

**City of Killeen, Texas Community Development Division
DRAFT
HOME-American Rescue Plan (HOME-ARP) Program
ALLOCATION PLAN**

PUBLIC COMMENT

Public Comment Period:

Begins: Monday, JANUARY 9, 2023

Ends: at close of Public Hearing, Tuesday, JANUARY 24, 2023.

Comments received after the close of the Public Hearing, JANUARY 24, 2023, will not be accepted.

Written comments may be submitted, in hard copy or electronic formats or verbal comments may be left on voice mail to:

Leslie Hinkle, Executive Director

Killeen Community Development

802 N. 2nd Street, Bldg. E

Killeen, Texas 76541

254-290-6487 (7 days a week/24 hours a day)

Email: lhinkle@killeentexas.gov

One (1) public hearing will be held to gather oral comment.

In-person hearing: Tuesday, January 24, 2023 at 5:00 p.m. CST

City of Killeen City Hall Council Chambers, 101 N. College Street, Killeen, Texas 76541

Individuals who require a language interpreter, auxiliary aids, or services for the hearing should contact Jolynn Jarnagin, ADA Responsible Employee, 254-616-3241 or jjarnagin@killeentexas.gov, or contact Relay Texas at (800) 735-2989 at least three business days prior to the hearing date so appropriate arrangements can be made.

Personas que hablan español y requieren un intérprete, favor de llamar a Leslie Hinkle al siguiente número (254) 501-7843 o por correo electrónico lhinkle@killeentexas.gov por lo menos tres días antes de la junta para hacer los preparativos apropiados.

Written comments may be submitted in hard copy or email formats in the designated public comment period; verbal comments may be made by leaving a voice mail at 254-290-6487 (7 days a week-24 hours a day). Those making public comment are encouraged to reference the specific draft section(s) related to their comment. Please be aware that all comments submitted to the City of Killeen will be considered public information.

CITY OF KILLEEN, TEXAS COMMUNITY DEVELOPMENT DIVISION
802 N. 2ND Street, Building E, Killeen, Texas 76541
www.killeentexas.gov/HOME-ARP

FINAL HUD APPV 03062023



The City of Killeen was allocated \$1,778,641 of funds from the U.S. Department of Housing and Urban Development (HUD) under section 3205 of the American Rescue Plan Act (P.L. 11702)(“ARP”), for the Home Investment Partnership Program (HOME) to provide homelessness assistance and supportive services. This program is known as the **HOME-American Rescue Plan** or “**HOME-ARP.**”

Funds provided are eligible for development and support of affordable housing, tenant-based rental assistance (TBRA), provision of supportive services, and development of non-congregate shelter units. Prior to receiving its HOME-ARP Allocation, the City of Killeen must develop a plan and gather public comment on that plan.

Contents

CONSULTATION PROCESS AND INPUT	5
PUBLIC PARTICIPATION PROCESS AND INPUT	15
NEEDS ASSESSMENT AND GAPS ANALYSIS.....	17
Summary of Gaps Analysis.....	19
HOME-ARP ACTIVITIES	32
HOME-ARP Production Housing Goals	35
Preferences.....	36
HOME-ARP Refinancing Guidelines.....	37

CONSULTATION PROCESS AND INPUT

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

The City of Killeen Community Development Division held various consultations in various formats to ensure participation from all elements of the community had an opportunity to participate in the development of the Killeen HOME-Allocation Plan ("Plan") and to identify gaps in housing and support service needs of populations who are homeless, at-risk of becoming homeless, fleeing/attempting to flee domestic violence, other populations that are at increased risk of homelessness due to housing instability, and who would benefit from services in prevention of situations of unstable housing.

The Killeen HOME-ARP Community Survey ("Poll") was open between March 24, 2022, through April 15, 2022, and available on the City of Killeen HOME-ARP web page¹ and the Killeen Texas main web page; a press release announced the *Poll* followed by postings on the City of Killeen social media pages. The *Poll* consisted of nine (9) questions posed to the Killeen community regarding identification of qualifying populations (QPs), permanent supportive housing (PSH), acquisition and development of non-congregate shelter (NCS) units, supportive services for qualifying populations, rental housing for developers, investors, owners, etc., identifying preferences, referral methods and subpopulations, if any, among the qualifying populations related to priority when utilizing the Killeen HOME-ARP funds for housing, supportive services, counseling and assistance, identification (ranking priority) of groups of persons fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking as defined by HUD, identification (ranking priority) of groups of persons who are homeless, and in need of housing and support services eligible as prescribed by the HOME-ARP Notice², identifying (ranking priority of) groups of persons who are considered to be "other populations," as defined by HUD, where providing supportive services or assistance would prevent the family from becoming homeless or would serve those with the greatest risk of housing instability, and identifying (ranking priority of) groups of persons who are at risk of homelessness as defined by HUD in 24 CFR 91.5.

¹ Killeen HOME-ARP web page – <https://www.killeentexas.gov/HOME-ARP>

² U.S. Department of Housing and Urban Development Community Planning and Development Notice CPD-21-10, Issued September 13, 2021; Cross Reference 24, CFR Part 92. Subject: Requirements for the Use of Funds in the HOME-American Rescue Plan Program

In addition to the *Poll*, seven (7) targeted community consultations were conducted via Zoom web meetings with Public Housing Agencies and HUD Housing Voucher Administrators, Public Agencies providing services/addressing needs for qualified populations. Housing Developer or Providers to include property management, owner/landlords, builders, owner/investors, etc., public, or private organizations addressing fair housing, civil rights, and needs of persons with disabilities, Veterans’ groups or Veteran Service Providers, Continuum of Care organization agency member/participants, and Homeless or Domestic Violence Services providers. The last event held seeking public input on reducing homelessness and increasing housing stability was on April 7, 2022 - the Killeen HOME-AARP Community Planning Meeting (Killeen H-ARP CPM). The Killeen H-ARP CPM was held at Killeen City Hall Council Chambers for in-person attendance as well as for virtual attendance; 15 attended virtually through Zoom and nine (9) attended in person. A total of 103 (79-targeted consultations, 24-Killeen H-ARP CPM) persons, broadly representing the community and it’s housing and service providers, participated in identifying qualifying populations, and gaps in housing and support services needed to assist homeless and persons at-risk of homelessness through use of the HOME-ARP funding.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Killeen Housing Authority – Daryl Peters; Central Texas Council of Governments – Tanya Clinton; Cove House Emergency Homeless Shelter – Brian Hawkins, Teach Them To Love – Lolita Gilmore, HFH Fort Hood Area –Kristin Smith, Central Texas Homeless Coalition – George Lasoya	Public Housing Agencies/Voucher Administrators	Scheduled; Virtual	The rental market in Killeen has gone beyond fair market rent affordability for voucher holders; rental owners non-renewing long time tenants with limited income. Units not being used at Killeen Housing Authority (Moss Rose units) in need of refurbishing could house homeless persons. Additional vouchers are not necessarily the answer. Cohesive approach to address homelessness within Bell County (west to east priority) is a must.
Make a Way Wellness – Deonte Davis, Cove House Emergency Homeless Shelter – Brian Hawkins, Hill Country Community Action Assoc. – Kimbra Hobbs, Families in Crisis/Friends in Crisis – William Hall, Salvation Army Temple, TX –	Public Service Providers	Scheduled; Virtual	Across the board, all persons who are homeless, women age 19-25 years of age, and women with children should be considered as qualified populations. Existing multi-family units in need of refurbishing and that meets HUD standards should be a priority for housing persons who are homeless.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Kimberly Aranda, New Jerusalem Holy Christian Church Outreach Ministry - Raquel Watkins	Public Service Providers <i>continued from previous page</i>	Scheduled; Virtual <i>continued from previous page</i>	<i>continued from previous page</i>
Mark Hyde – Hyde Rentals, Zoe’s Wings Foundation – Zoe Grant, Vinziant Rental Solutions-Victor Vinziant, Cove House, HFH Fort Hood Area, New Life Investment Properties – Deonte Davis, Urban Power Connection, Onward Movement Investments– Ashley Smith, Walking on Water Church, Noire Development – Morgan Harvey, Kristin Morghan	Housing Developer or Providers to include property management, owner/landlords, builders, owner/investors	Scheduled; Virtual	“When can we get started with rehab money for the units? Will there be additional funding in the future to continue operations of supportive services in the housing units?” There are no known housing units being used specifically for persons who are homeless or for persons who are at-risk of becoming homeless. “Many rental units in the Killeen area could use updates (rehabilitation) to make them able to pass inspections and that people want to live in.” Senior citizens with fixed income are in need of housing that is more affordable for them and the units they can get are not desirable.
Hyde Rentals – Mark Hyde, Ursula Johnson – Heart of Central Texas Independent Living, Prosperous Care Services – Titania Clark	Public or Private organizations addressing fair housing, civil rights, and needs of persons with disabilities	Scheduled; Virtual	Persons who are homeless are those with a negative rental history; credit history; or criminal background history including felony offenses (domestic and/or sexually violent offenses/sex offenders), prior incarceration, involvement in and/or repeated incidence (potential endangerment, ‘death, or grievous bodily harm’ to another) requiring law enforcement response; persons with disabilities have a hard time finding accessible units- cannot afford to make a changes to the unit due to limited income or, ‘owner’ does not want the unit changed.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<p>Prosperous Care Services – Titania Clark, Texas Homeless Network (THN) – Mary Stahlke, Walking on Water Church -Lisa Jimmerson, Heart of Texas Goodwill Operation Achieve Initiative (minority veterans and spouses) - Paul Bilunas, Bell County Veteran Services Veteran Resource Liaison - Berkely Smith, Operation Stand Down Central Texas – Joann Courtland, Austin Area Urban League – Earl Grant, Fort Hood Regional Health Child and Family Behavioral Health System (CAFBHS)- Michelle Aguayo, Citizens for Progress – Bobby Ehrig, Central Texas Veterans Health Care System - Melissa Brown and Jenina Wright, Salvation Army Temple – Kimberly Aranda, Cover House Emergency Homeless Shelter – Brian Hawkins, Families in Crisis Domestic Violence Shelter/ Friends in Crisis Homeless Shelter – William Hall, Veterans Justice Outreach (VJO) Program, Health Care Re-entry (HCRV) Program, Community Employment Program, Food Pantry – Paula Wood</p>	<p>Veterans’ Groups or Veteran Service Providers</p>	<p>Scheduled; Virtual</p>	<p>Veterans are facing housing instability which is actually one of countless things the veteran is facing, housing and support services are needed by veterans who are homeless, need local landlord/ property management participation in accepting housing vouchers/ veteran [VASH] vouchers, housing units should accept the veteran’s [support animal] pet(s), furnishings are needed for the rental unit, there is only one ‘known’ shelter in Killeen, need one central location for [veteran homeless service] providers as most do not have transportation or know ‘where to go’, non-congregate shelter units do not exist in Killeen or Bell County for homeless persons</p>

