vegas.</p> <p>After extensive analysis and discussion, on February 20, 2024, CDAC voted on a recommendation for projects to be funded. HUD regulations require that Community Housing Development Organizations (CHDOs) receive a minimum of 15% of the HOME funds. Members of the Consortium have agreed to distribute this responsibility proportionately among them, with each entity funding a pro-rata share of the CHDO obligation. The Consortium’s estimated FY2024-2025 CHDO requirement, including the obligation relating to the State HOME funds, is estimated at \$805,398.</p>
<p>Target Date</p>	<p>6/30/2028</p>
<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>A total 569 new units; 216 Senior units, 293 Low-income family units, 10 units for adults with brain injuries and 50 units for QPs .</p>

	Location Description	Various locations identified above
	Planned Activities	Construction of Housing (4)
4	<b>Project Name</b>	CDBG Administration FY2024-2025
	<b>Target Area</b>	Clark County, North Las Vegas, Boulder City and Mesquite
	<b>Goals Supported</b>	Provide Decent and Affordable Housing Provide Community and Supportive Services Provide Community Facilities and Infrastructure
	<b>Needs Addressed</b>	Affordable Housing Community Facilities, Infrastructure, Improvements
	<b>Funding</b>	CDBG: \$1,673,596 (TBD)
	<b>Description</b>	Funds to administer the community development programs. Clark County - \$1,548,596; Silver State Fair Housing - \$125,000.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Administration (21A) Fair Housing Activities (21D)
5	<b>Project Name</b>	Clark County CDBG Capital Projects
	<b>Target Area</b>	Clark County, North Las Vegas, Boulder City and Mesquite
	<b>Goals Supported</b>	Provide Community Facilities and Infrastructure
	<b>Needs Addressed</b>	Community Facilities, Infrastructure, Improvements
	<b>Funding</b>	CDBG: \$6,146,148 (TBD)
	<b>Description</b>	Clark County will allocate FY2020-2024 CDBG funds for Nevada Partnership for Homeless Youth -NPHY Outreach, Volunteer, and Operations (OVO) Center, Accessible Space, Inc. -Hastings House Capital Improvements, Clark County Parks & Recreation - Parkdale Park Basketball/Pool Renovation, Nevada Health Centers - Expansion of Nevada Health Centers' Martin Luther King Health Center, Lutheran Social Services of Nevada - JOURNEY Senior Services Center, Bridge Counseling Associates, Inc. -Bridge Adult Transitional Housing and Youth Residential Treatment Project, Jewish Family Services Agency Building Acquisition, Clark County Dept. of Juvenile Justice Sunrise Multi-Generational Community Center. St. Jude's Ranch for Children Healing Center and the Laughlin Multigenerational Center projects were cancelled, funds to be reallocated to other projects.
	<b>Target Date</b>	6/30/2025

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 Homeless households.
	<b>Location Description</b>	Not currently known.
	<b>Planned Activities</b>	Public Facilities (3)
6	<b>Project Name</b>	Mesquite CDBG (MS) FY2020-2024
	<b>Target Area</b>	Clark County, North Las Vegas, Boulder City and Mesquite
	<b>Goals Supported</b>	Provide Community and Supportive Services
	<b>Needs Addressed</b>	Community Facilities, Infrastructure, Improvements
	<b>Funding</b>	CDBG: \$251,039 (TBD)
	<b>Description</b>	The City of Mesquite expects to receive approximately \$231,000 annually in CDBG funds for Fiscal Years 2020-2024 for an estimated total amount of \$1,206,590. They have decided on dedicating all their funds to one big project which is the enhancement of the existing Woodbury Park to a community Skate/Pump track park. This will include the removal of approx. 1.20 Acres of grass for water conservation and add fill, fencing, cement, and asphalt. Installation of a pump track, skate/bike park, benches, security cameras and drinking fountains. Projects to be replaced are Fire Station #3, Mesquite Senior Center Electrical Improvements for Emergency Generator, Mesquite Senior Center Space Upgrades, Mesquite Recreation Center Energy Efficiency Upgrades, Mesquite Recreation Center Electrical Improvements for Emergency Generator, City Facility Energy Efficiency Upgrades, ADA Upgrades to Public Facilities, Trail System Shade Structures, Pulsipher Park Shade Structure and Hafen Lane Park Facility Enhancements.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Mesquite, NV.
	<b>Planned Activities</b>	Parks, Recreational Facilities (03F)
7	<b>Project Name</b>	Boulder City Projects FY2024-2025
	<b>Target Area</b>	Clark County, North Las Vegas, Boulder City and Mesquite
	<b>Goals Supported</b>	Provide Community and Supportive Services
	<b>Needs Addressed</b>	Community and Supportive Services
	<b>Funding</b>	CDBG: \$213,384 (TBD)

	<b>Description</b>	Boulder City FY2024-2025 capital funding will be used for the Lend-A-Hand Building rehabilitation with an estimated funding of \$213,384.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Community-wide for public services.
	<b>Planned Activities</b>	Sidewalks (03L)
	<b>Project Name</b>	<b>Boulder City Public Service Projects FY2024-2025</b>
<b>8</b>	<b>Project Name</b>	Boulder City Public Service Projects FY2024-2025
	<b>Target Area</b>	Boulder City
	<b>Goals Supported</b>	Provide Community and Supportive Services
	<b>Needs Addressed</b>	Community and Supportive Services
	<b>Funding</b>	CDBG: \$37,656 (TBD)
	<b>Description</b>	Emergency Aid of Boulder City, Inc. will be allocated \$27,865 (TBD) in CDBG funds to assist with rent and utility costs in providing emergency aid for Boulder City's welfare population. Lend A Hand of Boulder City will also be allocated \$9,791 (TBD) to assist with the salaries of the volunteer coordinator and assistant volunteer coordinator positions as well as operation expenses for Lend A Hand's transportation and escort services program for Boulder City's frail elderly and handicap population.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Community-wide for public services.
	<b>Planned Activities</b>	Transportation Services (05E) Operating of Homeless/AIDS Patients Programs (03T)
<b>9</b>	<b>Project Name</b>	Clark County HOME Set-Aside for Off-Cycle Initiatives
	<b>Target Area</b>	Clark County, North Las Vegas, Boulder City and Mesquite
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	Set-Aside (HOME/AAHTF/NV HOME) Funds \$5,407,007

	<b>Description</b>	<b>Activities will include off-cycle housing construction initiatives in collaboration with SNPLMA Section 7(b) land development (BLM), Private Activity Bonds or Low-Income Housing Tax Credits using prior year funds and program income.</b>
	<b>Target Date</b>	06/30/2028
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	Construction of Housing (12)
<b>10</b>	<b>Project Name</b>	FY2023-2024 North Las Vegas HOME Projects
	<b>Target Area</b>	Clark County, North Las Vegas, Boulder City and Mesquite
	<b>Goals Supported</b>	Provide Decent and Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$719,578
	<b>Description</b>	During the fiscal year of 2024 – 2025 the city of North Las Vegas finalized funding awards on several housing projects. Donna Louise Phase 2, a new 48-unit affordable multifamily rental development, received a funding award in the amount of \$700,000. The PuraVida Senior Apartments was awarded \$300k in HOME funds. A combination of North Las Vegas HOME funds, Clark County Community Housing Funds will be used to develop 74 units of affordable senior housing. Additionally, five eligible North Las Vegas families were assisted under the city's Single-Family Owner-Occupied Rehabilitation program for the rehabilitation of their homes. Finally, the North Las Vegas Homebuyer Assistance Program assisted 9 eligible families with the costs of purchasing a home in North Las Vegas, putting homeownership within reach. All projects will be funded with a mixture of HOME federal, HOME state, and program income funding.
	<b>Target Date</b>	6/30/2028
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 122 low to moderate income families will be provided with affordable housing. 5 low to moderate income homeowners will receive assistance with home rehabilitation for safety, habitability, and code compliance.
	<b>Location Description</b>	Las Vegas Blvd N, North Las Vegas, NV 89030 Donna St. North Las Vegas, NV 89081



	<b>Planned Activities</b>	Construction of Housing (12) Rehabilitation, Single Unit Residential (14A)
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## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

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

North Las Vegas will be giving priority to the urban core target area for its Choice Neighborhoods grant.

Clark County HOME funded projects are located both in unincorporated Clark County and in areas that have not traditionally had affordable housing or are not CDBG eligible, as well as in incorporated areas of Clark County. Clark County prefers to support the dispersal of affordable housing throughout the community. The majority of CDBG activities funded by Clark County and North Las Vegas take place within the CDBG eligible census tracts. Projects in Boulder City and Mesquite focus on providing services to populations presumed to be lower income, such as seniors and the disabled.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Maryland Parkway corridor	30
North Las Vegas Choice Neighborhood	10

**Table 5 - Geographic Distribution**

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

Clark County HOME funded projects are primarily located in unincorporated Clark County and in areas that have not traditionally had affordable housing or are not CDBG eligible. Clark County prefers to support the dispersal of affordable housing throughout the community. The majority of CDBG activities funded by Clark County and North Las Vegas take place within the CDBG eligible census tracts. Projects in Boulder City and Mesquite focus on providing services to populations presumed to be lower income, such as seniors and the disabled.

### **Discussion**

The HCP Consortium's geographic priorities were established based on the analysis of current community needs, the characteristics of the overall market, the ability of low-income households to afford, locate and maintain housing, and the availability of resources to address the identified needs.

# Affordable Housing

## AP-55 Affordable Housing - 91.420, 91.220(g)

### Introduction

Clark County will focus its 2024 HOME/AAHTF funds on the new construction of affordable housing for low-income families, disabled individuals, and seniors. North Las Vegas will be undertaking multifamily new construction for low-income families, homeowner rehabilitation, and homebuyer assistance.

North Las Vegas will be undertaking multifamily new construction for low-income families, homeowner rehabilitation, and homebuyer assistance.

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

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

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

**Table 7 - One Year Goals for Affordable Housing by Support Type**

### Discussion

Clark County will fund the following projects:

Help of Southern Nevada was awarded \$1,000,000 in funds to assist with the joint development/new construction of Tropicana Trails a 48 - studio units and 2 - one-bedroom units of Permanent Supportive Housing (PSH) for residents who have experienced homelessness. All the units will be designated for those at or below 30% AMI. This project will be located on Boulder Hwy. south of East Tropicana Blvd. in the unincorporated area of Clark County.

Nevada H.A.N.D. was awarded \$1,000,000 in funds to assist with the new construction of Pearson Pines a proposed 60-unit apartment project designed for senior occupancy. The project would contain 36 – one-bedroom units and 24 – two-bedroom units. All units are between 30% and 50% AMI. This project will be located on W. Carey Ave. and N. Martin Luther King Blvd. in the City of North Las Vegas.

Accessible Space, Inc. was awarded \$1,830,790 in funds to assist with the new construction of Stepping Stone Apartments II a proposed 10-unit apartment project designed for occupancy of adults with brain injury. The project would contain 10 – studio units in which all units are 30% AMI. This project will be located on E. Owens Ave. and Betty Lane in the unincorporated area of Clark County.

Wisconsin Partnership for Housing Development was awarded \$800,000 in funds to assist with the new construction of Laughlin Senior Apartments a proposed 36-unit apartment project designed for senior occupancy. The project would contain 30 – one-bedroom units and 6 – two-bedroom units. All units are between 30% and 60% AMI. This project will be located on Needles Hwy and Rio Vista Drive in the unincorporated area of Clark County.

McCormack Baron Salazar, Inc. was awarded \$1,500,000 in funds to assist with the new construction of 1632 Yale St a proposed 192-unit apartment project designed for senior occupancy. The project would contain 180 – one-bedroom units and 12 – two-bedroom units. All units are between 30% and 60% AMI. This project will be located on Main St and E. Tonopah Ave. in the City of North Las Vegas.

George Gekakis, Inc. was awarded \$1,800,000 in funds to assist with the new construction of Volunteer and Giles pie a proposed 188-unit apartment project designed for family-occupancy. The project would contain 56 – one-bedroom units, 67 – two-bedroom units, and 65 – three-bedroom units. All units are between 30% and 80% AMI. This project will be located on the corner of Volunteer and Giles pie in the City of Henderson.

NRP Lone Star Development, Inc. was awarded \$1,000,000 in funds to assist with the new construction of Pecos Apartments a proposed 105-unit apartment project designed for family-occupancy. The project would contain 10 – one-bedroom units, 20 – two-bedroom units, 55 – three-bedroom units, and 20 – four-bedroom units. All units are between 5%0 and 60% AMI. This project will be located on N. Pecos Road and E. Centennial Pkwy. in the City of North Las Vegas.

After extensive analysis and discussion, on February 20, 2024, CDAC voted on a recommendation for projects to be funded. HUD regulations require that Community Housing Development Organizations (CHDOs) receive a minimum of 15% of the HOME funds. Members of the Consortium have agreed to distribute this responsibility proportionately among them, with each entity funding a pro-rata share of the CHDO obligation. The Consortium’s estimated FY2024-2025 CHDO requirement, including the obligation relating to the State HOME funds, is estimated at \$805,398.

These projects will be available for comment during the 30-day comment period and during the public hearing for this Action Plan, scheduled for April 16, 2024, at the Board of County Commissioners meeting.

## **AP-60 Public Housing - 91.420, 91.220(h)**

### **Introduction**

Southern Nevada Regional Housing Authority's Supportive Services Department's primary function is to connect residents to resources and services in the community. The department's mission is to assist residents and their surrounding communities in developing and achieving self-sufficiency, quality of life and aging in place. These goals are continuously met by providing several onsite service providers, advocating for the residents, distributing resource information, and making referrals as needed.

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

SNRHA also has over 70 active partnering agencies as a part of its Program Coordinating Committee (PCC) which includes representatives from:

- Clark County
- Cities of Las Vegas, North Las Vegas, and Henderson
- Nevada System of Higher Educations (NSHE)
- Universities of Nevada, Las Vegas, and Reno
- College of Southern Nevada
- Nevada State College
- Early Childhood Education
- Communities in Schools
- Workforce Partnering Agencies
- Local Office of US Housing and Urban Development
- Local Nonprofit and Community Agencies
- Resident Representatives
- Healthcare Providers

Commitments with these organizations are established either verbally or through MOU's.

