FY 2022 Annual Action Plan

Executive Summary

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

1. Introduction

U.S. Department of Housing and Urban Development (HUD) requires jurisdictions that receive a direct allocation of HUD formula funds from the HUD Office of Community Planning and Development (CPD) to annually prepare an Annual Action Plan to implement the goals established in the Five-year Consolidated Plan. This is the Annual Plan for Year 2 of the current Five-year Consolidated Plan. CPD formula funds received by the City of Tucson Housing and Community Development Department (HCD) include the Community Development Block Grant program (CDBG), HOME Investment Partnerships Program (HOME), Housing Opportunities for Persons with AIDS (HOPWA) program, and Emergency Solutions Grant (ESG) program. The primary purpose of HUD CPD programs is to develop viable communities by promoting integrated approaches that provide decent housing, a suitable living environment and expanded economic opportunities for low-and-moderate income people, households and neighborhoods.

The vison of the Tucson Housing and Community Development Department (HCD) is “A Home for Everyone”. The City’s central long-term community development goal is to focus resources on community needs, particularly the comprehensive revitalization of distressed areas and areas with high levels of poverty. These goals address affordable housing, homelessness, community development and non-homeless special needs. The City of Tucson’s PY 2019 Annual Action Plan, Year Five of the PY 2015-2019 Consolidated Plan, details the goals and funding priorities to continue the City’s efforts in improving the quality of life for Tucson’s low- and moderate-income residents through enhancing the physical environment as well as providing direct benefits that will result in expanded housing opportunities and improved quality of life.

Subject to approval by the Department of Housing and Community Development (HUD) of the PY 2021 Annual Action Plan, the City of Tucson will receive the following federal funds for Program Year 2 (July 1, 2021 through June 30, 2022).

Community Development Block Grant (CDBG) funds - $5,649,138. The primary objective of the CDBG program is the development of viable urban communities through the provision of improved living environments, expansion of economic opportunity and decent housing. Funds are intended to serve low- and moderate-income residents and areas.

Home Investments Partnerships (HOME) funds - $3,523,477. (City/County Consortium Amount). The HOME program is dedicated to increasing the availability as well as the access to affordable housing for low income households.

Emergency Solutions Grant (ESG) funds - $477,821. The purpose of the ESG program is to assist individuals and families regain housing (temporary and permanent) after experiencing a housing crisis or homelessness.

Housing Opportunities for People with AIDS (HOPWA) funds - $842,153. HOPWA funds may be used for a wide range of housing, social services, program planning, and development costs for the benefit of individuals living with HIV/AIDS and their families.

2. Summarize the objectives and outcomes identified in the Plan

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

In general, HUD resources must be used to benefit low and moderate income (low-mod) households and neighborhoods. To address infrastructure, facility, housing and services needs using HUD funding, the City of Tucson established goals and objectives in the PY 2015-2019 Consolidated Plan to address the following needs:

The objectives of the Consolidated Plan, which guides this Annual Action Plan, are based on a housing market analysis, needs assessment, and stakeholder and citizen input. To address infrastructure, facility, housing and services needs with HUD CPD resources, the City established goals and objectives to address needs in seven categories:

1. Community Sustainability.
2. Public Services.
3. Decent Affordable Housing.
4. Homelessness.
5. Economic Development.

6. Housing and Services for People with HIV/AIDS and their Families.
7. Program Administration.

In many cases, federal, state and local resources leverage HUD funding.

3. Evaluation of past performance

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

People Experiencing Homelessness
During the summer, 620 people experiencing homelessness were served through TPCH's summer heat relief program, over 4,000 blankets and sleeping bags were distributed to people experiencing homelessness this past winter. HCD's Homeless Outreach Staff served 655 persons and helped 229 obtain permanent housing.

CDBG Funds – South 12th
Using CDBG funds, HCD played an integral role in a long-planned project to reconfigure South 12th Avenue in Tucson. With the goals of increasing and enhancing the mobility of residents and transit clients throughout the area, the project included creating an 11' center lane, 10 ½ ' travel lanes, five foot bike lanes, on-street parking in selected locations, and six foot-wide sidewalks.

TBRA
A total of 324 households were provided with Tenant Based Rental Assistance, 30 households were provided with Down Payment Assistance.

Developing or rehabilitating rental housing
Esperanza En Escalante Phase II is 50 affordable units of transitional and permanent supportive housing for homeless veterans and veteran's' families. This project was a collaborative effort using a variety of funding sources, including HOME funding. Direction was given from City of Tucson Mayor and Council to improve service level and effectiveness of the Housing Choice Voucher Program, both for residents and participating landlords, with the goal of moving towards 100% utilization of existing vouchers.

In 2020, we were able to achieve 187 new landlords signed up for the Section 8 program, over 925 families from our waitlist offered housing, improved inspection turnaround time and payment turnaround time.

Improvements to Public Housing
The ECHO program was developed to expand opportunities for chronically homeless families. The turnover time in public housing units was decreased to reduce vacancies.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The People, Communities, and Homes Investment Plan or P-CHIP was developed to serve as a foundation for Housing and Community Development department (HCD) programs and funding allocations for the next five years. The plan relies heavily on previous plans, priorities, and data resources, including Plan Tucson, the 2020 priorities identified by Tucson's Mayor and City Council, the Age-Friendly Tucson Action Plan, and other community plans and reports. In addition, HCD sought feedback from the public via an interactive website, public stakeholder meetings, outreach to experts and agencies, a public survey, and a budgeting tool. Public outreach for the P-CHIP enabled us to receive feedback from community stakeholders about key challenges and priorities. Public meetings were held on October 29th, October 30th, December 7th (In Spanish), January 6th and January 7th. Both stakeholder meetings were held November 19th.

The required public meeting was held April 1, 2021.

The required public hearing before the Mayor and Council was held May 4,2021.

5. Summary of public comments

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

The citizen participation outreach for the P-CHIP enabled staff to receive feedback from community stakeholders and residents about key challenges and priorities for the City as well as provided an opportunity through a budgeting tool for residents to allocate funds, on a percentage basis, to a variety of potential P-CHIP projects. Outreach to public and stakeholders consisted of virtual public and stakeholder meetings, including one meeting held in Spanish, and a website built to include background and details on the Plan. The website also included a Story Map as well as ways for the public to get involved in the process. As the Plan is implemented, the website will include progress reports and performance monitoring. The virtual public and stakeholder meetings occurred between October 2020 and January 2021. Four meetings were conducted with the public, one meeting with human service agencies, and one meeting with affordable housing developers.

Public comments received at the Public Meeting and the Public Hearing will be added as an attachment prior to submittal to HUD.

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

n/a

7. Summary

As an entitlement community, the City of Tucson receives direct allocations from the U.S. Department of Housing and Urban Development through Community Development Block Grant (CDBG) funds, HOME Investment Partnerships (HOME) funds, Emergency Solutions Grant (ESG) funds, and Housing Opportunities for Persons with AIDS (HOPWA) funds. As a recipient of these federal grant funds, the City of Tucson is required by HUD to develop an Annual Action Plan based on goals and objectives identified in the City's Consolidated Plan. The City of Tucson will work with its partners to actively respond to evolving conditions related to COVID-19 while continuing efforts to revitalize communities and address long-term affordability by investing in housing rehabilitation, development of new rental housing. The City of Tucson will also continue to allocate federal funds for services for people experiencing or at risk of homelessness, including persons with HIV/AIDS.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	TUCSON	Housing and Community Development Department
HOPWA Administrator	TUCSON	Housing and Community Development Department
HOME Administrator	TUCSON	Housing and Community Development Department
ESG Administrator	TUCSON	Housing and Community Development Department

Table 1 – Responsible Agencies

Narrative

In 1992 the City of Tucson and Pima County formed a HOME consortium and with this designation are required to coordinate on consolidated planning and reporting activities. The City of Tucson Housing and Community Development Department (HCD) is the lead agency for the development of the Consolidated Plan and with respect to the implementation of the annual HOME Investment Partnership Program (HOME). The City of Tucson and Pima County Consolidated Plan is carried out through individual Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Tucson participates in numerous efforts to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies, including: healthy homes initiatives to integrate health and housing resources; participation in the regional Continuum of Care that brings together public and assisted housing providers and health, mental health and services agencies to address the needs of the region's most vulnerable populations, including people being discharged from institutions of care; job training and placement services that integrate housing and services; initiatives to provide housing and supportive services for previously-incarcerated individuals; services that coordinate first responders and systems of care; networks that provide access to homelessness prevention resources; preferences for people with disabilities, people experiencing homelessness, and seniors in housing programs.

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

In the process of developing the People, Communities, and Homes Investment Plan (P-CHIP), the City of Tucson provided opportunities (i.e. virtual public and stakeholder meetings and forums) for representatives of a variety of agencies to gather to discuss issues, problems and solutions. These meetings act as an impetus to improve understanding and coordination. Numerous groups have ongoing discussions, including those that represent poverty-level households, elderly people, people with special needs and disabilities, and people who are homeless. From these meetings came input into the goals and policies written for each area of the P-CHIP. One meeting was held specifically for housing providers and service agencies where 33 participants gave input on the P-CHIP priorities and goals. Another meeting was held specifically for private and governmental health, mental health and human service agencies allowing 23 people to provide input on the P-CHIP priorities and goals.

On January 20th, 2021 the People, Communities, and Homes Investment Plan (P-CHIP) was presented to Mayor and Council. At this meeting, Mayor and Council passed the adoption of the P-CHIP, Resolution No. 23292. Soon after, the Call for Projects was opened allowing agencies to apply for funding for projects aligned with its priorities and goals.

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

The Continuum of Care is the methodology followed by organizations utilizing HUD funding to address the needs of individuals and families experiencing homelessness. Tucson Pima Collaboration to End

Homelessness (TPCH) is a coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness and addressing the issues related to homelessness in our community. TPCH acts as the U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) for Pima County. The City of Tucson became the Collaborative Application for the Continuum of Care in April of 2019.

The City presented the initial P-CHIP and the possible methods for enhancing coordination of services among and between housing providers and health service agencies to Tucson Pima Collaboration to End Homelessness (TPCH). This coordination with the CoC served to align the P-CHIP with the CoC's concurrent strategic plan ensuring future coordination between housing, health, and homelessness agencies.

The goal of an effective homeless response system is to quickly identify persons experiencing or at risk of homelessness and provide housing and services through which they can achieve housing stability. The Mayor and Tucson City Council have emphasized the need for a "Housing First" approach as this model is proven to be a best practice in reducing homelessness. The goals outlined in the P-CHIP include providing stable, accessible housing or shelter with a "Housing First" approach, coordinating a continuum of services to enable vulnerable populations to access and remain in stable housing, to support an efficient and effective services system based on evidence and data, and to increase collaboration, transparency, and access to public information through developing and implementing a homelessness communications plan in partnership with community organizations and target populations to provide more better and more consistent information to the public regarding homelessness concerns and response.

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

The Continuum of Care was invited to participate with the City in developing the People, Communities, and Homes Investment Plan through stakeholder meetings, public meetings, forums, and presentations. The P-CHIP call for projects process included inviting members of the Continuum of Care to participate on the funding recommendation committees. ESG funds were allocated through the Call for Projects process after committees reviewed, scored and recommended funding for projects to Mayor and Counsel. Projects and activities assisted by ESG funds will be monitored and evaluated for alignment to the P-CHIP priorities and goals, to project scope, and for community impact. Also, Information regarding community input sessions, the plan draft and priorities, and funding opportunity was distributed to agencies through the Continuum of Care.

The City collaborates with Tucson Pima Collaboration to End Homelessness (TPCH) who coordinates the HUD Continuum of Care program, oversees the local Homelessness Management Information System (HMIS) and administers the local Coordinated Entry system.

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

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	Pima County Community Development & Neighborhood Conservation Department
	Agency/Group/Organization Type	Housing Services - Housing Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Pima County representatives participated in our Human Service Agencies stakeholder meetings. Stakeholder meetings were via Zoom, featuring large group discussions and small group discussions via breakout rooms. The P-CHIP Draft Plan was presented and participants were asked to give input on priorities and goals. Anticipated outcomes include future collaboration to achieve goals in the Plan.

2	**Agency/Group/Organization**	PIMA COUNCIL ON AGING
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in virtual Zoom meeting. Pima Council on Aging provides services and advocacy for independence in the lives of Pima County older adults and their families.
3	**Agency/Group/Organization**	OLD PUEBLO COMMUNITY SERVICES
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representative participated in virtual Zoom meeting. When people face homelessness, Old Pueblo Community Services offers housing, counseling and support services to help them transform their lives.
4	**Agency/Group/Organization**	Community Home Repair Projects of Arizona
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representative participated in virtual Zoom meeting. CHRPA is part of the City of Tucson Housing Rehab Collaborative. They provide emergency home repair for clients including senior and persons with disabilities.
5	**Agency/Group/Organization**	UNITED WAY OF SOUTHERN ARIZONA
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy Equity in Education

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representative participated in the virtual Zoom meeting. United Way of Tucson responds to our community's needs, transforms lives and brings long-lasting systemic change to our community by focusing on education, financial wellness, equality and healthy communities for Tucson and Southern Arizona.
6	**Agency/Group/Organization**	Habitat for Humanity Tucson
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representative participated in virtual Zoom meeting. CHRPA is part of the City of Tucson Housing Rehab Collaborative. They provide emergency home repair for clients including senior and persons with disabilities.

7	**Agency/Group/Organization**	CATHOLIC COMMUNITY SERVICES
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services - Refugees
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representative participated in virtual Zoom meeting. CCS-SOAZ works to strengthen children, adults, families and communities by providing help, creating hope and serving all.

8	**Agency/Group/Organization**	COMPASS AFFORDABLE HOUSING, INC.
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representative participated in virtual Zoom meeting. Compass Affordable Housing believes that living in well-managed, quality affordable housing is a catalyst for family stability and independence. With stable housing, low- and moderate-income families, including those with special needs, will live with dignity.

9	**Agency/Group/Organization**	PRIMAVERA FOUNDATION
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The representative from the Primavera Foundation participated in the virtual stakeholder meeting. The Primavera Foundation provides pathways out of poverty through safe, affordable housing, workforce development and neighborhood revitalization.
10	**Agency/Group/Organization**	City of Tucson Department of Housing and Community Development
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency groups and organizations typically include entities whom are seeking funding from General Funds, CDBG, ESG and HOPWA. Most if not all participated during available public meetings or technical assistance workshops.

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

There were no agency types that were not contacted. Any agency that responded was able to participate in the process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Tucson Pima Collaboration to End Homelessness	The City of Tucson is one member of the Continuum of Care, which The City of Tucson is one member of the Continuum of Care, which is operated by the Tucson Pima Collaboration to End Homelessness. All Consolidated Plan goals related to homelessness overlap the goals of the Continuum of Care.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
City of Tucson General Plan	City of Tucson	The City's General Plan, Plan Tucson, supports a framework of local policies that can significantly and positively impact housing and other needs of LMI residents and neighborhoods. The City's expectations are focused on sustainability, reserving land for economic development, and revitalization. Plan Tucson includes 4 focus areas including social, economic, natural and built environments. Many of the Plan Tucson goals and policies are inter-related with Consolidated Plan goals and policies.
City of Tucson PHA Plan	City of Tucson HCD	HCD is both the Public Housing Authority and the Community Planning and Development Agency. The Community Planning Division, which is responsible for the development and implementation of the Consolidated Plan works closely with the PHA division in a joint effort to address the housing needs of the community.
Choice Neighborhoods	City of Tucson	The Oracle Choice Neighborhood Initiative will develop a comprehensive neighborhood Transformation Plan to guide the revitalization of Tucson House, the City of Tucson's largest public housing asset, while simultaneously directing the transformation of the surrounding neighborhood.

Table 3 – Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

The citizen participation outreach for the P-CHIP enabled staff to receive feedback from community stakeholders and residents about key challenges and priorities for the City as well as provided an opportunity through a budgeting tool for residents to allocate funds, on a percentage basis, to a variety of potential P-CHIP projects. Outreach to public and stakeholders consisted of virtual public and stakeholder meetings, including one meeting held in Spanish, and a website built to include background and details on the Plan. The website also included a Story Map as well as ways for the public to get involved in the process. As the Plan is implemented, the website will include progress reports and performance monitoring. The virtual public and stakeholder meetings occurred between October 2020 and January 2021. Four meetings were conducted with the public, one meeting with human service agencies, and one meeting with affordable housing developers. Community outreach efforts also included an online survey to gather feedback on priorities and populations most important to respondents. Nearly 400 respondents completed the survey. According to survey respondents, Tucson's top 5 challenges are: 1. Lack of Affordable or attainable housing options; 2. Inequitable access to services and community resources, including education; 3. Poverty; 4. Homelessness; 5. Lack of safe, connected, convenient transportation options for all. Respondents also generally indicated that the Covid-19 pandemic has had the following impacts: COVID-19 has exacerbated Tucson's key challenges; Access to good healthcare is more important than ever; More support for small businesses is needed given the impact the pandemic has had; and COVID-19 has spotlighted disparities. The top 5 categories of responses for P-CHIP funding priorities were: 1. Affordable Housing; 2. Homeless Services; 3. Education/Training; 4. Transportation and Mobility; 5. Health (behavioral, access to care, etc.).

The City of Tucson Citizen Participation Plan is provided as Appendix A. Public comments received at the Public Meeting and the Public Hearing will be added as an attachment prior to submittal to HUD.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)

1	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Human Service Agencies / Affordable Housing Developers	The City held four separate virtual public meetings via Zoom. Three meetings were held in English and one was in Spanish. The City also held two meetings for stakeholders including 23 Human Service Agency participants, and 32 Affordable Housing Developer particpants.	General topics that arose from these discussions included:* Timeline, process, and participation in P-CHIP development and funding deployment* The impacts of COVID on services and stability, particularly on stability and vulnerability in housing and in access to education* Topics related to affordable housing: historic and current practices of discrimination in housing; financing; the need for innovation and outside-the-box solutions and thinking; funding mechanisms	n/a	

				for housing (including the Low-Income Housing Tax Credit, HOME, vouchers, etc.)* The need to address past and current inequities in service provision, access to housing, etc. through outreach to underserved communities, remedying barriers to housing, and other means* Improved use of data to understand challenges (such as assessing affordable housing stock) and monitor impacts* Interest in the P-CHIP Neighborhood Pilot Program and working		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
				closely with neighborhoods to drive decision making.		

2	Internet Outreach	City of Tucson Residents and Stakeholders	392 respondents	According to survey respondents, Tucson's top 5 challenges are: 1. Lack of Affordable or attainable housing options 2. Inequitable access to services and community resources, including education. 3. Poverty4. Homelessness 5. Lack of safe, connected, convenient transportation options for all. Respondents also generally indicated that the Covid-19 pandemic has had the following impacts:* COVID-19 has exacerbated Tucson's key challenges* Access to good healthcare is	n/a	

				more important than ever * More support for small businesses is needed given the impact the pandemic has had * COVID-19 has spotlighted disparities. The top 5 categories of responses for P-CHIP funding priorities were:1. Affordable Housing2. Homeless Services3. Education/Training4. Transportation and Mobility5. Health (behavioral, access to care, etc.) Across all categories of People, Communities, and Homes, priority allocation was fairly evenly		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
				spread; no one potential P-CHIP project received more than 7% of allocations. Projects focused on People projects were allocated 47%, Communities was 28%, and Homes was 25%.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Budgeting Tool	City of Tucson residents and stakeholders	150 respondents	Across all categories of People, Communities, and Homes, priority allocation was fairly evenly spread; no one potential P-CHIP project received more than 7% of allocations. Projects focused on People projects were allocated 47%, Communities was 28%, and Homes was 25%.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The Annual Action Plan Public Meeting is scheduled for April 1, 2021. Information for this section will be completed prior to submittal to HUD.			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The Annual Action Plan Public Hearing before the Mayor and Council is scheduled for May 4, 2021. Information for this section will be completed prior to submittal to HUD.			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Tucson Department of Housing and Community Development funds numerous nonprofit organizations and may fund other City of Tucson departments. For most Human Service programs, organizations and activities are selected annually through a request for proposals/call for projects process.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	5,649,138	0	0	5,649,138	16,947,414	Community Development Block Grant (CDBG) funds may be used for a variety of activities that meet the needs of low- and moderate-income residents, neighborhoods and communities. Eligible activities include public services, and capital improvements such as infrastructure, facilities, and housing. Many activities are targeted to vulnerable populations, such as people experiencing homelessness and people with disabilities. Each activity must meet a CDBG national objective.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,523,477	250,000	0	3,773,477	10,570,431	The City of Tucson and Pima County created a HOME Consortium to utilize HOME Investment Partnership Program (HOME) funds to assist LMI owners and renters through new construction of housing, acquisition and/or rehabilitation of housing, tenant-based rental assistance, and homeownership assistance. 15% of HOME funds are set aside for development activities carried out by specially formed nonprofit organizations called Community Housing Development Organizations (CHDO). The City of Tucson is the lead agency for the Consortium. Approximately 71% of HOME funds are set-aside for eligible activities in the City and 29% for activities in Pima County outside the City of Tucson.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	842,153	0	0	842,153	2,526,459	The Housing Opportunities for Persons with AIDS (HOPWA) program funds housing assistance and support services for low-income persons with HIV/AIDS and their families. HOPWA funds are administered by the Southern Arizona AIDS Foundation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	477,821	0	0	477,821	1,433,463	The Emergency Solutions Grant (ESG) program provides funding to: 1) engage homeless individuals and families living on the street; 2) improve the number and quality of emergency shelters; 3) help operate shelters; 4) provide essential services to shelter residents; 5) rapidly re-house individuals and families experiencing homelessness; and 6) prevent families and individuals from becoming homeless.

Table 2 - Expected Resources – Priority Table

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

HUD Consolidated Plan resources are leveraged with numerous federal, state, local and private resources to address the needs identified in this plan. Federal leverage resources from the US Department of Housing and Urban Development include:

1. Continuum of Care funding received by the City for emergency and transitional housing, permanent housing placement, essential services,

rapid rehousing (rental assistance), and permanent housing in facilities.

2. Public Housing Capital funds for the development, financing and modernization of public housing developments and for management improvements.

3. Public Housing Operating funds for administration of public housing developments.

4. Section 8 Housing Choice Voucher funds for rent subsidies to low-income households in the City of Tucson and Pima County.

5. Veterans Affairs Supportive Housing vouchers for rent subsidies to Veterans experiencing homelessness.

6. Shelter Plus Care funds for permanent supportive housing for individuals and families with disabilities experiencing homelessness, including individuals and families with serious mental illness, physical disabilities, and/or chronic substance use problems.

7. Lead-Based Paint Hazard Control Program funds that target and serve low to very-low income families with children under six years of age residing in or frequenting housing built prior to 1978.

State leverage resources from the Arizona Departments of Housing and Economic Security include:

1. Low-income Housing Tax Credit financing for developers of affordable rental housing serving households with income below 60% of the area median income, on a competitive basis.

2. Homelessness prevention funding targeted to preventing eviction and maintaining housing stability.

3. Emergency Shelter Grant resources for street outreach, services, emergency/transitional shelter improvements and operating, addition of emergency/transitional housing beds, rapid rehousing (rental assistance), and homelessness prevention.