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<p>Hyde Rentals – Mark Hyde, Eleny Guerrero Pena, LPC-A, Texas Homeless Network (THN) – Mary Stahlke, Jen Beardsley, Axton Nichols, Hilltop Recovery Ministries – Tanya Roper, Heart of Texas Goodwill – Leah Berry, Families in Crisis Domestic Violence Shelter / Friends in Crisis Homeless Shelter – William Hall</p>	<p>Continuum of Care, Central Texas Homeless Coalition agency member/ participants</p>	<p>Scheduled; Virtual</p>	<p>Partnerships are necessary to bridge the gap between housing providers and service providers; mental health/trauma, substance abuse, and a lack of mental health resources are issues in addressing homelessness, group and individual classes (services) are necessary, financial assistance is necessary when assisted persons experience a ‘hiccup’ in their transition, a liaison between agencies and landlord would be ideal, referrals should be through one system and not necessarily direct [from one agency to another], the Coordinated Entry system may not be the ‘system’ to use for referrals.</p>
<p>Families in Crisis Domestic Violence Shelter/Friends in Crisis Homeless Shelter – William Hall, Cove House Emergency Shelter – Brian Hawkins, Texas Homeless Network (THN) – Mary Stahlke, Killeen Housing Authority – Janice Taylor, Hilltop Recovery Ministries – Tanya Roper, Eleny Guerrero Pena, LPC-A, Operation Stand Down Central Texas – Joann Courtland, The Refuge Corporation – Joseph Solomon, VA Services Center Texas Healthcare Veterans Justice Outreach (VJO) Program, Health Care Re-entry (HCRV) Program, Community</p>	<p>Homeless or Domestic Violence Services providers</p>	<p>Scheduled; Virtual</p>	<p>Persons who are Homeless and experiencing Domestic Violence including Human trafficking are male, older veterans, families, and female – in this order. Mental Health assessments / evaluations are necessary to help determine the individual/family’s needs. When housing is provided these households need basic furniture – bed(s), table/chairs, dresser or chest, pots/pans for cooking, utensils/dishes, towels, and there is no specific funding that allows for those items to be paid. Landlords/Property Managers need to make more accommodations (acceptance) for persons that have emotional support animals. Additionally, specific connection to other resources is necessary for complete transition.</p>

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<p>Employment Program, Food Pantry – Paula Wood and Celia Feller, Teach Them To Love (T3L) – Lolita Gilmore, Walking On Water (W.O.W.) Ministries - Lisa Jimmerson and Tearka Lovell</p>			
	<p>Killeen HOME-ARP Community Survey</p>	<p>web site posted March 24 through April 15, 2022; press release</p>	<p>Community Poll addressing homelessness in Killeen with the HOME-ARP allocation from Congress under section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) ("ARP") for the HOME Investment Partnerships Program (HOME) to provide homelessness assistance and supportive services. The program is known as the HOME-American Rescue Plan or "HOME-ARP".</p>
<p>Killeen Creators – Kristin Wright, Impact Clubhouse – Jason McCarty, OMC President, Licensed Real Estate Agent - Ashley Smith, Central Texas Youth Services – Antoinette Meyreles, Bari Gamble, Lashavio Little – Citizen, Hill Country Community Action Assoc – Kimbra Hobbs, Families In Crisis Domestic Violence Shelter / Friends in Crisis Homeless Shelter – William Hall and Suzanne Armour, Prosperous Care Services – Lady Tatiana, Make a Way Wellness – Deonta Davis, Jew Jerusalem Holy Christian</p>	<p>Killeen HOME-ARP Citizen Engagement and Community Planning Meeting</p>	<p>Scheduled; Virtual and Personal Attendance</p>	<p>Attendees received a presentation on the HOME-ARP purpose and process for HUD approval of Killeen’s HOME-ARP Plan then participated in a HOME-ARP “poll” regarding types of persons experiencing homelessness, fleeing domestic violence, what/who qualifying populations of homeless persons are, what services are needed to address homelessness populations to increase housing stability, what type of housing units are needed and how many housing units are needed, and the priority for non-congregate shelter unit construction.</p>

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Church (NJHCC) Outreach Ministries – Raquel Watkins, Innovation Black Chamber of Commerce – Ronnie Russell, Cove House Emergency Shelter – Brian Hawkins, Fort Hood Area Habitat for Humanity – Ken Cates, Killeen Police Dept. (KPD) Homeless Outreach Team – Kyle More, Area Agency on Aging / Central Texas Council of Governments – George Lasoya, Coldwell Banker Realty – Rickey Wilson, City of Killeen – Rashawn Smith, Salicea – Citizen, Alberta – Citizen, Samuel Kubiak - Citizen			

ASSESSMENT & ANALYSIS OF CONSULTATIONS

PHA/Voucher Administrators – attendees concluded: low-income persons need budgeting and financial education to graduate from voucher dependence; need education to maintain housing and take responsibility for themselves and their future; a lot of people being served [provided services] need to seek employment opportunities and set milestones to get out of assisted housing programs. Additional vouchers are not necessarily an option since [single family] units are being sold instead of leased; units available for leasing have increased in prices as much as \$400 to \$500 a month. Cohesive planning of addressing homelessness between the cities within Bell County.

Public Service Agencies-Identify the Qualified Populations and Housing Type Needed - attendees concluded: space for families is a priority because existing shelters do not have space available for families; women age 19-25 years and women with children are considered a priority. Existing multifamily unit rehabilitation, to meet HUD requirements, should be considered for addressing the housing needs of homeless persons, and construction of ‘tiny homes’ in a particular location.

Housing Developers, Property Management Providers, Owner/Landlords, Builders, Investors – attendees concluded: there are new investors in Killeen that want to be a part of addressing homelessness in the community and to do so they need additional funding resources to buy, rehab, or build the units needed. Investors also indicated they would have to partner/collaborate with others to provide the necessary [support] services to clients participating in programs to get out of homelessness. Attendees also indicated there needs to be some type of compensation paid to the property owner for damages from the tenant while occupying the unit.

Public or Private Organizations Advocating Fair Housing, Civil Rights, Persons with Disabilities - The attendees offered one conclusion: persons who are homeless are those with a negative rental history; credit history; or criminal background history including, felony offenses (domestic and/or sexually violent offenses/sex offenders), repeated incidence (potential endangerment, 'death, or grievous bodily harm' to another) requiring law enforcement response; persons with disabilities have a hard time finding accessible units and cannot afford to make a change to the unit because they have limited income or the 'owner' does not want the unit changed.