SNRHA has an active Resident Advisory Board (RAB) that is made up of resident council and tenant organization presidents, and members from Housing Choice Voucher (HCV)/Section 8 and Public Housing scattered sites. Their focus is to review the SNRHA's 5-year and annual plans. SNRHA also has its first tenant organization, different from a resident council in that it represents the Affordable Housing properties (non-public housing). Residents in housing developments converted to Project Based Rental Assistance (PBRA), from Public Housing, through Rental Assistance Demonstration (RAD) have the right to establish and operate a resident organization in accordance with 24 CFR Part 245, to address issues related to their living environment.

SNRHA also continues to expand its partnerships and is working hard to continue securing grants, private donor funds, and charitable gifts that may promote household self-sufficiency, moving into home

ownership, and assisting seniors to age in place.

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

As of January 31, 2024, the Family Self-Sufficiency (FSS) program had 540 voluntary slots, and 434 participants from the Public Housing (PH) and the Housing Choice Voucher (HCV) programs. Of those participants, 46 were PH residents. There are an additional 487 that are currently on the FSS interest list. The last graduating class of FSS in October 2023 produced:

- 40 graduates
- 39 graduates working full-time
- 3 first-time homebuyers
- 4 graduates no longer receiving housing assistance due to being over income or relinquishing voucher

SNRHA's Resident Opportunity and Self-Sufficiency (ROSS) program targets residents of PH for program participation in activities which lead up to independence and self-sufficiency. This program allows SNRHA to serve the below sites:

- Hulum Homes
- Jones Gardens
- Marble Manor
- Marble Manor Annex
- Sherman Gardens
- Sherman Gardens Annex
- Villa Capri
- Ernie Cragin Terrace
- Hampton Court
- Simmons Manor

SNRHA is looking to develop its technological infrastructure at housing sites to provide resident's free access to Internet/Wi-Fi. Through the Federal Communication Commission (FCC) Affordable Connectivity Program, households receiving federal housing assistance were eligible to receive a discount of up to \$30 per month for internet/Wi-Fi and a one-time discount of \$100 to purchase a computer or tablet from their provider. Many broadband providers had committed to offer a broadband tier for those eligible at or below the cost of the subsidy.

SNRHA continues its homeownership and housing counseling programs to assist low-income families reach the dream of owning a home of their own and moving out of subsidized housing. Between January 1, 2023, and December 31, 2023, six (6) SNRHA HCV participants became homeowners. Housing

counseling, through SNRHA's HUD certified Housing Counselors, is utilized as a part of regular programming for Family Self-Sufficiency participants who are interested in "seeking, financing, maintaining, renting, or owning a home". We have a total of six (6) HUD Certified Housing Counselors in the Supportive Services Department.

SNRHA continues to improve on its Section 3 program, especially while continuing the revitalization of its James Down Towers and Hullum Homes sites and its Choice Neighborhood Initiative planning grant for Marble Manor. The Section 3 program currently has a list with 152 interested participants. SNRHA will invite residents to receive training and/or employment within those PH sites and the surrounding low-income communities while working with contractors. The future of HUD Section 3 reporting will focus on labor hours attained. No reports were due in 2023.

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

The SNRHA is not designated as a troubled agency.

**Discussion**

The Southern Nevada Regional Housing Authority (SNRHA) continues to utilize its Capital Fund Program (CFP) for the required capital improvements. The SNRHA CFP Funds is one of the financing tools to fund comprehensive modernization and new construction under the Rental Assistance Demonstration (RAD) Program and Mixed Finance Program.

The agency was one of eight cities to receive a Department of Housing and Urban Development (HUD) Choice Neighborhood Initiative (CNI) Planning Grants for the Historic Westside of Las Vegas. The kickoff meeting for this grant occurred on January 25, 2022, and a virtual meeting is scheduled to introduce HUD to the community on February 24, 2022. The SNRHA (Grantee) and the City of Las Vegas (Co-Grantee) has worked with the community, residents, stakeholders, and public and private partners the last fifteen (15) months preparing a Transformation Plan. This Plan could lead to the receipt of an Implementation Grant which would provide funds to redevelop the Marble Manor property. A HUD requirement of the Transformation Plan is to develop an Early Action Activity within the targeted area. The SNRHA selected to partner with the Obodo Collective and provided \$100,000.00 to establish an Urban Farm on C. St & Monroe in the Historic Westside of Las Vegas. The farm will serve the community and provide several dedicated plots for residents of the Marble Manor Development. The Final Transformation Plan was submitted to HUD on November 15, 2023, and accepted by HUD on February 15, 2024. Building on its momentum the agency has applied for a CNI Implementation Grant for the Historic Westside of Las Vegas. The application was submitted February 8, 2024. As with the Transformation Grant the Implementation will go through a competitive process. If selected the agency could be awarded up to \$50 million to redevelop the Marble Manor Development creating, with one-for-one replacement units for its 235 families as well as developing an additional 400 units within a master-planned community. The agency will continue to work with a Master Developer to redevelop the Marble Manor Development in

conjunction with the Westside 100 Plan.

The agency received approval from HUD to convert the 200-unit James Down Towers Senior Development from Public Housing Units to Project Based Voucher units under the RAD/Section 18 Blend conversion program. Construction began June 2022 and is scheduled for completion by December 2024.

The agency was awarded 9% Low Income Housing Tax Credits to complete preservation rehabilitation of its fifty-nine (59) unit Hullum Homes Family Apartment Development. Construction began October 2023 and is scheduled for completion by January 2025.

The agency submitted applications to Clark County for Community Housing Funds (CHF) and the State of Nevada for Home Means Nevada (HMN) Funds. Funding was received from Clark County for the preservation of the 200-unit James Down Towns Senior Development and new Construction of the vacant land located on the adjacent site of the SNRHA Marion Bennett Plaza. An architect has been selected and funds have also been received from the State of Nevada Home Means Nevada Fund to develop 59 new apartments.

Funding from the State of Nevada has been awarded to develop 80 new Family Housing Units at the 6-acre Duncan and Edwards parcel, develop 121 new Family Housing Units at the 28<sup>th</sup> Street and Sunrise Ave 6ac-re parcel, develop 192 new 1 & 2-bedroom apartment units on the 6-acre Old Rose Gardens parcel located at Yale St and Tonopah Ave, and preservation rehabilitation of the one hundred (100) unit Janice Brooks Bay Affordable Housing Family development at Nellis Blvd and Walnut Ave.

The agency transferred its Clark County Community Housing Funds to Arthur Sartini Plaza which is a 220-unit public housing development. Funds will be used for major system upgrades includes plumbing lines, heating and cooling system replacement, installation of energy efficient windows, roof replacement and kitchen and bath replacement.

The agency is analyzing their public and affordable housing portfolio for possible repositioning as well as exploring options to develop more affordable housing on its remaining vacant land throughout Southern Nevada. These developments will be mixed-income, mixed-financed developments including public and affordable housing.



## **AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)**

### **Introduction**

The following strategies outline the HUD Consolidated Plan (HCP) Consortium's one-year goals and actions for reducing and ending homelessness. They include restructuring the sheltering system; expanding rapid rehousing and permanent supportive housing opportunities; implementing targeted, collaborative, diversion efforts, identification, and intervention for frequent users and chronically homeless; moving clients to self-sufficiency; better use of data to make funding decisions; and discharge planning. The SNHCoC has the objective to create a system of care that prevents homelessness to the maximum extent possible, while seeking to ensure that homelessness, when it happens, is rare, brief, and limited to a one-time occurrence. This is done using proven practices, collaboration, and civic engagement.

In 2017, the Southern Nevada Continuum of Care (SNH CoC) created a Prevention and Diversion Gaps Analysis. The report reviewed the ongoing homelessness prevention and diversion efforts in the region to determine gaps in the homelessness system of care and provide recommendations for improving system effectiveness.

To complete the report, HomeBase conducted consumer focus groups, met with key stakeholders, solicited survey responses from consumers and homeless housing and service providers and funders, analyzed relevant HMIS and reporting data, and reviewed applicable regulations and recognized best practices. The data already available in the community suggests that the community both recognizes and has started to solve the problem of homelessness by rationally aiming to prevent homelessness and avoid further increasing the region's homelessness crisis.

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

The SNHCoC and its providers share responsibility to provide an array of homeless services to the diverse households in Southern Nevada. The SNHCoC prioritizes new rapid rehousing (RRH) projects as a permanent housing solution. Service providers that provide RRH for homeless households include Clark County Social Service (CCSS), Catholic Charities, HELP of Southern Nevada, HopeLink of Southern Nevada, Jewish Family Services, Lutheran Social Services of Nevada, Nevada Partners, SafeNest, St. Jude's Ranch for Children, Southern Nevada CHIPS, The Just One Project, The Salvation Army, and U.S. Veterans Initiative-Las Vegas. These household types include individuals, families, transition-age youth, those fleeing domestic violence, and veterans. The SNHCoC implemented written standards in 2020 to consistently provide RRH assistance across funding sources and providers. These standards align with ESG standards that will also be implemented this year.

Clark County Social Service continues to provide financial assistance services for homeless households and bridge housing at locations across the county. Family Promise of Las Vegas provides scattered site sheltering as well as bridge housing for families. Las Vegas Rescue Mission provides single site sheltering for families. HELP of Southern Nevada provides emergency shelter to youth at the Shannon West Homeless Youth Center and bridge housing for families and the medically fragile. Safe House and SafeNest provide sheltering for those fleeing domestic violence.

Beginning in 2019, Clark County set aside annual funds from marijuana licensing fees to allocate towards homeless services. While this funding fluctuates annually, the funding has expanded RRH projects for

families and has also increased the number of street outreach teams available with HELP of Southern Nevada responding to large encampments.

The three subcommittees of the SNHCoC are recruiting members of the jurisdictions and subpopulation experts to participate. There will be nonprofits and those with lived experience on each committee to assist with CoC efforts. Along with the Veteran's Administration (VA), the SNHCoC has been successful using HUD-VASH vouchers to house chronically homeless and homeless veterans. HUD-VASH vouchers are available to the community and administered by the Southern Nevada Regional Housing Administration (SNRHA), with supportive services provided by the VA.

In 2020, Clark County worked to contracted with Clean the World Foundation to stand up three mobile hygiene units. The County ensures mobile showers are available at homeless outreach, resource pop-up, and County sponsored events in Southern Nevada. Fresh Start WASH and Wellness programs served 1,582 people with showers and hygiene kits.

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

Clark County has a regional Mobile Crisis Intervention Team (MCIT) that provides mobile street outreach to unsheltered individuals and families experiencing homelessness, including those with disabilities, and limited English proficiency. This team actively engages households and assesses for service referrals to an agency appropriate for their needs like emergency shelter, transportation, and other services. HELP of Southern Nevada is the largest, local, outreach provider, serving all households experiencing unsheltered homelessness, including individuals and families who are chronically homeless, substance users, mentally ill, and/or may have physical disabilities.

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

In 2019, the SNHCoC convened the Southern Nevada Emergency Shelter Learning Collaborative (ESLC) with technical assistance and facilitation provided by the National Alliance to End Homelessness (Alliance). The Alliance worked with CCSS, agency leaders, and jurisdictional funders in partnership with the emergency shelter providers. The goal of the ESLC was to support emergency shelters and build capacity to provide housing-focused and low-barrier shelter services that are safe for shelter participants and staff. The end goal for ESLC was to provide a path to housing and ending homelessness by resolving housing crises permanently, facilitating self-resolution, re-housing individuals quickly, reducing unsheltered homelessness, creating a better system flow, connecting people to coordinated entry, and connecting people to housing searches and other resources to help stabilize them once housed.

The shelter providers involved in the ESLC were able to shift their practices towards becoming low barrier, housing focused shelters. In 2020, some of these shelter providers were awarded new contracts to continue to use the skills implemented during this challenge to sustain progress and build a system and programs that are designed according to best practices. These current providers include Catholic Charities of Southern Nevada, HopeLink of Southern Nevada, and Las Vegas Rescue Mission.

The SNHCoC's overall objective with helping homeless persons (especially individuals and families, veterans and their families, and unaccompanied youth experiencing chronic and literal homelessness) is to support homeless persons making the transition to permanent housing and independent living. This includes shortening the 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.

In response to the COVID-19 pandemic, Southern Nevada maintained non-congregate shelter services in 2022. NCS consisted of partnerships between private hotel/motels and non-profit providers including HELP of Southern Nevada and our outreach teams assisting with case management services for those in hotels and other offsite lodging. NCS services have continued into 2024 with a new funding opportunity about to be released.

**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**

To increase non-employment cash income, SSI/SSDI Outreach, Access, and Recovery (SOAR) trained case managers encourage all who qualify for mainstream benefits to apply for and assist clients with applications for program enrollment. Case managers have been encouraged to become SOAR certified. Training support is offered at least monthly with Nevada Homeless Alliance meetings and trainings. Topics include community programs, referrals, mainstream benefits, workforce programs, and educational/employment services. Clark County also offers a monthly frontline learning collaborative for staff engaging with those experiencing a housing crisis. The collaborative hosts monthly presentations from various programs and providers to build connections to resources.

CoC providers have met HUD's established goal of 15% of clients securing employment at exit. This achievement is significant given that Clark County has a higher than the national average rate of unemployment. Despite the lack of jobs in the county, providers have assisted clients leaving their supportive housing projects to obtain gainful employment. The SNHCoC continues to expand relationships with Workforce Connections, the Workforce Investment Act service provider, and encourage their participation as an active member in the SNHCoC.

Southern Nevada launched a community-wide initiative in 2020 called Operation Home! (OH!). OH! was conceptualized during the COVID-19 pandemic by the Multi-Agency Coordination Center Recovery Support Functions (RSF-4) Housing (unhoused sub-work group) Group and endorsed by the SNHCoC Board as a recovery response to mitigate the spread of COVID-19 and protect those who are unhoused and are at highest risk for being negatively impacted by the virus. OH! will house 2,022 individuals experiencing homelessness by December 31, 2022, through different pathways to permanent housing by utilizing a client-centered, community, collaborative approach. Specifically, OH! utilized ESG-CV, CDBG-CV, and other funds to focus on rapid rehousing using a progressive engagement model of case management. Agencies have an identical scope of work no matter which jurisdiction awarded funds to keep continuity with the initiative. After the end of ESG-CV funding, Clark County continued to fund most of the providers to continue providing RRH services with new contracts that began in 2023 with eleven service providers.