4. HOME funds for housing development on a competitive basis.

5. National Housing Trust Funds for rental housing serving extremely low-income households, on a competitive basis.

Local and private leverage and match resources include:

1. General Fund Human Services funding for services for low-income and particularly vulnerable populations. Funds are granted to agencies through a competitive Request for Proposals process.

2. Federal Home Loan Bank resources that support savings for homeownership and provide financing for affordable housing development and preservation.

3. HOME matching funds from the City General Fund, project partners, and private resources, including sweat equity, third-party in-kind contributions, and below-market interest rate financing.

4. ESG matching funds from allowable costs incurred by sub-grantees, cash donations, and the value of third-party in-kind contributions.

Human Services Program Funding -- Fiscal Year 2021 is provided as Appendix B.

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

The City of Tucson may make available multiple parcels of city-owned land for the development of housing or facilities that serve LMI people and neighborhoods.

Discussion

Choice Neighborhoods Program

The Choice Neighborhoods Program leverages significant public and private dollars to support locally driven strategies to address struggling neighborhoods with distressed public or HUD-assisted housing through a comprehensive approach to neighborhood transformation. The Choice Neighborhoods Program is focused on three core goals: 1) Housing: Replace or renovate distressed public and assisted housing with high-quality mixed-income housing that is well-managed and responsive to the needs of the surrounding neighborhood; 2) People: Improve outcomes of households living in the target housing related to employment and income, health, and children's education; and 3) Neighborhood: Create the conditions necessary for public and private reinvestment in distressed neighborhoods to offer the kinds of amenities and assets, including safety, good schools, and commercial activity, that are important to families' choices about their community.

Choice Neighborhoods Planning and Action Grant

The City is the current recipient of a 2018, $1.3 million Choice Neighborhoods Planning and Action Grant. The 2018 grant has been incorporated into a collaborative effort known as "Thrive in the 05." Thrive in the 05 (Thrive) refers to a place-based, comprehensive transformation initiative that focuses on a 2.5-square-mile area in the 85705 zip code. The area is located less than two miles from the central business district in Tucson, roughly bounded by Miracle Mile to the north, Speedway Boulevard to the south, Stone Avenue to the east, and Interstate-10 to the west.

The Thrive Initiative

The Thrive Initiative is a collaboration of the City of Tucson, Arizona State University School of Social Work, and Pima Community College. In addition to the Choice Neighborhoods Planning Grant from HUD, the area is in the implementation phase for a Community-Based Crime Reduction Grant from the US Department of Justice (DOJ). Through an additional partnership between the Pima Community College Downtown Campus' Workforce and Economic Development divisions and the City of Tucson's Economic Initiatives Office, these combined efforts have engaged neighborhood residents, local businesses, and community stakeholders in developing a shared vision for the transformation of the area. This shared vision will be reflected in the Transformation Plan, anticipated to be submitted to HUD in 2021.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Community Facilities and Improvements	2020	2024	Non-Housing Community Development	Citywide CDBG Target Area	Community Sustainability	CDBG: $1,854,948	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 20 Households Assisted Buildings Demolished: 6 Buildings
2	Human and Public Services	2020	2024	Non-Housing Community Development	Citywide CDBG Target Area	Human and Public Services	CDBG: $847,371	Public service activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Decent Affordable Rental and Homeowner Housing	2020	2024	Affordable Housing	Citywide CDBG Target Area	Decent Affordable Housing	CDBG: $1,816,992 HOME: $3,396,129	Rental units constructed: 20 Household Housing Unit Rental units rehabilitated: 32 Household Housing Unit Homeowner Housing Rehabilitated: 101 Household Housing Unit Direct Financial Assistance to Homebuyers: 32 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 65 Households Assisted
4	Prevent and Reduce Homelessness	2020	2024	Homeless	Citywide CDBG Target Area	Homelessness	ESG: $441,984	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted Homeless Person Overnight Shelter: 100 Persons Assisted Homelessness Prevention: 40 Persons Assisted Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Housing and Services for People with HIV/AIDS	2020	2024	Non-Homeless Special Needs	Citywide CDBG Target Area	HIV/AIDS Housing and Services	HOPWA: $816,888	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 40 Households Assisted Homelessness Prevention: 200 Persons Assisted
6	Program Administration	2020	2024	Program Administration	Citywide CDBG Target Area	Program Administration	CDBG: $1,129,828 HOPWA: $25,265 HOME: $377,348 ESG: $35,837	Other: 1 Other

Table 3 – Goals Summary

Goal Descriptions

1	**Goal Name**	Community Facilities and Improvements
	Goal Description	CDBG-funded facilities, infrastructure improvements and clearance and demolition activities.
2	**Goal Name**	Human and Public Services
	Goal Description	CDBG-funded human services activities.

3	**Goal Name**	Decent Affordable Rental and Homeowner Housing
	Goal Description	CDBG and HOME funded affordable rental and homeowner housing activities.
4	**Goal Name**	Prevent and Reduce Homelessness
	Goal Description	ESG-funded homelessness activities.
5	**Goal Name**	Housing and Services for People with HIV/AIDS
	Goal Description	HOPWA-funded housing and services.
6	**Goal Name**	Program Administration
	Goal Description	Program administration, indirect costs and fair housing activities.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The 5-year Consolidated Plan serves as a guide for annual investments of City and County project funds. For each of the five years covered by the Consolidated Plan, each local government is required to prepare an Annual Action Plan that correlates with the needs, priorities and goals specified in the Consolidated Plan, showing how annual entitlement funds will be allocated to meet the overall 5-year goals. The full plan may be found at

https://www.tucsonaz.gov/files/hcd/Documents/Plans/COT_-_Pima_County_Consortium_2020-2024_HUD_Consolidated_Plan_and_FFY2020_Annual_Action_Plans.pdf

The City's Consolidated Plan Strategic Plan includes seven priority needs and related goals and activities to address priority needs:
1. Community Sustainability.
2. Public Services.
3. Decent Affordable Housing.
4. Homelessness.
5. Economic Development.
6. Housing and Services for Persons with HIV/AIDS and Their Families.
7. Program Administration.

Improvements to facilities and housing include energy-efficiency and disability accessibility improvements. Priority is given in many projects and programs to particularly vulnerable (special needs) populations. Decent affordable housing goals include only units assisted with Consolidated Plan funding; additional units are anticipated with leverage resources.

This section outlines projects and activities for fiscal year 2022 beginning July 1, 2021 and ending June 30, 2022. Eligible projects may be directly implemented by the local government or administered through partner agencies and eligible contractors, designated as sub-recipients. All federal regulations apply to projects that are supported with HUD formula grant funding.

#	Project Name
1	Community Facilities
2	Human and Public Services
3	Decent Affordable Rental and Homeowner Housing
4	CDBG Administration and Planning
5	City of Tucson HOME Decent Affordable Rental and Homeowner Housing
6	City of Tucson HOME Administration
7	Pima County HOME Decent Affordable Rental and Homeowner Housing
8	Pima County HOME Administration

#	Project Name
9	ESG21 City of Tucson
10	Southern Arizona Aids Foundation AZH21F002 (SAAF)
11	City of Tucson AZH21F002 (COT)

Table 4 – Project Information

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

Recognizing disparities in income, employment, housing conditions and choice, and facilities which are indicators of urban stress, the City of Tucson adopted a Community Development Block Grant (CDBG) Target Area in program year 2013. The Target Area was updated with the 2020-2024 Consolidated Plan. The Target Area is made up of contiguous Census Block Groups where more than 50% of households earn no more than 80% of the area median income ("low-mod households"). The Target Area consists of approximately 18.3% (44 square miles) of the City of Tucson. The 2019 estimated population of the Target Area is 205,472 persons, approximately 38.7% of the population of the City of Tucson. The CDBG Target Area will be a primary focus for investment over the new 5-year Consolidated Plan period (July 1, 2020 through June 30, 2025). Approximately 40% of the City of Tucson entitlement grant funding for will be committed to projects in the CDBG Target Area. The CDBG Target Area Map is provided as Appendix C.

AP-38 Project Summary

Project Summary Information

1	**Project Name**	Community Facilities
	Target Area	Citywide CDBG Target Area
	Goals Supported	Community Facilities and Improvements
	Needs Addressed	Community Sustainability
	Funding	CDBG: $1,854,948
	Description	Public and community facilities through-out the City of Tucson with a focus on the City of Tucson CDBG Target Area.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	10,000 persons and 30- beds.
	Location Description	Citywide with a focus on the City of Tucson CDBG Target Area.
	Planned Activities	Development of or improvements to facilities for seniors, youth, persons with disabilities, abused and neglected children, neighborhood facilities, parks/recreation facilities, childcare centers, fire stations/equipment, public housing, health facilities. Improvements to emergency/transitional shelter. Development of or improvements to flood, drainage, water and sanitary sewer systems, streets, and sidewalks, for economic development in LMI areas. Includes fire hydrants, traffic lights, streetlights, signs, and bus shelters. Development of or improvements to group homes, facilities for abused/neglected children, public housing. Clearance and demolition or movement of building to other sites.
2	**Project Name**	Human and Public Services
	Target Area	Citywide CDBG Target Area
	Goals Supported	Human and Public Services
	Needs Addressed	Human and Public Services
	Funding	CDBG: $847,371
	Description	CDBG funded activities serving LMI persons and vulnerable populations.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 1,500 persons will benefit from CDBG Human Services funding.
	Location Description	Citywide
	Planned Activities	Services targeted to LMI individuals and households, including persons experiencing homelessness, seniors, persons with disabilities, youth, domestic violence survivors, people with alcohol/substance use disorders, abused/neglected children, public housing residents, previously-incarcerated individuals, and refugees.
3	**Project Name**	Decent Affordable Rental and Homeowner Housing
	Target Area	Citywide CDBG Target Area
	Goals Supported	Decent Affordable Rental and Homeowner Housing
	Needs Addressed	Decent Affordable Housing Program Administration
	Funding	CDBG: $1,816,992
	Description	Rental housing development and homeowner rehabilitation.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	300 housing units, and ten buildings.
	Location Description	Citywide
	Planned Activities	Rehabilitation of housing occupied by LMI owners. Acquisition and/or rehabilitation of affordable rental housing, including energy-efficiency, disability accessibility improvements, temporary or permanent relocation, and permanent supportive housing.
4	**Project Name**	CDBG Administration and Planning
	Target Area	Citywide CDBG Target Area
	Goals Supported	Program Administration
	Needs Addressed	Program Administration

	Funding	CDBG: $1,129,828
	Description	These funds will be used to administer all CDBG activities and to support fair housing and planning initiatives.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	City of Tucson funding for CDBG Administration, planning, and fair housing activities.
5	**Project Name**	City of Tucson HOME Decent Affordable Rental and Homeowner Housing
	Target Area	Citywide CDBG Target Area
	Goals Supported	Decent Affordable Rental and Homeowner Housing
	Needs Addressed	Decent Affordable Housing
	Funding	HOME: $2,408,535
	Description	HOME funding will be used for acquisition, development, and/or rehabilitation of rental and homeowner housing, and rental assistance.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	200 households will be assisted.
	Location Description	Citywide
	Planned Activities	Acquisition and/or rehabilitation of affordable rental housing, including energy-efficiency, disability accessibility improvements, temporary or permanent relocation, permanent supportive housing and HOME-funded transitional housing. Construction of affordable rental housing, including permanent supportive housing and transitional housing. Monthly rental assistance and security and utility deposits. Assistance for first time home buyers. Construction of or acquisition/rehabilitation/resale of affordable homeowner housing.

6	**Project Name**	City of Tucson HOME Administration
	Target Area	Citywide CDBG Target Area
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	HOME: $267,615
	Description	City of Tucson HOME program administration.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	City of Tucson HOME program administration.
7	**Project Name**	Pima County HOME Decent Affordable Rental and Homeowner Housing
	Target Area	Citywide CDBG Target Area
	Goals Supported	Decent Affordable Rental and Homeowner Housing
	Needs Addressed	Decent Affordable Housing
	Funding	CDBG: $987,594
	Description	New construction, acquisition and/or rehabilitation of rental and homeowner housing units, down payment assistance, and rental assistance for LMI households.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	46 Household Housing Units, and 21 Households
	Location Description	City Wide

	Planned Activities	Acquisition and/or rehabilitation of affordable rental housing, including energy-efficiency, disability accessibility improvements, temporary or permanent relocation, permanent supportive housing and HOME-funded transitional housing. Construction of affordable rental housing, including permanent supportive housing and transitional housing. Monthly rental assistance and security and utility deposits. Assistance for first time home buyers. Construction of or acquisition/rehabilitation/resale of affordable homeowner housing.
8	**Project Name**	Pima County HOME Administration
	Target Area	Citywide CDBG Target Area
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	HOME: $109,733
	Description	This funding supports Pima County HOME program administration costs.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Administration of the Pima County HOME program.
9	**Project Name**	ESG21 City of Tucson
	Target Area	Citywide
	Goals Supported	Prevent and Reduce Homelessness
	Needs Addressed	Homelessness
	Funding	ESG: $477,821
	Description	These funds will support ESG activities in the following categories: Emergency Shelter, Street Outreach, Homeless Prevention and Rapid Re-housing.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	Provide street outreach to 200 persons. Emergency/transitional shelter for 400 persons. Rental assistance for 100 households.
	Location Description	Citywide
	Planned Activities	Essential services including street outreach. Operating support for emergency/transitional shelter. Monthly rental assistance for households experiencing homelessness. Program Administration.
10	**Project Name**	Southern Arizona Aids Foundation AZH21F002 (SAAF)
	Target Area	Citywide
	Goals Supported	Housing and Services for People with HIV/AIDS
	Needs Addressed	HIV/AIDS Housing and Services
	Funding	HOPWA: $816,888
	Description	This project includes HOPWA project funds that are administered by the Southern Arizona Aids Foundation (SAAF) on behalf of the City of Tucson.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	500 persons and/or households.
	Location Description	Citywide
	Planned Activities	Essential services for LMI persons with HIV/AIDS and their families. Monthly rental assistance and/or security/utility deposits. Support for the operation of emergency/transitional and permanent housing facilities serving LMI persons with HIV/AIDS and their families.
11	**Project Name**	City of Tucson AZH21F002 (COT)
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	HOPWA: $25,265
	Description	HOPWA program administration funding.

	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Citywide
	Planned Activities	City of Tucson Administration of the HOPWA program.

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

Recognizing disparities in income, employment, housing conditions and choice, and facilities which are indicators of urban stress, the City of Tucson adopted a Community Development Block Grant (CDBG) Target Area in program year 2013. The Target Area was updated with the 2020-2024 Consolidated Plan. The Target Area is made up of contiguous Census Block Groups where more than 50% of households earn no more than 80% of the area median income ("low-mod households"). The Target Area consists of approximately 18.3% (44 square miles) of the City of Tucson. The 2019 estimated population of the Target Area is 205,472 persons, approximately 38.7% of the population of the City of Tucson.

The Target Area is the primary focus of concerted investment of Consolidated Plan Public Facilities resources for such uses as parks, street and sidewalk improvements, homeless shelters, and public bathrooms. Eligibility for these funds is determined based on the income of the households within the service area for the proposed facility.

Funding is also dedicated to serving individuals and households anywhere in the City based on income eligibility of individual households.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	60
CDBG Target Area	40

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Due to socio-economic and housing conditions in the City's target area, this area is the primary focus of concerted investment of CDBG resources for public facilities and infrastructure. Because LMI households and particularly vulnerable populations may reside throughout the City, funding is also dedicated to serving these individuals and households outside of the target area.

Discussion

The City of Tucson will track activity funded within the City of Tucson CDBG Target Area and complete an evaluation of geographic distribution of investments that will be included in the Consolidated Annual Performance and Evaluation Report (CAPER) in fall 2022. The City of Tucson CDBG Target Area Map is

provided as Appendix C.

Affordable Housing

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

Introduction

The City of Tucson plans to provide affordable housing to 493 households. This includes rapid rehousing and permanent housing for the homeless, tenant based rental assistance for the homeless and special needs populations, new construction of rental units, homeowner rehabilitation and home buyer assistance. In addition, the City will use General Fund dollars to provide low income households with Acute Emergency Home Repairs and 150 low income elderly/disabled household with Home repair, adaptation and maintenance.

One Year Goals for the Number of Households to be Supported	
Homeless	280
Non-Homeless	37
Special-Needs	176
Total	493

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	309
The Production of New Units	47
Rehab of Existing Units	137
Acquisition of Existing Units	0
Total	493

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

Discussion

The City of Tucson and Pima County may fund rental housing that limits eligibility or gives a preference to a particular segment of the population. Except for rental housing that also receives funding from a federal program that limits eligibility to a specific population, when limiting eligibility or giving a preference 1) the limitation or preference must be limited to households with disabilities that significantly interfere with their ability to obtain and maintain housing; 2) households that would not be able to obtain or maintain themselves in housing without appropriate supportive services; and 3) the supportive services cannot be provided in a non-segregated setting. The households must not be required to accept the services offered at the project and the project owner must advertise the project as offering services for a particular type of disability. The project must be open to all otherwise eligible persons with disabilities who may benefit from the supportive services provided.

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

Introduction

The City of Tucson Public Housing Program owns and operates 1505 public housing units and an additional 300 or more affordable housing units throughout the City of Tucson and Pima County. The PHA provides housing to over 4000 residents that are low to extremely low-income families, of those families, 3769 are public housing residents. The average income of those families is $15,207.88.

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

The City of Tucson hired a consultant in December 2020 to complete a physical needs assessment of the public housing portfolio to determine the feasibility of the properties over the next twenty years. The assessment includes a review of the structure and major systems of each unit. The final report by the consultant will provide the agency the information needed to develop a long-term repositioning plan which would include modernization, disposition, or purchase of units.

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

The PHA will expand the efforts of establishing resident councils across all the AMP Offices. These councils assist with improving the quality life for residents in Public Housing; the council will also work in collaboration of the PHA in public housing operations. Currently there is one fully operational resident council for the last two years.
After the final report of the physical needs assessment is completed and reviewed the PHA will have a better understanding of homeownership opportunities for the public housing residents. The PHA has determined that they will earmark Capital Funds monies for homeownership that could assist with down payment, preparation for home sale, home repairs and homeownership counseling to name a few.

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

n/a

Discussion

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

Introduction

This section describes the City's activities to address the needs of people experiencing homelessness and special needs populations.

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

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

The CoC will coordinate outreach activities through partnerships between the City of Tucson, Pima County, behavioral health entities, and local non-profit outreach programs. These efforts have proven effective in reaching out to unsheltered homeless people. Outreach workers are trained to conduct VI-SPDAT screening in the field and use progressive engagement strategies with unsheltered individuals toward the aim of engaging them in shelter, supportive housing, and/or other available housing subsidies.

The City additionally administers SSO Coordinated Entry funds through the CoC program. Through the project, City and subrecipient agency staff conduct affirmative outreach, assessment, service navigation, and housing problem-solving activities throughout the region with targeted services in rural and tribal community areas.

Addressing the emergency shelter and transitional housing needs of homeless persons

ESG funds will be used to support emergency and transitional housing for people experiencing homelessness. Funds will provide essential services, including operations and maintenance for facilities assisting people experiencing homelessness, including particularly vulnerable populations.

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

The CoC maintains an active by-name list approach that removes individuals/families from the housing referral list after 90 days with no contact consistent with federal benchmarks. This reduces the frequency at which housing referrals are made for households that cannot be located or that have self-resolved through other resources. The CoC is also piloting solutions-focused case conferencing

procedures with separate case conferencing sessions for vulnerable subpopulations including veterans, people experiencing chronic homelessness, and youth. Through the City's recently awarded SSO Coordinated Entry project, the City has hired three housing navigators have been hired to expedite housing placement and move-in among vulnerable subpopulations.

The City has additionally managed the Tucson/Pima County Youth Homelessness Demonstration Project initiative through which nearly 100 additional beds for unaccompanied youth have been added to the local housing inventory. Furthermore, in its role as the Public Housing Authority, the City has significantly increased the number of units aside for homeless specialty programs to expand permanent housing options in public housing and voucher programs for people experiencing homelessness.

The CoC is currently establishing benchmarks to increase monitoring of projects based on timeliness of housing move-ins and reduction in the number of returns to homelessness post-participation. The City has contracted with National Alliance to End Homelessness to facilitate a targeted Rapid Rehousing Institute aimed at serving higher-vulnerability households, including households experiencing chronic homelessness, in rapid rehousing programs which launches in March 2021 and has been made available at no cost to all local rapid rehousing provider agencies in the City area.

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

Individuals and families can access homelessness prevention resources across a continuum based on the immediacy of their risk, current housing situation, and family resources. The type of services varies by funding source ranging from rent/utility assistance only to a broad range of prevention assistance (transportation, vehicle repair, daycare, etc.) to help people remain stably housed. People being discharged from a publicly-funded institution of care also have access to these resources along with specialized coordination of services through nonprofit agencies that address the risk of homelessness among the re-entry population, and through agencies that work with health care facilities to prevent discharge into homelessness. Additionally, families can receive assistance from their child(ren)'s school through McKinney-Vento funds providing transportation, school supplies, free breakfast and lunch, case management/advocacy, and other services.

Additional prevention services include programs aimed at maintaining people in their homes, i.e. rent and mortgage assistance, utility payment assistance to prevent eviction, case management, housing counseling, landlord/tenant mediation and legal services, behavioral health services, referral services, income maintenance programs and food stamps, job training and placement, and guardianship/representative payee programs. In addition, prevention programs include education

regarding an owner/landlord's specific requirements, and information on tenants' rights and obligations under Arizona law.

Discussion

Funding to agencies is provided through a contract between the recipient agency and the City Housing and Community Development Department. The contract contains terms and conditions of funding, reporting and invoice requirements, performance and outcome expectations and service delivery levels, record keeping responsibilities, and consent to on-site monitoring. Funds are awarded on a competitive basis. The City of Tucson and Pima County jointly make some funding allocations. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum of Care. Every effort is made to involve in the process a person who is currently experiencing homelessness or formerly experienced homelessness.

AP-70 HOPWA Goals - 91.420, 91.220 (l)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	200
Tenant-based rental assistance	40
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	240

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

Introduction

Both local and federal public policies on affordable housing and residential investment may increase the cost of housing or cause costly delays. Participants in Consolidated Plan forums discussed HUD program barriers including lengthy processes, increasing data collection and variable data collection requirements, and the regulatory knowledge necessary to maintain compliance with a myriad of conflicting program requirements.

Forum participants also discussed local regulations that increase the cost of development, specifically the sometimes-lengthy rezoning and variance processes, lack of a fast track permitting process, parking and landscaping requirements, and infill and modular housing requirements. A follow-up meeting with developers revealed challenges with the focus of funding on vulnerable populations, lagging HUD data that doesn't reflect current market conditions, high cost of construction, insufficient inventory of appropriate land, and NIMBY (Not in My Backyard). Specific to the City of Tucson, participants cited the lack of an expedited permitting process and a complex overlay district process.

The City of Tucson, Pima County, and other incorporated jurisdictions in Pima County completed HUD's Regulatory Barrier Questionnaire and identified possible barriers. Identified barriers included: no examination of the need for housing for households at various income levels; no assessment of conformance of the zoning ordinance and map, development and subdivision regulations or other land use controls with the general plan housing element and lot and setback requirements to determine if they may be excessive for multi-family housing; no comprehensive studies, commissions or hearings to review the rules, regulations, development standards and processes to assess their impact on the supply of affordable housing; and neighborhood opposition to infill and higher density development in some areas.