By not directly addressing the topic and discussion of fair housing laws and how they apply to everyone regardless of race, color, religion, national origin, familial status, disability, or sex- including gender identity, and sexual orientation [LGBTQ], the housing industry remains guarded and, in many cases, may attempt to circumvent issues by disguising housing refusals on the actual reasons they state for why a person or family may be homeless. Housing, whether rental or purchase, is a commodity for the housing industry, it's how it generates money and may see the laws as an affront in being told how to handle their business and may not see it as their responsibility to review and address the reasons why they would refuse housing to anyone. In addition, many are under the assumption that these 'rights' are only applicable to situations involving federally assisted/funded housing developments, facilities, or programs and do not understand obligations associated with advertising and marketing, meaningful access to programs and activities by Limited English Proficient (LEP) persons, the actual types of housing covered, what is prohibited, or that civil rights ensure that no person in a democracy is treated unequally³ applying to all citizens, protecting those who are particularly at risk for unfair treatment, and does not apply only to situations of segregation.

Veterans' Groups or Veteran Service Providers – this was one of the larger group of attendees (16 persons) for the consultations. Attendees concluded: veteran homelessness (on the street) has an age range is from 21 to 85 years; veterans have 2-15 years of service, have made bad choices, have no retirement, are in need of identification, in need of all aspects of housing, "need to know where to start" when looking for assistance or programs, have limited income if any, have 'needs' locally including Bell County, as well as throughout this central corridor of Texas, receive limited information about veteran services during transition, need one central location to obtain information (assistance) available to them [homeless veterans], and there are no non-congregate shelter units in the area.

Continuum of Care/Central Texas Homeless Coalition and Texas Homeless Network – attendees participated in a group poll requesting participants to respond regarding current and potential collaboration between organizations and whether or not an entity could take on added [component] public services to provide either homeless housing or supportive services where the agency currently does not provide one or the other of those services. The attendees concluded: homelessness among individuals causes mental trauma and these [homeless] persons would rather walk away from the potential of having a home (housing) because the mental health aspect is not in alignment with what is happening with them personally, more intensive case management is necessary on a daily or weekly basis to be successful, women are of greater risk in Killeen, and women fleeing domestic violence are military connected, the coordinated entry (CE) system could be conducted via paper document but can only be used by agencies currently participating in CE, THN community mapping of all agencies, support services gap in the community includes life skills, and 'housing/tenancy' counseling, financial literacy, transportation, child care in order to maintain employment.

³ <https://examples.yourdictionary.com/what-are-examples-of-civil-rights.html> ; October 11, 2022; What are Examples of Civil Rights? - Classes Protected by Civil Rights

Although attendees indicated they would ‘partner’ with other agencies to bridge the gap of housing and services necessary to address homelessness in the community there is no formal ‘partnership or collaboration’ that has combined experience, expertise, and staffing into a strategic approach to both housing and providing services to homeless people.

Homeless or Domestic Violence Providers – attendees were very vocal on the number and type of homeless persons concluding persons who are: male; male with families; female populations to include older veterans who need additional connections with mental health services. Human trafficking victims are female up to age 40; Domestic Violence victims are male with children or female with children (children include babies). Homeless persons are male and female of different households. This group was one of the larger groups with representation from 14 different public/human service providers, local community, and government agencies. Additionally, this group indicated housing was the greatest need followed by basic furnishings (furniture, dishes, pots/pans, towels, etc.) as a priority need but indicated funding sources do not allow these items to be covered when housing homeless. Finally, the most heavily stressed need in addition to the housing and basic furnishings was acceptance, by landlords/property managers, of emotional support animals in rental units. Further discussion included the need for better service to members of the military who are exiting (not retiring) active duty and remaining in the community as most persons are not familiar with various resources, in the community, for public assistance.

Killeen HOME-ARP Community Survey – the Killeen Community Development Division provided the public with a press release regarding the HUD allocation of HOME-ARP funding and requested the public to participate in a ‘community poll’ about reducing homelessness and increasing housing stability of homeless persons and persons at-risk of homelessness. The poll consisted of only nine questions and asked participants to thoroughly read through each question before selecting an answer and estimated a minimum of 25 minutes to complete the poll.

Although there were only 24 community participants the results concluded:

- HIGH priority is: Permanent Supportive Housing (PSH) for Qualifying Populations - (PSH is long-term leasing or rental assistance, and supportive services are provided to assist households with at least one member (adult or child) with a disability in achieving housing stability.) Permanent Supportive Housing is inclusive of indefinite leasing or rental assistance combined with supportive services for disabled persons experiencing homelessness so they [homeless] may live independently. Acquisition and Development of Non-Congregate Shelter (NCS) and supportive services to qualifying populations (A non-congregate shelter (NCS) is one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement; NCS units may only be occupied by individuals that meet the criteria for one or more of the QP's. QP's are not to be charged occupancy fees or other charges to occupy a HOME-ARP NCS unit. HOME-ARP supportive services may also be provided as needed to QP's served by the HOME-ARP NCS.)
- Results for Supportive Services for Qualifying Population concluded: HIGH priority = 1- Homelessness prevention - provide housing relocation and stabilization services, and short-and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter [Short-term and medium-term rental assistance - up to 24 months of rental assistance during any 3-year period - *Short-term rental assistance is assistance for up to 3 months of rent. Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent. Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears. Rental assistance may be*

tenant-based or project-based.] 2- Mental health services and employment assistance with job training ranked equally as a high priority.

- Results of the Type(s) of Rental Housing and Number of Rental Units necessary to reduce homelessness, decrease the number of persons at-risk of homelessness, safely house persons fleeing/attempting to flee domestic violence, and other populations that would benefit from housing assistance to increase housing stability results concluded: HIGH priority = Tenant Based Rental Assistance/TENANT - monthly subsidy to pay utilities, and over 40-75 Units are needed.
- Results of the Preferences, Referral Methods, and Subpopulations that make up the Qualifying Populations (QPs) when utilizing HOME-ARP funded housing, supportive services, counseling, and assistance concluded: HIGH priority = Elderly (age 62 years+) with dependents, and Families with disabilities ranked equally among the highest priority as QPs, followed by Adult Females then Families, regardless of age. To prioritize applicants for HOME-ARP projects or activities, Killeen will implement a uniform referral process with detail in the Killeen HOME-ARP Allocation Plan ensuring compliance with fair housing, civil rights, and nondiscrimination when applying the preferences through any referral method(s). Targeted Assistance: reasonable preferences among the QP's may be established for persons with special needs or persons with disabilities at such time HOME-ARP is used for tenant based rental assistance -TBRA. Referral Methods: To increase efficiency, use of the Coordinated Entry or Coordinated Entry Process (CE) may be used for HOME-ARP projects and activities provided the CE covers the Killeen jurisdiction and the CE point collects information and documentation required to determine eligibility with the QP's established but not to rank the applicant other than what is specified by preferences or method of prioritization. Veterans and Families that include a Veteran Family Member that meet any part of the definition above meet the definition of "qualifying population(s)."
- Results of the priority ranking of each group of persons Fleeing or Attempting to Flee Domestic Violence and et al (as listed) concluded: HIGH priority = Unaccompanied Youth age 13-19 alone, Families with Disabilities, and Adult Females equally ranked among the highest priority in this category followed by Families regardless of age.
- Results of the priority ranking of each group persons who are homeless and in need of housing and support services concluded: HIGH priority = Families regardless of age, followed by Adult Males, then Adult Females and Families with Disabilities were equally ranked.
- Results for persons in Killeen who are "Other Populations" as defined by HUD, where providing supportive services or assistance would prevent the household's homelessness or would serve those with the greatest risk of housing instability concluded: HIGH priority = Adult Male, Adult Female, and Persons with a disability/handicap all ranked equally followed by Children under age 12 with adult(s).
- Results of the priority ranking of each group of persons who are at-risk of homelessness as defined by HUD concluded: HIGH priority = Adult Male and Adult Female ranked equally followed with *equal ranking* of Persons with a Disability/Handicap and Elderly only (age 62 years+) then Unaccompanied Youth over age 19 to 25, alone.

Killeen HOME-ARP Citizen Engagement and Community Planning Meeting – this public meeting was attended in person and virtual attendance and held in the Killeen City Hall Council Chambers. Results are as follows:

- Qualifying Populations = Homeless – individual or family; Types of Populations Experiencing Homelessness = Families Regardless of Age;
- Types of Populations Fleeing/Attempting to Flee Domestic Violence, et al = Families Regardless of Age;
- Types of “Other Populations” Experiencing Homelessness = Unaccompanied Youth and Children;
- Support Services Needed to Reduce Homelessness/ Increase Housing Stability = Homeless Prevention with Rent Assistance;
- Type of Rental Housing Needed to Reduce /Decrease Homelessness = equally, Rental Assistance Vouchers, and Acquire and Rehab Existing Units;
- Number of Housing Units Needed to Reduce/Decrease Housing Instability = Over 100 units;
- Priority of Long-Term Permanent Housing with Supportive Services = High;
- Priority of Non-Congregate Shelter Unit Construction = High.