**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.**

There have been several strategic partnerships with organizations to ensure that special needs populations are returning from mental and physical health institutions to independent living situations. The County has been working on projects for frequent users of high-cost systems, particularly corrections and emergency medical services in recent years. The first component includes identification of clients from emergency rooms, arrests, and interactions with the mental health system. This includes attempting to integrate data from previously non-sharing data systems to find common clients and better coordinate services. Clients are assessed for vulnerability and prioritized for services in alignment with local coordinated entry procedures.

The Healthy Living Consolidated Project (HLCP), a permanent supportive housing project, continues to provide intensive case management via HELP of SNV, medical case management via MCO partners (Anthem, United Healthcare/Health Plan of Nevada (HPN), Silver Summit Health plan, Molina) and permanent housing for medically fragile individuals ready to exit hospitals, but not appropriate for shelters due to their medical fragility. Clients with medical fragility that do not meet the chronicity requirement are connected to other housing programs such as Operation Home! to support their recovery and continued improvement in health-related challenges.

Since 2017, Clark County has collaborated with local detention centers to identify the most frequent users of public systems and provide housing options to reduce the number of arrests and uses of high costs systems such as emergency rooms and 9-1-1 calls. Using data sharing agreements and an automated system, frequent users are identified and screened for enrollment in STAR TH-RRH (Stability, Tenancy, Access, Restore) which offers transitional housing in combination with rapid rehousing assistance, case management, and supportive services, ultimately with the goal of permanent housing. For those experiencing chronic homelessness, STAR PSH is a similar program offering a full range of services along with permanent supportive housing and more intensive case management.

Clark County maintains Crisis Stabilization contracts for those in Southern Nevada experiencing unsheltered homelessness and mental health or substance abuse crisis. Crisis Stabilization provides safe shelter to stabilize, receive wrap around services and connection to stable housing placements in a continuity of care model. Bridge, Crossroads and Southern Nevada CHIPs. Since its inception in 2020, the project has served 8,605 people.

## **Discussion**

The SNHCoC, and the cities of *Boulder City*, Las Vegas, North Las Vegas, and Henderson, and Clark County as well as local providers and partners share responsibility to provide services to the array of homeless households in Southern Nevada. The community continues to band together to respond to growing needs, like COVID-19 response, and embraces these unique funding opportunities towards ending homelessness in our community.

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

The HUD Consolidated Plan (HCP) Consortium continues its partnership with Silver State Fair Housing Council to address fair housing barriers and provide fair housing resources to Clark County residents. Southern Nevada has a significant shortage of Affordable Housing (AH), especially at the 60% AMI level and below. The Clark County, North Las Vegas, Boulder City and Mesquite HUD Consolidated Plan (HCP) 2020-2024 identifies both rental housing serving very low-income and extremely low-income households and housing for persons with special needs, including elderly, as priorities. The deficiency in affordable housing is both due to a demand vs. supply imbalance, along with recent escalations in the cost of land, materials, and labor, and escalations in rent. Clark County has taken steps to mitigate costs through the acquisition/transfer of affordable land, fee discounts and waivers, expedited plans check processing and grants/low interest loans for AH development. The recently adopted update to the County's development code also includes a density bonus and reduced parking requirements for AH projects.

The FY 2020-2024 Regional Analysis of Impediments identified the following impediments to fair housing:

#### **#1 Address Lack of Knowledge of Fair Housing**

- Support fair housing training and education opportunities throughout the region, specifically for rental properties that will be directed to housing service providers, management companies, and rental residents.
- Ensure training opportunities for rental residents to clearly inform this population on their rights and responsibilities, particularly in the area of disabilities. Ensure these trainings are offered in English and Spanish.

#### **#2 Address Disproportionate Housing Problems and Economic Barriers**

- During the grant allocation process give special consideration to rental housing development which includes at least 10% accessible units and single-family housing which includes universal design.
- Consider the placement of developments funded by the jurisdictions so that access to opportunities for low-income residents is enhanced.
- Provide homebuyer education using HUD approved counselors. Ensure training is available in Spanish and English.

#### **#3 Educate on and deter subprime lending**

- Offer or partner with providers to educate the community on subprime lending through financial literacy courses. Ensure courses are available in Spanish and English.

#### **#4 Address Lack of Access to Transportation Options Reducing Housing and Economic Opportunities**

- Explore options for coordinating transportation across the region.
- Locate affordable housing along transportation routes.

### **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**

Clark County intends to continue utilizing the BLM land disposal process for the purpose of developing AH for lower income citizens and was instrumental in updating the BLM guidance document used for facilitating the transfer of Federal land for AH under the Section 7(b) provision of the federal law governing this program, the Southern Nevada Public Lands Management Act (SNPLMA). The land will now be transferred at \$100/acre as opposed to the discount of 90% to 95% of fair market value under the old guidance.

On March 16, 2021, the Board of County Commissioners (BCC) implemented a policy of providing development fee discounts of 75% for AH projects that offer units available to households at or below 60% AMI, and a 50% discount for projects with units available to 60%-80% AMI households. The Planning Department also offers fee waivers and expedited processing for no additional cost. To date, 8 Certified AH projects with 1,214 units have saved nearly \$1.7M in County imposed fees. Several other jurisdictions in Southern Nevada are following suit and offering, or planning to offer, similar incentives specifically for AH.

The State of Nevada Housing Division (NHD) allocated \$500M for AH under the Home Means Nevada Initiative (HMNI) in early 2022. The Clark County BCC established the creation of the Community Housing Fund (CHF) in April 2022. The CHF has awarded \$105M in funding to support the development or rehabilitation of approximately 2,500 permanent AH units for FY22/23. Another \$70M in funding is currently in process for FY23/24. Much of the HMNI and CHF funding provides additional leverage and gap financing to Low-Income Housing Tax Credit (LIHTC) projects. Clark County will also continue supporting these projects with our annual HUD HOME allocation.

Clark County is currently in the process of awarding up to \$20M in funding for much needed Permanent Supportive Housing (PSH) units by leveraging CHF and other County funds with our HOME-ARP allocation. This project -is intended to directly target the critical need for extremely low-income households at or below the 30% AMI levels that require supportive services.

Clark County will continue to remove barriers to AH by internally pursuing and collaborating with other local jurisdictions, and by continuing to provide incentives such as reduced parking requirements, a property tax abatement, flexible zoning, and fee waivers/discounts as well as gap funding/financing that could make AH more economically feasible to develop. It will also continue to facilitate land transfers from the local and federal level, which is one of the primary barriers to developing AH.

**Discussion**

On December 5, 2018, the BCC approved a Zone Change to (High Density Multiple-Family Residential) for 10 BLM owned sites the County has reserved for AH development under SNPLMA (7b). The first of those sites is near Pebble & Eastern.

The 195-unit Pebble & Eastern Senior Apartments is a multi-family rental development that is currently

under construction. This project will meet a growing need for affordable senior housing and supportive elderly housing in the Las Vegas Valley; all units will serve households at or below 60% AMI with 20 of the units set aside for those below 30% AMI. The land transferred from BLM to Clark County, then to the Developer at a 95% discount to Fair Market Value.

BLM and HUD recently completed a new SNPLMA 7(b) guidance document that will streamline the nomination and transfer process and allow the land to be sold for AH at a nominal cost of \$100/acre going forward. Clark County was instrumental in the development of this document and a signing event commemorating this milestone was held in April 2023.

The County has also nominated a 20-acre site near Cactus Avenue and Buffalo Drive for a first ever “For Sale”, Community Land Trust AH project. The County also intends to nominate the remaining 6 BLM sites in the below table for the purpose of developing affordable rental housing. The following table highlights the status of BLM AH nominations:

<b>BLM Affordable Housing Project (AHP) Site Reservations</b>				
			<b>Potential Units</b>	
<b>Location/Status</b>	<b>APN:</b>	<b>Acres</b>	<b>Min</b>	<b>Type</b>
Pebble & Eastern (1)	177-14-802-021	5.0	195	For Rent/Senior
Cactus, E. of Buffalo (2)	176-27-401-013	20	210	For Sale/CLT
B. Diamond, W. of Durango (3)	176-20-601-009	10	320	For Rent/Family
NWC Flamingo/Riley (3)	163-17-801-004 (part)	10	320	For Rent
Near Flamingo/Durango (3)	163-20-504-001	10	320	For Rent
Buffalo, S. of Windmill (3)	176-15-101-015	5	160	For Rent
Cactus, E. of Las Vegas Blvd. (3)	177-28-401-017	10	320	For Rent
NEC Decatur & Pebble	177-18-401-016	10.36	320	For Rent

(1) *Under Construction*

(2) *Developer Selected, Nomination in process with BLM*

(3) *Future Nominations*

Clark County intends to accelerate the nomination of the AH-BLM sites it has reserved now that the new BLM/HUD guidance document is in place. This near zero land cost will reduce the need for additional gap financing and/or allow for deeper income targeting than the typical LIHTC AH projects. Clark County is also allocating land it owns for AH and is in the process of establishing a Community Land Trust (CLT) that will own/lease the land for the “For Sale” projects to guarantee affordability in perpetuity.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

This section will describe the County's plans to use its 2024 projects to address obstacles to meeting underserved needs, foster and maintain affordable housing, evaluate, and reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

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

Clark County supports and participates in Project Homeless Connect, an annual event that connects homeless individuals with the services they need in a one-stop setting. Those in need come to find housing support, shelter referrals, job search assistance, obtain IDs and birth certificates, and access a variety of other services they need to get off the streets. Over the last five years alone, these events have assisted over 15,000 individuals experiencing homelessness in accessing vital resources and services.

To meet underserved needs more quickly, Clark County sought and received HUD Pre-Award approval for its CDBG Capital Improvement Plan (CIP) for the period covering FY 2020-2024 after a year-long citizen participation process. Mesquite and Boulder City have projects approved as part of the CIP with Mesquite focusing on parks and Boulder City focusing on infrastructure and public service. Non-profit sponsored projects received priority funding from the CDBG capital funds awarded annually, and all but one of those projects are completed. The County will be entering the 5th year of the FY2020-2024 Capital Improvement Plan and will complete all projects, which address underserved needs.

Clark County has also sought technical assistance from HUD to address the timeliness issue of spending down CDBG funds. The County hopes to get recommendations on how to address the issue to quickly get back on track while still serving the needs of the underserved.

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

Within the Clark County HOME Consortium, public sector and non-profit groups work to increase the supply of affordable rental and owner-occupied housing in Clark County.

In Spring of 2022, the Welcome Home Program and Clark County's Community Housing Fund (CHF) were created to address the urgent need for housing for low-income residents in Southern Nevada, including families, seniors, and those who are employed but unable to find affordable housing. In September of that year the Board of County Commissioners approved CHF funding of nearly \$120 million for 30 housing developments across the community, both new construction and rehab, to ensure that Clark County residents have safe, modern, and most importantly, affordable options to call home. These initial Welcome Home funds were the first of their kind provided by a local government in Nevada and are



helping to build or maintain approximately 2,500 units of low-income rental housing.

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

All housing properties assisted with the County's program funds must comply with HUD's lead-based paint regulations. As homes enter these programs they are evaluated for lead-based paint and when necessary, such hazards are reduced or eliminated, as required by law.

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

Efforts to address poverty in the Clark County HOME Consortium and Urban County areas include the funding of education and training programs, small business development, and other programs that assist community members to climb the economic ladder. The Consortium jurisdictions have allocated millions in CDBG and ESG funding for anti-poverty activities including construction of an expanded Workforce Training Center.

Clark County also provides approximately \$3 million annually in Outside Agency Grant funds for projects and programs that address poverty, clearly demonstrating that the County uses its own funds and does not rely primarily on federal funds to address this critical issue. To be eligible for funding, a program must provide services and assistance that substantially benefits Clark County residents. Programs that provide a substantial benefit are programs or services needed by disadvantaged citizens to increase their self-sufficiency and personal independence, programs or events that foster community pride or cohesiveness, and programs that strengthen the community's infrastructure.

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

Clark County and the cities of Las Vegas, Henderson, North Las Vegas, Boulder City, and Mesquite continue to meet on a bi-monthly basis to discuss issues relating to HOME, CDBG, and ESG. The meetings continue to include the SNRHA and State of Nevada Housing Division staff. The discussions range from questions relating to joint projects, coordination of grant application cycles, audits, best practices, and cross-cutting regulations.

Although Henderson, Las Vegas, and recently North Las Vegas are independent entitlement communities for CDBG and ESG, their activities affect the region, and the Clark County Urban County and HOME Consortium activities may affect their communities. North Las Vegas remains part of the HOME Consortium, but Henderson and Las Vegas also have independent HOME entitlement status. All these jurisdictions' participation in the Consortium meetings allows for an assessment of the regional impact of housing and community development policies. HCP Consortium members will also continue to participate in jointly funded HOME and CDBG projects.

In 2023, Clark County requalified for the CDBG Urban County Program and renewed the HOME Consortium for FYs 2024-2025. Boulder City and Mesquite remained part of the CDBG Consortium and by virtue of their participation in that Consortium are part of the Clark County HOME Consortium. Meanwhile, the City of North Las Vegas became an independent entitlement entity for CDBG but

remained part of the HOME Consortium in FY2024-2025.

HCP Consortium members will continue to work with the board of the Southern Nevada Homelessness Continuum of Care and implementation of all its initiatives including, but not limited to, Coordinated Entry and CMIS/HMIS. HCP Consortium members have been active with the board in the development of projects and policies that strengthen a structure of cooperation and collaboration.

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

Clark County, North Las Vegas, and Boulder City are members of the Southern Nevada Homelessness Continuum of Care, whose primary responsibility is to manage the overall planning effort for the entire CoC on homeless issues. HCP Consortium staff is also members of the Continuum of Care Evaluation Working Group (CoCEWG) which oversees the operations and activities of the CoC. It includes representatives from both public and private agencies, ensuring compliance with the regional 10-year strategic plan. ESG program information is regularly discussed as a standing item on that agenda which has representatives of many major stakeholder groups including the school district, police department, social service agencies, and non-profits. ESG and CoC staff have also collaborated on monitoring planning and implementation for subrecipients of their funding.

The HCP Consortium works with the Southern Nevada Regional Housing Authority (SNRHA) throughout the year, acting on new issues as they arise and working to support activities and housing opportunities for public housing residents and Section 8 residents.

Coordination with non-profit service providers and among governments takes place consistently through other meetings held in the community including the Emergency Food and Shelter Program (EFSP) Local Board and the Continuum of Care Working Groups. The HCP Consortium will continue to be active members of these committees and others.