Average rental prices in the City increased by 10.9% between 2013 and 2018 and continue to climb. The existing challenges related to housing affordability and access have been exacerbated by the COVID-19 pandemic and related state and national eviction moratoria. As a result of the moratoria and a growing population, availability of rental housing (vacancy rate) has decreased by nearly half to less than 4%

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

In 2020 the City of Tucson, Pima County, and the University of Arizona's Economic and Business Research Center partnered to prepare a regional Housing Market Study. The study aims to help decision makers better understand the existing housing stock and development trends and to identify gaps and potential policies to support a variety of housing options that meet the needs of the full range of

household types in our community.

The study will help support greater understanding of the current and future demand for housing, and the need for housing for households at various income levels. Potential policies will be developed to support the development of new housing serve current and projected needs, allow central neighborhoods to maintain affordability, encourage homeownership, and direct housing development appropriately.

The City of Tucson is working with the University of Arizona to prepare a Vulnerable Neighborhood Index to provide greater information on communities that are vulnerable to displacement and gentrification. The study will be done in phases. The first phase is a heat map identifying vulnerable neighborhoods.

To further encourage affordable housing development, the consortium will:

1. Provide HOME funds to Low-income Housing Tax Credit projects, subject to underwriting and subsidy layering analyses.
2. Provide infrastructure, where practical, in support of affordable housing development.
3. Make HOME funds available for non-LIHTC projects.
4. Invest in neighborhood and community improvements.
5. Examine HOME program underwriting criteria.

Discussion

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

Introduction

This section discusses the City's efforts to address underserved needs, expand and preserve affordable housing, reduce lead-based paint hazards, develop institutional structure for delivering housing and community development activities, and address identified impediments to fair housing choice

Actions planned to address obstacles to meeting underserved needs

The City's central long-term community development goal is to focus resources on community needs, particularly investment in distressed areas and areas with high levels of poverty. Assisting LMI households throughout the City is a community goal intended to ensure that neighborhoods not currently in distress do not become so. The City's General Plan – Plan Tucson - supports a framework of local policies that can significantly and positively impact housing and other needs of LMI residents and neighborhoods. The City's expectations are focused on sustainability, reserving land for economic development, and investment in areas experiencing disinvestment. While many of the City's General Plan goals and policies are inter-related with Consolidated Plan goals and policies, the most relevant housing and community development goals include stabilizing and improving the existing housing stock, increasing affordable housing options, and supporting programs that expand economic development opportunities.

The City of Tucson will support non-profit agencies that provide:

* Support to seniors including emergency repairs, senior companion program, independent living support, mobile meals, nutrition programs, and homecare services.

* Support for youth and families including childcare, early childhood development, daycare tuition support, parent education and support, and after school programs.

* Support services including temporary shelters for people experiencing homelessness and domestic violence survivors, and other support such as case management and emergency food assistance.

Actions planned to foster and maintain affordable housing

During the coming year, the City will:

* Promote homeownership by providing down payment and closing cost assistance to LMI households in partnership with local HUD-approved housing counseling agencies, locally approved Community Housing

Development Organizations, and Industrial Development Authorities.

* Promote the development of affordable housing to serve low-income homebuyers and renters.

* Prioritize projects that maximize leveraged funding from other public and private resources such as the Low-income Housing Tax Credit Program; Federal Home Loan Bank Affordable Housing, and WISH and IDEA Programs.

* Continue monitoring of previously funded affordable housing activities for compliance with federal and local regulations.

To address impediments to fair housing choice, the City will:

* Continue funding for fair housing education, outreach and enforcement activities. Housing professionals from the nonprofit and for-profit sectors (i.e. property managers, developers; realtors; mortgage lenders; mortgage insurers; and others) and consumers will be encouraged to attend fair housing and/or affirmative marketing training.

* Monitor trainings to housing consumers about fair housing rights and responsibilities.

* Provide fair housing literature at the City Housing and Community Development Department, community facilities, and other locations throughout the City.

* Require robust affirmative marketing by recipients of HCD funds.

* Affirmatively further fair housing by encouraging investment in projects and programs to benefit people living in areas of racial and ethnic concentrations, or that assist residents to relocate to areas of high opportunity.

* Celebrate Fair Housing Month by organizing a community event.

Actions planned to reduce lead-based paint hazards

Any structure built before 1978 that is proposed for rehabilitation under federal programs is tested for lead-based paint. Notices and requirements regarding testing and removal of lead-based paint are provided to program participants, contractors and project sponsors. Licensed contractors are available to perform appropriate abatement and/or removal procedures if lead-based paint is present.

The City follows strict HUD guidelines for testing and abatement of lead-based paint and other hazardous substances, requiring contractor and subcontractor compliance with guidelines. Rehabilitation activities are procured through a bidding process and contracted to licensed contractors. All contractors and subcontractors are required to comply with HUD Lead Safe Housing requirements

and federal National Environmental Policy Act environmental review procedures. In addition, the City follows a multi-pronged approach to reduce lead hazards:

1. Section 8 Housing Choice Vouchers. The PHA inspects prospective dwellings constructed prior to 1978 that will have a child under the age of six residing therein, for compliance with EPA and HUD Lead Based Paint rules and regulations. The inspection includes visual inspections for chipped, peeling, chalking and deteriorated interior and exterior paint. Clearance testing may be performed after remediation by the property owner, to assure a lead-safe environment.

2. Public Education. Lead Hazard Information is distributed to participants in homeownership and rental programs including distribution of HUDs Protect Your Family from Lead in your Home brochure.

The City of Tucson applied for a Lead Based Paint Hazard Control and Healthy Homes Grant in August of 2019. The $3.9 million Lead based Paint Hazard Control (LBPHC) + Healthy Homes Program began in October of 2019 and will continue through June of 2023.

Actions planned to reduce the number of poverty-level families

The City of Tucson will take multiple efforts that combined will reduce the incidence of poverty and help people move from crisis to stability. Most activities undertaken with CDBG, HOME, ESG and HOPWA funds are efforts to reduce the number of persons living in poverty and improve the quality of life for city residents.

The City will continue its economic development efforts, working cooperatively with employers, workforce investment agencies, and education agencies to promote jobs-based education and services to help lower-income households attain higher-wage employment.

In addition, the City will continue to support emergency assistance programs and a variety of other support services needed by low-income households to obtain necessities and avert crisis and homelessness.

The City will also continue to incorporate training for contractors and other private sector entities to increase understanding of and participation in HUD programs, with emphasis on Section 3 and Labor Standards that promote economic self-sufficiency.

The City updated the Poverty and Urban Stress report, which documents disparities in urban stress based on factors such as income levels, education, housing issues and incidence of crime. https://povreport.tucsonaz.gov/

Actions planned to develop institutional structure

The City of Tucson and Pima County recognize the benefits of increasing administrative efficiencies to

improve the delivery system. During the next year the Consortium members will:

1. Reestablish their respective Housing Commissions to address the need for affordable housing.

2. Work with program partners to:
* Increase and coordinate homelessness prevention resources; and
* Examine approaches to developing additional permanent supportive housing, family shelter and low demand shelter.

3. Evaluate a first-come, first-served process for allocating HOME rental housing funds to quickly address the need for rental housing.

4. Examine alternate methods of fair housing outreach and education to reach a broad range of individuals and organizations.

5. Develop resources to reach landlords and encourage participation in tenant-based rental assistance and acceptance of households with unique backgrounds.

6. Examine methods of increasing homelessness outreach in rural areas.

In addition, the City of Tucson will:

1. Create a Housing First Coordinator position to coordinate City Department efforts and recommend best practices to reduce homelessness.

2. Coordinate with Constables to connect people with homelessness outreach staff to provide connection to housing and services.

3. Utilize Specialty Vouchers to assist people experiencing or at risk of homelessness, and HOME funds to provide move-in assistance.

4. Expand the OPCS Homeless Work program from 4 days/week to 5 days/week utilizing General Funds.

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

The City and County will continue to work together and with public and private housing and social service agencies to build trust and expand a collaborative mindset that honors the contributions, needs and perspectives of local service providers. The City and County will also examine methods to allocate funds to a flexible funding pool to address unique issues or pilot new initiatives on a small scale. Actions that may allow for co-funding of highly effective projects at significant levels, alignment of funding

application processes that allow for a single application to both entities and coordinated contract requirements will also be examined. As the collaborative applicant for CoC funding, the City of Tucson will continue to work with public and private housing and social service agencies to improve coordination between workforce development resources and Section 8 Housing Choice Voucher and public housing programs for people experiencing homelessness. The Continuum of Care (COC) Program Written Standards are provided as Appendix D.

Discussion

The People, Communities, and Homes Investment Plan

The People, Communities, and Homes Investment Plan or P-CHIP, replacing the 2017 Human Services Plan, was developed in 2020 to serve as a foundation for Housing and Community Development department (HCD) programs and funding allocations for the next five years. It is meant to provide the starting point, offer direction and scope, and create a framework for decision making. It is the intent and expectation that this foundation will be built on over time; setting a guidepost while offering flexibility and space for changing priorities and changing needs. The People, Communities, and Homes Investment Plan is provided as Appendix E.

Housing Market Study

In 2020 the City of Tucson, Pima County, and the University of Arizona's Economic and Business Research Center partnered to prepare a regional Housing Market Study. The study aims to help decision makers better understand the existing housing stock and development trends and to identify gaps and potential policies to support a variety of housing options that meet the needs of the full range of household types in our community.

Neighborhood Vulnerability in the Tucson Region

The City of Tucson, Pima County, and the Economic and Business Research Center at the University of Arizona have collaborated to identify "vulnerable", or stressed, neighborhoods within our region by compiling a Neighborhood Vulnerability Index. Vulnerability in this context refers to the differing ability of members of socio-demographic groups to withstand threats to their livelihoods, security, and social, economic, and political networks. The Vulnerability Index may be used for geographically - targeted strategies to direct resources, policies, and programs to best meet the needs of Tucson and Pima County's unique neighborhoods.

Commission on Equitable Housing and Development

The City has formed new Commission on Equitable Housing and Development (CEHD) The Commission will identify solutions that will promote affordability and prevent displacement; as well as, promote social responsibility from both developers and landlords with the City of Tucson in order to assist those in vulnerable housing situations.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

Introduction

This section describes specific requirements of the Consolidated Plan for the CDBG, HOME and ESG programs.

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

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

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

Other CDBG Requirements

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

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

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

as follows:

There are no other planned forms of investment.

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

   The City of Tucson and Pima County may utilize either the resale or recapture methods when funding homebuyer activities. The new construction or acquisition/rehabilitation of homeownership housing is subject to resale provisions, down-payment and closing cost assistance is subject to recapture provisions. Both resale and recapture provisions are secured through a deed of trust and promissory note. Resale and recapture provisions remain in place for a period of 5 to 15 years, depending upon the amount of HOME funds invested as proscribed by the HOME regulations. The City of Tucson/Pima County HOME Resale and Recapture Provisions are provided as Appendix F.

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

   Resale provisions may be used for homeowner development, including new construction, acquisition/ rehabilitation/resale, or units purchased through the Pima County Community Land Trust. If the home subject to resale provisions is sold or no longer occupied as a primary residence during the 5- to 15-year period of affordability, it must be sold to another low-income household. Upon resale, the resale price must provide the original HOME-assisted owner a fair return on investment and ensure the unit is affordable to a reasonable range of low-income homebuyers. Fair return on investment means the original homeowner shall be permitted to recoup their down payment, any principal paid on the mortgage, and the value of any property improvements paid for. Affordable to a reasonable range of low-income homebuyers means that the mortgage payment, including principal, interest, taxes and insurance will not exceed 30% of a subsequent low-income (less than 80% AMI) buyer's income. Additional HOME funds may be used to provide down payment assistance for a subsequent buyer and the period of affordability extended based on the total amount of HOME funds invested.

   Recapture provisions may be used when HOME funds are provided in the form of down-payment and closing cost assistance and/or an interest-rate buydown, or are used for homeowner development. If the home is sold or no longer occupied as a primary residence during the 5- to 15-year affordability period, repayment of the HOME funds subject to recapture is required. HOME funds subject to recapture are defined as the sales price, less the first lien (mortgage payoff) and any seller-paid closing costs.

   In the event of foreclosure, transfer in lieu of foreclosure, or assignment of an FHA mortgage to clear title, resale or recapture restrictions may be extinguished in accordance with HOME

regulations. In these cases, the consortium or a CHDO may exercise a right of first refusal or other means to intervene to preserve affordability of the unit

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

   The Consortium will not utilize HOME funds to refinance existing debt secured by multifamily housing.

Emergency Solutions Grant (ESG)

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

   The Emergency Solutions Grant Policy Manual is attached as Appendix G.

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

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

   The Tucson Pima Collaboration to End Homelessness has Coordinated Entry Policies and Procedures. Coordinated Entry is both a standardized access and assessment model and a coordinated referral and housing placement process. The goal is to ensure that people experiencing homelessness receive appropriate housing assistance and services.

   The Coordinated Entry process is a "no wrong door" approach that uses a standardized process from initial engagement to successful housing placement. In summary, the policies and procedures include:

   * Trained service providers use the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as the common assessment unless the assessor believes the depth of the individual’s vulnerability warrants a full SPDAT.

   * If an individual agrees to participate in the coordinated entry process, they are asked to sign the release of information before proceeding with the assessment. The information is entered into HMIS.

   * Each housing program serves as the primary point of contact to assist a client with navigating their

matched housing program. The navigator works with outreach teams to locate the client and help collect any documentation needed for a voucher. Housing navigators are those who currently work for agencies participating in Coordinated Entry.

* A uniform process is used across the community for assessing individuals, matching them to an intervention, and within each category, prioritizing placement into housing

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

Both the City of Tucson and Pima County receive an ESG formula grant. To promote consistent standards and avoid duplicate and unnecessary assistance, the City of Tucson and Pima County collaborate in the development of policies and procedures regarding the disbursement of funds and data collection. There are differences between the jurisdictional requirements and procedures due to jurisdictional target area differences. Pima County is focused on unincorporated areas whereas the City of Tucson is focused on the population within city limits.

Funds are awarded by the ESG Grantees (City and County) on a competitive basis. A Request for Proposal (RFP) Notice is released through the Continuum of Care as well as through the City Participation Process. Pima County also solicits RFP's through public meetings throughout the RFP period. The City of Tucson and Pima County make separate funding awards through allocation committees that review both City and County proposals. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum. Committee members first review and rank proposals individually. Proposals are then reviewed and ranked by the committee, which makes the final funding recommendations

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

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

The Tucson Pima Collaboration to End Homelessness reaches out to and consults with individuals currently and formerly experiencing homelessness in considering policies and funding decisions regarding facilities and services funded with ESG resources.

5. Describe performance standards for evaluating ESG.

Pima County and the City of Tucson in consultation with the Continuum of Care developed performance standards that provide measures to evaluate the effectiveness of

1. Targeting those who need the assistance the most
2. Reducing the number of people living on the streets and emergency shelters
3. Shortening the time people spend homeless
4. Reducing each program participant's housing barriers or housing stability risks

Attachments

Citizen Participation Comments

Citizen Participation Comments Attachments 1-6

Will be provided in final submittal to HUD

Attachment 1
Legal Ad Affidavit of Publishing for April 1, 2021 AAP Public Meeting and Public Comment Period

Attachment 2
Summary of April 1, 2021 AAP Public Meeting

Attachment 3
Summary of public comments received during the April 1, 2021 AAP Public Meeting

Attachment 4
Legal Ad Affidavit of Publishing for Mayor and Council May 4, 2021 AAP Public Hearing

Attachment 5
Summary of public comments received during the Mayor and Council May 4, 2021 AAP Public Hearing

Attachment 6
Approved Resolution adopting the FY 2022 Annual Action Plan

Grantee Unique Appendices

Grantee Unique Appendices **Appendices A-H**

Appendix A
Citizen Participation Plan

Appendix B
Human Services Program Funding - Fiscal Year 2021

Appendix C
Target Area Map

Appendix D
Continuum of Care (COC) Program Written Standards

Appendix E
People, Communities, and Homes Investment Plan

Appendix F
AP-90 City of Tucson and Pima County HOME Resale and Recapture Provisions

Appendix G
Policy Manual for Emergency Solutions Grant (ESG) Program

Appendix H
City of Tucson Annual Action Plan Checklist

Appendix A

Citizen Participation Plan

CITY OF TUCSON-PIMA COUNTY CONSORTIUM CITIZEN PARTICIPATION PLAN

This plan describes how citizens can participate in an advisory role in the planning, implementation, and assessment of the City of Tucson-Pima County Consortium HUD 5-year Consolidated Plan, Assessment of Fair Housing, Annual Action Plans, and Consolidated Annual Performance Reports

April 2020 DRAFT

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INTRODUCTION

This Citizen Participation Plan has been prepared to provide Tucson and Pima County residents an opportunity to participate in an advisory role in the planning, implementation, and assessment of:

1. The City of Tucson-Pima County Consortium 5-Year HUD Consolidated Plan;
2. City of Tucson and Pima County HUD Annual Action Plans;
3. City of Tucson and Pima County HUD Consolidated Annual Performance Reports (CAPER); and
4. The City of Tucson-Pima County Consortium Assessment of Fair Housing (AFH), when applicable.

By completing these planning and assessment documents, the City of Tucson – Pima County Consortium (Consortium) receives an annual allocation of HOME Investment Partnerships (HOME) funding from the US Department of Housing and Urban Development Office of Community Planning and Development (HUD CPD). In addition to HOME funds received by the Consortium, the City of Tucson receives Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) funding and Pima County receives CDBG and ESG funding. Both the City of Tucson and Pima County may also utilize NSP Program Income or participate in the Section 108 Loan Guarantee program.

ENCOURAGING CITIZEN PARTICIPATION

The Consolidated Planning process offers opportunities for resident participation through public meetings and hearings, public notices, and review of draft documents. Opportunities to comment on or participate in the planning community development and affordable housing activities and projects will be publicized and disseminated as widely as possible throughout Pima County and Tucson, and partner organizations will be asked to encourage participation of the populations they serve. The Consortium will take appropriate actions to encourage the participation of all its citizens including:

- Low- and moderate-income persons, as measured by the county's AMI, particularly those living in areas designated as a target area or revitalization area and in areas where federal funds are proposed to be used;
- Residents of predominantly low- and moderate-income neighborhoods, where more than 51% of the residents are low- and moderate-income as measured by the county's AMI;
- Minorities;

- People with Limited English Proficiency (LED);
- People with disabilities;
- People who are experiencing homeless;
- Residents of public and other assisted housing developments, including any resident advisory boards, resident councils, and resident management corporations; and
- Local and regional institutions, program partners, the regional Continuum of Care (COC), and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations).

The City of Tucson-Pima County Consortium 5-Year HUD Consolidated Plan

The 5-Year Consolidated Plan provides a framework for identifying affordable housing, homeless/ special needs, and community development priorities, and guidance for how HUD CPD funds will be invested in Tucson and Pima County. The 5-Year Consolidated Plan is prepared by May of a given year.

Consultation

In preparing the 5-year Consolidated Plan, the Consortium will:

- Consult with CDBG Target areas, partner organizations including the Housing Commission, the Tucson-Pima Collaboration to End Homelessness, and incorporated jurisdictions in Pima County, and other organizations necessary to fulfill consultation requirements.
- Solicit input through online surveys publicized on the City and County website and social media, and supplemented by mass emails to City and County stakeholders and Neighborhood Associations registered with the City of Tucson.
- Consult with public housing residents, and low-income residents of targeted revitalization areas in which federal projects are anticipated.
- Make the Plan available to local housing authorities on a continuing basis and for public meetings/hearings to be held under HUD Capital Grant Program or Public Housing Agency Plan established pursuant to 24 CFR Part 903.
- Provide a limited number of free printed copies for those who request it.

Public Meetings and Hearings

The Consortium will hold at least one public meeting and one public hearing for input on the 5-Year Consolidated Plan. At least one public meeting will be held during Plan formulation and preparation. A Mayor and Council public hearing and County Board of Supervisors public

hearing will be held once the draft Plan has been completed. The public meetings/hearings will address:

- The amount of HUD funds covered by the Consolidated Plan anticipated to be made available on a fiscal year basis, the amount of funds anticipated to benefit low- and moderate-income persons, and the eligible range of activities that may be undertaken concerning such federal programs.
- The range of activities that may be undertaken with the funding being discussed.
- Priorities for affordable housing, homeless and special needs populations, and community development in Tucson and Pima County.
- Plans to minimize the displacement of persons assisted through the use of HUD CPD funds.
- Other aspects of the 5-Year Consolidated Plan, as applicable.

Public meetings/ hearings will be held at accessible locations and times determined by the Consortium with consideration made for public convenience. The Consortium may utilize alternative public involvement techniques, such as the use of the Internet and/or virtual meetings or hearings.

Public Comment Period

On or before April 10 of any given year, the Consortium will make available the draft 5-Year Consolidated Plan for a 30-day public comment period.

In accordance with HUD guidance issued on April 9, 2020, the Consortium may follow expedited procedures to draft, propose or amend the Citizen Participation Plan, Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

Annual Action Plans

Annual Action Plans are prepared by the City and County by May of each year and describe the planned investment of the HUD CPD resources for the coming year (July 1 – June 30). The City of Tucson Annual Action Plan includes HOME funds for the Consortium.

City of Tucson Consultation

In preparing the Annual Action Plan, the City of Tucson will:

- Consult with CDBG Target areas, partner organizations including the Metropolitan Housing Commission, the Tucson-Pima Collaboration to End Homelessness and other organizations as necessary to fulfill consultation requirements.

- Provide a limited number of free printed copies for those who request it.

Pima County Consultation

Prior to beginning a new program year and in preparing the Annual Action Plan, Pima County will:

- Hold up to fifteen public hearings, meetings and/or workshops to solicit public input on the past year's project performance and recommendations for new project allocations for the upcoming program year.
- Hold meetings in identified CDBG target areas to discuss target area needs and eligible uses of CDBG funds relative to identified needs.
- Provide a limited number of free printed copies for those who request it.

City of Tucson and Pima County Public Meetings and Hearings

The Consortium members will respectively hold at least one public meeting and one public hearing for input on the Annual Action Plans. At least one public meeting will be held during Plan formulation and preparation. A Mayor and Council public hearing and County Board of Supervisors public hearing will be held once the draft Plans have been completed. As subrecipients of Pima County CDBG funding, the Town of Marana and City of South Tucson Councils will hold public meetings. The public meetings/hearings will address:

- The amount of HUD CPD funds anticipated to be made available on a fiscal year basis, and the eligible range of activities that may be undertaken concerning such federal programs.
- Priorities for affordable housing, homeless and special needs populations, and community development.
- The anticipated uses of CDBG, ESG, HOME, HOPWA *and NSP* funds, as applicable.
- Other aspects of the Annual Action Plan, as applicable.

The Consortium and subrecipients may utilize alternative public involvement techniques, such as the use of the Internet and/or hold virtual meetings or hearings.

City of Tucson and Pima County Public Comment Period

On or before April 10 of any given year, the Consortium members will make available the draft Annual Action Plans for a 30-day public comment period.