PUBLIC PARTICIPATION PROCESS AND INPUT

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

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

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

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

The draft Killeen HOME-ARP Plan will be released for a 16-day public comment period from January 9, 2023, through January 24, 2023 where a Public Hearing will take place at a regular Killeen City Council meeting. The Public Hearing will accept any final comments on the Plan prior to final approval of the draft Plan by the Killeen City Council.

In-Person Hearing

Tuesday, January 24, 2023
 5:00 pm CST
 City of Killeen City Hall Council Chambers
 101 N. College Street,
 Killeen, Texas 76541

If comment(s) received during the public comment period do not suggest significant plan revisions, the Plan will move forward after City Council approval with submittal to HUD. If

comment is significant, the Plan will be attuned to the comment(s) then presented with revisions to the Killeen City Council for final approval on January 24, 2023.

Describe any efforts to broaden public participation:

The city will allow both written and verbal comment via telephone and email along with the in-person public hearing to accept comment. The in-person hearing will allow for a more traditional method of receiving comment; the verbal via telephone comment option will allow for broader outreach during the comment period. In addition, the hearing will be published in the local newspaper and notice of the hearings will be sent via Killeen's subscription email lists as well as all social media outlets to further broaden outreach efforts. Comments will also be accepted via traditional mail. Finally, the plan will be posted online for ease of access during the public comment period.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

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

No public Comments were received during the public comment period nor during the Public Hearing held at Killeen City Council Jan. 24, 2023.

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

No comments were not accepted on the DRAFT HOME-ARP Plan.

NEEDS ASSESSMENT AND GAPS ANALYSIS

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

The following tables represent the status of homeless person, available housing, and designated shelter to serve homeless persons as well as the number of homeless from the most recent HUD Point in Time (PIT) count for the Killeen area- January 2022.

FINAL HUD APPV 0302022

Homeless Needs Inventory and Gap Analysis Table – 1

Homeless – Killeen Only													
	Current Inventory					Homeless Population				Gap Analysis*			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter*	63	21	80	NA	0								
Transitional Housing	4	2	8	NA	0								
Permanent Supportive Housing [€]	9	2	14	NA	0								
Other Permanent Housing						NA	NA	NA	NA				
Sheltered Homeless						12	51	2	NA				
Unsheltered Homeless						0	54	0	NA				
CURRENT GAP										+64	-	-3	-

Data Sources: 1) 2022-Killeen Point in Time Count (PIT); 2) 2022 Continuum of Care Housing Inventory Count (HIC)

*There may not be a direct correlation between the types of housing offered in the chart and the number of people experience homelessness, as not every person experiencing homelessness would need or want to use emergency shelter, transitional housing, or permanent supportive housing. Therefore, the gap analysis is not reflected in this chart, but possible gaps are discussed below.

[€] The number of Permanent Supportive Housing beds depicted in this table are in the City of Temple and operated by Central Texas Veterans Health Care System.

[†] The number of Emergency Shelter Family beds available include 55 beds dedicated to victims of domestic violence leaving 8 beds for non DV program participants.

Homeless Needs Inventory and Gap Analysis Table – 2

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis*
	# of Units	# of Households	# of Households
Total Rental Units	29,900		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	17,085		
Rental Units Affordable to HH at 50% AMI (Other Populations)	6,690		
0% - 30% AMI Renter HH w/1 or more severe housing problems (At-Risk of Homelessness)		4,225 +12,860	
30%-50% AMI Renter HH w/1 or more severe housing problems (Other Populations)		4,030 +2,660	
Current Gaps			-8255 +15,520

Data Sources: 1) 2011-2015 American Community Survey (ACS); 2) 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

*There may not be a direct correlation between the affordable rental units and the households with a housing problem at that income level; this chart does not reflect the housing mismatch, which shows the difference between the households that can afford the rental units and households living in the rental units.

Summary of Gaps Analysis

The following summary is an analysis of the gap in shelter units available for persons experiencing homelessness and the number of persons in need of shelter during the the January 2022 Point in Time (PIT) count conducted in accordance with HUD requirements for entities receiving federal block grant funding and/or other HUD funding to address homelessness in the community – depicted in Homeless Needs Inventory and Gap Analysis Table – 1. Additionally, information in the Homeless Needs Inventory and Gap Analysis Table – 2 identifies the total number of rental units available in the community, number of rental units affordable to households with income at or below 30% AMI and 50% AMI. The “Level of Need” column identifies the difference in the number of rental units available to households with 0%-30% AMI that have 1 or more severe housing problems⁴ – households At-Risk of Homelessness, and the number of rental units available to households with income 30%-50% AMI that have 1 or more severe housing problems – households in “Other Populations” that are also likely to be at-risk of homelessness.

“Cost burdened” is the ratio of housing costs to household income. Housing cost is calculated as a monthly expense - for renters, housing cost is gross rent (contract rent plus utilities); for owners, housing cost is “select monthly owner costs”, which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. A household is considered as cost burdened at such time the monthly housing cost exceeds 30% of the household’s monthly gross income. A household is considered as severely cost burdened at such time the monthly housing cost exceeds 50% of the household’s monthly gross income.

⁴ The four housing problems, as defined by the U.S. Census Bureau, are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, cost burden greater than 30% - or severe cost burden greater than 50%.

During the January 2022 PIT count, table-1 indicates the **current inventory** of beds and units available for persons experiencing homelessness with the number of beds/units available for families, for adults only, and for veterans. The **homeless population** column indicates the number of family households (HH) with at least 1 child, adult households without (w/o) children, veterans, and victims of domestic violence (DV). The **gap analysis** column indicates the gap between current inventory available and the number [of inventory] needed for the categories of family and adults only- respectively. At the time of the 'PIT', bed availability for families were 67 Emergency Shelter beds – 55 of those dedicated to victims of domestic violence (8 non DV), 4 Transitional Housing beds, and 9 Permanent Supportive Housing beds. The available inventory for adults only indicated 80 Emergency Shelter beds – 10 of those dedicated to victims of domestic violence (70 non DV), 8 Transitional Housing beds, and 14 Permanent Supportive Housing beds. A special note on the number of permanent supportive housing units is that all these beds/units are in Temple and operated by Central Texas Veterans Health Care System (VHCS) – specifically for veteran families or adults. Also, during the PIT count in January 2022, a total of 12 homeless families with at least 1 child were counted as being 'sheltered' with zero counted as 'unsheltered'. The number of adults without children were counted with 51 sheltered and 54 'unsheltered.' The number of veterans counted equaled two (2) persons sheltered and zero 'unsheltered'; there were zero victims of domestic violence counted as sheltered or unsheltered.

The gap analysis [table -1] is distorted as there appears to be a surplus of 'shelter beds' with a total of 76 beds available for families in 25 units and only 12 persons were unsheltered; **an excess of 64 beds**. The distortion is significant to the number of beds available since 87% / 55 of the emergency shelter beds available are dedicated to victims of domestic violence – leaving only 8 beds available for non-DV homeless persons, and 12% / 9 beds not located within the corporate city limits of Killeen. Consequently, the number of beds available to adults without children (male and female) totaled 102 beds available with 51 sheltered and 54 persons unsheltered; **a deficiency of three (3) beds to shelter the 'unsheltered' population**. The number of sheltered veterans may or may not have been located within the corporate city limits of Killeen since specific shelter units for veterans are available through the VHCS in Temple.

Data shown in table-2 is a compilation of data from the U.S. Census Bureau 2011-2015 American Community Survey (ACS) and a special compilation for HUD known as the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS). The table reflects the total number of rental units available in **current inventory**, the number of units that are affordable to households (HH) earning 30% of the Area Median Income (AMI), and the number of units affordable to households earning 50% of the AMI. Likewise, the column indicated as **level of need** reflects the number households in need of quality rental units that have no severe housing problems. There are **4,225 households earning 30% or less of the AMI** and another **4,030 households earning more than 30% up to 50% of the AMI all have 1 or more severe housing problems**. Consequently, the number of available rental units reflect a +12,860 and +2,660 respectively **however households with annual income equal to or less than 50% AMI need monthly subsidy to maintain a housing unit that is renting at the fair market rent (FMR)**. Monthly subsidy assistance is not available to all persons in need as reflected by the current wait list for a HUD Housing Choice Voucher (HCV), through the local HCV Administrator – Central Texas Council of Government's Housing Division, is a minimum of 24 months or longer; the Housing Authority of Killeen has approximately 81 HCVs that are being utilized and is not accepting new applications to a wait list. In retrospect, a near +16,000 (+15,520) available rental units are not being made available to low-income households since the pandemic allowed for tenants to remain in rental units without payment of rent. The landlord/owners are not allowing individual with a housing voucher of any type to occupy a unit if the tenant is responsible for even partial rent amounts; No acceptance of HCVs in local rental

units. The actual reflection of available, affordable, rental units for low-income families is at -8,255 instead of the +15,520 shown in table-2 above. The tenants with income less than 50% of the AMI occupying local rental units are 'at-risk of homelessness.' Likewise, 3,840 rental households with income greater than 50% up to 80% of the AMI also fit into the 'other populations' category as well as 'at-risk of homelessness' category since they are severely cost burdened with paying more than 50% of the household's gross monthly income for rent.