### **Discussion**

Clark County staff has also participated in various housing roundtables and legislative committees at both the state and federal levels to explore and address impediments to affordable housing. This work will continue as the information gathered through multiple meetings will be brought to the legislative process.

In addition to the actions outlined above, there are regional initiatives underway in which the HCP Consortium participates. Clark County and North Las Vegas continue to participate with Southern Nevada Strong at the Regional Transportation Commission. Clark County is working on the redevelopment of the Maryland Parkway Corridor to remove blight, develop transit-oriented housing, and provide zoning incentives for revitalization activities. County planners have been striving to understand the role of affordable housing in transit-oriented development in urban settings. To create a compact, pedestrian-oriented, mixed-use community centered on public transportation provides an opportunity for economic revitalization, and Clark County seeks to do so without gentrification of the currently low- to moderate-

income area.

## **Program Specific Requirements**

### **AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)**

#### **Introduction**

#### **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
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
3. The amount of surplus funds from urban renewal settlements
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.
5. The amount of income from float-funded activities

Total Program Income

#### **Other CDBG Requirements**

1. The amount of urgent need activities

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

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

Clark County does not intend to use forms of investment other than those described in 24 CFR 92.205(b).

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:

For homeownership projects, in accordance with 24 CFR 92.254(a)(5), Clark County elects at its option to impose recapture requirements, rather than resale requirements, under the "shared net proceeds" method authorized by 24 CFR 92.254(a)(5)(ii)(A)(3), for its HOME program, to ensure that it recoups all or a portion of the HOME assistance to the homebuyers, if the housing does not continue to be the

principal residence of the family for the duration of the period of affordability.

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:

If the homebuyer transfers the property either voluntarily or involuntarily during the period of affordability, Clark County recovers, from available net proceeds, all, or a portion of the HOME assistance to the homebuyers. Net proceeds are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Under no circumstances can the PJ recapture more than is available from the net proceeds of the sale. In some cases, such as declining housing markets, the net proceeds available at the time of sale may be insufficient to recapture the entire direct HOME subsidy provided to the homebuyer. Since the HOME rule limits recapture to available net proceeds, Clark County can only recapture what is available from net proceeds. If there are insufficient net proceeds available at sale, Clark County is not required to repay the difference between the total direct HOME subsidy and the amount Clark County is able to recapture from available from net proceeds. Clark County and North Las Vegas do not operate nor fund homebuyer assistance programs using HOME funds currently.

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:

Clark County HOME funds will not be used to refinance existing debt.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Clark County does not have HOME TBRA activities planned for the 2024 program year.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Clark County does not have HOME TBRA activities planned for the 2024 program year.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Tropicana Trail having HOME ARP funding has a limitation for serving HOME ARP qualifying populations with no preference to serve one in particular.

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

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

Individuals and families eligible for emergency shelter housing funded by ESG funds must be homeless as defined by the General Definition of Homeless Individual, found in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act) Section 103 [42 USC 11302]:

(a) In general, for purposes of this chapter, the terms “homeless”, “homeless individual”, and “homeless person” means— [1]

- (1) an individual or family who lacks a fixed, regular, and adequate nighttime residence;
- (2) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- (3) an individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements;
- (4) an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
- (5) an individual or family who—
  - (A) will imminently lose their housing;
  - (B) has no subsequent residence identified; and
  - (C) lacks the resources or support networks needed to obtain other permanent housing;and
- (6) unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who—
  - (A) have experienced a long-term period without living independently in permanent housing,
  - (B) have experienced persistent instability as measured by frequent moves over such period, and
  - (C) can be expected to continue in such status for an extended period because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a

disability, or multiple barriers to employment.

(b) Domestic violence and other dangerous or life-threatening conditions

Notwithstanding any other provision of this section, also to be considered to be homeless is any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing.

(c) Income eligibility

(d) Exclusion, for purposes of this chapter, the term "homeless" or "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or a State law.

(e) Persons experiencing homelessness, any references to homeless individuals (including homeless persons) or homeless groups (including homeless persons) shall be considered to include, and to refer to, individuals experiencing homelessness or groups experiencing homelessness, respectively.

(f) Standards for targeting and providing essential services related to street outreach. Outreach must be conducted to zip codes within the appropriate jurisdiction and addressing encampments within the jurisdictional boundaries.

Please refer to appendix E in the consolidated plan for full details and updated 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.

Coordinated Entry (CE) is a requirement of the U.S. Department of Housing and Urban Development (HUD) and is Southern Nevada's strategy for a more efficient system to help people experiencing homelessness to access housing services. This has proven to be an effective way to assess people for multiple programs throughout the community and match them to appropriate housing as it becomes available. CE allows providers to focus their time and resources on providing direct services to clients and improves the coordination of shelter and housing services. It has also been effective in improving data collection and providing accurate information on prevention, client needs and service gaps within the community.

In July 2014, Southern Nevada began utilizing the Coordinated Entry process in a pilot project for Households without Children. Southern Nevada intends in using the pilot to develop the most efficient and effective process. The knowledge gained has been used to improve the existing CE processes for youth, families, and survivors of domestic violence. The additional subpopulations began implementing CE in October 2017. In January 2018, the Southern Nevada Homelessness Continuum

of Care adopted Southern Nevada Coordinated Entry System Policies & Procedures (see attachment).

Even though Clark County has a Coordinated Entry System, it is not required for use under Street Outreach or Homeless Prevention.

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).

Clark County Community Resources Management (CRM) distributes the application for ESG funding annually. The application is advertised in local newspapers, on the CRM and CoC websites, and email announcements to previous applicants and new potential applicants who have expressed interest in the program.

Clark County uses a special subcommittee of members from the Community Development Advisory Council (CDAC) and the Continuum of Care Evaluation Work Group (CoCEWG) to review, discuss, and make funding recommendations for the ESG program. This subcommittee makes their decisions based on community needs and national and local priorities. All applications are reviewed by staff for eligibility and completeness prior to review by the subcommittee.

These recommendations are presented to the larger CDAC group for ratification. The CDAC presents the recommendations to the Board of County Commissioners (BCC) for approval. The BCC makes the final project selections.

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.

Clark County serves as the collaborative applicant and is an active participant in the SNHCoC and has frequent, regular input and interaction with members of the homeless community. The SNHCoC board maintains a seat for at least one currently or formerly homeless member. These individuals are also invited to be a part of the various work groups and subcommittees. These individuals are encouraged to provide input into all aspects of the Clark County's planning activities – from assessing needs and setting priorities through performance evaluation. Clark County will continue to provide a forum for citizens to contribute information, ideas, and opinions on how residents can be benefit from these grant programs.

Southern Nevada has a process in place for regional collaboration on homeless issues which includes discussion related to ESG funding, while respecting each the individual political jurisdiction. As a result, the governance structure recognizes the initial regional framework designed by SNRPC in 2003, while incorporating the rules and regulations enacted through the HEARTH Act and the Continuum of Care (CoC) Program in 2009. In 2014, both the Southern Nevada Homelessness Continuum of Care (SNH CoC) and the Southern Nevada Homelessness Continuum of Care Board (SNH CoC Board) were defined. Although Clark County Social Service provides the staff support for the much of the activities



of the SNH CoC. The SNH CoC Board, comprised of local stakeholders, homeless individuals, and jurisdictional representatives oversee the activities of the SNHCoC. This oversight includes identification of homeless issues, gaps in services, coordination of the allocation of funds, and the development and biannual evaluation of HELP HOPE HOME, Southern Nevada’s Regional Plan to End Homelessness. Activities of the SNHCoC Board include yearly strategic planning, the annual homeless census, regional coordination, inclement weather shelter, CMIS/HMIS, system evaluation, HEARTH Act implementation, CoC monitoring, and other activities.

Its members are the Housing and Neighborhood Services Manager and staff for the City of North Las Vegas, City of Las Vegas, City of Henderson, and Clark County Social Service Assistant Director and staff; Veterans Administration, United Way staff, the Nevada Homeless Alliance, Southern Nevada Adult Mental Health Services, Clark County School District Title I HOPE, the Las Vegas Metropolitan Police Department, MGM Resorts, and the City of Boulder City.

The working groups oversee the planning, operations, and activities of the SNHCoC. They develop the updates to and ensure compliance with the regional 10-year strategic plan through: monitoring of performance measures and outcomes; conducting the services and housing gaps analysis; planning for the Point-In-Time count (PIT) of the homeless population; reviewing/ recommending potential CoC projects; submission of the CoC application; HEARTH implementation, and any other activities under the CoC. City of North Las Vegas, City of Las Vegas, City of Henderson, and Clark County staff are active participants in the working groups with the ESG programs from all jurisdictions being a standing item on the agenda. All CoC meetings are open to the public; providers or interested parties are encouraged to volunteer for appropriate subgroups representing specific populations. The Southern Nevada Housing and Homeless Plan includes all the jurisdictions that make up Southern Nevada and outlines goals and strategies to guide local governments in funding, developing, and supporting homeless services.

#### 5. Describe performance standards for evaluating ESG.

Organizations are aware they are subjected to “on-site monitoring” by jurisdiction staff, a jurisdiction designee, or a HUD representative on a 24-hour notice during normal working hours. For annual performance review Clark County and the local jurisdictions have contracted the monitoring services of Strategic Progress. Strategic Progress monitors all CoC and ESG funded programs for Clark County, the City of Las Vegas, the City of North Las Vegas, and Henderson. Strategic Progress representatives are granted access to all program records for audit, examination, and review and may request to interview program recipients who volunteer to be interviewed.

All monitoring in is to be based on the following risk analysis process (subrecipients who have had high staff turnover, who are new awardees, or who have not been monitored in two years)

- Schedule monitoring visit with subrecipients
- Send out a letter notifying the subrecipient of the time and date of the monitoring visit
- Update monitoring tools/forms as needed

- Post schedule on calendar and notify other staff members responsible for conducting monitoring
- Conduct entrance conference and monitoring visit using monitoring form
- Request missing documents to be submitted by a designated time
- Send monitoring summary letter
- Letter should include findings and conclusions and the timeline for addressing findings. It should also include recommendations for improvement.

At the end of the monitoring review, staff conducts an exit conference with the appropriate participant officials or staff to discuss conclusions. In part, this serves to confirm the accuracy and completeness of the information used to form the basis for the monitoring conclusions.

The SNHCoC has extended the agreement with Strategic Progress to continue to monitor CoC programs as well as ESG programs. Fiscal year 2017/2018 was the first year of this endeavor Strategic Progress was selected to conduct the onsite monitoring; this team has participated in over 30 federal grant evaluation designs, evaluation projects, and implementation of evaluation plans or evaluation of federally funded agencies or initiatives. Strategic Progress has developed various tools for desktop and onsite monitoring that have been implemented for the annual reviews with respect to COVID-19 protocols which should provide greater ease of calculation and reporting of the scoring.

# ESG Written Standards



# Southern Nevada Emergency Solutions Grant Written Standards

Approved April 2022

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# I. Definitions

**Certification:** is a written, notarized assertion, based on supporting evidence that must be kept available for inspection by ESG recipient staff, HUD, by the Inspector General of HUD, and by the public. The assertion shall be deemed to be accurate unless HUD determines otherwise, after inspecting the evidence and providing due notice and opportunity for comment.

**Consolidated Plan:** is the plan prepared in accordance with 24 CFR Part 91. Recipient means the legal entity to which HUD awards an ESG award and which is accountable for the use of the funds provided.

**Grantee(s):** "Grantee(s)" refers to recipients and Subrecipients of Federal Continuum of Care or Emergency Solutions Grant funding.

**HMIS:** is the Homeless Management Information System.

**Household:** refers to individuals or families.

**HUD:** is the U.S. Department of Housing and Urban Development.

**Non-profit organization:** is an organization described in 26 U.S.C. 501(c) that is exempt from taxation under subtitle A of the Internal Revenue Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance.

**Participant(s):** "Participant(s)" refers to all individuals and families receiving assistance through a Continuum of Care or Emergency Solutions Grant-funded provider, including persons participating in programs funded through other federal, state, local, or private sources.

**State:** is the State of Nevada.

**Sub-recipient:** is any private non-profit organization or unit of general local government to which a sub-recipient provides funds to carry out the eligible activities under the grant and which is accountable to the sub-recipient for the use of the funds provided. The terms "sub-recipient" and "sub recipient" are synonymous.

## **II. Introduction**

In accordance with Title 24 of the Code of Federal Regulations (24 CFR) 91.220(l)(4)(i) and 576.400(e) (1), The Southern Nevada Homeless Continuum of Care (CoC) developed the following written standards for the provision and prioritization of Emergency Solutions Grant (ESG) funding for the City of Las Vegas, the City of North Las Vegas, and Clark County. ESG recipients and subrecipients are required by HUD to have written standards for providing ESG assistance and must consistently apply these standards to all program participants. The following standards are intended as basic, minimum standards to which individual ESG applicants and/ or subrecipients can add additional and more stringent standards applicable only to their own projects. These required standards help to ensure that the ESG program is administered fairly and systematically. The Southern Nevada Homeless CoC will continue to build upon and refine this document.

### **III. Background**

The City of Las Vegas, the City of North Las Vegas, and Clark County are each awarded ESG funds annually from the Department of Housing and Urban Development (HUD) as part of the annual allocation Process. These funds are designed to assist sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) significantly amended the McKinney-Vento Homeless Assistance Act, including major revisions to the Emergency Shelter Grants program, which was renamed the Emergency Solutions Grants program. The HEARTH Act, and implementation of the applicable federal regulations by HUD, incorporated many of the lessons learned from the implementation of the Homelessness Prevention and Rapid Re-Housing Recovery Act Program (HPRP) into the new ESG program, including placing a stronger emphasis on rapid re-housing assistance.



## **IV. Evaluation and Documentation of Eligibility for ESG**

### **ESG General Eligibility Standards**

Individuals and families eligible for emergency shelter, rapid re-housing, or other assistance funded by ESG funds must be homeless or at risk of homelessness based on criteria defined by the General Definition of Homeless Individual, found in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act) and the Definition of At-Risk of Homelessness defined by the Emergency Solutions Grant Program interim rule. Complete definitions are found at 24 CFR 576.2 and are included as Appendix A.