In accordance with HUD guidance issued on April 9, 2020, the Consortium members may follow expedited procedures to draft, propose or amend the Citizen Participation Plan,

Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

Consolidated Annual Performance Report

Consolidated Annual Performance Reports (CAPER) are prepared by the City and County by September of each year and describe the actual investment of HUD CPD resources during the prior year. The City of Tucson CAPER includes HOME funds for the Consortium.

On or around September 1 of any given year, the Consortium members will make available the draft Comprehensive Annual Performance Evaluation Reports (CAPER) for a 15-day public comment period.

The City of Tucson-Pima County Consortium Assessment of Fair Housing (AFH)

The Assessment of Fair Housing (AFH) replaces the Analysis of Impediments to Fair Housing Choice (AI). The AFH will assist the Consortium in identifying fair housing issues and contributing factors to achieve comprehensive community development goals and affirmatively further fair housing. If applicable, a draft of the AFH will be prepared by the Consortium by May of the year prior to preparation of the 5-year Consolidated Plan.

Consultation

The Consortium will consult with community-based and regionally-based organizations representing protected class members, and organizations that enforce fair housing laws, including participants in the Fair Housing Assistance Program (FHAP), Fair housing organizations, nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP), and other public and private fair housing service agencies, to the extent that such entities operate within Pima County.

As soon as feasible after the start of the public participation process, the Consortium members will make available HUD-provided data and any other supplemental information the Consortium members plan to incorporate into the AFH to residents, public agencies and other interested parties.

This consultation will help provide a better basis for the AFH, the City and County certifications to affirmatively further fair housing, and other portions of the Consolidated Plan concerning affirmatively furthering fair housing. This consultation will occur with any organizations the City and County can identify that have relevant knowledge or data to inform the AFH.

To the greatest extent practicable, the organizations involved in the consultations will be sufficiently independent and representative to provide meaningful feedback on the AFH and its implementation. The consortium will consult with the above referenced organizations in the development of both the AFH and the Consolidated Plan; consultation on the Consolidated Plan will seek input into how the goals identified in an accepted AFH inform the priorities and objectives of the Consolidated Plan.

Public Meetings and Hearings

The Consortium will hold at least one public meeting and one public hearing for input on the AFH. At least one public meeting will be held during AFH formulation and preparation. A Mayor and Council public hearing and County Board of Supervisors hearing will be held once the draft AFH has been completed. The Consortium may utilize alternative public involvement techniques, such as the use of the Internet.

Public Comment Period

On or before April 1 of any given year, the Consortium will make available the draft AFH for a 30-day comment period. The Consortium will provide a limited number of free printed copies for those who request it.

PUBLIC NOTICES

Public notices will be provided for each public meeting/hearing a minimum of **7 (seven)** days prior to the public meeting/hearing. Notices will indicate the date, time and location of scheduled meetings and reference the topics that will be considered.

In accordance with HUD guidance issued on April 9, 2020, the Consortium members may follow expedited procedures to draft, propose or amend the Citizen Participation Plan, Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

Public notice will be published in a local newspaper of general circulation, posted on the consortium member's websites, and provided to program partners, including the City Metropolitan Housing Commission, and the Tucson-Pima Collaboration to End Homelessness. Pima County may mail notices directly to county residents when feasible.

Public notices will be provided for each public comment period prior to the first day of the public comment period and may be combined with public notice for a public meeting/hearing. Public notice for multiple documents may be combined in years where public comment periods are the same.

Public notices regarding draft documents available for public comment will include a summary of the draft 5-Year Consolidated Plan, draft AFH, draft Annual Action Plan, or draft CAPER, as applicable, and the physical location and website where citizens may review copies of draft plans, and a mailing address, email address, and fax number for submittal of comments.

PUBLIC ACCESS TO INFORMATION

The Consortium will provide citizens, public agencies and other interested parties with reasonable and timely access to public records relating to their past use of HUD funds and related assistance for the previous five years. The 5-year Consolidated Plan, AFH, Annual Action Plan and CAPER will be posted on the City and County websites.

ACCOMMODATIONS FOR NON-ENGLISH SPEAKING PERSONS AND/OR PERSONS WITH DISABILITIES

To encourage participation by non-English speaking persons, where applicable, a bilingual Spanish/English staff person will be present at public meetings/hearings to meet the needs of Spanish speaking persons. For complete information, please refer to the Housing and Community Development Limited English Proficiency Language Assistance Plan (https://www.tucsonaz.gov/files/hcd/LEP2015.pdf).

Specific determinations on accommodations to encourage participation by persons with disabilities will be made by Consortium staff on a case by case basis.

COMMENT AND COMPLAINT PROCEDURES

Comments

Any citizen, organization, or group desiring to make a comment regarding the 5-year Consolidated Plan, the Annual Action Plan, the Comprehensive Annual Performance Evaluation Report (CAPER), or the Assessment of Fair Housing may do so in writing, or by email to the Consortium during the public comment period, or in writing or verbally during the public meetings/hearings. The Consortium will respond to written and email comments within 15 working days of receiving the comment where practicable. Responses will be provided in the same manner in which they were submitted. All Consortium responses will be posted to the City and County websites. The response will include a description of any action that will be taken as a result of citizen comments. Comments received during the public comment period will be made a part of the public record and provided to Mayor and Council and/or the County Board of Supervisors. A summary of the comments and responses will be attached to the final

5-Year Consolidated Plan, Annual Action Plan, CAPER, or AFH submitted to HUD. Citizens may also submit comments directly to HUD, though these comments, unless also submitted to the Consortium, cannot be made a part of the public record.

Complaints

Throughout the year, the Consortium will provide a substantive response to every written citizen complaint related to the 5-Year Consolidated Plan, amendments, Annual Action Plan, or CAPER within 15 working days of receiving the complaint where practicable.

CRITERIA AND PROCESS FOR SUBSTANTIAL AMENDMENTS TO THE 5-YEAR CONSOLIDATED PLAN OR ANNUAL ACTION PLAN

Substantial Amendment Criteria

1. A change in the method of distribution (application process, selection criteria) of Consolidated Plan funds that will alter the distribution of funds by at least 20% of the Consortium member's current year allocation.
2. The addition or elimination of a high priority goal originally described in the 5-year Consolidated Plan.
3. A change in the allocation of funds to a project that exceeds fifteen percent (15%) of the Consortium member's current-year CDBG or HOME allocation, including program income.
4. The elimination of a project originally described in the Annual Action Plan, except a project that is cancelled and did not draw down any funds.
5. The addition of a project not originally described in an Annual Action Plan.
6. Movement of funds from one project to another in an amount greater than fifteen percent (15%) of the annual CDBG or HOME allocation, including program income.
7. Addition of new programs that must be included in the Consolidated Plan.

A change in the HUD annual allocation of funds received after submission of an Annual Action Plan will not be considered a substantial amendment.

All other changes to the method of distribution or investment strategy that do not meet the substantial amendment criteria will be considered minor amendments and not subject to notification, public hearing and public comment period requirements; minor amendments will be incorporated into the CAPER for review during the public comment period and submitted to HUD annually.

Substantial Amendment Process

1. Public notice of the proposed amendment will be published in a local newspaper of general circulation and posted on the City of Tucson and/or Pima County website. Amendments to the Pima County Annual Action Plan or CAPER will include notification of local governments. The notice will include a summary of the proposed amendment, a request for public comments, the start and end dates of a 30-day public comment period, the physical location and website where citizens may review copies of draft plans, and a mailing address and email address to submit comments.
2. The amendment(s), public comments received, and the response(s) of the Consortium will be provided to the Mayor and City Council and/or Board of Supervisors for review and approval at a public hearing following the 30-day public comment period.
3. The Consortium will notify HUD of any amendments executed, public comments received, and the response(s) of the Consortium.

In accordance with HUD guidance issued on April 9, 2020, the Consortium members may follow expedited procedures to draft, propose or amend the Citizen Participation Plan, Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

CRITERIA AND PROCESS FOR SUBSTANTIAL AMENDMENTS TO THE ASSESSMENT OF FAIR HOUSING

The AFH, if applicable, will be revised in the event of a significant material change in circumstances that calls the AFH into continued validity. Significant material changes include:

- Significant demographic changes related to zoning, or to housing or community development plans or policies.
- The City or County are subject to significant civil rights findings, determinations, Voluntary Compliance Agreements, or other settlements.

Revisions to the AFH will provide at least 30 days for public comment. All comments received will be handled pursuant to this Citizen Participation Plan.

1. Public notice of the proposed amendment will be published in a local newspaper of general circulation and posted on the City of Tucson and Pima County websites. The notice will include a summary of the proposed amendment, a request for public comments, the start and end dates of a 30-day public comment period, the physical location and website where citizens may review copies of draft plans, and a mailing address and email address to submit comments.

2. The amendment(s), public comments received, and the response(s) of the Consortium will be provided to the Mayor and City Council and Board of Supervisors for review and approval at a public hearing following the 30-day public comment period.
3. The Consortium will notify HUD of any amendments executed, public comments received, and the response(s) of the Consortium.

TECHNICAL ASSISTANCE

The City and County will provide technical assistance to any persons or groups interested in commenting on the Consolidated Plan, AFH, Annual Action Plans, or CAPERs. The City and County will also provide technical assistance to very-low and low-income persons and groups representative of very-low and low-income persons in developing proposals for funding under the programs covered by the Consolidated Plan.

ADOPTION OF THE CITIZEN PARTICIPATION PLAN

Prior to adoption of the Citizen Participation Plan, the Consortium will provide notice that the draft Citizen Participation Plan is available for review and comment. The notice will be published in a local newspaper of general circulation, posted on the City and County websites, and provided to program partners. The Citizen Participation Plan and any amendments will be adopted by the Tucson City Council and Pima County Board of Supervisors with the scheduled adoption of the 5-year Consolidated Plan in May of any given year.

In accordance with HUD guidance issued on April 9, 2020, the Consortium members may follow expedited procedures to draft, propose or amend the Citizen Participation Plan, Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

ANTI-DISPLACEMENT PLAN

The Consortium will take all reasonable steps to minimize the displacement of persons assisted through the use of HUD CPD funds. Persons temporarily displaced through the use of HUD CPD funds may receive optional relocation assistance. Optional relocation assistance may be provided when conditions in a structure pose an immediate hazard to the health and/or welfare of the occupant(s) of a structure or adjoining structure. Optional relocation assistance may be provided to displaced persons when completion of the work associated with the temporary displacement will require more than one day and not exceed 16 days. The Consortium will secure decent, safe, and sanitary temporary housing, using CDBG funds, in motel rooms or rental properties. Relocation assistance, including room, meals, and transportation, to be paid by the Consortium, are estimated to range from $100 to $125 per

day. Costs recovered by insurance or court order will be treated as program income. Implementation of optional relocation assistance will be a matter of last resort when all other available resources in the community have been exhausted.

CONTACT INFORMATION

Comments may be made or information and materials requested by contacting:

The City of Tucson

Housing and Community Development Department Planning and Community Development Division
Physical Address: 310 N. Commerce Park Loop, Tucson, AZ 85745
Mailing Address: P.O. Box 27210, Tucson, AZ 85726-7210
Email Address: HCDAdmin@tucsonaz.gov
Phone Number: 520-791-4171
Fax Number: 520-791-5407
Website: https://www.tucsonaz.gov/hcd

Pima County

Community Development and Neighborhood Conservation
Physical Address: 2797 E Ajo Way, Tucson, AZ 85713
Phone Number: 520-724-3777
Fax Number: 529-724-6796
Website: https://www.pima.gov/cms/One.aspx?portalId=169&pageId=18389

Appendix B

Human Services Program Funding - Fiscal Year 2021

Human Services Programs - Fiscal Year 2021		
Projects selected through a competitive RFP process.		
Community Development Block Grant Funding (CDBG)		
Organization	**Program**	**Amount**
Tucson Center for Women and Children dba Emerge Center Against Domestic Abuse	Crisis Intervention - Domestic Violence Shelter	$150,000.00
Our Family Services, Inc.	CDBG - Homeless Youth Services Human Trafficking Program	$90,000.00
Primavera Foundation, Inc.	HIP: Emergency Assistance, i.d.s	$75,000.00
Southern Arizona Children's Advocacy Center	Investigative Services for Child Abuse Victims	$76,511.00
Primavera Foundation, Inc.	Casa Paloma: Emergency Assistance and Emergency Shelter	$50,000.00
Tucson Center for Women and Children dba Emerge Center Against Domestic Abuse	Crisis Intervention - Domestic Violence Hotline	$106,808.00
Youth On Their Own	YOTO Program (Special Needs)	$55,000.00
Pima Council on Aging	Nutrition Program for the Elderly Home Delivered Meals	$50,000.00
Pima Council on Aging	Home Care	$50,000.00
Total CDBG		**$703,319.00**
Emergency Solutions Grant (ESG) Program Funding		
Organization	**Program**	**Amount**
Our Family Services, Inc.	ESG - Our Family Services Emergency Shelter Services Program	$50,000.00
Tucson Center for Women and Children dba Emerge Center Against Domestic Abuse	ESG - Shelter	$98,000.00
Southern Arizona AIDS Foundation	Anti-Violence Project - Rapid Rehousing	$75,000.00
Compass Affordable Housing, Inc. (CAH)	Housing Solutions Tucson - Rapid Rehousing	$55,000.00
Tucson Center for Women and Children dba Emerge Center Against Domestic Abuse	ESG - Rapid Rehousing, Survivors of Domestic Violence	$50,000.00
Total ESG		**$328,000.00**
General Fund - Elderly and Disabled		
Organization	**Program**	**Amount**
Mobile Meals of Southern Arizona, Inc.	Home-Delivered, Medically-Tailored Meals for Low-Income Seniors, Adults with Disabilities	$53,269.00
Catholic Community Services of Southern AZ, inc. dba Community Outreach Program for th	Collaboration and Employment for Deaf Youth and Adults	$53,269.00
Catholic Community Services of Southern AZ, inc. dba Community Outreach Program for th	Supportive Programs Serving Deaf and DeafBlind Persons	$53,269.00
Pima Council on Aging	Senior Companion Program	$50,000.00
Total General Fund - Elderly and Disabled		**$209,807.00**
General Fund - Homelessness		
Organization	**Program**	**Amount**
TMM Family Services Inc.	Family Journey- Transitional Housing	$50,000.00
Total General Fund - Homelessness		**$50,000.00**

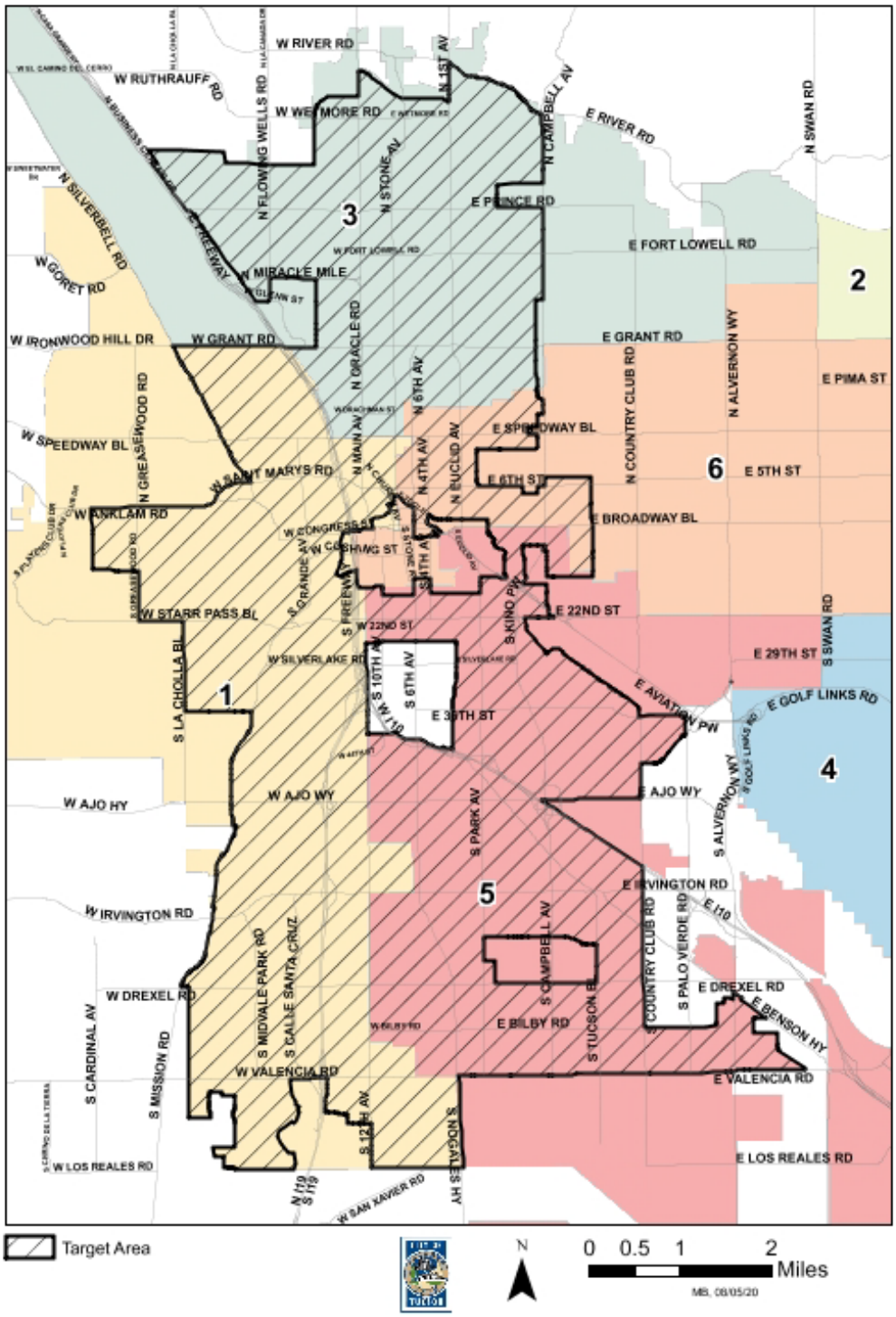
General Fund - Special Populations		
Organization	**Program**	**Amount**
Southern Arizona Legal Aid, Inc.	Homeowner and Tenant Protection Project	$53,269.00
Tucson Center for Women and Children dba Emerge Center Against Domestic Abuse	General Fund - Domestic Violence Crisis Hotline	$53,269.00
Total General Fund - Special Populations		**$106,538.00**
General Fund - Youth		
Organization	**Program**	**Amount**
SARSEF: S. AZ Research, Science & Engineering Foundation	Leading the Way to Prosperity: Critical Thinking for ALL Children	$50,000.00
Our Family Services, Inc.	Our Family Services Homeless Youth Parent Education Program	$50,000.00
Youth On Their Own	YOTO Program (Stipends)	$50,068.00
Southern Arizona Association for the Visually Impaired (SAAVI)	REAL Program for Blind Children and Youth	$50,000.00
Total General Fund - Youth		**$200,068.00**
General Fund - After Hours Homeless Outreach		
Organization	**Program**	**Amount**
Old Pueblo Community Services	After Hours Outreach	$50,000.00
Total General Fund - After Hours Homeless Outreach		**$50,000.00**
General Fund - Food Security		
Organization	**Program**	**Amount**
Community Food Bank, Inc.	The Emergency Food Assistance Program	$50,000.00
Pima Council on Aging	Nutrition Program for the Elderly Home Delivered Meals	$50,000.00
Catholic Community Services of Southern Arizona, Inc	Meal Program at Quincie Douglas	$50,000.00
Total General Fund - Food Security		**$150,000.00**
General Fund - Food Security - Youth		
Organization	**Program**	**Amount**
Community Food Bank, Inc.	BackPacks Program	$50,000.00
Total General Fund - Food Security - Youth		**$50,000.00**
General Fund - Acute Home Repair		
Organization	**Program**	**Amount**
Community Home Repair Projects of Arizona	Tucson Acute Repair Program (TARP)	$100,000.00
Foundation for Senior Living	Acute Home Repair	$50,000.00
Total General Fund - Acute Home Repair		**$150,000.00**

General Fund - Low Barrier Shelter for Individuals		
Organization	**Program**	**Amount**
Old Pueblo Community Services	Low Demand Shelter- Individuals	$100,000.00
Our Family Services, Inc.	Low Barrier Shelter, Homeless Youth Services, Human Trafficking	$50,000.00
Total General Fund - Low Barrier Shelter for Individuals		**$150,000.00**
General Fund - Low Barrier Shelter for Families		
Organization	**Program**	**Amount**
Old Pueblo Community Services	Low Demand Shelter- Families	$100,000.00
Primavera Foundation, Inc.	Family Pathways: Low Barrier Shelter for Families	$50,000.00
Total General Fund - Low Barrier Shelter for Families		**$150,000.00**
General Fund - TC3 Collaboration		
Organization	**Program**	**Amount**
Community Bridges, Inc.	TC-3 Navigation	$100,000.00
Total General Fund - TC3 Collaboration		**$100,000.00**
General Fund - Emergency Utility Assistance		
Organization	**Program**	**Amount**
Interfaith Community Services	Emergency Assistance (Utilities, rent, eviction prevention)	$50,000.00
Total General Fund - Homelessness		**$50,000.00**
General Fund- Gentrification		
Organization	**Program**	**Amount**
Pima County Community Land Trust - Cafecito	Gentrification Pilot, Community Outreach	$50,000.00
General Fund		**$50,000.00**

Appendix C

Target Area Map

City of Tucson CDBG Public Facilities Target Area



Appendix D

Continuum of Care (COC) Program Written Standards

TUCSON PIMA COLLABORATION TO END HOMELESSNESS
COC PROGRAM WRITTEN STANDARDS
Adopted May 11, 2017

Introduction & Purpose
Key Terms
General Policies
Performance Standards
Permanent Supportive Housing
Rapid Rehousing
Transitional Housing
Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification)
Appendices

INTRODUCTION & PURPOSE

Tucson Pima Collaboration to End Homelessness (TPCH) has established written standards that encompass local community needs and follow guidelines set forth by the Department Housing and Urban Development (HUD) and comply with requirements established by law and HUD Notice. These written standards are developed to ensure people within this community who are experiencing homelessness are prioritized and provided with the most appropriate housing and services to meet their needs.

These written standards are reviewed and adjusted at least annually. Changes to priorities may supersede this notice if voted on by the TPCH Board of Directors (for example; a surge in prioritizing veterans). Further requirements are detailed in TPCH Policy and Procedure documents.

These written standards are developed in coordination with recipients of Emergency Solutions Grants program funds to achieve the following:

- Create and maintain a centralized or coordinated entry system that provides an initial, comprehensive assessment of the needs of families and individuals for housing and services
- Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive transitional housing assistance.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive rapid rehousing assistance.
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive permanent supportive housing assistance

KEY TERMS

Beds

A bed is each assigned spot in a housing program for a person; not literally a bed. If there are three people in a household, regardless of their sleeping arrangements, the household has three beds.

Client-Centered

Client-centered (or person-centered) services are designed and delivered based on the specific needs and wants of each family or individual as they perceive those needs and wants rather than as required or delivered by the service provider based on a schedule, program participation, or the providers' perception. A client-centered service delivery process involves mutual discussion and decision-making on what steps are needed for client stability and when and how to take those steps. For example, client-centered service could include, but not be limited to, determining a family's preferences and helping them find housing that is not just to their needs and liking, but also near a particular school.