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

Homeless

HOME-ARP requires the funds be used to primarily benefit individuals and families (persons/households) in specified "Qualifying Populations (QPs)" and who further meet criteria as eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria (e.g., additional income criteria). All income calculations for determining QPs and HOME-ARP eligible actives will use the annual income definition in 24 CFR 5.609. Qualifying Populations are those considered as homeless, at-risk of homelessness and are specifically defined in the *HUD CPD Notice 21-10 Requirements for the Use of Funds in the HOME-American Rescue Plan Program*.

Homeless⁵ is an individual or family who lacks a fixed, regular, and adequate nighttime residence, is at 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, 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 is 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; An individual or family who will imminently lose their primary nighttime residence and no subsequent residence has been identified, lacks resources or support networks; or is an Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless, have not had a lease or occupancy agreement in the last 60 days and can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment. In short, persons who are experiencing homelessness, and households who have previously been qualified as "homeless" as defined in 24 CFR §91.5 who are housed due to temporary or emergency assistance and need additional housing assistance or supportive services to avoid a return to homelessness or break the patten of [chronic] homelessness.

In HUD's 2022 Point in Time (PIT) count for Killeen, Texas there was a combined total of 141 persons considered as homeless (sheltered and unsheltered) consisting of 116 Adults⁶, 7 Young

⁵ Homeless, as defined in [24 CFR 91.5](#) *Homeless (1), (2), or (3)*

⁶ Adults are age 18 years of age or older.

Adults⁷, and 25 Children.⁸ Among all persons, 21 were classified as Veterans, and 36 as Chronically Homeless.⁹ Of the 141 homeless persons counted, 61% were sheltered- *were in a supervised publicly or privately operated shelter designated to provide temporary living arrangements* with 43% counted as adults and 18% counted as children under age 18; Additionally, 10% were considered as chronically homeless and 11% were veterans.

Among the total homeless persons counted within various Killeen shelters, there were 86 sheltered - 65% counted as Male, 57% Female, with 58% Black-African American, 45% White, 10% Multiracial, and less than 2% Asian, American Indian – Alaska Native, or Native Hawaiian-Pacific Islander.

Unsheltered persons counted as “on the street [without shelter the previous night]” in Killeen totaled 39% with 65% of those being Male, 22% Female, 44% White, 38% Black-African American and less than 1% Asian, American Indian-Alaska Native, or Native Hawaiian-Pacific Islander. Among the unsheltered persons counted, 16% were considered as chronically homeless and 3% were veterans.

In January 2022, the cities of Killeen and Temple, and Bell County collaborated with Marbut Consultants, Dr. Robert G. Marbut, Jr., to create a homeless and mental health strategic plan to cooperatively address homelessness across the entire county as well as specifically for each city/community. Dr Marbut presented preliminary findings to the Killeen City Council on August 16, 2022, indicating that homelessness recovery will not occur on a jail cell floor or a park bench, and that criminalization and handouts will never reduce homelessness. Recovery will only occur in 24/7 programs that address root causes of homelessness (e.g., mental health, substance abuse, and domestic violence). Dr. Marbut continued by stating a systems approach of addressing the REAL root causes of homelessness is a very successful and proven way to reduce homelessness and the need to move to a culture of transformation vs. the old culture of warehousing, integrate, and co-locate as many services as possible, use a customizable master case management system, reward positive behavior, although have consequences for negative behavior, external activities are to be redirected or stopped and panhandling enables homelessness and it must be stopped. Killeen must revisit its response to homelessness to pursue actions that do not waste time, wait for additional federal and/or state governments to solve “our” problem, and make “big” waves that will result in big changes. Five strategic keys were offered as a ‘systems approach’ resulting in addressing the real root causes, improvement to service delivery systems and change the community culture to ‘engage’ instead of ‘enable’ persons experiencing homelessness.

⁷ Young Adults are age 18 to 24 years of age.

⁸ Children are under 18 years of age.

⁹ Chronically Homeless means, with respect to an individual or family, that the individual or family—(i) is homeless and lives or resides in a place not meant for human habitation, a safe haven, or in an emergency shelter; (ii) has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 1 year or on at least 4 separate occasions in the last 3 years; and (iii) has an adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability, including the co-occurrence of 2 or more of those conditions.

Dr. Marbut identified the “positives and negatives” arriving at - people understand the connection with untreated mental illness and co-presenting substance use disorders and the governments, agencies, and advocates are willing to work together, but there is no plan or system in place. Then concluding – currently there is no “formal system” of coordination, there is a thin track record [if any] of system successes, and no entity has the volume and inventory necessary to provide needed services within the entire [Bell] County. Marbut concluded the presentation by providing some initial statistics where Killeen has chronic homelessness, where homeless individuals have or are considered as “chronic” *having had reoccurring episodes of homelessness for two years or less*; the average number of years homeless is 5.2 years; most homeless persons did not originate or go to high school in Bell County but had a job before they were homeless, have family and started homelessness in Bell County and have been in the county for 12.9 years. Many of the homeless in Killeen are extended family members that came to the Fort Hood Area as family support for active military members and then stayed in Killeen as they aged out of their home. Additionally, many of these individuals happen to be women. Finally, Marbut stated, the Killeen area is very transient and therefore the HUD PIT count is just a small snapshot and the more accurate number of 300-600 homeless persons in Killeen on any given day is what should be considered when addressing reducing homelessness.

The information from Dr. Marbut obtained individually and through consultations with community stakeholders, is noted as follows:

Male	60.2%
Female	39.8%
18-24 years	2.7%
Veterans	18.8%

Chronic 80.1% (Dr. Marbut applied the Hud Definition of Chronic Homelessness of 12 months/1 year)

Average Age 47.6 years

Avg. Years Experiencing Homelessness 5.2 years

The jurisdiction will consider the following for **Homeless**:

Qualifying Populations (QPs) within Killeen’s boundaries are those who are considered as Chronically Homeless¹⁰ or have a Serious Mental Illness and/or Substance Abuse-Addiction

¹⁰ **Chronically Homeless is defined at 24 CFR 578.3** meaning: (1) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who: **(i)** Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and **(ii)** Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). *Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;*

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

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

listed in the order of priority and presenting with the additional qualifying factors listed above and who are:

1. Households/Families (minimum one adult and one child);
2. Female or Male households without Children
3. Young Adult Females with Children; and
4. Unaccompanied Youth.

At-Risk of Homelessness

Again, HOME-ARP requires funds be used to primarily benefit individuals and families (persons/households) in specified “Qualifying Populations (QPs).” Persons considered “**at-risk of homelessness**”¹¹ are those whose annual income is below 30% of the median family income for the area, as determined by HUD and do 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) and who meet one of seven other conditions¹², or is a child or youth who does not qualify as “homeless” under 24 CFR 91.5 *Homeless*, but qualifies as “homeless” under other federal regulatory programs¹³

Persons at-risk of homelessness are individuals and families with extremely low annual income [30% of the AMI determined by HUD] and is experiencing severe cost burden (i.e., paying more than 50% of monthly household income toward housing costs); has annual income that is less than or equal to 50% of the AMI as determined by HUD **and** meets one of seven (7) conditions from the definition of “At risk of homelessness” definition established at 24 CFR 91.5¹⁴ .

¹¹ **At-Risk of Homelessness as defined in 24 CFR 91.5** is an individual or family with annual income below 30 percent of the median family income for the area, as determined by HUD, does not have sufficient resources or support networks, and meets one seven additional criteria; is a child or youth meeting prescribed qualifying criteria.

¹² Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance; Is living in the home of another because of economic hardship; 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; 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; 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 people per room, as defined by the U.S. Census Bureau; Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the jurisdiction’s approved consolidated plan.

¹³ “Homeless” defined 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(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); 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.