Participants in ESG-funded programs must have incomes at or below 30% of the Area Median Income based on the HUD income limits in effect at the time of income verification. Income eligibility is not based on HUD income limits that correspond with the grant year under which the ESG funds were awarded. Current income limits can be found by following the directions on the HUD Exchange web site at: <https://www.hudexchange.info/resource/5079/esg-income-limits/>

Subrecipients of ESG funds will develop policies and procedures to evaluate individuals' and families' eligibility for assistance under ESG. This will involve participating in Coordinated Entry with the CoC and screening individuals to determine eligibility based on criteria for ESG as determined by HUD.

### **Emergency Shelter Eligibility & Documentation**

Emergency Shelter programs are required to document eligibility at program entry. However, HUD recognizes that third-party documentation at the emergency shelter level is not feasible in most cases. Therefore, shelters have a different standard of recordkeeping than is required for all other types of assistance. Subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. Under no circumstances must the lack of third-party documentation prevent an individual or family from being admitted immediately to emergency shelter, receiving street outreach services, or receiving services from a victim service provider.

For shelters where program participants may stay only one night and must leave in the morning, documentation must be obtained each night. If program participants stay more than one night, then documentation must be obtained on the first night the household stays in the shelter. Please note that emergency shelters are required to enter each individual or family seeking emergency shelter into HMIS, but the intake process should be able to be done in a quick manner.

### **Rapid Re-Housing Eligibility & Documentation**

Program participants receiving ESG Rapid Re-Housing assistance must be literally homeless, as defined by the ESG interim rule. Re-evaluation must occur not less than once annually. At this re-evaluation, the participant's household income cannot exceed 30% of median family income for the area, as determined by HUD. Examples of documentation include program entry forms, assessment tools for

Coordinated Entry, and copies of wage statements, tax returns, benefits statements, bank statements or other documents that outline participant assets and affirm that the household is at or below 30% of the Area Median Income. HUD's preferred order of documentation as described below applies to Rapid Re-Housing programs.

## **Homelessness Prevention Eligibility & Documentation**

For households receiving ESG Homelessness Prevention assistance through ESG, income also cannot exceed 30% of Area Median Income, and this must be determined during entry into the assistance program. Re-evaluation for Homelessness Prevention assistance must take place not less than once every three months, with records being kept for each re-evaluation. Examples of documentation include program entry forms, assessment tools for Coordinated Entry, copies of eviction notices or utility bills and shut-off notices, and copies of wage statements, tax returns, benefits statements, bank statements or other documents that outline participant assets and affirm that the household is at or below 30% of the Area Median Income. HUD's preferred order of documentation as described below applies to Homeless Prevention programs.

## V. Recordkeeping Requirements

### Preferred Order of Eligibility Documentation

Subrecipients must establish and follow written intake procedures to ensure compliance with HUD's definition of homelessness and recordkeeping requirements. Subrecipient will maintain records for five years for each individual and family determined ineligible to receive ESG Homelessness Prevention or Rapid Re-housing assistance. The record must include documentation of the reason for that determination, demographic data (race, sex, national origin), and age.

HUD has a preferred order of documentation for eligibility of clients being served by ESG-funded projects. Please note that there are exceptions to this preferred order, including emergency shelters, street outreach, and victim services, in order to protect the safety of individuals/families fleeing or attempting to flee domestic violence. HUD's preferred order for other ESG-funded programs is:

1. Third Party Documentation
  - a. Written documentation that includes such items as eviction notices, job termination notices, wage statements, benefits statements, tax returns or bank statements.
  - b. Oral documentation, which includes clear notes that document names, dates, and information shared through conversations with former employers, landlords, government benefits staff or others in an official position to verify client status.
2. Intake Staff Observations, including notes on client status; this is not applicable to income documentation.
3. Self-Certification, which should be used only as a last resort with careful documentation of how income documents were sought and why they could not be secured for a client.

For all ESG programs, subrecipients are required to keep documentation of client eligibility, but the original assessment and HUD's preferred order can vary somewhat based on the type of program, as outlined above.

### Survivors of Domestic Violence

For individuals who are survivors of domestic violence, acceptable evidence includes:

1. Source documents provided by an outside source (Written Third Party Verification of Homeless Status form or Oral Third-Party Verification of Homeless Status); or Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations.
2. Staff/Intake worker observations. Documentation by Subrecipients' staff is considered observation of Homeless Status.
3. Certification from the person seeking assistance. Subrecipient staff must certify efforts made to obtain third party documentation before allowing applicant to self-certify.

Lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a survivor service provider.

## Individuals Residing in an Institution

For individuals residing in an institution (including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility) for fewer than 90 days, acceptable evidence includes:

1. Discharge paperwork or a written or oral referral. From a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution that demonstrates the person resided there for less than 90 days.
2. An Oral Statement-All oral statements must be recorded by the intake; or
3. Certification from the person seeking assistance. Where the evidence above is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in the paragraph above and a certification by the individual seeking assistance that states that they are exiting or have just exited an institution where they resided for less than 90 days; and Evidence of literally homeless status prior to entry.

Evidence that the individual was homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter, and was chronically homeless prior to entry into the institutional care facility (as defined in paragraph (1) of 25 CFR 578.3) (acceptable documentation listed above).

## **VI. Use of Data and Coordination of Services**

### **Using HMIS and the Sage HMIS Reporting Repository**

Clients assisted with ESG funds need to be entered into the Homeless Management Information System (HMIS) during client intake. Agencies administering ESG funds must:

- 1) Maintain a minimum HMIS data quality of 90%
- 2) Maintain complete and accurate files for all clients assisted with ESG funds (both in HMIS and through hard copy documentation of eligibility)
- 3) Comply with all data collection and entry requests to allow proper use of the Sage HMIS Reporting Repository and the completion of the Consolidated Annual Performance and Evaluation Report (CAPER)
- 4) Keep complete and accurate files for all families and individuals denied services under the ESG program. These files must contain general demographic information and document the reason for the denial of services and must be kept for five (5) years.

PLEASE NOTE: Agencies providing services solely to victims of domestic violence, stalking, sexual abuse, and trafficking are exempt from using HMIS. In those cases, a comparable database will be used that protects the identity and safety of clients.

### **Coordinated Entry**

To help ensure homeless households receive immediate housing and minimize barriers to housing access, all service providers which receive Department of Housing and Urban Development (HUD) funding, including ESG recipients and subrecipients, are required to participate in the Southern Nevada Continuum of Care Coordinated Entry System (CES)/Coordinated Intake (CI). All ESG providers must comply with relevant provisions of the Southern Nevada Coordinated Entry Policies and Procedures.

The primary coordinative body for implementation will begin with the Southern Nevada Homelessness Continuum of Care. Implementing Coordinated Entry is a federal requirement for several federal programs under the Department of Housing and Urban Development (HUD). In Southern Nevada, we have used it as an opportunity to initiate changes in our homeless response system, shifting from an ad hoc access and assessment process to a standardized process for all clients with coordinated referrals to housing and supportive services. The Continuum's designated coordinated entry provider(s) will coordinate with referral agencies, United Way EFSP recipients, and other community resources to link clients in need of housing assistance to other services and shelters.

Homeless individuals will be assessed through the centralized coordinated entry process. During intake, homeless individuals will be assessed, evaluated, and referred to services if they are available and appropriate for the individual.

Homeless service providers who serve other types of sub-populations such as families (adults accompanied by children), unaccompanied youth, and persons at risk of homelessness will also be required to use the centralized coordinated intake process as implemented for that particular sub-population. Providers serving households fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions, including human trafficking, may include

separate but comparable processes and databases in order to provide safety, security, and confidentiality. The Coordinated Entry process must allow emergency services and shelter programs to operate with as few barriers to entry as possible. The process must also ensure adequate privacy protection of all participant information.

Additional information on Coordinated Entry can be found in the HUD Notice: CPD-17-01, issued January 23, 2017 and found at: <https://www.hudexchange.info/resources/documents/Notice-CPD-17-01-Establishing-Additional-Requirements-or-a-Continuum-of-Care-Centralized-or-Coordinated-Assessment-System.pdf>.

## **HMIS Data Standards**

Except as otherwise specified, data associated with the CE system should be stored in the CoC's HMIS. All data entered into or accessed or retrieved from HMIS must be protected and kept private in accordance with the Clarity Nevada HMIS Governance Charter's Privacy Plan and HMIS Data and Technical Standards as announced by the CoC Interim Rule at 24 CFR 578.7(a)(8).19. Before collecting any information as part of the CE system, all staff and volunteers must first either (1) obtain the participant's informed consent to share and store participant information for the purposes of assessing and referring participants through the CE process, or (2) confirm that such consent has already been obtained and is still active.

Prior to every client's initial assessment, ESG-funded programs must provide a verbal explanation that the client's information will be entered into an electronic database that stores client information and an explanation of the HMIS Client Consent to Release Information form terms. After being provided a verbal explanation, each client who agrees to have his or her personal protected information HMIS must sign the HMIS Client Consent to Release Information form.

Whenever possible, the participant's consent should be in written form. The ESG subrecipient will not deny services to any participant based on that participant's refusal to allow their data to be stored or shared unless a Federal statute requires collection, use, storage, and reporting of a participant's personally identifiable information as a condition of program participation. Where appropriate, non-personally identifiable information about participants who refuse consent to share personally identifiable data should be logged in an electronic case file that uses pseudonyms, e.g., "Jane Doe," to preserve as much non-personally identifiable information as possible for statistical purposes.

The completeness and accuracy of data entered into HMIS and the CE system will be checked at least once per month as part of the community's overall efforts to continuously improve data quality. The CoC will provide training and technical assistance upon request to anyone using the CE system that faces obstacles to inputting complete and accurate data, and may recommend and/or require technical assistance for providers who receive a low score on automated data quality reports. Clients assisted with ESG funds should be entered into HMIS during client intake, agency must maintain a minimum HMIS data quality of 80%. Agencies solely providing emergency shelter to victims of domestic violence, stalking, sexual abuse, and trafficking can request an exempt but, must try to code clients in the HMIS to hide their identity. If that is not possible, and only in those cases, a comparable database should be used that protects the identity and safety of clients.

## Confidentiality of Records

All ESG-funded programs must uphold all privacy protection standards established. Only individuals who have completed a full set of HMIS training and signed an HMIS end-user agreement may directly access CE system data. All such persons must be informed of and understand the privacy rules associated with collection, management, and reporting of client data. Only persons who have a direct role to play in the CE system (i.e., intake, assessment, matching, referral, management, technical assistance, or evaluation) should have direct access to CE system data on the general homeless population of the CoC. Other service providers should be limited to data that relates to specific clients who are currently assigned to or enrolled with those service providers. In certain circumstances, individuals can access CE HMIS data for research purposes without meeting the above criteria. A research data agreement is required to receive HMIS aggregated data. Please see the Clarity Nevada HMIS Governance Charter for more details on research agreements.

However, in sharing data, great care must be taken not to share personally identifiable data outside the context of the systems and purpose(s) covered by the client's affirmative consent. Therefore, all entities that routinely share data with or receive data from the CE system must sign data-sharing agreements that obligate the entities to follow comparable privacy standards and that restrict the use of the data being shared to uses that are compatible with clients' consent. In particular, personally identifiable data must always be used for the benefit of the client to which the data pertains, and not for the general convenience of other government entities. Requests for data made by prosecutors, detectives, immigration officials, or by police officers who are not actively cooperating with the CoC should be refused unless the requesting party displays a valid warrant specifically ordering the release of the data.

## VII. Street Outreach Standards

*Standards for targeting and providing essential services related to street outreach | 24 CFR 576.400(e)(3)(ii)*

### **Street Outreach Requirements, Eligible Activities & Costs**

Street Outreach should be principally focused to one goal: that of supporting persons experiencing homelessness in achieving some form of permanent, sustainable housing. While Street Outreach providers may use incentives to encourage trust and build relationships, or to ensure that homeless households' emergency needs are met, the awards made should be used with permanent housing as the end goal rather than simply seeking to alleviate the burden of living on the streets.

ESG street outreach funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate facility.

Individuals and families shall be offered the following eligible Street Outreach activities, as needed and appropriate: engagement, case management, emergency health and mental health, transportation services (24 576.101).

### **Target Population**

Providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground. All street outreach must target areas where homeless individuals dwell, be that on private/public property, undeveloped land, in encampments or in tunnels located within the municipality.



## VIII. Emergency Shelter Standards

### Emergency Shelter Requirements, Eligible Activities & Costs

*Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.*

ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters. An emergency shelter is any facility with the primary purpose of providing temporary shelter for the homeless in general or for a specific population of the homeless. Emergency shelters do not require occupants to sign leases or occupancy agreements.

Homeless individuals/families seeking shelter must be provided shelter. Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. If there are no appropriate or available beds immediately available for the client at the location he/she is seeking assistance, then the agency must collaborate with another provider to place client into another appropriate shelter.

Shelters must meet or exceed minimum habitability standards specified in CFR 576.403 that covers the building structure and materials, access, space and security, interior air quality, water supply, sanitary facilities, environmental temperatures, light and electricity, food preparation, sanitary conditions, and fire safety.

There is no city or county-imposed limit on the length of stay. It is the discretion of the agency and program providing shelter services to set limits, if any, on the length of stay depending on the target population, client's barriers to obtain permanent housing, and other circumstances the client is facing. Households should only be referred to ESG-funded emergency shelters after exhausting all available options for diversion. Emergency shelter programs should be closely linked to the Regional Coordinated Entry System (CES) to ensure clients are referred to the most appropriate housing resources including, but not limited to, rapid re-housing and permanent supportive housing. Linkages should also be made to applicable mainstream resources.

Per HUD, sheltered families with children cannot be broken apart. If no shelter is available on-site, an alternative living arrangement must place the family together which may include placement at another shelter/ housing provider that can house families, or hotel-motel rooms (only in areas where no other appropriate shelter is available).

Providers should aim to have clients leave the program into a permanent and stable housing situation. This can be placement into supportive housing, or client may become self-sufficient and able to maintain his/her own housing with a stable source in income.

If client leaves the program and is not stably housed, all efforts should be made to place client into another more appropriate shelter/ housing situation.