Chronically Homeless

An individual or family is chronically homeless when the person or head of household (adult or minor) meets all three criteria established as the final rule for 24 CRF Parts 91 and 578 as amended December 4, 2015. The three criteria are that the person/family:

- Has a qualifying disability (a diagnosable substance use disorder, serious mental illness, developmental disability, post traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability)
- Is literally homeless (at the time of eligibility assessment for a specific project opening)
- Has at least 12 months of homelessness from one of the below avenues:
    - The current episode of homeless has lasted at lasted the past 365 nights, including the night before assessment, without breaks in homelessness.
    - Having four episodes, or more, of homelessness within the past three years up to and including the date of assessment. These episodes, when added together, total 365 nights or more of literal homelessness. Also, each break in homelessness must have lasted at least seven (7) consecutive nights.
    - Both the cumulative nights and four or greater episodes criteria must be met. Fewer than four episodes in three years – even if homeless nights add up to 12 or more months – will not qualify the person/family as chronically homeless. Greater than four episodes in three years will not suffice if the total nights homeless are under 365.

Equal Access:

This community provides equal access to all programs and activities, regardless of (actual or perceived) sexual orientation, gender identity, marital status, race, color, national origin, religion, sex, familial status, disability, or any other protected class as identified by Federal or Local law.

This community houses people based on the gender they identify as, without requesting documentation to validate their report. This community recognizes the HUD Final Rule and all amendments published 2/3/2012, 9/21/16 and the Notice on Equal Access Regardless of Sexual Orientation, Gender Identity, or Marital Status for HUD's CPD Programs.

Gender Identity

This is defined as a person's concept of oneself as male, female, both or neither. Gender identity may or may not align with the "sex" or "gender" described on an individual's birth certificate or other identity documents.

Homeless

HUD classifies homelessness into categories, or levels, of homelessness. These include literally homeless, imminent risk of homelessness and chronically homeless and are detailed in the Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification) section of this document.

Unsheltered: People are considered homeless, and unsheltered, when they are living in places not meant for human habitation.

Sheltered: People are considered homeless, yet sheltered, when they are staying in places meant for human habitation, emergency shelters, transitional housing, or facing imminent homelessness.

Housing First

Housing First is an approach in which housing is offered to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements. Rapid placement and stabilization in permanent housing are primary goals. Service participation is not required for continued tenancy. Projects that use a Housing First approach promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services, yet offer assertive engagement in support and treatment options to the participants who are housed.

LGBTQ

This is an acronym for "lesbian, gay, bisexual, transgender or transsexual, questioning or queer." It is intended to emphasize a diversity of sexuality and gender identities, including identities that do not fall within the binary of "male" and "female," and may be used to refer to anyone who self-identifies as non-heterosexual.

Permanent Supportive Housing (PSH)

Permanent Supportive Housing is rental assistance with supportive services without a designated length of stay to assist homeless persons with a disability to live independently and achieve housing stability.

Rapid Rehousing (RRH)

Rapid Rehousing Assistance is client-centered housing relocation and stabilization services with short and/or long term rental assistance. RRH helps an individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

Safe Haven

A Safe Haven is a temporary supportive housing program that serves hard-to-reach literally homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services. These facilities allow 24-hour residence for an unspecified duration, have private or semi-private accommodations, and provide access to needed, but not required, services in a low demand facility.

Severity of Service Needs

TPCH classifies service needs into four categories; Severe, High, Moderate and Low. Families and Individuals are classified via the SPDAT score indicates which level of service needs the individual or family will be classified as.

	VI SPDAT			Full SPDAT	
	Individuals	Youth	Families	Individuals/Youth	Families
Severe Service Needs	12-17	12-17	12-22	45-60	66-80
High Service Needs	8-11	8-11	9-11	35-44	54-65
Moderate Service Needs	4-7	4-7	4-8	20-34	27-53
Low Service Needs	0-3	0-3	0-3	0-19	0-26

An individual or family is considered to have a high severity of services needs when at least one of the following is true:

i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; or
ii. Significant health or behavioral health challenges or functional impairments which require a significant level or support in order to maintain permanent housing.
iii. For youth and victims of domestic violence, there is a high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
iv. When applicable CoC Program-funded PSH may use alternate criteria used by state Medicaid departments to identify high-need, high-cost beneficiaries.

The determination is not to be based on a specific diagnosis or disability type. The determination will not be based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements. (See 24 CRF § 5.105 (a).)

Families and individuals with low service needs will not be served in CoC-funded projects.

SPDAT (Service Prioritization Decision Assistance Tool)

The SPDAT portfolio consists of evidence-based, standardized assessment tools that allow providers to effectively assess the severity of service needs for people experiencing homelessness. TPCH utilizes SPDAT scores for prioritization of families and individuals for housing resources. The Vulnerability Index (VI) SPDAT is utilized for pre-screening families, individuals, and youth. The Full SPDAT assessment also has versions for these populations. These SPDATs are more in-depth assessments and case management tools.

Transitional Housing (TH)

Transitional housing provides homeless families and individuals with the interim stability and support to successfully move to and maintain permanent housing. Homeless persons may live in transitional housing for up to 24 months and receive support services that help them live more independently.

TPCH

Tucson Pima Collaboration to End Homelessness (TPCH) is a coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness, advocating for and addressing the issues related to homelessness in our community, and acting as the U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) for the geographic area of Tucson and Pima County, Arizona.

Victim Service Provider

A victim service provider is an organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, stalking or human trafficking.

GENERAL POLICIES

Family Admission and Non-Separation
Ensuring Educational Rights
Persons Fleeing Domestic Violence
Persons Identifying as LGBTQ
Housing First

Family Admission and Non-Separation

Consistent with the CoC Program Interim Rule 578.93, neither CoC nor ESG program-funded grant recipients and subrecipients may involuntarily separate families. The age and gender of a child under age 18 will not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds. The gender, sexual orientation and/or marital status of a parent or parents will also not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds.

The CoC will work closely with providers to ensure that placement efforts are coordinated to avoid involuntary family separation, including referring clients for the most appropriate services and housing to match their needs.
Any client who believes that they or a family member has experienced involuntary separation may report the issue to the CoC through www.tpch.net and "Contact TPCH". The CoC will investigate the claim and take appropriate remedial action.

Ensuring Educational Rights

Consistent with the CoC Program Interim Rule 578.23 and 578.93 (e), all CoC and ESG program funded recipients and subrecipients assisting families with children or unaccompanied youth must:

1. Take into account the educational needs of children when placing families in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.
2. Inform families with children and unaccompanied youth of their educational rights, including providing written materials, provide linkage to McKinney Vento Liaisons (including assistance with enrollment if needed) as part of intake procedures.
3. Not require children and unaccompanied youth to enroll in a new school as a condition of receiving services.
4. Allow parents or the youth (if unaccompanied) to make decisions about school placement.
5. Not require children and unaccompanied youth to attend after-school or educational programs that would replace/interfere with regular day school or prohibit them from staying enrolled in their original school.
6. Post notices of educational rights at each program site that serves homeless children and families in appropriate languages.
7. Designate a staff member who will be responsible for:
   a. ensuring that homeless children and youth in their programs are in school and are receiving all educational services to which they are entitled.
   b. coordinating with the local McKinney Vento Educational Coordinator and Liaison, the appropriate school district, the CoC, and other mainstream providers as needed.
   c. facilitating unaccompanied youth who have not obtained a high school diploma or certificate of General Educational Development (GED) to obtain such a credential and ensuring that unaccompanied youth are connected to appropriate services in the community.

Clients who believe that their educational rights have not been observed may report the issue to the CoC through www.tpch.net and "Contact TPCH".

Persons Fleeing Domestic Violence

Consistent with the CoC Program Interim Rule 24 CFR Part 578.5 (8), all CoC program funding recipients and subrecipients will provide safe, confidential and equal access to TPCH's "no wrong door" coordinated entry process and referrals to either

domestic violence service providers or CoC or ESG funded project recipients and subrecipients for families and individuals who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking regardless of whether or not they consent to share their data through the HMIS.

The CoC will work closely with ESG and domestic violence service providers to ensure that any individual or family fleeing as described above will have the opportunity through coordinated entry and in accordance with the CoC's Coordinated Entry Policies and Procedures to be safely, confidentially and immediately transferred to a domestic violence services provider, if desired. While domestic violence service providers do not participate in the TPCH HMIS, these providers are encouraged to obtain from their clients consent for confidential staffing (using de-identified data) and referral to housing and services from other providers through the coordinated entry as desired and needed by clients. If individuals or families fleeing domestic violence do not desire such a transfer, they may be assessed and/or undergo intake through the normal coordinated entry system.

All CoC grant recipients and subrecipients within the CoC geographic area will make all efforts to: protect the privacy and safety of domestic violence survivor; uphold client choice by presenting a range of housing and service options; and ensure that housing, once established, is not endangered because of reports of domestic violence or re-victimization. TPCH will offer staff training on dealing with those fleeing domestic violence and/or trauma informed care no less than annually.

In compliance with under §578.51 (c)(3), any program participants who have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence), if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and may move to a different CoC geographic area if they move out of the assisted unit to protect their health and safety and the CoC to which they are moving did not participate in the decision to move.

For each program participant who elects to move to a different CoC due to imminent threat of further violence under §578.51 (c) (3), the CoC project in which they participated must retain:

1. Documentation of the original incidence of violence.
2. Documentation of the reasonable belief of imminent threat of further violence. This would include threats from a third party, such as a friend or family member of the perpetrator of the violence.

In either case, the documentation may be the housing or service provider's written observation; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider or other professional from whom the victim has sought assistance; medical or dental records; court or law enforcement records; or written certification by the program participant to whom the violence occurred or by the head of household.

Persons Identifying as LGBTQ

Consistent with the CoC Program Interim Rule 578.93 (a), final rule 77 FR 21 5662 and CPD-15-02, all CoC recipients and subrecipients will make available their housing and services to families and individuals without regard to actual or perceived sexual orientation, gender identity (whether actual or perceived gender-related characteristics), or marital status. In addition, CoC and ESG program funded recipients and subrecipients will:

1. Recognize that biological sex as reported at birth may not correspond to an individual's gender identity, ask about gender identity or sexual orientation to determine eligibility if the facility to which the individual client seeks admission has shared sleeping areas or bathrooms, or to determine the number of bedrooms to which a household may be entitled.
2. Provide access to shelter and housing programs based on a person's self-identified gender, taking health and safety, and non-binary gender identity concerns into consideration.
3. Neither request documentation of a person's sex, anatomy or medical history in order to determine appropriate placement nor deny access to a single-sex emergency shelter or facility solely because the individual's identity documents indicate a sex different than the gender with which the client or potential client identifies or because his or her appearance or behavior does not conform to gender stereotypes; nor consider a person ineligible for any facility based on the factors outlined above.
4. Maintain the confidentiality of any individual's disclosure regarding their sexual orientation or gender identity; notify persons who identify as LBGTQ when and to whom that identification may be shared during referrals; and, during

intake, inquire about a client's preference regarding the disclosure or non-disclosure to some or all staff of their stated orientation and/or gender identity, and then abide by that preference.

5. Neither isolate nor segregate a client based on gender identity unless by that client's request or for that client's safety. HUD assumes that a provider will not make an assignment or re-assignment based on complaints of another person when the sole stated basis of the complaint is a client or potential client's non-conformance with gender stereotypes.
6. Take reasonable steps to address any concerns expressed by a client or observed by a provider regarding safety or privacy. Whenever physically possible, providers will ensure that toilet stalls have doors and locks and that separate shower stalls are available. When these physical amenities are not available, providers will work with individuals (to the extent possible within the physical layout of their facility) to provide accommodations such as: addition of a privacy partition or curtain; use of a nearby private restroom or office; or a separate changing schedule.
7. Ensure that all recipient and subrecipient staff members and contractors who interact directly with potential and current clients are aware of these rules and guidelines through at least annual training, and take prompt corrective action to address noncompliance as reported through www.tpch.net and "Contact TPCH".

Housing First

These Written Standards establish that all Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH) Projects adopt the Housing First model.

Housing First is an approach to quickly and successfully connect families and individuals to permanent housing. Housing First programs do not create barriers to entry such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness.

Housing First considers all participants as "housing ready" vs only those participants that have completed treatment or achieved sobriety. There are no programmatic prerequisites to program entry such as minimum income, sobriety or treatment requirements. Programs fill their vacancies with households selected through the Coordinated Entry process.

All attempts are made to streamline the move-in process by aiding households with the eligibility process and by obtaining documents per the HUD regulations, which provide a grace period for obtaining chronic homeless documentation when it cannot be obtained at the time of housing offer of move-in. (See Timelines for Obtaining Documentation of Chronic Homelessness) This community's Housing First programs do not require chronic homeless documentation prior to program entry.

Housing First programs recognize tenant rights, responsibilities, and legal protections. Programs educate participants on these topics such as lease terms and Fair Housing. Program managers abide by these laws; projects respect tenant rights while providing services.

Housing First programs seek to maintain housing for participants through practices that provide services to build skills and seek leniency whenever possible. For example, the program will offer budgeting classes and seek a payment plan instead of seeking eviction for a participant failing to pay his or her rent.

Supportive services support recovery while respecting client choice. Participants are not forced into treatment but are continually offered a wide array of services and supports understanding that participants may decline them. There are no penalties for declining services within Housing first programs.

PERFORMANCE STANDARDS

TPCH requires that Project Recipients meet the following benchmarks for grants and financial management that communities must reach to meet this Standard of Recipient Performance. (Per 24 CFR 578 and the FY2015 NOFA)

1. Partner with established integrated health care relationships to ensure coverage for all participants.
2. Partner with employment resources to ensure participants have access to job training and development resources as needed.
3. Work closely with participants to access all mainstream benefits for which they are eligible.
4. Submit Annual Performance Reports by the deadline.
5. Avoid or resolve HUD monitoring findings, or OIG Audits, if applicable.
6. Maintain quarterly drawdowns
7. Fully expend awarded funds.
8. Maintain full and high quality participation in the TPCH HMIS.
9. Maintain full and high quality participation in the TPCH Coordinated Entry system.

PERMANENT SUPPORTIVE HOUSING

Community Priorities
Priorities for those who will receive assistance with Permanent Supportive Housing programs.

- Beds dedicated and prioritized to serve families and individuals facing chronic homelessness
- Beds that are not dedicated or prioritized to serve families and individuals facing chronic homelessness

Documentation and Move-In Requirements

- Timelines for obtaining documentation of Chronic Homelessness
- Timelines for accessing housing

Community Priorities

When housing members of the community, this community prioritizes families and individuals with severe service needs who have experienced two or more years of homelessness. This community follows guidelines set forth in (Notice: CPD-16-11). Case conferencing will be used to further ensure appropriate matching, client choice, and navigation into housing and associated support services offerings.

Due diligence should be exercised when conducting outreach and assessment to ensure that persons are served in the order of priority in these standards, and as adopted by the CoC. HUD recognizes that some persons – particularly those living on the streets or in places not meant for human habitation – might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant where there are persons who meet a higher priority within the CoC and who have not yet accepted the PSH opportunities offered to them. Street outreach providers should continue to make attempts with those persons using a Housing First approach to place as few conditions on a person's housing as possible.

Service needs, defined in detail in the key terms section of this document, are categorized as Severe, High, Moderate, and Low as measured by use of the tools in the SPDAT portfolio.

Beds Classified as Dedicated or Prioritized for Chronically Homeless (CH)

See the key terms section for the definition of Chronic Homelessness.

TPCH seeks to end chronic homelessness. Certain CoC-funded beds have been dedicated or prioritized to serve families and individuals experiencing chronic homelessness. Only persons experiencing chronic homelessness (CH) will be served in CH-dedicated or CH-prioritized beds until all people facing chronic homelessness within our geographic boundaries have been offered housing. TPCH recognizes those with severe service needs who have been homeless for two years or more over the course of their lives as prioritized for housing. We give first opportunity to those who are unsheltered. Families and individuals with moderate and low service needs are not currently served with these beds.

TPCH prioritizes these beds as follows:

1) Severe Service Needs & 2+ years homeless & unsheltered
2) Severe Service Needs & 2+ years homeless & sheltered

When priority populations are housed, TPCH will offer housing to the remaining families and individuals facing CH as follows:

3) Severe Service Needs & Less than 2 years homeless & unsheltered
4) Severe Service Needs & Less than 2 years homeless & sheltered
5) High Service Needs & 2+ years homeless & unsheltered
6) High Service Needs & 2+ years homeless & sheltered
7) High Service Needs & Less than 2 years homeless & unsheltered
8) High Service Needs & Less than 2 years homeless & sheltered

Beds Classified as Not Dedicated or Prioritized for CH

This community will follow the above prioritization levels for these beds until the community has determined that we have housed families and individuals who meet the definition of chronic homelessness within our geographic boundaries. When that has been achieved, these beds will be prioritized to those with high service needs, a disability, and have experienced at least 2 years of cumulative lifetime homelessness. Families and individuals with moderate and low service needs are not currently served with these beds.

1. Severe Service Needs, with a disability, with 2 or more years homeless
2. Severe Service Needs with a disability

After everyone in the above groups has been offered housing, TPCH prioritizes the remaining households as follows:

3. Severe Service Needs, 2 or more years homeless
4. Severe Service Needs
5. High Service Needs, with a disability, with 2 or more years homeless
6. High Service Needs, with a disability
7. High Service Needs, 2 or more years homeless
8. High Service Needs

Timelines for Obtaining Documentation of Chronic Homelessness

Verification of homeless status and disability are required per HUD. Details on what types of homeless verification are provided in this document under Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification).

Obtaining verification of disability and chronic homeless status shall not be a barrier to entering housing. When projects are verifying chronic homeless status, TPCH allows projects to require no more than the minimum HUD-required documentation prior to move-in. This includes a review of homelessness with the household to ascertain whether the household qualifies and a primary or secondary source of disability verification. Once the program has enough information from the participant to believe the participant qualifies, s/he should be allowed to move forward with program entry.

The secondary source of disability documentation (social security award letter, handicap parking placard, or written intake worker's notation of a visible disability) allows the program to take up to 45 days to obtain direct third-party disability verification.

Projects are given up to 180 days to obtain written verification of chronic homeless status.

Timelines for Accessing Housing

Programs must make every effort to house participants quickly. Additional barriers may not be imposed and client-centered assistance must be provided to enable participants a quick turnaround from eligibility determination to move-in.

RAPID REHOUSING PROGRAMS

Introduction
Priorities for which eligible families and individuals will receive Rapid Rehousing assistance.
Standards for determining what percentage of income participants may be asked to pay as rent while receiving Rapid Rehousing assistance.

Introduction

Rapid rehousing assistance helps families and individuals who are experiencing homelessness to move as quickly as possible into permanent housing and achieve stability in that housing through a combination of rental assistance and supportive services. Rapid rehousing rental assistance is available for a maximum of 24 months within a three year period; participants may maintain their housing units once the rental assistance has ended by paying full rent to the property. Rapid rehousing uses Fair Market Rates (FMR) established annually by HUD http://www.huduser.org/portal/datasets/fmr.html .

Priorities for which families and individuals will receive Rapid Rehousing assistance

Rapid Rehousing programs will use SPDAT tools (through the HMIS per Coordinated Entry) to determine and prioritize who will receive RRH assistance. Households with moderate service needs will be offered rapid rehousing assistance, with priority going to unsheltered households. Families and individuals with low service needs are not currently served with these beds.

Participants must meet the HUD definition of homelessness for Categories 1, 2, or 4. Households must lack sufficient resources and support networks to sustain stability in permanent housing. Rapid Rehousing will be offered on a Housing First basis and re-house households in less than 30 days. Rapid Rehousing utilizes the Transition-In-Place model which allows program participants to retain the unit when the rental assistance and supportive services end.

Standards for determining what percentage or amount of rent each program participant must pay while receiving Rapid Rehousing assistance

The percentage of income each household will pay will increase over time. (NOTE: participants without income will not pay rent; x% of 0 = 0). The rent the participant pays shall not exceed the rental costs on the unit; programs will not profit from participant contributions. Annual earnings are divided by 12 months to calculate a monthly earning amount.

The rent schedule is as follows:

Participants in short-term rental assistance (1-3 months in duration) may pay up to 10% of their income for rent and utilities.
Participants in medium-term rental assistance (4-8 months) may pay up to 25% of their income for rent and utilities.
Participants in long term rental assistance (months 9-24) may pay up to 50% of their income for rent and utilities.

At no point shall the rent collected from the household exceed the lease rent on the property.

TRANSITIONAL HOUSING

Introduction
Community Priorities for those who will receive Transitional Housing
Eligibility
Documentation Protocol for verification of homeless status

Introduction

Transitional Housing (TH) facilitates the movement of homeless families and individuals to permanent housing within 24 months of entering Transitional Housing.

Community Priorities

Transitional Housing programs will use SPDAT tools (through the HMIS per Coordinated Entry) to determine and prioritize who will receive assistance. Households with moderate service needs will be offered assistance; priority going to unsheltered households who are less likely to be able to secure a lease in their own name. Families and individuals with low service needs are not served with these CoC-funded beds.

Eligibility

Participants must meet the HUD definition of homelessness Categories 1, 2 and 4.

Documentation Protocol

Documentation to verify homeless status must be obtained per the Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification) section of this document.

EVALUATING & DOCUMENTING ELIGIBILITY

HUD further defines homelessness into various categories. This section contains the category definitions and documentation requirements for each level of homelessness. Procedures for evaluating and documenting eligibility are unique to each category of homelessness. HUD has two levels of documentation; Level 2 is only acceptable if level 1 documentation cannot be obtained.

Literally Homeless (also referred to as Category 1)

An individual or family sleeping in an emergency shelter or a Safe Haven (Sonora House), sleeping in a place not meant for human habitation, (staying in someone else's residence does **not** meet the requirements for literal homeless), or exiting an institution where s/he has resided for 90 days or less and was at one of the above places immediately before entering the institution.

Level 1 Options:

- Written observation by the outreach worker
- Written referral by another housing or service provider

Level 2 Options (to be obtained when none of the above are available)

- Certification by the individual or head of household seeking assistance stating that s(he) was living on the streets or in shelter PLUS documentation outlining efforts to obtain both level 1 forms of documentation.

For individuals exiting an institution obtain one of the forms of evidence above for where the person slept prior to entering the institution and one of the following regarding the institution stay:

- Discharge paperwork or written/oral referral
- Written record of intake worker's due diligence to obtain the evidence and certification by individual that they exited institution

At Imminent Risk of Homelessness (also referred to as Category 2)

An individual or family who will imminently lose their primary nighttime residence is considered to be imminently homeless if the residence will be lost within 14 days of the application for homeless assistance, no subsequent residence has been identified and the individual or family lacks the resources or support networks needed to obtain other permanent housing.

Level 1 Options:

- If in housing, a court order resulting from an eviction action notifying the individual or family that they must leave. If in a motel; evidence showing they lack the financial resources to stay.

Level 2 Options consist of three components, **all** of which must be obtained:

- A documented and verified oral statement with certification that no subsequent residence has been identified
- Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.
- Documentation outlining efforts to obtain the level 1 documentation.