¹⁴ (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

Killeen's current 30% Area Median Income¹⁵ (AMI) level is at \$25,350/ \$2,112 monthly for an individual (1 person) household, and \$36,150 / \$3,012 monthly for a family of four (4) persons. Annual income at this level and below restricts the location of housing chosen by a household therefore unintentionally concentrating low-income households to older rental units, usually in less desirable areas of the community. Lower income is often associated with elderly individuals who rely only upon income from Social Security or with younger households - minimum wage earnings from the service or accommodation industry where employment is often associated with less than full-time hours further reducing annual income. Additionally, households receiving Supplemental Security Income (SSI) are also in the 30% AMI level as well. Each of these households strain the limited supply of their support networks, friends, faith based or other social networks by heavily depending upon public resources for extended periods or indefinitely. These households are prone to frequent moves or are faced with choosing the cost for rent and utility expenses over food or medications.

The 2020 population in Killeen¹⁶ was estimated at 156,261 persons / 54,840 households¹⁷ with a median income of \$50,335¹⁸ / \$23,871 per capita¹⁹. Data indicates 15.1% /23,595 of the population are considered as "persons in poverty."²⁰ Poverty levels have increased 9% from 2020 to 2022²¹ with the current Federal Poverty Level for an individual at \$13,590; for a household of 4 the annual income is \$27,750 - annual income before taxes, capital gains, or noncash benefits. This most recent data indicates Killeen has a minimum of 23,595 people – nearly 8,300 (8,281) renter households who qualify as at risk of homelessness. There are 13,195 renter households in Killeen that have at least 1 of 4 severe housing problems²² which includes

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 people 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.

¹⁵ Area Median Income level for the Killeen-Temple-Fort Hood Metropolitan Statistical Area (MSA) as determined by HUD, effective April 1, 2022.

¹⁶ United States Census Quick Facts Killeen city, Texas July 1, 2021 (V2021). *The vintage year (e.g., V2021) refers to the final year of the series (2020 thru 2021). Different vintage years of estimates are not comparable.*

¹⁷ United States Census Quick Facts Killeen city, Texas July 1, 2021 (V2021) *families & Living Arrangements, Households, 2016-2020.*

¹⁸ Median income in 2020 dollars, (2016-2020)

¹⁹ Per capita income is the mean income computed for every man, woman, and child in a particular group including those living in group quarters. It is derived by dividing the aggregate income of a particular group by the total population in that group.

²⁰ The Census Bureau poverty definition - Following the Office of Management and Budget's (OMB) Statistical Policy Directive 14, the Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps)

²¹ <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines> U.S. Department of Health and Human Services Office of the Assistant Secretary for Planning and Evaluation Poverty Level for 48 contiguous states and the District of Columbia 2020, 2021, and 2022.

²² Severe housing problems identified by HUD are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room (overcrowding), and 4. Cost burden over 50%.

households with annual income greater than 100% of the AMI. Additionally, 4,225 / 32% extremely low-income (30% AMI) renter households are included in this total; the median gross rent was \$948 monthly.

Although the consultations with community stakeholders did not clearly disclose an exact demographic composition or number of persons that would be considered as a qualifying population (QPs) for the category of 'at-risk of homelessness,' the Killeen HOME-ARP Survey and resource data above provided us with the following conclusion:

Qualifying Populations (QPs) within Killeen's boundaries with annual income at or below 30% AMI and listed below in the order of priority:

1. Adult Female or Male households;
2. Elderly only age 62 years+, and/or Persons with a disability or handicap;
3. Unaccompanied youth alone over age 19 to age 25;
4. Children under age 12 with Adult(s), Unaccompanied Youth alone age 12-19, Families with disabilities, Families regardless of age;
5. Elderly (age 62 years+) with dependents under age 25;
6. Youth age 12-19 with Adult(s).

The jurisdiction estimates these households will be primarily 1-2 person (small) households – 78%, with an estimated 12% making up larger (3 persons+) households. The jurisdiction is also using the race and ethnicity percentages consistent with the 2022 HUD PIT *Sheltered* count estimating the overall race and ethnicity as 58% Black-African American, 45% White, 10 % Multiracial, 14% Hispanic and 86% non-Hispanic.

Individual or family fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Domestic violence (DV) shelters have been a part of Killeen for more than 40 years with the longest known DV shelter owned and operated, since 1981, by nonprofit organization Families in Crisis, Inc. Smaller shelters include other nonprofit organizations - Teach them to Love (T3L) which has been in existence since 2014 and Jesus Hope and Love Mission since 2009. Each of these entities provide emergency shelter for DV victim(s) and children.

During consultations in March 2022, fourteen (14) agencies from across Bell County participated identifying characteristics of DV victims needing shelter as being both Male and Female with females between the age of 25-59 years. Additionally, Human Trafficking victims are primarily females up to age of 40. No specific number of individuals

Family violence in Texas falls into 5 general categories: Assaults; Homicides; Kidnapping/ Abductions; Robberies; and Sex offenses. In 2021, Texas Council on Family Violence (TCFV)²³ documented the third highest number of intimate partner homicides in the last decade; 204 Texans were victims of intimate partner homicide. This number includes 169 women and 35 men, including 12 LGBTQ+ victims. Homicide perpetrators also shot and killed 22 family members, friends, or bystanders, including 11 children ages 18 and below. During the homicides, perpetrators injured an additional 21 victims including four law enforcement officers, six children, and 11 family members and friends. Two hundred fifty-six adults and minor children lost a parent to domestic violence.

²³ Council on Family Violence https://tcfv.org/wp-content/uploads/tcfv_htv_summary_facts_2021.pdf, 2021 Summary

2. ***Describe the unmet housing and service needs of qualifying populations, including but not limited to:***
- ***Sheltered and unsheltered homeless populations;***
 - ***Those currently housed populations at risk of homelessness;***
 - ***Other families requiring services or housing assistance or to prevent homelessness; and,***
 - ***Those at greatest risk of housing instability or in unstable housing situations:***

Regarding housing for Qualifying Populations (QPs) - QPs seeking shelter may find themselves in crowded conditions when in local shelters and are often placed within a “group” room if they are presenting as a family unit and/or are potentially faced with being relocated to another similar shelter in Bell County that does have “family” space. For single men, women, and unaccompanied youth populations often are left without adequate shelter due to the lack of shelter space (beds) because of the space taken by homeless family units and are forced to remain unsheltered or, they have no desire to be contained in a shelter setting containing families including children. Local shelters often will reduce space for individuals to give priority to homeless individuals with children or families who are homeless. The time of year and weather also plays a significant part to the number of QPs that are seeking shelter – warmer weather in Central Texas provides an opportunity for the QPs to group (camp) together in areas that are not readily visible to the public but are close to services such as free meals, restrooms, and areas near stop lights, which allow time for individuals to display signage indicating a need for money or food, during times of ‘rush’²⁴ traffic. Unmet ‘service’ needs of QPs that are both sheltered and unsheltered continues to be one of great need in Killeen. Generally, local nonprofit agencies usually start off providing services to one subpopulation of QPs and then later incorporate other service elements which appear to provide well rounded care of that subpopulation of QP. Unfortunately, the agencies do not have the necessary expertise or capacity to fully function in the added component area and often share staff among various fund sources to increase salary for the employees to meet compliance of funding sources and are not fully transitioning clients. Additionally, local agencies do not have formal collaborations with each other for addressing holistic needs of a particular QP; no one agency can address housing and service needs of sheltered and unsheltered QPs without collaboration.

Qualifying Populations (QPs) currently housed, but who are at-risk of homelessness are those individuals and families that may have steady/regular income – regardless of source; tend to not be organized in tracking their income and expenditures; and attempt to suppress the reality of their expenses greatly exceeding all aspects of their resources. These households tend to borrow money from sub-prime lenders or pay-day loan businesses only finding themselves deeper in debt with no clear way to regain control. Income to these households is in the 50% - 100% of the AMI for the Killeen area. Additionally, these households are not in the same group as those individuals who are currently receiving a Housing Choice Voucher (HCV) from either the Central Texas Council of Governments-Housing Division or the Killeen Housing Authority. The non-voucher holders generally have less income from which they must pay the area market rent, often 2 times what is required of a voucher holder. These households are considered as cost burdened and severely cost burdened when paying the contract rent and basic utilities for a unit that is conducive for their household size or are forced to live in areas of the community that have less access to amenities like groceries, employment, medical care, public transportation, or quality schools. This category of QP would benefit from a full financial assessment and counseling associated with living within their means, crisis planning and

²⁴ Rush traffic means a time during each day when traffic is at its heaviest.

budgeting, increasing annual income through opportunities of secondary education and or relocation to an area with greater amenities to increase household income.