Vulnerable populations seeking shelter need access to appropriate shelter that is safe, sanitary, and meets or exceeds minimum habitability standards. This population includes victims of domestic violence, youth, people with special needs, the elderly, medically frail, mentally ill, and victims of human trafficking. Upon intake and if necessary, client may be referred and sheltered elsewhere in a more appropriate location. Emergency shelters that provide housing to victims of domestic violence must have an appropriate security system in place to protect housed victims of domestic violence from their perpetrators. Currently there are a few providers that offer emergency shelter beds and supportive services to these vulnerable populations. There is no time limit on their length of stay. Clients are not discharged back out to the street or into unsafe living conditions, but if necessary are referred to another appropriate housing program.

In addition to homeless clients seeking shelter, street outreach is conducted by local homeless providers including the Las Vegas Metropolitan Police Department to get homeless people located in places not meant for human habitation into emergency shelter or transitional/ permanent housing.

## **Emergency Shelter and Essential Services**

*Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter | 24 CFR 576.400(e)(3)(iv)*

ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter. Essential services for participants of emergency shelter assistance can 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.

ESG recipients shall be required to use the Coordinated Entry system to help determine an individual or family's need for emergency shelter or other ESG funded assistance, per the Clark County/Las Vegas Continuum (COC).

ESG sub-recipients are responsible to assess an individual or family's initial need for emergency shelter and must re-assess their need on an ongoing basis to ensure that only those individual or families with the greatest need receive ESG-funded emergency shelter assistance. Shelters that serve families must serve all eligible families and may not refuse services based on the age of children or the size of the family.

Client re-assessment will take place at the participant level and at the service provider level. Clients meet with case managers throughout their participation in the program, and have regular progress evaluations. Clients have opportunity to provide assessment and feedback of programs as well.

Clients assisted with ESG funds are to be entered into HMIS during client intake and agency must maintain a minimum HMIS data quality of 90%. Agencies solely providing emergency shelter to victims of domestic violence, stalking, sexual abuse, and trafficking are exempt. In those cases, a comparable database should be used that protects the identity and safety of clients.

Clients must be assisted to the maximum extent possible with connections to other programs targeted to homeless people in the local Continuum of Care area, as well as mainstream housing, health, social services, employment, education, and youth programs for which they may be eligible (see 24 CFR 576.400 Area-wide systems coordination, sections b and c for a full list). This includes CoC, HUD-VASH, Education for Homeless Children and Youth, Health Care for Homeless, Runaway and Homeless Youth, Homeless Veterans Reintegration, Section 8, Public Housing, HOME Investment Partnership, Workforce Investment Act, and TANF programs. When assisting vulnerable populations, services must be tailored to address their special needs. Individualized case management is also highly encouraged.

To improve awareness of services, ESG-funded agencies are required to attend training and meeting sessions on homeless services in the community. This includes the Mainstream Programs Basic Training, the SNRPC Committee on Homelessness meetings, and SOAR training.

## **Eligible Participants**

ESG-funded emergency shelter programs serve households that meet the definition of "homeless" as defined by HUD at 24 CFR 576.2. Households served by ESG-funded emergency shelters lack a fixed, regular, and adequate nighttime residence; cannot be served by other programs or resources; and have no other options for overnight shelter.

## **Recordkeeping Requirements**

For shelters where program participants may stay only one night and must leave in the morning, documentation must be obtained each night. If program participants may stay more than one night, then documentation must be obtained on the first night the household stays in the shelter.

Subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. One method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are homeless.

Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

## **HMIS**

All individuals and families seeking emergency shelter must be entered into HMIS. Only the uniform data elements are required, however, at entry.

## Coordination Among Shelters and Service Providers

*Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers. See § 576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable | 24 CFR 576.400(e)(3)(v)*

A centralized coordinated entry has been adopted by the Continuum of Care and is in place in Southern Nevada for certain populations. Providers assisting those populations and assisted with ESG funds must participate in the centralized coordinated entry system. Providers are also required have their most recent information updated in Nevada 211. To improve collaboration and awareness of services, ESG funded agencies are required to attend training and meeting sessions on homeless services in the community.

Case management and intake staff are required to attend Mainstream Programs Basic Training classes, which provide information on the local and federal resources and programs covering the following core topics: Income Supports, Employment Services, Health Care, Legal Services, and Housing Resources. Specialized topics typically include: Veterans, Housing Resources, Employment Services/Income Supports, Addictions & Mental Health, Homeless Youth/Young Adults and Families w/ Children, Human Trafficking, Senior Services/ HealthCare Services, Legal Services/Financial Literacy, Domestic Violence, HIV/AIDS, and Services for Persons with Disabilities.

ESG subrecipients on the director or management level are highly encouraged to attend a minimum of 5 Southern Nevada Homelessness Continuum of Care (SNH CoC) Board meetings per year.

One staff member from each ESG-funded program providing direct supportive services is highly encouraged to complete SSI/SSDI, Outreach, Access, and Recovery (SOAR) training within 18 months of the date their assistance agreement for ESG funds is fully executed. Outcomes should be reported to SNH COC Board staff at least once per year. SOAR training, a national project funded by Substance Abuse and Mental Health Services Administration (SAMHSA) is available for direct service workers who, once trained, understand Disability Determination Services and Social Security Administration's requirements and appropriate documentation needs. SOAR training helps to decrease the time to issue determinations and reduces the need for appeals. This is highly beneficial for eligible adults who are homeless or at risk of homelessness and have a mental illness and/or co-occurring substance abuse disorder, which are also populations that face significant barriers to seeking stable affordable permanent housing.

# IX. Homelessness Prevention and Rapid Re-Housing Standards

## Homelessness Prevention & Rapid Re-Housing Eligible Activities & Costs

Homelessness Prevention (HP) assistance includes housing relocation and stabilization services and/or 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. 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.

Rapid Re-Housing (RRH) assistance includes housing relocation and stabilization services and short- and/or medium-term rental assistance to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. All Subrecipients are required to receive referrals through the Regional Coordinated Entry System.

## Eligibility & Recordkeeping

*Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance | 24 CFR 576.400(e)(3)(vi)*

**Intake and HMIS:** In addition to the application forms created by their organization, subrecipients are required to use HMIS during client intake when adding a client to their ESG-funded program. Criteria must be supported by documentation that has been copied and uploaded into the electronic file in HMIS and stored in the client's file.

**Homeless Prevention: Eligible participants** are individuals/families with incomes below 30% Area Median Income, at risk of becoming homeless and moving into an emergency shelter or a place not meant for human habitation. All assisted individuals/families must meet eligibility criteria as outlined at 576.103 Homeless Prevention Component in the Interim Rule. Participants are eligible if they meet the HUD definition of "at risk of homelessness", or who meet the criteria in paragraph 2, 3, or 4 of the homeless definition in 24 CFR 576.2 (See Appendix A) AND have an annual income below 30% of area median family income. The client file must contain source documentation of annual income, including wage statements, tax returns, benefits statements, or bank account statements. Those who meet the HUD criteria of eligibility will receive priority for assistance over other eligible persons. Those who meet the HUD criteria of eligibility and who score over 20 points on the Housing Needs Assessment Matrix will receive priority for the most appropriate assistance over other eligible persons.

**Rapid Re-housing: Eligible participants** need to be literally homeless. To be eligible beneficiaries must meet the definition of homelessness under paragraph 1 of the "homeless definition" defined by the ESG interim rule (see Appendix A), or meet criteria under paragraph 4 of homeless definition AND live in an emergency shelter or other place described in paragraph 1 of homeless definition. Clients eligible under the HUD definition of literally homeless will receive priority over other eligible persons. Clients eligible

under the HUD definition of literally homeless and receive the appropriate score from the CHAT will receive priority over other eligible persons. HUD requires clients receiving assistance for rapid re-housing to be re-evaluated at least once per year, however, on a local basis, additional assessments are required.

## **Prioritization**

Homeless Prevention programs should target households at greatest risk of homelessness and assist participants to increase household incomes during enrollment.

ESG rapid re-housing assistance targets and prioritizes homeless families who are most in need of this temporary assistance and are most likely to achieve and maintain stable housing, whether subsidized or unsubsidized, after the program concludes. Depending on need, families are connected to either short-term or medium-term rental assistance.

Short-term rental assistance (up to 3 months) programs target families with low to moderate barriers to securing and retaining permanent housing. These families require minimal service intervention and limited financial assistance to secure and stabilize in permanent housing.

Medium-term rental assistance (4-24 months) is targeted towards families who experience moderate to high barriers to securing and retaining housing. These families have multiple barriers to housing that require longer periods of time to resolve and may require more intensive service interventions.

## **Homelessness Prevention: Rental Assistance to Prevent Eviction**

All clients will complete the Homeless Prevention Consortium Housing Needs Assessment Matrix and the Supplemental Application or agency application. Clients eligible under the HUD definition of at risk of homelessness and who score over 20 points on the Matrix will receive priority for the most appropriate assistance over other eligible persons who are at risk of homelessness. Clients eligible under the HUD definition of homelessness will be matched to a program that best fits their circumstances. HUD requires clients receiving assistance for homeless prevention to be re-evaluated at least once every three months. Furthermore, the following local conditions apply:

### Short-term rent (1 to 3 months of assistance allowed at 100% rate of rent)

1. The household will actively engage in a Housing Stabilization Plan, the goal of which will be to either increase income and/or reduce expenses such that the rental cost is no more than 80% of the household's net income.
2. The client household will agree to participate in case management and other activities designed to improve their ability to remain stably housed.
3. The initial assistance must have been necessary to avoid eviction (eviction notice/ notice to quit letter required), or to avoid or reduce an unnecessary episode of homelessness of the household.
4. Rental assistance may not be provided to a program participant receiving rental assistance from other public sources (except for 6 months arrears).
5. Rental rates must not exceed the Fair Market Rent specified for household size and rental rates must comply with HUD's rent reasonableness.

6. Any housing units constructed before January 1, 1978, will be assessed for lead-based paint hazards.
7. Housing unit must meet minimum habitability standards specified in 24 CFR 576.403(c).
8. Each household receiving rental assistance must have a legally binding, written lease (between the owner and participant household) for the rental unit in their name.
9. Agency must have a rental assistance agreement in place with the party to which payments are being made which must set forth the terms under which rental assistance will be provided.
10. Arrears (no more than 6 months) must be paid off first to bring the balance to zero. Payment of rental arrears can only be a one-time payment up to 6 months including any late fees on those arrears. Late fees for subsequent months will not be paid with ESG funds.
11. Unit owners must be paid on a timely basis in accordance with the rental assistance agreement. Any late payment penalties that are incurred must be paid by subrecipient or household (with non-ESG funds).
12. The household will be "re-evaluated" for income eligibility no later than the 20th day at the end of the 3rd month. At re-evaluation, household income cannot exceed 30% of AMI, otherwise financial assistance will cease. The client file must contain source documentation of income, including wage statements, tax returns, benefits statements, or bank account statements.
13. A second and third issuance of rental assistance can be considered when the household demonstrates compliance with and progress on the Housing Stability Plan.
14. If at the third month "re-evaluation" and assessment finds that the client needs additional assistance, and if the household demonstrates compliance with and progress on the Housing Stability Plan, and if client continues to meet income qualifications, client may proceed to receive medium term rent assistance. Client must continue to be "re-evaluated" every three months.

#### Medium-term rent (4 to 24 months of assistance)

Up to 100% of the fourth month of rent may be paid. Additional months may be paid at a rate of 75% of rent.

1. The household will continue to actively engage in a Housing Stability Plan, the goal of which will be to either increase income and/or reduce expenses such that the rental cost is no more than 80% of the household's net income;
  - a. Priority will be given to households who receive the appropriate score from the CHAT and who may need more than 3 months to stabilize.
2. The household will be re-assessed monthly, no later than the 20th day of each month. Each additional month of rental assistance can be considered when the household demonstrates compliance with and progress on the Housing Stability Plan. For each re-assessment, the client file must contain source documentation of income, including wage statements, tax returns, benefits statements, or bank account statements.

### **Homelessness Prevention: Housing Relocation and Stabilization Services**

Eligible expenses under this category include: rental application fees, last month's rent, security deposits, moving costs, utility deposits, and utility payments.

#### Housing relocation and stabilization services relating to rent

NOTE: All clients will complete the Clark County Coordinated Entry process

1. Eligible households/ individuals must be individuals/families with incomes below 30% Area Median Income, at risk of becoming homeless and moving into an emergency shelter or a place not meant for human habitation. All assisted individuals/families must be evaluated and

meet eligibility criteria as outlined at 24 CFR 576.103 Homeless Prevention Component in Interim Rule. Participants are eligible if they meet the HUD definition of "at risk of homelessness", or meet the criteria in paragraph 2, 3, or 4 of the homeless definition (see Appendix 1) AND have an annual income below 30% of area median family income. The client file must contain source documentation of annual income, including wage statements, tax returns, benefits statements, or bank account statements.

2. If necessary to relocate to another affordable housing unit, security deposits may be paid but must equal no more than 2 months of rent.
3. If necessary as a component of relocation to affordable housing, moving costs may be allowed on a case-by-case basis as allowed by the ESG Interim Regulation: 24 CFR 576.105. Eligible costs are truck rentals, hiring a moving company, and temporary storage fees for up to 3 months. Fees must be reasonable and occur after client intake and before the new move into a more affordable home.
4. If necessary to relocate and obtain new housing for household, last month's rent (of new housing unit) may be paid. Assistance must not exceed one month's rent.

#### Housing relocation and stabilization services relating to utility assistance

All clients will complete the Homeless Prevention Consortium Housing Needs Assessment Matrix, Homeless Prevention Consortium Supplemental Application, agency application and/or have a Southern Nevada Continuum of Care Centralized Coordinated Assessment and Intake System referral.

Eligible utility services are gas, electric, water, and sewage.

1. Eligible households/ individuals must be individuals/families with incomes below 30% Area Median Income, at risk of becoming homeless and moving into an emergency shelter or a place not meant for human habitation. All assisted individuals/families must be evaluated and meet eligibility criteria as outlined at 24 CFR 576.103 Homeless Prevention Component in Interim Rule. Participants are eligible if they meet the HUD definition of "at risk of homelessness", or meet the criteria in paragraph 2, 3, or 4 of the homeless definition (see Appendix 1) AND have an annual income below 30% of area median family income. The client file must contain source documentation of annual income, including wage statements, tax returns, benefits statements, or bank account statements.
2. The utility must be for a service at a housing unit leased or otherwise contracted to the assisted household. Housing unit must also meet minimum habitability standards specified in 24 CFR 576.403(c).
3. Household must provide documentation that they will be losing their housing (eviction letter) and is also to receive rental assistance to avoid homelessness.
4. Utility service must be in client's name and at the address they are living and obtaining rental assistance.
5. Households with a shut off notice of utilities shall be assisted to bring the past due amount to a zero balance, provided utilities are no more than six (6) months in arrears and shall be considered for rental assistance in that or the following month.
6. If the household has an Eviction Notice, they can be assisted with rent arrears and utilities arrears.
7. The client file must contain evidence that the household has applied for assistance from one or more of the Energy Assistance Programs administered through the Division of Welfare and Supportive Services of the State of Nevada or through the United Way of Southern Nevada, or other public programs available for assistance with utility payments;
8. Up to 24 months of utility payments per household, per service, including up to 6 months of arrearages, per service is allowed. Arrears must be paid as a one- time payment.