Homeless under other Federal Statutes (Category 3) This category is available for RHY and ESG programs; Category 3 households are not eligible for COC programs

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

i) Are defined as homeless under the other listed federal statues;
ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
iii) Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers.

There are no level 2 sources of documentation for this category, all of the following must be obtained:

v) Certification by the nonprofit, state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute
vi) Certification of no permanent housing in the last 60 days
vii) Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days
viii) Documentation of special needs or two (2) or more barriers

Fleeing/Attempting to flee domestic violence (Category 4)

An individual or family is considered to be fleeing domestic violence when fleeing, or attempting to flee, domestic violence, has no other residence and lacks the resources or support networks to obtain other permanent housing. There are no level 2 sources of documentation for this category.

For victim service providers:

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-victim service providers **all** of the below must be gathered:

- Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker.
- Certification that no subsequent residence has been identified
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Chronically Homelessness

See the key terms section for the definition of Chronic Homelessness.

Projects must document households meeting the HUD criteria for chronic homelessness. This documentation includes three things

i) Documentation of the current household status as Category 1; Literally Homeless.
ii) Documentation of disability
iii) Documentation of the homeless history required to qualify as chronically homeless.

These documents may be obtained after the household has moved in. These documents have levels of documentation as prescribed by HUD. Time spent homeless must be verified; breaks in homelessness do not require third-party verification.

Level 1: Third-Party documentation. This includes written observation by an outreach worker, a written referral by another housing or service provider, or documentation from institutions such as hospitals, correctional facilities, etc. when they include length of stay and are signed by the institution staff. HMIS data may be used in when it contains the information required of all third-party documentation.

Level 2: Self-Certification. This is a signed certification by the individual seeking assistance describing how they meet the definition accompanied with the intake worker's documentation of the living situation and the steps taken to obtain evidence to support this. (A minimum of 5 must be made, and documented, to entities that could provide third-party verification).

Projects are capped at the number of households that can self-certify. A household's documentation packet is considered complete when it verifies disability and third-party verification for at least 9 months of the household's time homeless. 75% of the project's households must have complete documentation packets on file. 25% of the project's households may self-certify all of their time homeless.

REFERENCES

24 CFR 578 HEARTH Act (amending McKinney-Vento Act) and all subsequent amendments

U.S. Department of Housing and Urban Development Notice CPD 16-11: Prioritizing Persons Experiencing Chronic Homeless and Other Vulnerable Homeless Persons in Permanent Supportive Housing.

U.S. Department of Housing and Urban Development Notice CPD 17-01: Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System

Appendix E

People, Communities, and Homes Investment Plan

P-CHIP

People, Communities, and Homes Investment Plan

Investing in Tucson's Infrastructure of Opportunity.

Housing and Community Development

Adopted by the Tucson Mayor and City Council on January 20, 2021. Resolution No. 23292

Letter from Director Liz Morales

So much about the past year has signaled to us that we need to make big changes – as people, as a city, as a society. Injustice, vulnerability, and inequity take many forms and pervade everything we do, from the way we provide education and health care, to the way we enforce laws, to the way we ensure that everyone's most basic needs are met.

We aim to do better.

Tucson's rental eviction and poverty rates surpass both state and national averages, remaining persistently high over time. Patterns of housing segregation and historic disinvestment in communities of color continue to leave certain neighborhoods more vulnerable to economic and environmental crises and prevent equitable access to opportunity. Rising housing costs and finite funding for affordable housing limit our community's ability to keep up with the demand for quality housing for low-income households. There remains a great deal of work to do. To get where we need to go, we envision an "infrastructure of opportunity" that is as well-defined and well-supported as the water lines and roads that we rely on every day; that clearly identifies the gaps that prevent everyone in Tucson from realizing their full potential and happiness.

In this plan, we begin to define what such an infrastructure could look like for Tucson in the long term, while recognizing that we have an immediate obligation to aid recovery from the ongoing COVID-19 pandemic in the short term.

In the long term, we aim for a deeply integrated and comprehensive continuum of services, focused particularly on prevention and diversion of crises rather than intervening only after vulnerable residents have fallen off an emotional, functional, or financial cliff. We aim to truly realize the concept of Housing First, ensuring that our neighbors have safe shelter before all else, as a bridge to stability and success. We aim to optimize the programs we have while building toward those that we need, with an eye toward correcting systemic inequities. We aim to create a clear understanding of where we need

to go as well as a multi-year path to get there. This People, Communities, and Homes Investment Plan (P-CHIP) is just the first step.

The funding sources included in this plan comprise some of the best tools the City of Tucson has to directly impact the immediate needs of low-income Tucsonans. The funds will support and guide the vital work of community-based service and housing providers, while also leveraging communitywide resources toward long-term solutions. The priorities reflected here are drawn from multiple community plans, from comments received during the City's participatory budgeting process, and from plan-specific feedback received during the fall of 2020. P-CHIP is further intended to compliment the City's equity-oriented efforts, such as the Climate Action Plan and Community Safety Pilot Project.

We will use the information here to structure our calls for funding proposals in 2021 and to guide our processes for future funding cycles. Through the P-CHIP, the City of Tucson's Department of Housing and Community Development seeks to provide greater transparency and pursue deeper partnerships with Tucson's residents, neighborhoods, and service providers. Thank you for your ongoing partnership.

Sincerely,

Liz Morales, Director

City of Tucson Housing and Community Development Department

People, Communities, and Homes Investment Plan (P-CHIP)

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SECTION 1:

PLAN DEVELOPMENT

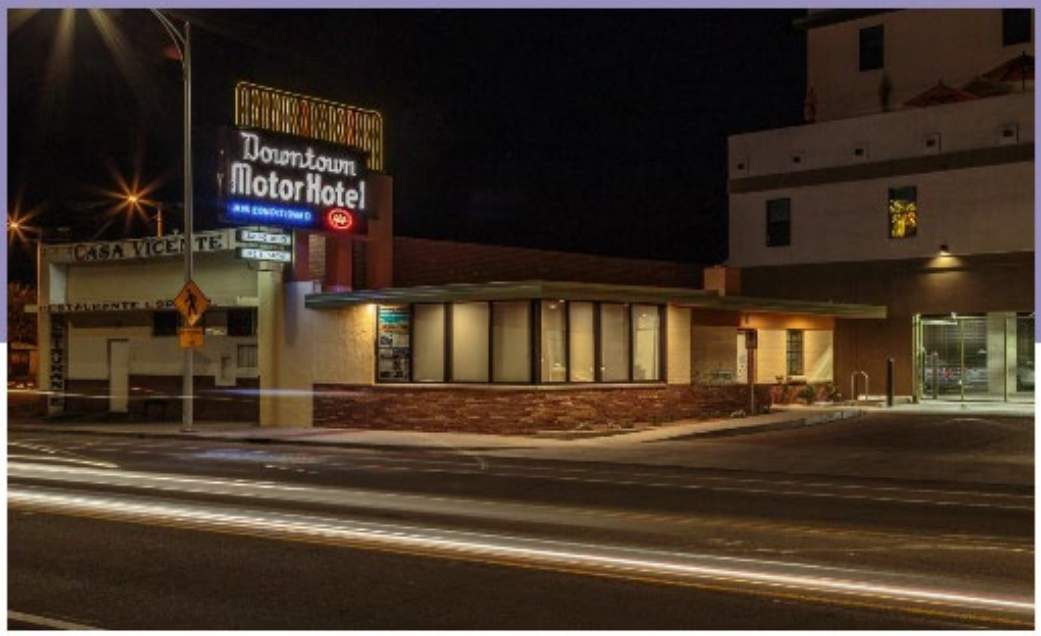

Photo Credit: Compass Affordable Housing

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The People, Communities, and Homes Investment Plan or P-CHIP, replacing the 2017 Human Services Plan, was developed to serve as a foundation for Housing and Community Development department (HCD) programs and funding allocations for the next five years. It is meant to provide the starting point, offer direction and scope, and create a framework for decision making. It is the intent and expectation that this foundation will be built on over time; setting a guidepost while offering flexibility and space for changing priorities and changing needs.

The plan was developed with these objectives:

- Organize the priorities of the Tucson Mayor & Council into actionable items
- Increase the level of transparency in the planning and funding allocation processes
- Provide greater clarity and accountability on plan implementation
- Facilitate public outreach
- Focus on social equity while developing all aspects of the plan
- Be data driven and tie together various data gathering efforts

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METHODOLOGY

HCD department staff researched current local plans and efforts that supported the objectives of the People, Communities, and Housing Investment Plan (P-CHIP). Staff summarized these supporting plans and their related data collection and research efforts to identify the key challenges.

As part of P-CHIP development, staff also conducted public outreach, including virtual public meetings and virtual meetings with stakeholders. During this period, two input tools – a survey and a budgeting tool – helped gather important feedback.

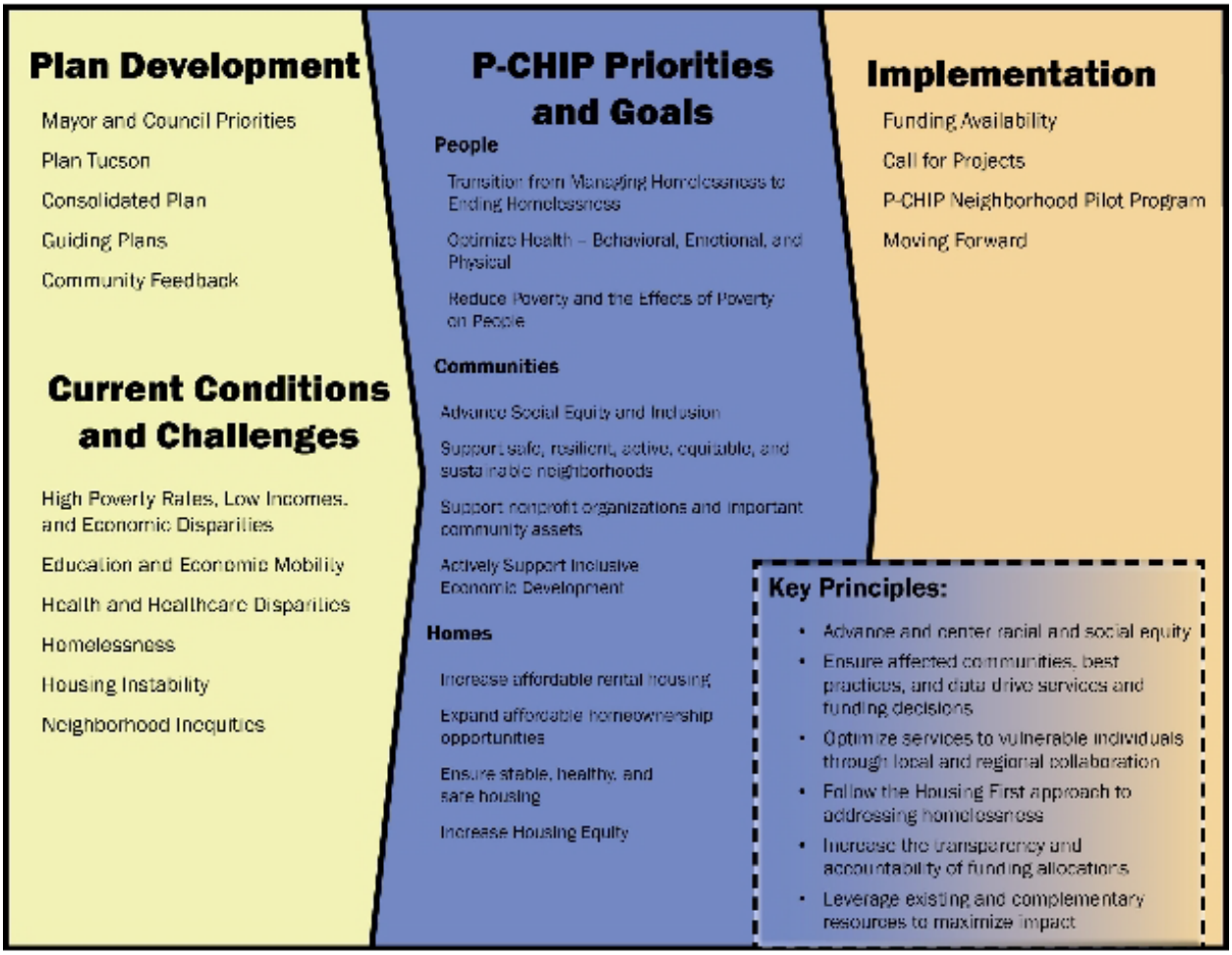
The plan reflects this research and the information gathered through the public outreach efforts. These "inputs" are the foundation on which the funding priority framework ("P-CHIP Priorities and Goals") was built. The P-CHIP Priority and Goals will be used to guide funding allocations and the implementation of the plan.

The next section gives a richer look at both the "inputs," including the public feedback received.

Housing and Community Development Department Courtyard

PLAN OVERVIEW

The graphic below summarizes the different sections of the plan:



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RESEARCH AND PUBLIC ENGAGEMENT

Existing outreach efforts and new research were conducted and compiled to arrive at what Current Conditions and Challenges (next section) will be addressed in P-CHIP. These efforts and research are referred to as Inputs and Outreach.

Guiding Sources

Staff relied heavily on guidance, initiatives, and previous research of related local plans. These local plans, along with the input received through public outreach, informed the primary challenges the P-CHIP focuses on along with the P-CHIP Priorities and Goals.

- **Mayor & Council Priorities - City of Tucson**
  In January 2020, the Mayor and Tucson City Council conducted its annual retreat to set policy direction and identify key priorities for the City of Tucson. From this retreat came a list of initiatives for Housing and Community Development to address (see Appendix A). Several Mayor and Council priorities relate to the P-CHIP, including reducing evictions, preventing displacement, and a focus on a "Housing First" approach to end homelessness.

- **Plan Tucson – City of Tucson General & Sustainability Plan**
  The City of Tucson General & Sustainability Plan, Plan Tucson, guides city policies, including the development and growth of the city. The P-CHIP Priorities and Goals closely align with these chapters of Plan Tucson: Social Environment (Housing, Parks & Recreation, Public Health); Economic Environment (Jobs & Workforce Development); and Built Environment (Land Use, Transportation & Urban Design). The P-CHIP will inform the next update of Plan Tucson, which will begin in the next few years.

- **2020-2024 HUD Consolidated Plan – City of Tucson – Pima County Consortium**
  The five-year, federally required Housing and Urban Development (HUD) Consolidated Plan (Con Plan) uses data gathering and analysis and public discussion to create goals for anticipated federal funding. Every year, an Annual Action Plan, which supports the goals laid out in the Con Plan, is created to identify projects that will meet those established goals. The federal funding source programs outlined in the Con Plan that are included in the P-CHIP are Community Development Block Grants (CDBG), Emergency Solutions Grants (ESG), Housing Opportunities for Persons With AIDS (HOPWA), and HOME Investment Partnership (HOME). The P-CHIP therefore needs to be consistent with the general goals and funding allocations established through the Con Plan.

The Con Plan is created in partnership with Pima County. HCD works closely with Pima County to ensure resources are spent efficiently. However, each jurisdiction gets their own separate funding allocations. The P-CHIP plan focuses on the City of Tucson priorities and funding.

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GUIDING PLANS

The development of the P-CHIP was informed and guided by multiple community plans. Some of these were created within the City of Tucson, some from community partners, and some as a joint effort between the City and local service agencies. These Guiding Plans are listed below. For more detailed information about each of the plans, including how they relate to the P-CHIP and where they can be accessed, see Appendix B.

Plan	Source
Community Data Report and Update on Homelessness in Pima County, Arizona	Tucson Pima Collaboration to End Homelessness
Coordinated Community Plan to Prevent & End Youth Homelessness	Tucson Pima Collaboration to End Homelessness
Scaling Smart Resources, Doing What Works: A System-level Path to Producing Supportive Housing in Tucson and Pima County. TPCH Gaps Analysis	Tucson Pima Collaboration to End Homelessness
Age-Friendly Tucson	City of Tucson with support from Pima Council on Aging, ELDER Alliance, and AARP Arizona
Aging in Pima County; A Report to the Community	Pima Council on Aging
Comprehensive Economic Development Strategy	City of Tucson, Office of Economic Development
Pima Community Health Assessment	Pima County Health Department, Area Stakeholder Planning Committee
Housing Market Study	Economic and Business Research Center at the University of Arizona, The City of Tucson, Pima County
Pedestrian Safety Action Plan	City of Tucson Department of Transportation and Mobility
Analysis of Opportunity in the Tucson Metropolitan Area	Southwest Fair Housing Council
Parks and Recreation System Master Plan	City of Tucson, Parks and Recreation Department

COMMUNITY OUTREACH

Public outreach for the P-CHIP enabled us to receive feedback from community stakeholders about key challenges and priorities. This consisted of the following:

Website: p-chip.tucsonaz.gov

The website includes background and details on the plan, a Story Map to highlight previously funded activities, and information on ways to get involved. Moving forward, the P-CHIP website will include progress reports and performance monitoring.

Virtual Public and Stakeholder Meetings

Meetings took place from October 2020 – January 2021. Due to the COVID-19 pandemic, all meetings were held virtually. Four meetings were conducted with the public, one meeting with human service agencies, one meeting with affordable housing developers, and one public meeting conducted in Spanish.

Image from Virtual Public and Stakeholder Meetings

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The general topics that arose from these discussions included:

- Timeline, process, and participation in P-CHIP development and funding deployment
- The impacts of COVID on services and stability – particularly on stability and vulnerability in housing and in access to education
- Topics related to affordable housing: historic and current practices of discrimination in housing; financing; the need for innovation and outside-the-box solutions and thinking; funding mechanisms for housing (including the Low-Income Housing Tax Credit, HOME, vouchers, etc.)
- The need to address past and current inequities in service provision, access to housing, etc. through outreach to underserved communities, remedying barriers to housing, and other means
- Improved use of data to understand challenges (such as assessing affordable housing stock) and monitor impacts
- Particular challenges for older adults, including access to housing, health care, and transportation
- Disparities in access to the internet and computers
- The balance between funding core services and funding emerging needs
- Interest in the P-CHIP Neighborhood Pilot Program and working closely with neighborhoods to drive decision making

Further details of these discussions are summarized in Appendix C.

Survey

Community outreach efforts also included an online survey to gather feedback on priorities and populations most important to respondents. Nearly 400 respondents completed the survey. See the Community Engagement Appendix (Appendix C) for a detailed analysis on the survey responses. Key findings are summarized below.

Tucson's top five challenges:

1. Lack of affordable or attainable housing options
2. Inequitable access to services and community resources, including education
3. Poverty
4. Homelessness
5. Lack of safe, connected, convenient transportation options for all

Respondents generally indicated that COVID-19 pandemic has had the following impacts:

- COVID-19 has exacerbated Tucson's key challenges
- Access to good healthcare is more important than ever
- More support for small businesses is needed given the impact the pandemic has had
- COVID-19 has spotlighted disparities

P-CHIP Funding Priorities

The survey also enabled respondents to provide open-ended suggestions for the most important solutions and programs to address the challenges. Over 1,000 individual responses were provided on projects, programs, or ideas that the City of Tucson should consider funding. The top five categories of responses (and the number of related suggestions) were:

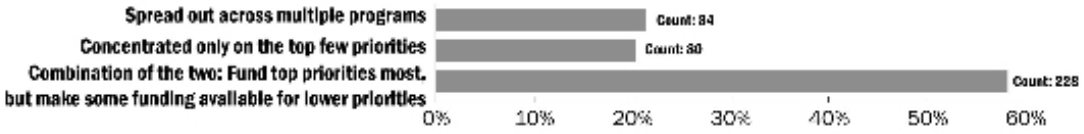
Top five categories of responses for P-CHIP Funding Priorities:

1. Affordable Housing: 177
2. Homeless Services: 107
3. Education/Training: 97
4. Transportation and Mobility: 94
5. Health (behavioral health, access to care, etc.): 94

Examples of some of the thoughtful suggestions we received are distributed through this plan. These ideas will be considered in more detail as we review projects for funding and support.

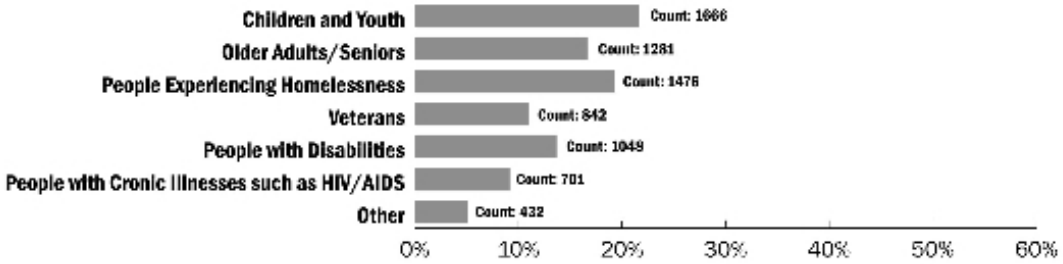
Funding Distribution

Other survey questions pertained to funding distribution. Respondents indicated a desire to concentrate most of the funding on a few key priorities, with a smaller amount made available to lower-priority programs if appropriate.



Target Populations

Respondents also targeted children and youth, people experiencing homelessness, and seniors as priority populations for funding.



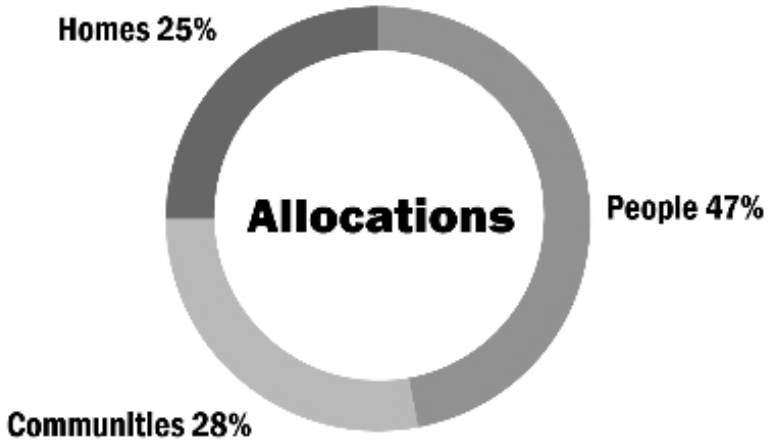
Budgeting Tool

Finally, our outreach efforts included an interactive budgeting tool that allowed respondents to allocate funds, on a percentage basis, to a variety of potential P-CHIP projects. Over 150 participants completed the budget tool. Below shows a breakdown of the responses received.

Key Takeaways from the Budget Tool:

Across all categories of People, Communities, and Homes, priority allocation was fairly evenly spread; no one potential P-CHIP project received more than 7% of total allocations.

Within the individual categories of People, Communities, and Homes, there were clear projects that received higher allocation (see next page).