Elderly persons and persons or families who are/with a disabled family member are among those requiring services and/or housing assistance to prevent homelessness. The QPs are among the most vulnerable as they tend to have no room for unexpected increased expenses of any kind. Services could be those that help the QP seek out additional nonprofit resources to help with utilities, medication and medical expenses, and food. Housing assistance could be in the form of deeply subsidized target housing and/or long-term rental and utility assistance for QPs that have a fixed or limited income at or below the 50% AMI income level.

The two groups of QPs that are at the greatest risk of housing instability or in unstable housing situations are those who are elderly and disabled or families with a disabled member and have annual income at or below 50% of the AMI, and those households currently with steady/regular income – regardless of source, with annual income greater than 50% up to 100% of the AMI for the area and are not HCV holders.

3. ***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:***

At present, Killeen has only one known set of non-congregate shelter units that are owned and operated by a nonprofit organization - Jesus Hope and Love Mission. These units are offered only to those persons participating in the agency's faith-based ministry. Regarding *congregate* shelter units, Families in Crisis Inc. owns and operates the domestic violence shelter - Families in Crisis and homeless shelter - Friends in Crisis (FICs). These are the only two shelters in the Killeen community serving persons who experience either domestic violence and homelessness or are homeless without domestic violence. Between the two shelters there are approximately 138 beds that can be occupied by individuals - male or female, and/or families- adult with child/children or adults over age 18 years. The occupancy level in each shelter varies pending the season, weather, military deployments, and most recently – the pandemic. Other agencies are small but present within the community, are without the financial support like that of the FICs, tend to offer somewhat provisional assistance that is membership (military) and/or spiritual based curriculum for transitioning beyond the temporary situation; these agencies are not usually recipients of HUD funding.

Families in Crisis also is the only agency that applies for Emergency Solutions Grant (ESG) at the state level and receives funding to provide security deposit and/or rent, maximum 3 months, to re-establish permanent housing for the affected individual or family. These ESG assisted households generally do not have essentials - towels, dishes, pots/pans, bed linens, let alone furniture, mattress bedding or additional clothing for themselves or dependents that are with them. Additionally, there are no known additional support services associated with this type of rehousing or the funding that may provide the support services.

There are no agencies that provide Tenant Based Rental Assistance (TBRA) associated with QPs. Since the pandemic effected the rental housing market in Killeen, the owners/landlords and property management companies, who are not required to accept HCVs, have made it clear

that ‘vouchers’ are not welcome, and a verifiable rental history is a minimum requirement. The jurisdiction created a TBRA program funded with \$405,000 of its HOME entitlement funds from 2021 only to realize that “approved housing unit outreach” would be a greater task than anticipated, and the support services necessary to successfully house chronic homeless persons from Killeen where not available at any level – including for persons with suspected mental health concerns and/or substance/alcohol use. The program is on hold until adequate support services and increased City Staff can fully administer the program as intended.

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

At present there are not enough shelter units to house all persons who are homeless. Additionally, there are not enough funding resources to provide rental subsidy for persons who have extremely low- or no income. The Housing Choice Voucher Administrators do not have enough HCVs to distribute special purpose vouchers to allow for homeless persons to obtain quality affordable housing in a desirable area or that is close to employment and public transportation.

Local rental units across the community use the most recent Fair Market Rent (FMR) which is beyond the financial capacity of a person transitioning from a homeless shelter to permanent housing. The current FMR for Killeen is \$754 and \$957 for one- and two-bedroom units respectfully. In most cases the use of a one-bedroom unit is necessary for an individual or “couple²⁵”; Killeen does not have an adequate supply of one-bedroom or studio type apartments to offer to individuals. Although the **Homeless Needs Inventory and Gap Analysis Table – 2** above indicates an adequate number of rental units for extremely low-income individuals most of these units are for small families and consist mostly of two bedrooms. The two-bedroom units have a higher rent charge and justification of expenditure is not effective for an agency with limited sources to pay rent.

Known social services delivery systems, to persons experiencing homelessness, is somewhat uncoordinated even though agencies indicate they collaborate. Each agency serving the Killeen community specializes in one major element of human service, i.e., domestic violence, health/clinic, veterans, or children. The collaboration is more of a referral system when an agency is approached and does not provide the needed services the inquirer is then provided an agency name, telephone, and address to contact for the needed service. It is unknown whether this referral method is to protect the limited resources of one agency or if the agency actually does not provide the service and does not have a coordinated referral system in place to address the entire needs of the client.

5. ***Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:***

²⁵ Two individuals of the same sort considered together; two people who are married, engaged, or otherwise closely associated romantically or sexually.

The jurisdiction will not include additional characteristics associated with housing instability or an increased risk of homelessness in its definition of “other populations” as already established in the HOME-ARP Notice.

6. ***Identify priority needs for qualifying populations:***

The priority needs for QPs in the Killeen community are those that incorporate a true collaborative effort among all entities that choose to participate in programs that will change the result of serving homeless persons to that of transitioning homeless persons to self-sufficiency. The priority to accomplish this will be through:

- Comprehensive interviewing, assessment, and interpretation of psychological test measures to uncover untreated mental and behavioral health illness and/or substance abuse disorders with all data entered in HMIS for true case management success tracking of individuals/ households.
- Educated, licensed, and experienced clinical psychologists to provide mental and behavioral health care for individuals, couples, families, and groups in a wide range of mental/behavioral health problems. The ability to assess cognitive, behavioral, emotional, and interpersonal functioning and conduct intervention to improve using a wide range of evidence-based interventions and establish maintenance therapeutic relations and communication with a diversity of populations while recognizing and responding to ethical, legal, regulatory issues as they pertain to the practice of clinical psychology.
- Long-term and Short-term Permanent Housing coupled with Supportive Services focusing on the individual and/or family’s specific needs, as determined by an initial comprehensive assessment, to avoid a return to homelessness.
- Acquisition and Development of Non-Congregate Shelter (NCS) and supportive services to qualifying populations
- Homelessness prevention providing housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter.
- Education and Employment assistance with job coaching and workforce development training for securing employment.
- Affordable rental units located near employment, public transportation, medical and participating human service providers assisting the household to transition out of homelessness.
- Reconnect those who are recently homeless (within the last 30 days) with family members or hometown to address the cause of homelessness with holistic and comprehensive intervention resolve the issue.

7. ***Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:***

The level of need and gaps in shelter units and housing inventory along with delivery of services were a culmination of data from: **2022 HUD Point In Time Count (PIT); 2022 Continuum of Care Housing Inventory Count (HIC); Homelessness Services Needs Assessment and Recommended**

Homeless & Mental Health Strategic Action Steps (HMHSA, 2022), as well as more than 15 years of experience working with local providers serving the homeless population.

HOME-ARP ACTIVITIES

- 1. Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:**

The jurisdiction will prepare a proposal process available to experienced entities for eligible programs and projects as identified in this Plan, as approved by HUD. The process will be known as the HOME-ARP Application (HOME-ARP App). The application will offer funding only for those programs and/or projects indicated as a high priority from the information taken from the consultations conducted with area service providers and recommendations from the Homelessness Services Needs Assessment and Recommended Homelessness & Mental Health Strategic Action Plan. Selection of developers, service providers, subrecipients and/or contractors will be evaluated and assessed based upon relative experience and quantitative outcome of similar projects and/or programs.

Funding for development of affordable rental housing, acquisition and development of non-congregate shelters will be available to a maximum 60/40 ratio for any one (1) project whereby the applicant will provide a minimum 40% of development cost and HOME-ARP may provide up to a maximum of 60% of development cost for any one (1) project; subject to underwriting, other fund sources, and subsidy layering review and evaluation. Development cost eligibility will be defined in accordance with the HOME-ARP Notice and will be disbursed on the 60/40 ratio for each approved payment request. Before the jurisdiction can commit HOME-ARP funds to a project, the project must be evaluated to determine the amount of HOME-ARP capital subsidy and operating cost assistance necessary to provide quality affordable housing that meets the requirements of the HOME-ARP Notice, and is financially viable throughout the minimum 15-year HOME-ARP compliance period.

Tenant Based Rental Assistance (TBRA) may only be accessed by individuals and families in the Killeen qualified populations. HOME-ARP TBRA may be used by a QP individual or household for a HOME-ARP rental unit or any other eligible rental unit. HOME-ARP TBRA can assist qualifying households with payments for the entire or insufficient amounts the QPs cannot pay for housing and housing-related costs (i.e., security deposit, rental assistance, and utility deposit). In conjunction with HOME-ARP TBRA the QPs must be offered support services appropriate for rental housing – appropriate to the household to include Housing Search and Housing Counseling Services, Housing Counseling – HUD rental and rent subsidy programs, landlord tenant laws, lease terms, rent delinquency, crisis and disaster budgeting, and other eligible HOME-ARP topics under housing counseling. Housing Counselors must establish an action plan for each participating QP household.