## Homelessness Prevention: Maximum Period and Frequency of Assistance

Any combination of *rental assistance* which includes short- and medium-term rental assistance (including arrears) AND security deposits and last month's rent (both eligible under housing relocation & stabilization services financial assistance) may not exceed 24 months total during any 3-year period.

### Rental assistance

- The maximum *times* a participant can receive non-consecutive short/ medium term *rental assistance* is 3 times per 24-month period. Rental arrears are the exception and are limited to 1 time assistance, per participant, within a 3-year period.

### Housing relocation & stabilization services financial assistance costs (relating to rent)

- Rental application fees, security deposits, and last month's rent are limited to 1 time assistance, per participant, per service, within a 3-year period.
- Security deposits cannot exceed 2 months of rent.
- Last month's rent may not exceed 1 month of rent.

### Housing relocation & stabilization services financial assistance costs (relating to utilities)

- The maximum times a participant can receive non-consecutive utility assistance for monthly utility bill payments is 3 times per 24-month period per service.
- The maximum period a participant can receive utility assistance is 24 months within a 3-year period. The exception is arrears. Utility arrear payments of up to 6 months are allowed per participant, per service, within a 3-year period.
- Deposits are limited to 1 time assistance per participant, per service, per 3 years.

## Rapid Re-Housing: Evaluation of Participant Eligibility

ESG-funded RRH projects are required to complete an initial evaluation of a participant's eligibility and needs prior to program entry. ESG-RRH is available to individuals and families whose income is less than or equal to 30 percent of Area Median Income (AMI) and who are literally homeless under Category 1 of the Homeless Definition Final Rule. In addition, during the initial evaluation, grantees are required to determine the amount of assistance and type of assistance needed by the participant to obtain and maintain permanent housing stability. At a minimum, subrecipients must re-evaluate participant eligibility and the amount and type of assistance required at least once annually for all participants receiving assistance. To continue to receive CoC- and ESG-RRH assistance, a participant's re-evaluation must demonstrate eligibility based on:

- **Amount and Type of Assistance Needed:** The grantee must determine the amount and type of assistance needed by the participant to (re)gain stability in permanent housing.
- **Lack of Resources and Support Networks:** The participant must continue to lack sufficient resources and support networks necessary to retain housing without assistance.
- **Income:** The participant's income must be less than or equal to 30 percent of Area Median Income (AMI).

Subrecipients should require participants/clients to notify the project in the event of changes in their income or other circumstances that affect their need for assistance (e.g., changes in employment

income or in household composition). When notified of any such material change, grantees must re-evaluate eligibility, as well as the amount and/or types of assistance needed by the participant.

## **Rapid Re-Housing: Rental Assistance**

Generally, restrictions are similar to the rent and utility restrictions under Homelessness Prevention, except that the maximum number of month's client can be assisted is 24 months, per 3-year period, under rapid re-housing.

Depending on the terms of the project's individual grant agreement, ESG grantees may provide participants with up to 24 months of rental assistance during any three-year period. Assistance may include any combination of short-term rental assistance, medium-term rental assistance; or rental arrears (consisting of a one-time payment of up to 6 months of rent in arrears, including any late fees).

Participants may receive additional assistance if they have received less 24 months of rental assistance during any three-year period. Participants who have complied with all project requirements during their residence and have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened with harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence), if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and move to a different CoC's geographic area if they move out of the assisted unit to protect their health and safety. See recordkeeping requirements to ensure proper documentation of imminent threat of harm.

### Short-term rent (1 to 3 months of assistance allowed at 100% rate of rent)

Short-term rental assistance (up to 3 months) is targeted to individuals and families with low-to-moderate housing barriers. These persons require minimal service intervention and limited financial assistance to secure and stabilize in permanent housing.

1. The household will actively engage in an intensive case management plan, the goal of which will be to either increase income and/or reduce expenses such that the rental cost is no more than 80% of the household's net income.
  - a. The household should score over 20 points on the Housing Needs Assessment Matrix or a Southern Nevada Continuum of Care Centralized Coordinated Assessment and Intake System referral. Highest priority for the most appropriate program will be given to clients scoring over 30 points
2. The household will be "re-evaluated" for eligibility at the end of the third month, not later than the 20th day of each month. At re-evaluation, household income cannot exceed 30% of AMI, otherwise financial assistance will cease. The client file must contain source documentation of income, including wage statements, tax returns, benefits statements, or bank account statements.
3. Rental assistance may not be provided to a program participant receiving rental assistance from other public sources.
4. Rental application fees are eligible for ESG reimbursement (under housing relocation & stabilization services).
5. Security deposits may be paid but must equal no more than 2 months of rent (eligible under housing relocation & stabilization services).

6. If necessary to obtain housing for household, last month's rent (of new move housing unit) may be paid. Assistance must not exceed one month's rent (eligible under housing relocation & stabilization services).
7. Up to 6 months of arrears are allowed by HUD including any late fees, but must be one-time payment, per participant, per service.
8. Each household receiving rental assistance must have a legally binding, written lease (between the owner and participant household) for the rental unit in their name.
9. Agency must have a rental assistance agreement in place with the party to which payments are being made which must set forth the terms under which rental assistance will be provided.
10. The housing unit where the household will reside must be affordable to the household. Rental rates must not exceed the Fair Market Rent specified for household size and rental rates must comply with HUD's rent reasonableness.
11. Any housing units constructed before January 1, 1978 will be assessed for lead-based paint hazards.
12. Housing unit must meet minimum habitability standards specified in 24 CFR 576.403(c).
13. The first issuance of rental assistance can be up to 100% of the upcoming month's rent. Rent must be paid on a timely basis, in the case that any late fees are incurred in the new housing situation, those fees will not be paid with ESG funds.
14. A second and third issuance of rental assistance can be considered when the household demonstrates compliance with and progress on intensive case management plan.
15. If necessary, client receiving short term assistance may proceed to receive medium-term rent assistance (4-15 months of assistance). Client will continue to be re-assessed on a monthly basis. For each re-assessment, the client file must contain source documentation of income, including wage statements, tax returns, benefits statements, or bank account statements.

#### Medium term rent (4 to 15 months of assistance)

Medium-term rental assistance is targeted to individuals and families with moderate-to-high housing barriers. These persons have multiple housing barriers that require longer periods of time to resolve and may require more intensive service interventions.

Month 4 can be paid at up to 100%, months thereafter can be paid at 75%.

1. The household will actively engage in an intensive case management plan, the goal of which will be to either increase income and/or reduce expenses such that the rental cost is no more than 80% of the household's net income.
2. The household will be "re-evaluated" for eligibility monthly, not later than the 20th day of each month. For each re-evaluation, the client file must contain source documentation of income, including wage statements, tax returns, benefits statements, or bank account statements.

#### Amount of Rental Assistance

It is expected that the level of assistance will be based on the goal of providing the minimum level of support necessary for each household to achieve long-term housing stability. As such, case managers will use HUD's rental calculation process to determine the amount of rental assistance and the participant's contribution, which shall not exceed the following guidelines:

- **Maximum Rental Assistance Amount:** Grantees may provide up to 100% of the cost of rent to participants.
- **Maximum Participant Share of Rent:** Participants may pay up to 100% of the cost of rent.

Provision of rental assistance should be based on the participant's individualized need. Participants should be offered the minimum amount of rental assistance necessary for the participant to obtain and maintain stability in permanent housing. Based upon the initial evaluation of a participant's housing barriers, periodic re-evaluation, and the participant's progress meeting the goals of his or her housing stability plan, grantees have the discretion to determine and provide the appropriate level of rental assistance.

#### Gradually Declining Subsidies

Grantees shall institute a gradually declining rental assistance structure so that individuals and families will be confident that they can assume full responsibility of the monthly contracted rent, monthly utility costs, and other essential household costs at the end of the rental assistance period.

#### Payments

Grantees must make timely payment to each owner in accordance with the rental assistance agreement. All rent payments must go directly to a third-party (i.e., the landlord). Participants and grantees are solely responsible for paying any late-payment penalties that they incur, using non-CoC or ESG funds.

#### Administration of Funds

Participants receiving rental assistance funds pay their portion of rent directly to the landlord. The difference between the total rent and the amount paid by the participant is then paid by the grantee. Grantees may never cover the cost of the participant's rent if the participant fails to pay his or her portion of the rent.

The Consolidated Appropriations Act of 2017 (Public Law 115-31, approved May 5, 2017) authorizes nonprofit organizations to administer rental assistance to landlords in permanent housing. Administering rental assistance in the CoC Program is defined as: (1) contracting for and making rental assistance payments to the landlord/landowner; and (2) conducting the Housing Quality Standards inspections. The costs of administering rental assistance are considered service delivery costs of rental assistance and are eligible under the rental assistance budget line-item of the CoC Program.

#### Restriction for Participants Already Receiving Rental Assistance

Rental assistance cannot be provided to a participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other Federal, State, or local sources.

### **Rapid Re-Housing: Housing Relocation and Stabilization Services**

All clients will be assessed in the Clark County Coordinated Entry process.

### Housing relocation and stabilization services relating to rent:

1. If necessary to move to an affordable housing unit, security deposits may be paid but must equal no more than 2 months of rent.
2. If necessary to obtain housing for household, last month's rent (of new housing unit) may be paid. Assistance must not exceed one month's rent.

### Housing relocation and stabilization services relating to utilities:

All clients will complete the Housing Needs Assessment Matrix, agency application and/or have a Southern Nevada Continuum of Care Centralized Coordinated Assessment and Intake System referral. Clients eligible the HUD definition of literally homeless and who score over **30** points on the Matrix or have a Southern Nevada Continuum of Care Centralized Coordinated Assessment and Intake System referral will receive priority for the most appropriate program over other eligible persons. Generally, restrictions are similar to the rent and utility restrictions under Homeless Prevention except that the maximum number of months client can be assisted is 24 months with rapid re-housing within a 3-year period.

- Up to 15 months of utility payments per participant, per service, including up to 6 months of arrearages, per service is allowed (must pay arrear as a one-time payment). Eligible utility services are gas, electric, water, and sewage. Household is also to receive assistance with rent in order to stabilize.
- The assisted household's existing arrears (of only up to 6 months) must be paid in full to bring their past due balance to zero. After the payment of any arrearages, client may receive utility assistance for new utility charges.
- Utility deposits to pay a standard utility deposit required by utility company are an eligible ESG expense (under housing relocation & stabilization services).
- The utility is for a service must be at a housing unit leased or otherwise contracted to the assisted household.
- The client file must contain evidence that the household has applied for assistance from one or more of the Energy Assistance Programs administered through the Division of Welfare and Supportive Services of the State of Nevada or through the United Way of Southern Nevada, or other public programs available for assistance with utility payments.

## **Rapid Re-Housing: Case Management**

Participants must meet with a case manager not less than once per month to assist the participant in ensuring long-term housing stability. Additional case management will be provided on a case-by-case basis as necessitated by demonstrated need. Case managers should help to develop a plan to assist the participant retain permanent housing after the assistance ends, taking into account all relevant considerations, such as the participant's current or expected income and expenses, other public or private assistance for which the participant will be eligible and likely to receive, and the relative affordability of available housing in Southern Nevada.

Case management consists of costs associated with assessing, arranging, coordinating, and monitoring the delivery of individualized services.

ESG-RRH participants may receive case management for no more than 30 days during the period in which the participant is seeking permanent housing and no more than 24 months during the period in which the participant is living in permanent housing.

## **Rapid Re-Housing: Supportive Services**

Case managers will assist each participant, as needed, to obtain appropriate supportive services, including assistance in obtaining permanent housing, medical and mental health treatment, counseling, and other services essential for achieving independent living. Grant funds may be used to pay for eligible supportive services that address the specific needs of participants. See Appendix B for a full list of eligible supportive services under ESG Rapid-Rehousing.

## **Rapid Re-Housing: Maximum Period and Frequency of Assistance**

Any combination of *rental assistance* which includes short- and medium-term rental assistance (including rental arrears) AND security deposits and last month's rent (both eligible under housing relocation & stabilization services financial assistance costs) may not exceed *24 months* during any 3-year period.

### Rental assistance

- The maximum *times* a participant can receive non-consecutive short/ medium term *rental assistance* is 3 times per 24-month period. Rental arrears are the exception and are limited to 1 time assistance, per participant, within a 3-year period.

### Housing relocation and stabilization services financial assistance costs (relating to rent)

- Rental application fees, security deposits, and last month's rent are limited to 1 time assistance, per participant, per service within a 3-year period.
- Security deposits cannot exceed 2 months of rent.
- Last month's rent may not exceed 1 month of rent.

### Housing relocation and stabilization financial assistance costs (relating to utilities)

- The maximum times a participant can receive non-consecutive utility assistance with monthly utility bill payments is 3 times per 24-month period, per service.
- The maximum period a participant can receive utility assistance is 24 months within a 3-year period. The exception is arrears. Utility arrear payments (of up to 6 months) and deposits are limited to 1 time assistance, per service, per 3-year period.
- Deposits are limited to one-time assistance, per participant, per service, per 3 years.

## **Limits on Housing Stabilization and Relocation Services**

Housing Stabilization and Relocation Services financial assistance policies and procedures addressed above in detail. This includes rental application fees, security deposits, last month's rent, utility deposits, utility payments and moving costs.

There will be no maximum monetary amount of assistance established per client as long as expenses are reasonable and comply with fair market costs.

Under Homeless Prevention: Any combination of *rental assistance* which includes short- and medium-term rental assistance and rental arrears, *housing relocation & stabilization services financial assistance costs* which includes security deposits, and last month's may not exceed 12 months during any 3-year period.