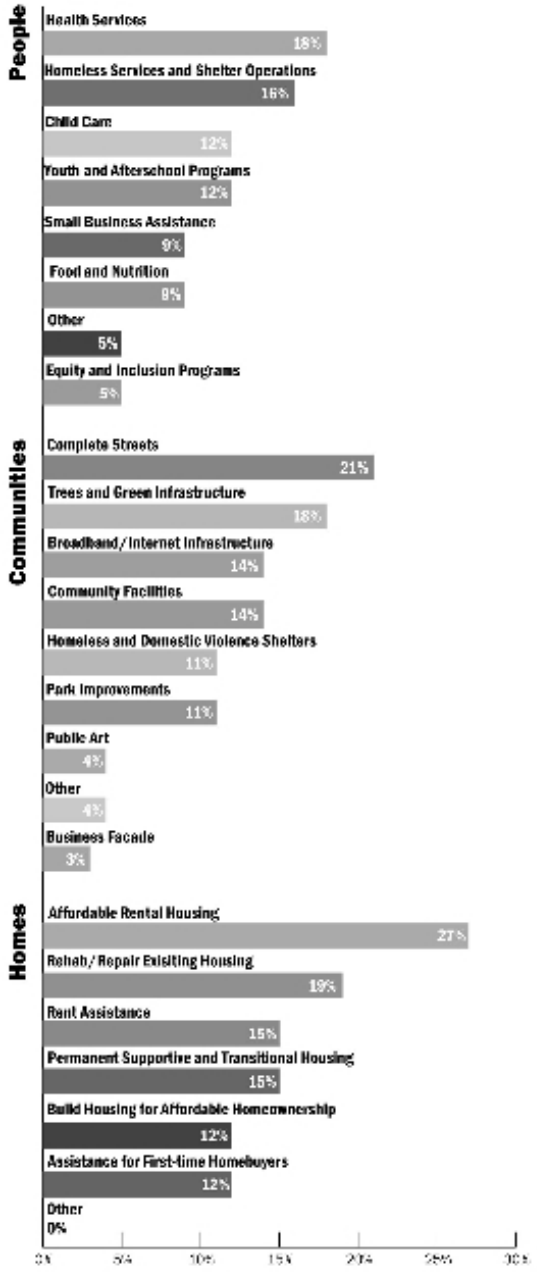
Focus Area Allocation

Funding Distribution within the Focus Areas

Twenty-two potential projects were presented in the budget tool. Respondents were asked to allocate a total of 100% funding across all categories (People, Communities, Homes). This means for example, they could have allocated 50% of the funding to Child Care and another 50% to Health Services (both within People). Conversely, they could have allocated 10% of the funding to 10 different projects within all three of the category areas.

The following graphs show the budget allocation breakdown within each individual Focus Area (People, Communities, Homes).

Funding Distribution Within Each Individual Focus Area



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SECTION 2:

CURRENT CONDITIONS AND CHALLENGES

Photo Credit: Joel Muniz on UnSplash

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The following section outlines some of Tucson's greatest challenges identified through multiple sources, such as the U.S. Census Bureau, and data and planning efforts commissioned by the City of Tucson, Pima County, Tucson Pima Collaboration to end Homelessness, Pima Council on Aging, the Southwest Fair Housing Council, Mayor and Tucson City Council, and the University of Arizona.

The challenges fall within six main areas of concern:

1. High Poverty Rates, Low Incomes, and Economic Disparities
2. Education and Economic Mobility
3. Health and Healthcare Disparities
4. Homelessness
5. Housing Instability
6. Neighborhood Inequities

Each challenge area addressed takes a detailed examination across varying demographic characteristics to help evaluate the populations most affected by these challenges and inform solutions. The demographic analysis includes information on race and ethnicity, age, gender, and residential neighborhoods to highlight disparities across groups.

Before discussing each challenge, an overview of current socioeconomic and demographic data is presented.

TUCSON AT A GLANCE

Population, Growth, and Age

548,082
Total Population (2019)

521,132
Total Population (2010)

217,993
Number of Households (2019)

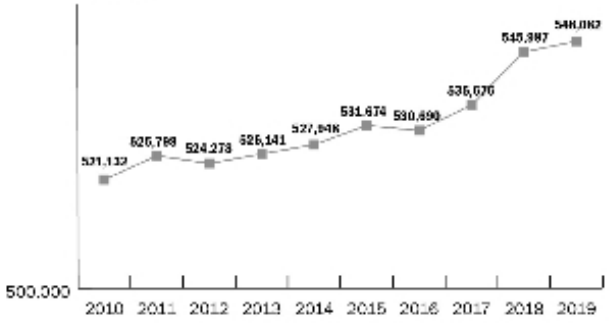
5.2%
Population Percent Change 2010-2019

34.5
Median Age

32.8
Median Age 2010

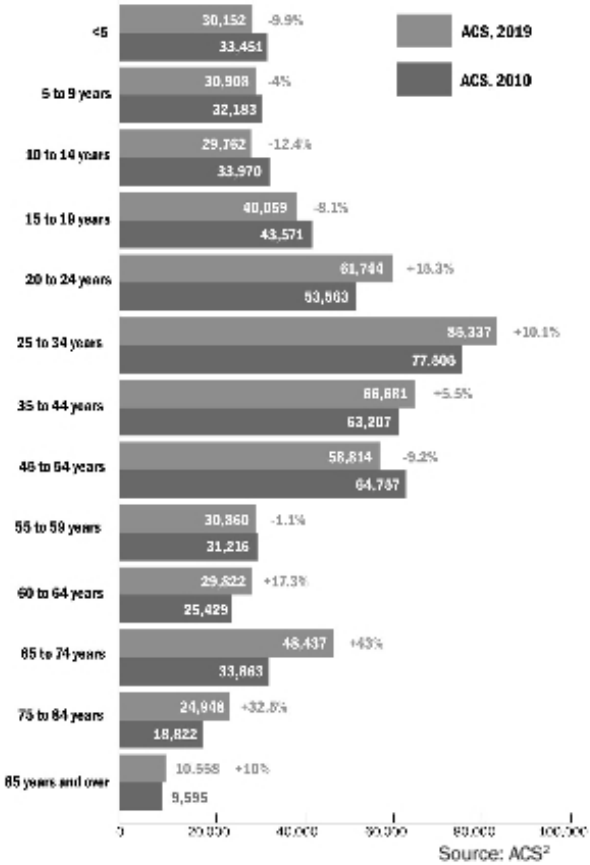
Source: 1-Year American Community Survey (ACS) Estimates

Population Over Time
in Tucson



Source: 1-Year American Community Survey (ACS) Estimates[1]

Population by Age and Change Over Time
in Tucson



Source: ACS[2]

19

TUCSON AT A GLANCE

Workforce and Education

6.3%
Unemployment Rate

7.5%
with an Associates Degree

27.3%
with a Bachelor's degree or higher

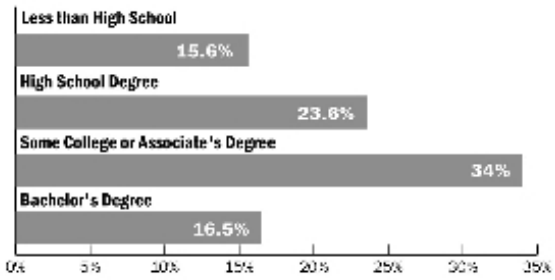
$44,365
Median Household Income

Source: 1-Year American Community Survey (ACS) Estimates

Top Industry Employers
in Tucson

Source: ACS 2015-2019[3]

Educational Attainment by Population 25 Years and Older
in Tucson



Source: ACS 2015-2019[4]

20

TUCSON AT A GLANCE

Race and Ethnicity

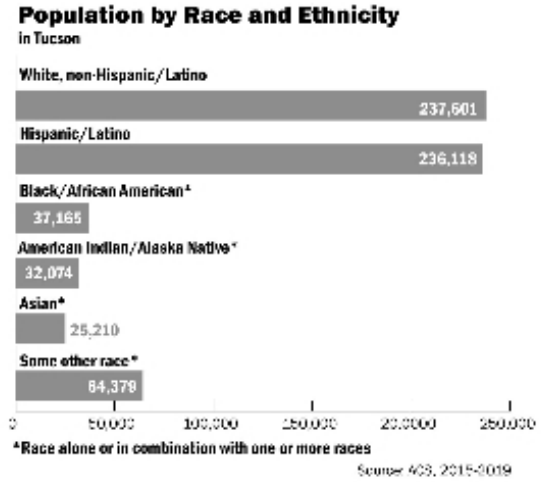
15.3%
Percent born outside the US

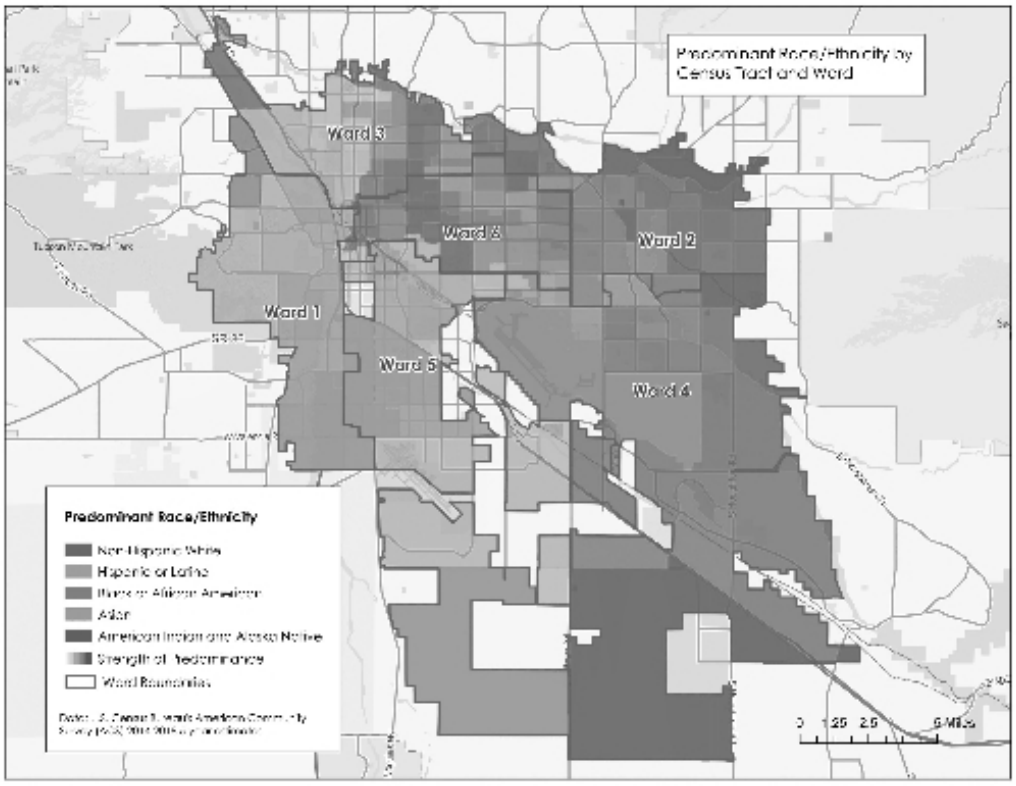
33.5%
speak a lanugage other than English at Home

43.6%
Percent Hispanic or Latino

43.9%
Percent White, non-hispanic

Source: 2019 5-Year American Community Survey (ACS) Estimates



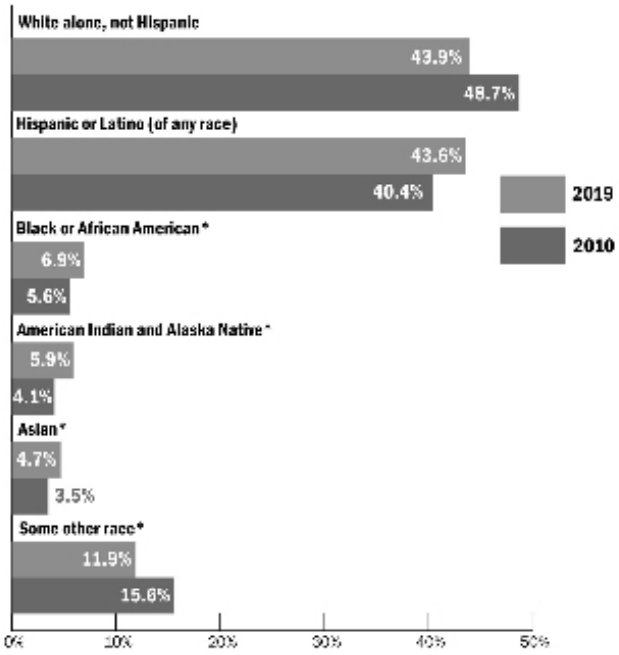


Source: Poverty and Urban Stress Report, 2020[6]

21

TUCSON AT A GLANCE

Race and Ethnicity Over Time



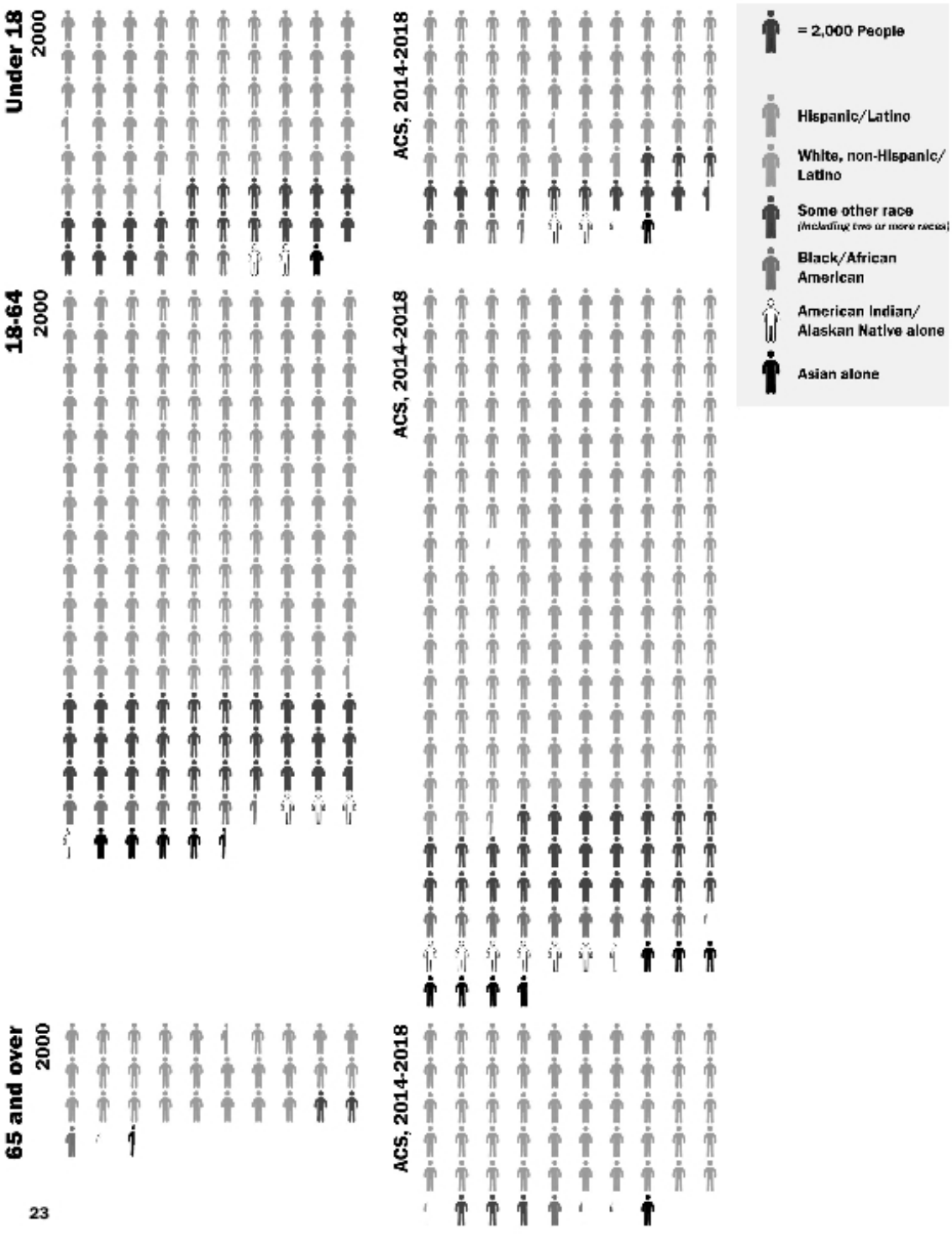
*Race alone or in combination with one or more races

Source: ACS 5-Year Estimates[5]

The racial and ethnic breakdown of Tucson has shifted over the past two decades. The Hispanic and Latino population has increased overall by 34%. Additionally, the proportion of the Tucson population that is Hispanic and Latino is greater now (43%) than it was in 2000 (35.7%). The racial breakdown shows a decrease in white residents and an increase in Black/ African, Native American, and Asian residents.

About Race/Ethnicity Categories:

Throughout this section we are using the language used by the U.S. Census Bureau American Community Survey (ACS). For example, ethnicity in the ACS is categorized as 'Hispanic or Latino' and 'Not Hispanic or Latino' and is reported separately from race. Latino is used to reflect Latino, Latina, and Latinx. Similarly, American Indian is used for Native American or Indigenous. We recognize these are imperfect terms for complex and intersecting identities.


Tucson Demographic Snapshot
Under 18
2000
ACS, 2014-2018
18-64
2000
ACS, 2014-2018
65 and over
2000
ACS, 2014-2018
= 2,000 People
Hispanic/Latino
White, non-Hispanic/ Latino
Some other race
Black/African American
American Indian/ Alaskan Native alone
Asian alone
23

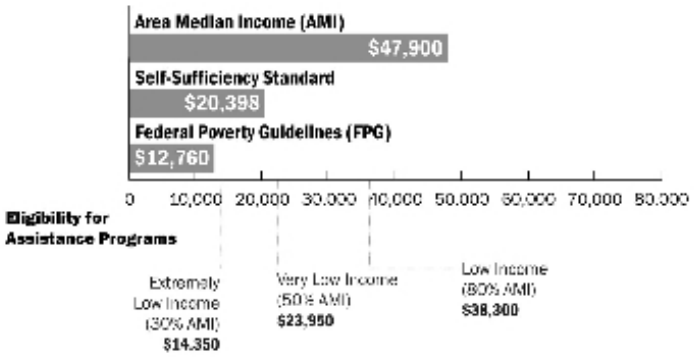
HOW DO YOU DEFINE "LOW-INCOME"?

Depends on who you ask...

There are a few different standard measurements of income used for determining funding eligibility for certain programs. While these measures can give us a big picture snapshot, they are an imperfect means of understanding the tough decisions households face to make ends meet. The following are standards that are used throughout this report:

- **Area Median Income (AMI)** - The U.S. Department of Housing and Urban Development (HUD) establishes income limits for program eligibility based on Area Median Income. HUD uses the five-year estimates of the American Community Survey – a national sample survey similar to the Census – to measure income.[7] Low-income is typically considered at or below 80% AMI.
- **Self-Sufficiency Standard** - A project of the Center for Women's Welfare (CWW), the Self-Sufficiency Standard is the budget-based measure of the real cost of living and an alternative to the official poverty measure. The Self-Sufficiency Standard is an estimate of the amount of income required for working families to meet basic needs at a minimally adequate level, taking into account family composition, age of children, and geographical differences.[8]
- **Federal Poverty Guideline** - A simplified version of the federal poverty thresholds used by the Department of Health and Human Services (HHS) to financial eligibility for certain federal programs.[9]

1 Person Household



Average Monthly Costs for 1 Person Household

Housing $642

Child Care $0

Food $243

Transportation $314

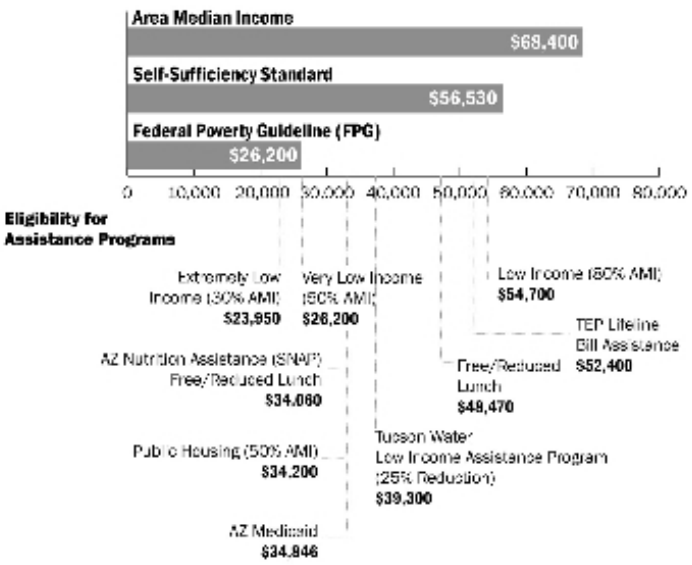
Health Care $128

Miscellaneous $133

Total $1,460

24

4 Person Household



Average Monthly Cost for a 4 Person Household*

Housing $854

Child Care $1,332

Food $749

Transportation $612

Health Care $466

Miscellaneous $398

Taxes $766

Total $5,177

**Two adults, one preschooler, one school age*

Source: 2020 Self Sufficiency Standards, Center for Women's Welfare[10]

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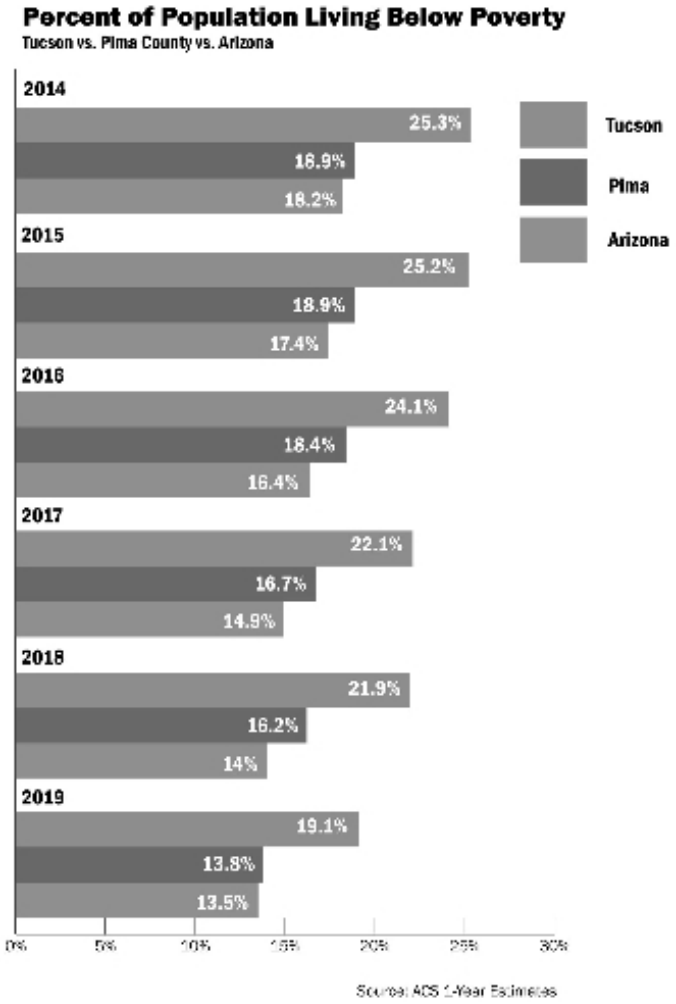
CHALLENGE: HIGH POVERTY RATES, LOW INCOMES, AND ECONOMIC DISPARITIES

One of the major challenges facing Tucson is persistent high rates of poverty, which are considerably higher than both Pima County and Arizona.