Project Based Rental Assistance Housing Assistance Payments (HOME ARP PBR-HAP) may be awarded to a HOME-ARP rental project for a minimum compliance period that is equal to 15 years or the term of the PBR-HAP, pending project financial feasibility.

Support Services Providers are any private non-profit organization,²⁶ or unit of general-purpose local government²⁷ with demonstrated (through documentation) quantifiable successes in the supportive services activity for which an application is being submitted. HOME-ARP includes eligible costs for supportive services that are necessary to assist the qualifying populations, prevent homelessness, or to enable qualifying households to obtain and maintain housing. Housing Counseling services may be provided regardless of whether a person is homeless or currently housed.

Support Services/Housing with Supportive Services with HOME-ARP, the jurisdiction will prepare a list of support services eligible to be paid by HOME-ARP funds that are also consistent with the requirements of the HOME-ARP Notice and 2 CFR part 200, subpart E, Cost Principles that require all costs be necessary and reasonable. Necessary services will be required to be documented through a program participant "action plan", reasonable costs must be documented by the number of partial or complete hours the service is delivered to each program participant. Program participants cannot receive or be approved to receive duplicate services through another program or service provider. Disbursement for support services will be on a reimbursement basis based on the number of hours each program participant receives services. Additionally, the jurisdiction may set a maximum dollar amount or a maximum period for which a program participant may receive any of the types of eligible services. An entity providing support services may be required to provide service 24 hours a day - seven days a week.

The jurisdiction may administer some or all of the eligible activities funded by HOME-ARP.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all the PJ's HOME-ARP program:

Not Applicable

²⁶ Private nonprofit organization means a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance.

²⁷ Unit of general-purpose local government means any city, county, town, township, parish, village, or other general purpose political subdivision of a State.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME- ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Amount of Funding*	Percent of Grant	Statutory Max. Limit
Supportive Services*	\$ 700,000.00		
Acquisition and Development of Non-Congregate Shelters*	\$ 500,000.00		
Tenant Based Rental Assistance (TBRA)*	\$ 111,844.85		
Development of Affordable Rental Housing*	\$ 200,000.00		
Non-Profit Operating	\$ 0.00	%	5%
Non-Profit Capacity Building	\$ 0.00	%	5%
Administration and Planning	\$ 266,796.15	15%	15%
Total HOME-ARP Allocation	\$ 1,778,641.00		

*Based on the applications received, these amounts may fluctuate.

Additional narrative, if applicable:

The jurisdiction will utilize HOME-ARP administrative costs within the requirements of the HOME-ARP limits and will submit a substantial amendment at such time changes are made in the method of distributing funds; to carry out an activity not previously described in the plan; or, to change the purpose, scope, location, or beneficiaries of an activity, including new preferences not previously described in the plan.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Based upon information confirmed and released in the **Homelessness Services Needs Assessment and Recommended Homeless & Mental Health Strategic Action Steps (HMHSA, 2022)**, HUD Housing Inventory Count (HIC) of 2022, the **2011-2015 American Community Survey (ACS)**, and the **2015-2019 Comprehensive Housing Affordability Strategy (CHAS)** the relative characteristics of homeless shelters and the current service delivery system attempting to address homelessness within the jurisdiction does not suffice in the true transitioning out of homelessness of individuals and households who are homeless or at-risk of homelessness. Additionally, the jurisdiction is familiar with local organizations working with the homeless populations in Killeen. Justification of the rationale for the proposed distribution of funding in the manner and amounts listed above in the **Use of HOME-ARP Funding** table and oversight and management, by the jurisdiction, of the day-to-day operations of its HOME-ARP programs

will provide the direct connection to performance necessary to fully address homelessness in the Killeen community. HOME-ARP funded programs and projects will also affect future years of CDBG and HOME formula grant funding in the jurisdiction's 5-year Consolidated Strategic Plan and program years 3 through 5 of the Action Plans as it relates to funding of future public services, facilities, and affordable housing.

HOME-ARP Production Housing Goals

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

The jurisdiction estimates 25 affordable rental housing units for QPs will be produced and/or supported in part with Killeen HOME-ARP funds.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

The jurisdiction has a goal of developing 12 permanent supportive housing units in conjunction with a 'supportive service experienced' nonprofit or local general-purpose local government entity for the benefit of chronic homeless individuals in Killeen. These individuals are among those experiencing homelessness the longest length of time with approximately 5.2 years of living 'on the street' without shelter or support services. Additionally, the jurisdiction has a goal of providing support services to 100 persons who are 'new' to experiencing homelessness (being homeless for less than the most recent 2 years) in Killeen and to provide supportive services to persons who are highest at-risk of homelessness as detailed above in the section **At-Risk of Homelessness**.

Although these goals are somewhat aggressive for this jurisdiction, who has little experience in homelessness, comprehensive assessments, and holistic treatment geared to the individual/family, these goals will most readily decrease the homeless population, provide housing, and services to individuals with untreated mental/behavioral health illnesses as this subpopulation has the greatest priority needs of all persons experiencing homelessness in Killeen.

Preferences

Other qualifying criteria

Preferences that will be added to the process of providing housing and support services will include:

Access to Killeen HOME-ARP funded activities through a modified Coordinated Entry System (CES) whereby all program participants are entered into the Homeless Management Information System (HMIS) and personal interview by licensed clinical psychologists to assess need for mental or behavioral health support services needs;

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

A preference will be given to all individuals who are from Killeen: The origin area where the homelessness began and length of time experiencing homeless (residency prior to being homeless) to access long- and intermediate-term housing and services; other short-term emergency services will be available for up to seven days in a year regardless of origin of homelessness. This preference is being proposed because of known communication channels within the homelessness community, providing support to non-origin persons will likely attract more [homeless] persons to Killeen and Bell County, which will result in longer periods of stay in the area.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

By utilizing a 'residency' preference, the jurisdiction will be able to rapidly address the unmet support service needs and housing gap for persons who are chronically homeless and will then provide immediate short-term support services and shelter to persons who are recently homeless.

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

By using HOME-ARP for short-term emergency services and assistance to non-origin homeless persons this will place the individuals in the best environment to achieve the highest chance of recovery from homelessness.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

The jurisdiction will not use HOME-ARP funding to refinance existing debt secured by multifamily rental housing that could be rehabilitated with HOME-ARP funds.

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
- ***Other requirements in the PJ's guidelines, if applicable:***

For all activities associated with Killeen HOME-ARP funds -

Total rehabilitation costs will be evaluated along with other fund sources for the project. At a minimum, the HOME-ARP assisted 'unit' must be rehabilitated to such level that complies with current building code for existing structures, as applicable that will be the International Property Maintenance Code 2021 (IPMC) or the 2021 International Building Code for Single Family & Two Family Residential or Multifamily Residential construction.

The maximum HOME-ARP investment²⁸ in rehabilitation per unit is based upon bedroom size of the unit and is as follows: 0 bedroom = \$63,902; 1 bedroom = \$73,253; 2 bedrooms = \$89,078; 3 bedrooms = 115,238; 4 bedrooms = \$126,495; common area = 40% of the total ratio of HOME-ARP assisted units to all units. Each unit and common area constructed prior to 1978 must be examined for potential hazards of lead-based paint, unless the unit/property has

²⁸ The minimum HOME-ARP investment, per unit, is \$1,000 times the number of HOME-ARP assisted units; the maximum HOME-ARP investment per bedroom size is equal to forty percent (40%) of the 2022 Limits for HOME Maximum per unit subsidy for Ft. Worth Tx Field Office Participating Jurisdictions rounded up to the nearest whole dollar and is subject to change during annual update by HUD.

previously been tested and confirmed no lead hazard exists.²⁹ In the event the hazard is present, the hazard must be abated. Additional HOME-ARP funds in the amount of 30% of the lead hazard inspection and 30% of the lead hazard abatement can be provided for a unit that is rehabilitated for use in a HOME-ARP project.

Compliance with all requirements of the HOME-ARP Notice will apply to all HOME-ARP assisted supportive services and housing, with funds committed only after completion of the required environmental review and approval of the Request for Release of Funds and Certification (RROF/C) as required by 24 CFR Part 58 (Title 24 Housing and Urban Development, Subtitle A Office of the Secretary, Department of Housing and Urban Development, Part 58 Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities) and is specified and reduced to itemized requirements in a written grant agreement.

The City of Killeen, at its sole discretion, reserves the right to reject any proposal for support services, single family - multi-family rental housing development, development of non-congregate shelter, or tenant based rental assistance that does not clearly meet the goals of the jurisdiction relative to proactively reducing homelessness.

²⁹ Lead based paint hazards may only be confirmed by a Texas lead licensed Environmental Firm.