- The maximum times a participant can receive non-consecutive rental assistance is 3 times per 24-month period. Arrears are the exception, which are limited to a one-time payment per service.
- Rental application fees, security deposits, and last month's rent are limited to a one-time payment per service per 3 years.
- Security deposits cannot exceed 2 months of rent.
- Last month's rent may not exceed 1 month of rent.
- The maximum times a participant can receive non-consecutive utility assistance for monthly utility bill payments is 3 times per 24-month period per service.
- Utility arrear payments (of up to 6 months) per participant per service per 3-year period.
- Deposits are limited to one-time assistance per participant per service per 3-year period.

Under Rapid Re-Housing: Any combination of *rental assistance* which includes short- and medium-term rental assistance and rental arrears, *housing relocation & stabilization services financial assistance costs* which includes security deposits, and last month's may not exceed 24 months during any 3-year period.

- The maximum times a participant can receive non-consecutive rental assistance is 3 times per 24-month period.
- Arrears are the exception, (rental application fees, security deposits, and last month's rent) which are limited to a one-time payment per service per 3-year period.
- Security deposits cannot exceed 2 months of rent.
- Last month's rent may not exceed 1 month of rent.
- Utility arrear payments (of up to 6 months) and deposits are limited to one-time assistance per service per 3-year period.

Note on moving costs: eligible costs are for moving expenses, such as truck rental or hiring a moving company. Assistance may include payment of temporary storage fees for up to 3 months as long as fees are accrued after the program participant begins receiving ESG assistance. Fees must be reasonable and occur after client intake and before the new move into a more affordable home. Moving and storage costs are limited to one-time assistance per client household per 3-year period.

Housing stabilization and relocation service costs include: housing search and placement, housing stability case management, mediation, legal services, and credit repair.

1. Housing stability case management is limited to 24 months during the period the program participant is living in permanent housing.
2. All other service costs are limited to 24 months per 3-year period on service costs assistance for program participants receiving homeless prevention assistance, and 24 months per 3-year period for program participants receiving rapid re-housing assistance.

## **Additional Rapid Re-Housing Program Requirements**

Under the ESG Interim Rule, rental assistance is subject to additional requirements, including rent reasonableness and Fair Market Rent (FMR) standards, housing standards, lease agreements and rental assistance agreements, and termination policies.

### Rent Requirements

Rental assistance must be sufficient to ensure long-term housing stability for the participant, both for the duration of his or her participation and upon exit. Thus, the purpose is to place participants into housing that will be sustainable in the long-term. In addition, case managers are expected to work with participants to review household budgets and ensure that households can maintain their housing upon completion of the program.

### Rent Reasonableness

For participants receiving rental assistance, unit rent may not exceed HUD's rent reasonableness standard. This means that the rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private, unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. These rent restrictions are intended to help ensure that participants can remain in their housing after assistance ends.

Rent reasonableness requirements do not apply when a participant receives only financial assistance or services under the ESG Program's Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of "last month's rent," utility payments or deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

### Fair Market Rent

Household rent for participants receiving ESG-funded rental assistance must not exceed the FMR established by HUD. Current FMR guidelines may be found online at <https://www.huduser.gov/portal/datasets/fmr.html>.

As with rent reasonableness, FMR requirements do not apply when a participant receives only financial assistance or services under the ESG Program's Housing Stabilization and Relocation Services.

**Please refer to the Southern Nevada Rapid Rehousing Written Standards for more details:**  
<https://helphopehome.org/wp-content/uploads/2020/02/Revised-Southern-Nevada-RRH-Written-Standards-02-24-20.pdf>



## X. Housing Standards

**Lead-Based Paint Requirements:** All HUD-funded programs with housing units occupied by participants are required to incorporate lead-based paint remediation and disclosure requirements. Generally, these provisions require the recipient to screen for, disclose the existence of, and take reasonable precautions regarding the presence of lead-based paint in leased or assisted units constructed prior to 1978.

CoC-funded units are required to incorporate HUD regulations in 24 CFR part 35, subparts A, B, K, and R. ESG-funded projects are required to incorporate the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4846), and 24 CFR part 35, subparts A, B, H, J, K, M, and R in the unit.

**Habitability Standards:** Housing for all ESG program participants receiving rental assistance must meet HUD minimum habitability standards for permanent housing. Grantees must document compliance with this standard by signing and completing a Habitability Standards Checklist before the participant signs the lease and before the grantee provides any ESG rental assistance or services specific to the unit. In addition, grantees must inspect all units at least annually to ensure that the units continue to meet habitability standards.

**Rental Assistance Agreements:** In addition to a lease between the participant and owner, the ESG Interim Rule also requires a rental assistance agreement between the grantee and the property owner. The grantee may make rental assistance payments only to an owner with whom the grantee has entered into a rental assistance agreement. To help establish a relationship with a participant's landlord, CoC grantees may also choose to require a rental assistance agreement.

The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements of ESG assistance. In addition, the rental assistance.

## **XI. Additional Minimum Standards and Requirements**

### **Nondiscrimination, Equal Opportunity, Affirmative Outreach, and Fair Housing**

Southern Nevada's ESG recipients – the City of Las Vegas, the City of North Las Vegas, and Clark County - do not tolerate discrimination on the basis of any protected class (including actual or perceived race, color, religion, national origin, sex, age, familial status, disability, sexual orientation, gender identity, or marital status) during any phase of the CE process. Some programs may be forced to limit enrollment based on requirements imposed by their funding sources and/or state or federal law. All such programs will avoid discrimination to the maximum extent allowed by all funding sources and their authorizing legislation. All aspects of the Southern Nevada CE system will comply with all Federal, State, and local Fair Housing laws and regulations. Participants will not be "steered" toward any particular housing facility or neighborhood because of race, color, national origin, religion, sex, disability, or the presence of children. All locations where persons are likely to access or attempt to access the CE System will include signs or brochures displayed in prominent locations informing participants of their right to file a non-discrimination complaint and containing the contact information needed to file a nondiscrimination complaint. Maximum standards shall comply with the requirements for nondiscrimination, equal opportunity, and affirmative outreach processes.

### **Faith-Based Activities**

Minimum standards for faith-based activities (24 CFR 576.406) are:

Providers receiving ESG funding shall not engage in inherently religious activities as part of the ESG-funded programs or services. Such activities must be offered separately from ESG -funded programs and services and participation must be voluntary.

### **Environmental Review**

Before any funds are committed, an environmental review will be conducted of all ESG-funded grantee project site(s) to demonstrate there are no hazardous materials present that could affect the health and safety of the occupants. Environmental reviews will be acceptable for a 1 to 5-year time period, depending on the project type. The costs of carrying out environmental review responsibilities are an eligible use of administrative funds. All ESG activities are subject to environmental review under HUD's environmental regulations in 24 CFR part 58.

The subrecipient, or any contractor of the subrecipient, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for an ESG project, or commit or expend HUD or local funds for ESG eligible activities, until an environmental review under 24 CFR part 58 has been performed and the recipient has received HUD approval of the property.

## **Termination Policies**

If a program participant violates program requirements or no longer meets minimum eligibility requirements for program assistance, the subrecipient may terminate assistance. To terminate assistance, the minimum required formal process must consist of:

1. A written notice to the program participant containing a clear statement of the reasons for termination; and
2. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
3. Prompt written notice of the final decision to the program participant.

Termination does not bar the subrecipient from providing further assistance at a later date to the same family or individual.

## **Grievance Policy**

Each ESG funded organization shall have a grievance procedure and shall implement the procedure when applicable.

## **XII. Best Practices for ESG Programs**

### **Housing First**

Housing First is a proven approach in which all people experiencing homelessness are believed to be “housing-ready” and are provided with permanent housing immediately, with minimal or no preconditions, behavioral contingencies, or barriers (e.g., income, sobriety, etc.). Effectively implementing a Housing First approach requires prioritizing people with the highest needs and vulnerabilities, engaging more landlords and property owners, and making our projects client-centered spaces without barriers to entering or remaining in the project. All CoC and ESG grantees are expected to minimize barriers to entry to the maximum extent permitted under their individual grant agreements and take appropriate steps to implement the Housing First approach.

### **Low-Barrier Programming**

Entry requirements can act as a barrier to services and housing placement, leaving our most vulnerable and chronic homeless unable to access services. Low Barrier Housing is housing in which a minimum number of expectations are placed on people who wish to live there. The aim is to have as few barriers as possible to allow more people access to services. Low barrier programs typically follow a harm reduction philosophy which focuses on the risks and consequences of a particular behavior, rather than on the behavior itself. With regard to housing, harm reduction means that tenants have access to services to help them address their substance use issues. It is based on the understanding that recovery is a long process, and that users need a stable living arrangement in order to increase the likelihood for success in overcoming their addictions. The focus centers on being healthier rather than on the unrealistic goal of being perfectly healthy right away.

The following are some common eligibility and continued stay criteria for emergency and permanent housing for clients that can be considered “low threshold”:

- Homeless
- Age 18 or older
- Ambulatory and not requiring hospital or nursing home care
- Agree to be nonviolent
- Agree to not use or sell drugs or illegal substances on the premises
- Agree to treat other clients, staff, and the property with respect
- Agree to obey fire and other safety regulations.

Below are examples of criteria that providers are recommended NOT to include when determining eligibility:

- Sobriety and/or commitment to be drug free
- Requirements to take medication if the client has a mental illness
- Participation in religious services or activities
- Participation in drug treatment services (including NA/AA)
- Proof of citizenship
- Identification
- Referral from the police, hospital, or other service provider (as opposed to self-referrals)
- Payment or ability to pay (though saving plans are encouraged)

- Complete a period of time in a transitional housing, outpatient, inpatient, or other institutional setting/treatment facility
- Maintain sobriety or abstinence from alcohol and/or drugs
- Comply with medication
- Achieve psychiatric symptom stability
- Show willingness to comply with a treatment plan that addresses sobriety, abstinence, and/or medication compliance
- Agree to face-to-face visits with staff

# Appendix A. Definitions of “Homeless” and “At-Risk of Homelessness” for the ESG Program

## HUD Definition of Homelessness

**Literally Homeless (Category 1 of the HUD Homeless Definition).** An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- (1) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- (2) An individual or family 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,
- (3) An individual who is 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 that institution.

**At Imminent Risk of Homelessness (Category 2 of the HUD Homeless Definition).** An individual or family, who will imminently lose their primary nighttime residence, provided that:

- (1) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- (2) No subsequent residence has been identified; and,
- (3) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

**Homeless Under Other Federal Statutes (Category 3 of the HUD Homeless Definition).** Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- (1) 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);

(2) 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;

(3) 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,

(4) 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.

**Fleeing Domestic Abuse or Violence (Category 4 of the HUD Homeless Definition).** Domestic violence and other dangerous or life-threatening conditions.

Any individual or family who:

(1) 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;

(2) Has no other residence; and,

(3) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

(4) Notwithstanding any other provision of this section, the program shall consider any individual or family to be homeless, who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing.

## **ESG Program Definitions of “Homeless” and “At-Risk of Homelessness”**

*At risk of homelessness* means:

**(1)** An individual or family who:

**(i)** Has an annual income below 30 percent of median family income for the area, as determined by HUD;

**(ii)** Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; and

**(iii)** Meets one of the following conditions:

**(A)** Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

**(B)** Is living in the home of another because of economic hardship;

**(C)** 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;

**(D)** Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

**(E)** Lives in a single-room occupancy 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 1.5 persons reside per room, as defined by the U.S. Census Bureau;

**(F)** 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

**(G)** Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

**(2)** A child or youth who does not qualify as "homeless" under this section, but qualifies 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)), 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

**(3)** A child or youth who does not qualify as "homeless" under this section, but qualifies 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.

*Homeless means:*

**(1)** An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

**(i)** An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

**(ii)** An individual or family 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

**(iii)** An individual who is 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 that institution;

**(2)** An individual or family who will imminently lose their primary nighttime residence, provided that:

**(i)** The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

**(ii)** No subsequent residence has been identified; and

**(iii)** The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;



**(3)** Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

**(i)** 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);

**(ii)** 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;

**(iii)** 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

**(iv)** 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; or

**(4)** Any individual or family who:

**(i)** 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;

**(ii)** Has no other residence; and

**(iii)** Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

# Appendix B. ESG Rapid Re-Housing Eligible Supportive Services

## Housing Services and Related Services

Assisting participants in locating, obtaining, and retaining suitable permanent housing, including:

- Housing search
- Tenant counseling
- Understanding leases
- Arranging for utilities
- Making moving arrangements
- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Outreach to and negotiation with landlords
- Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness
- Assistance with submitting rental applications

## Case Management

Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or to assist a participant in overcoming immediate barriers to obtaining housing by, for example:

- Providing ongoing risk assessment and safety planning to victims of domestic violence, dating violence, sexual assault, and stalking
- Using the Coordinated Entry System
- Counseling
- Developing, securing, and coordinating services
- Obtaining Federal, State, and local benefits
- Monitoring and evaluating participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability
- Conducting required annual re-evaluation(s)

## Legal Services

Costs of resolving a legal problem that prohibits a participant from obtaining or retaining permanent housing, including:

- Client intake
- Preparation of case for trial
- Provision of legal advice
- Representation at hearings
- Counseling
- Filing fees and other necessary court costs

Legal services are subject to the following provisions:

- Eligible Billing Arrangements: CoC funds may be used only for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys. Costs may be based on: (1) hourly fees; or (2) fees based on the actual service performed (i.e., fee-for-service) but only if the cost would be less than the cost of hourly fees.
- Ineligible Billing Arrangements: Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements.
- Eligible Subject Matters: Landlord/tenant disputes; 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; resolution of outstanding criminal warrants.
- Ineligible Subject Matters: Legal services related to immigration and citizenship matter, or related to mortgages and homeownership.

## **Moving Costs**

Costs such as truck rental or hiring a moving company, including payment of temporary storage fees for up to 3 months

## **Utility Deposits**

Standard utility deposit that the utility company requires of all customers.

## **Mediation**

Mediation between the participant and the landlord/landowner or person(s) with whom the participant is living.

## **Credit Repair**

- Credit counseling
- Accessing a free personal credit report
- Resolving personal credit issues
- Other services needed to assist with critical skills related to household budgeting and money management

**Please refer to the Southern Nevada Rapid Rehousing Written Standards for more detail:**

<https://helphopehome.org/wp-content/uploads/2020/02/Revised-Southern-Nevada-RRH-Written-Standards-02-24-20.pdf>