Between 2015 and 2019, Tucson's median household income was $44,365, compared to $56,169 across Pima County, and $62,055 statewide.[11]



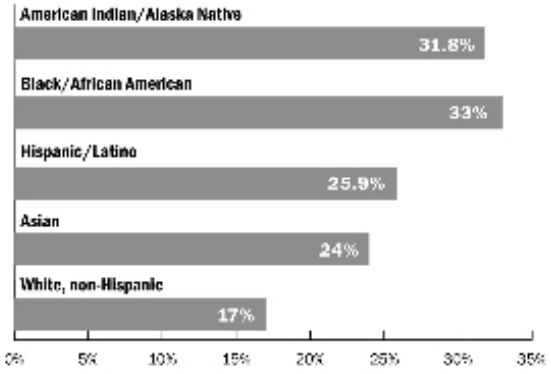
Economic Disparities

Poverty does not affect our community equally and exposes economic disparities, or differences between racial and ethnic populations, gender and household compositions, age groups, and neighborhoods within the city.

American Indians, Blacks or African Americans, and people who identify as two or more races in Tucson experience poverty at rates nearly **twice** as high as those who are white.[6]

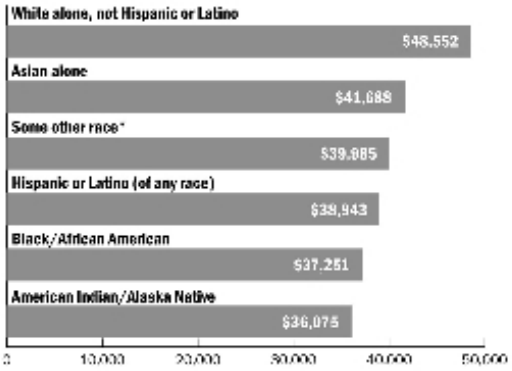
Poverty and Income by Race

Percent of the Population Living Below Poverty Level by Race and Ethnicity
In Tucson



Source: ACS 2015-2019[12]

Median Income by Race and Ethnicity in the Past 12 Months
In Tucson



Source: ACS 2015-2019[13]

Additional Poverty and Income Disparities

Median earnings for men are $39,560 annually, and the median earnings for women are $34,663; translating to men earning approximately $1.14 to every $1 a woman earns.

Economic inequality also impacts women and their families. 41.8% of single female-headed households with children were living below the poverty level.[14]

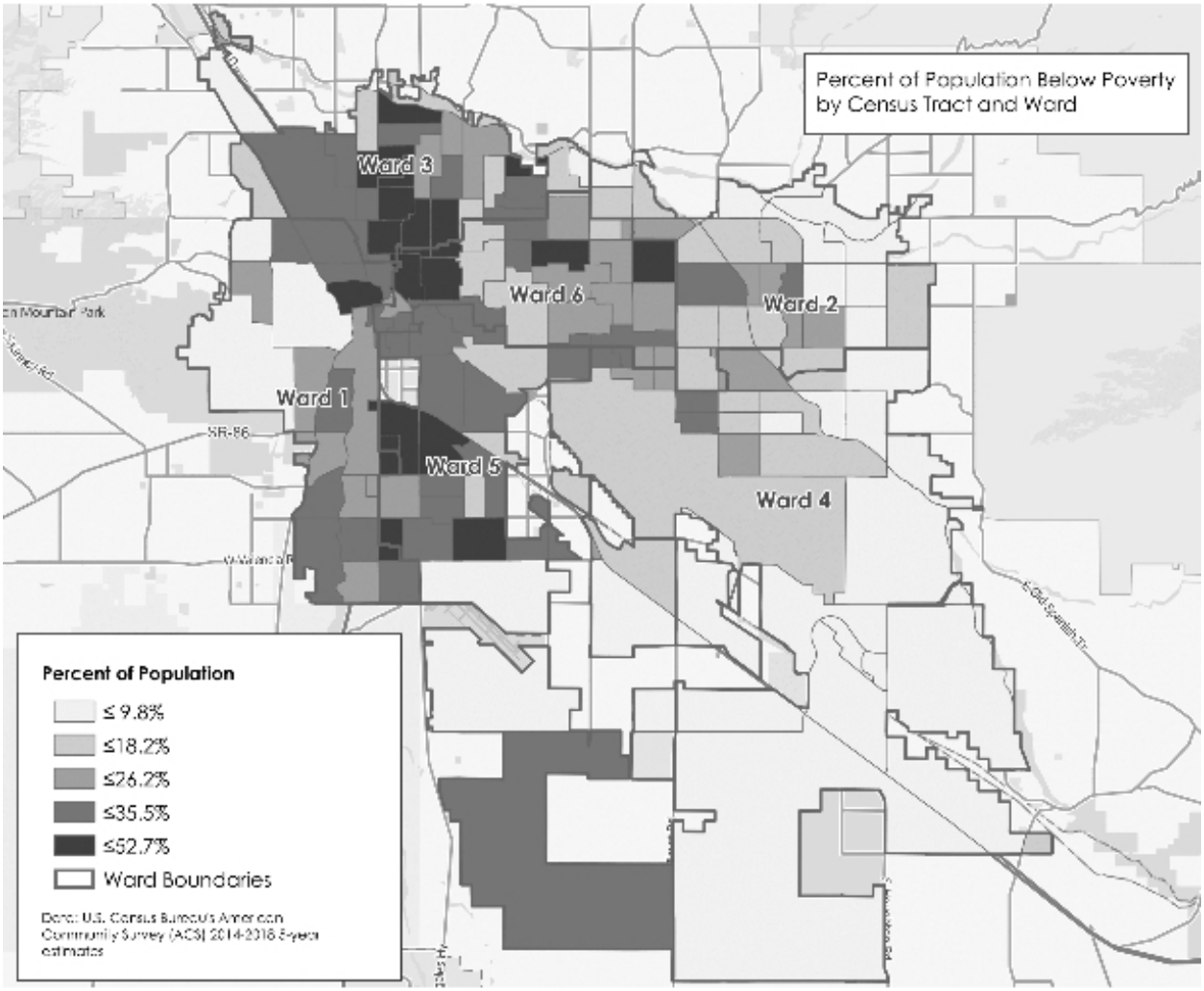
As an age group, children experience the highest rates of poverty in Tucson. 30.5% of all children were living below the poverty level. Older adults age 65 and older experience the lowest rates of poverty (13%). However, that proportion is far above the averages across Arizona (8.6%) and the United States. (12%).[15]

Individuals living with disabilities are disproportionately impacted by poverty. 27.4% of the population with a disability lives below the poverty level, compared to 21.7% of the population with no disability.[16]

Similarly, median income varies across differing racial and ethnic groups. On average, communities of color receive a **lower** median annual income.[7]

Poverty by Tucson Location

The City of Tucson Poverty and Urban Stress Report indicates that while poverty is experienced to some degree across Tucson, the census tracts in which 35% percent or more of the population lives below the federal poverty line tend to be clustered in a north-south band toward the west side of the city, along with a smaller second cluster on either side of Alvernon Way.[17]



Source: the Poverty and Urban Stress Report, 2020[18]

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CHALLENGE: EDUCATION AND ECONOMIC MOBILITY

Not only are poverty rates high and income levels low in Tucson, but there is limited opportunity for economic mobility. In 2019, Pima County received a 47.6 out of 100 on the Opportunity Index, a tool developed to provide a comprehensive snapshot of conditions that can be used to identify and improve access to opportunity. The County's score is lower than Arizona (48.5) and the rest of the United States (53.2).[19]

Research shows that children's lives are shaped by the neighborhoods they grow up in well into adulthood.[20] Economic mobility, or the ability to move from low income to higher incomes, relies on equitable access to educational and job opportunities, among other factors of neighborhood and community health discussed in this plan. The information presented in this Challenge area reflect city and county-wide data, but it's important to note here that the issues are compounded geographically as discussed in the Neighborhood Inequities Challenge.

Education

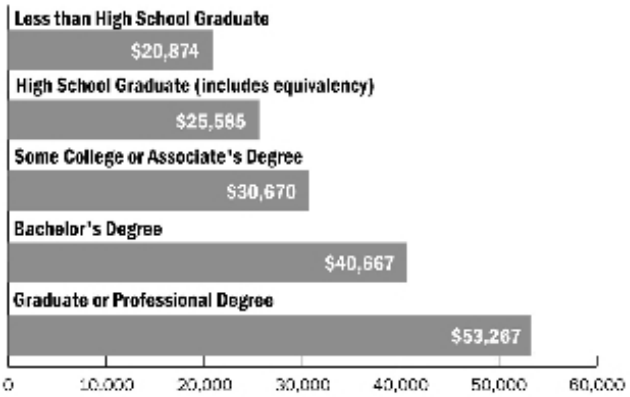
The Opportunity Index provides a broad picture of opportunity that goes beyond just economics and examines the opportunity to access quality education – including metrics like children in preschool, on-time high school graduation rate, and post-secondary education rate. Pima County scored below the state and the nation for education on the Opportunity Index, receiving 45.1, compared to 47.0 statewide and 56.1 nationwide.[21]

Education and Income

Educational attainment, the amount of education a person has, has a major and direct correlation to median income, with each additional level of education resulting in a subsequent and expected increase in income.

Tucsonans with a bachelor's degree earn on average $40,000 annually, which is **63%** more than those with a high school diploma.[22]

Median Earnings by Educational Attainment for the Population 25 Years and Over
In Tucson

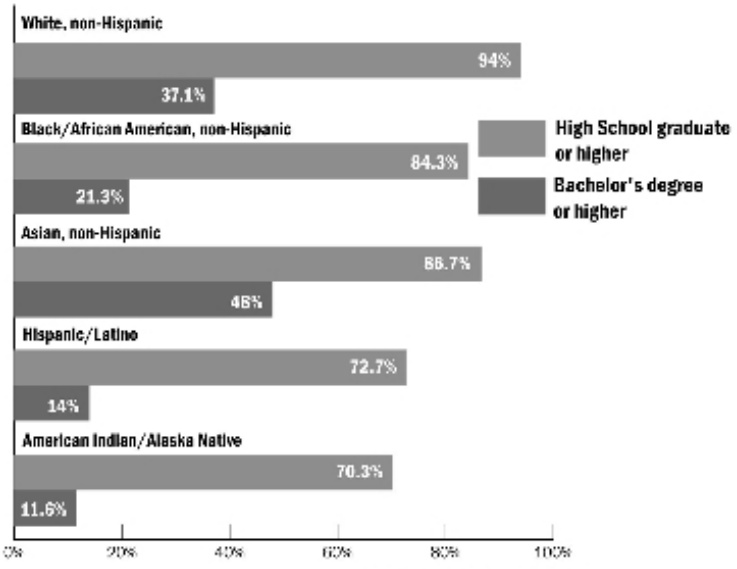


Source: ACS 2015-2019[23]

Education and Race/Ethnicity

Between 2015 and 2019, 85% of the population 25 years and older obtained a high school degree or higher, 34% had some college education or obtained an Associate's degree, and 27.4% obtained a bachelor's degree or higher.[24] However, educational attainment is not proportionate among racial and ethnic groups, contributing to lower incomes among those groups.

Educational Attainment by Race and Ethnicity
In Tucson



Source: ACS 2015-2019[25]

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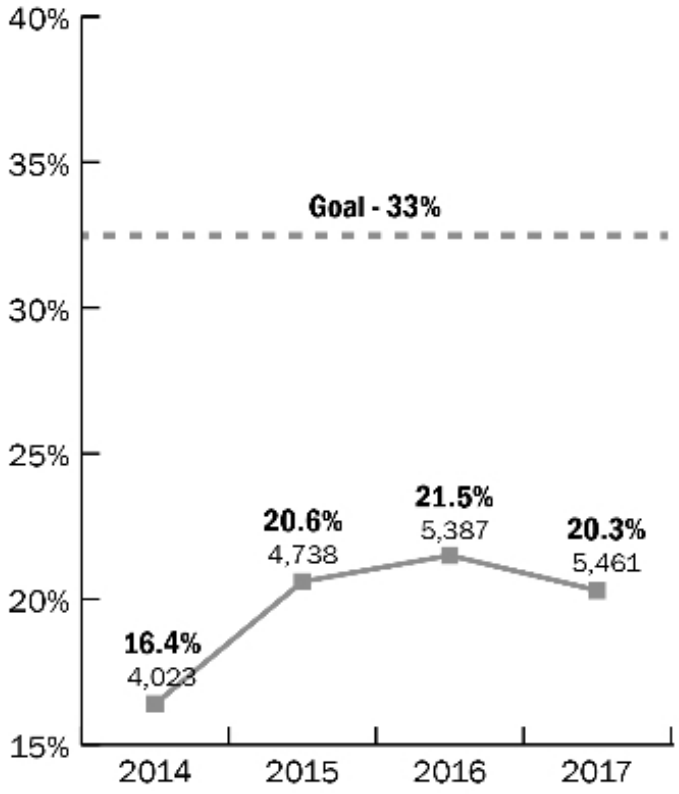
Early Childhood Education

Quality early education childhood programs and K-12 learning lay the important groundwork for future educational attainment and economic opportunity. The Cradle to Career Partnership (C2C), a local network of public, private, and non-profit organizations working together with a mission to, "prepare every child for success in school and life, ensuring the economic vitality of our community," tracks data on eight core outcomes to evaluate how the Pima County region is doing in preparing children for success.

C2C reports that in 2017, **5,461** out of **26,872** 3-to-4-year-olds were enrolled in high-quality early education programs which is **20%**. The goal is to reach **33%**.[26]

Number of 3- and 4-Year-Olds in High-Quality Early Education Childhood Programs



Source: Cradle to Career Partnership[27]

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Digital Divide

Access to the internet is an important consideration for primary education students. The COVID-19 pandemic resulted in a rapid transition to exclusively online learning and access to broadband internet has become a crucial resource for education. According to 2019 ACS data, 16.2% of all Tucson households do not have an internet subscription of any kind, while an additional 14.1% have a cellular data plan with no other type of internet subscription. This means that nearly one-third of households before the pandemic did not have a connection that could adequately support learning or working remotely.[28]

The COVID 19 pandemic has also highlighted the digital divide for older adults where technology has become increasingly important to access services and connect with loved ones. According to the Pew Research Center, "internet and broadband use drop off around age 75." For people 65 and older nationwide, only 65% have broadband at home and for the 75 and older population, only 34% have broadband at home. Pew also cites a number of challenges older adults face when using technology, including physical challenges, skepticism around technology, and the ability to learn how to use technology effectively.[29]

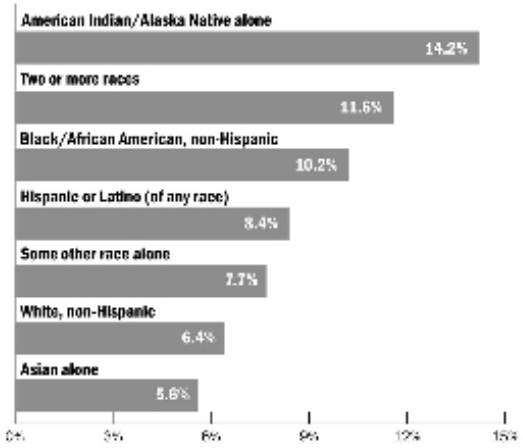
30.3% of Tucson households in 2019 did not have internet access at home beyond a cellular data plan.

Businesses and Employment

The Opportunity Index also looks at economic health. Pima County trails behind the state in the economy score which considers indicators such as unemployment, median income, and number of people below the poverty line, as well as the availability of banking institutions, affordable housing, and subscriptions to broadband internet. Tucson's unemployment rate and business demographics continue to show disparities in economic opportunities along racial, ethnic, and gender lines.

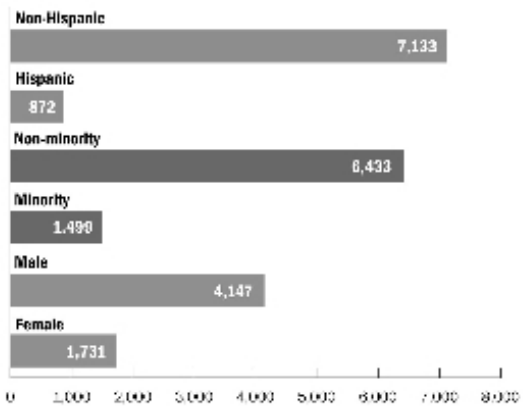
The unemployment rate for Black/African Americans is almost **twice** as high as white persons, while the rate for Native Americans/American Indians is almost **three times** as high.

Unemployment Rate by Race and Ethnicity
In Tucson



Source: ACS 2015-2019[30]

Business Owner Demographics
In Tucson



Source: Annual Business Survey, 2017[31]

CHALLENGE: HEALTH AND HEALTHCARE DISPARITIES

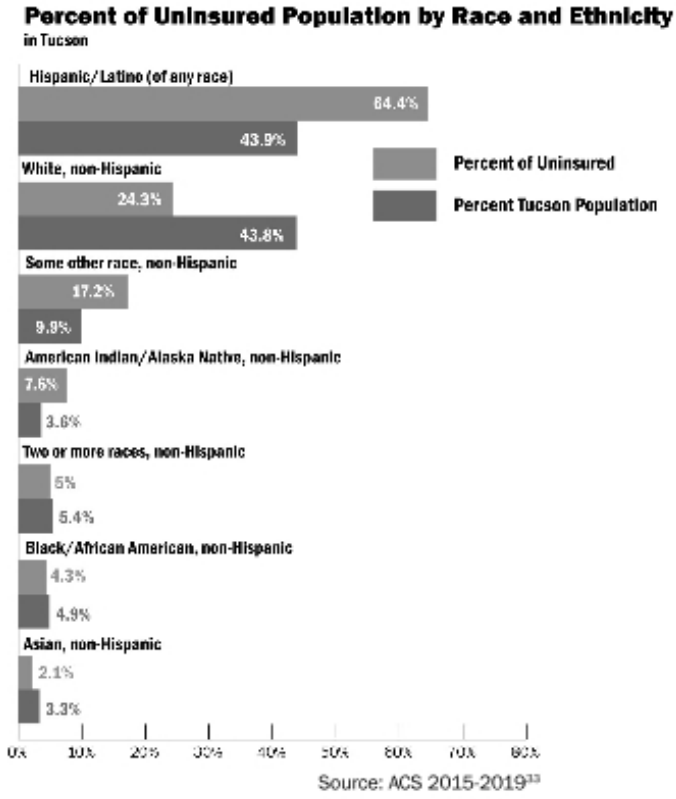
"Health starts in our homes, schools, workplaces, neighborhoods, and communities."[32] The Social Determinants of Health (SDOH), as advanced by organizations like the World Health Organization (WHO) and Centers of Disease Control (CDC), outline a growing understanding that a variety of economic and social conditions influence individuals' health. The SDOH outline five domain areas that affect health. For a more detailed description of all five domains, see the P-CHIP Priorities and Goals section.

This Health and Healthcare Disparities challenge focuses on one of the SDOH domains: "Healthcare Access and Quality"- the connection between people's access to and understanding of health services and their own health; access to healthcare, access to primary healthcare, health insurance coverage, and health literacy.

Access to Healthcare

Lack of access to healthcare is measured by the percentage of uninsured populations within the community.

64.4% of Tucsonans who are uninsured are Hispanic or Latino.



Source: ACS 2015-2019[33]

35

Uninsured and Income/Poverty

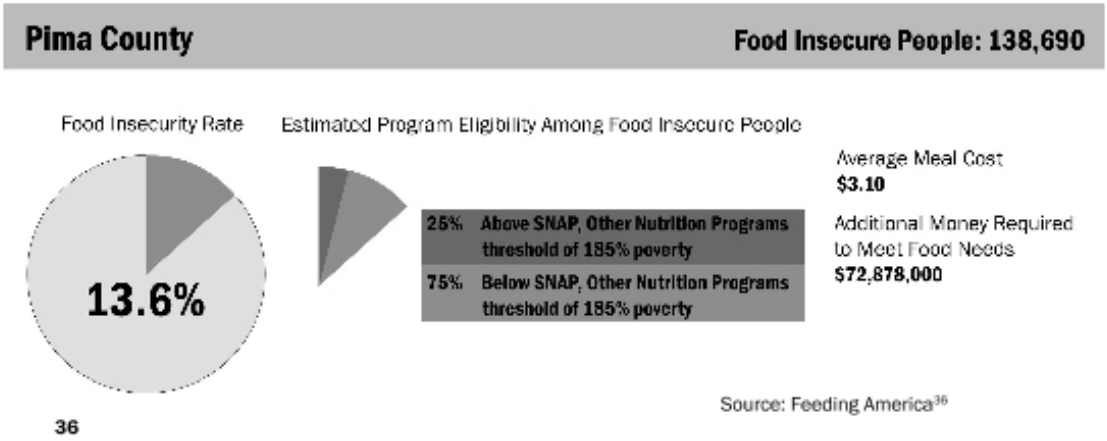
Not having health insurance is especially risky for low-income households and individuals living below the poverty level. In the event of a medical emergency, the cost of an expensive and unexpected medical bill could dramatically increase a household's financial instability, jeopardizing the ability to pay for other basic needs. Similarly, individuals often choose to postpone critical care due to cost. Between 2015 and 2019, 16.1% of households with incomes under $25,000, and 16.8% of the population living below poverty level were uninsured in Tucson.[34]

Healthcare Access for Older Adults

As discussed in the Age Friendly Tucson Action Plan, older adults have specific health care challenges, such as accessing preventative and non-Medicare services like affordable dental, vision, assistive devices, and behavioral health care. There is inadequate funding for home care services and a shortage of home care workers that could help older adults age in place. In a 2016 needs assessment, Pima Council on Aging found that concerns about memory loss, affordable dental care, and access to information about changes in Medicare were all among the top five concerns of survey respondents.

Food Insecurity

In 2017, the Tucson metropolitan area had the fourth-highest rate of food insecurity (13.6%) among other western metropolitan areas. Food insecurity is defined by Feeding America, the nation's largest domestic hunger-relief organization, as a household's inability to provide enough food for every person to live an active, healthy life. Food insecurity can cause a myriad of health problems for children, from declines in overall health to birth defects. Studies have shown that decreased nutrient intake can cause increased rates of mental health problems and depression, diabetes, hypertension, and poor health and sleep outcomes in adults.[35]



Food Assistance Programs

The Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps) and other nutrition programs like WIC (Special Supplemental Nutrition Program for Women, Infants, and Children) provide a critical line of defense against food insecurity. While Feeding America estimates that about 25% of Pima County households are eligible for SNAP, only about 13% are enrolled.

In 2015, only **26.3%** of Pima County residents reported eating the recommended amounts of fruits and vegetables.[37]

The Older Americans Act provides food supportive services that allow older adults to remain in their homes. Local organizations such as Pima Council on Aging provide mobile food delivery.

Behavioral Health and Substance Abuse

Behavioral health and substance abuse are conditions that extend beyond the user and affect their families and communities. Concerns are prevalent in specific vulnerable populations that experience high levels of stress, such as individuals within the LGBTQ+ community, veterans, previously incarcerated populations, refugees, undocumented immigrants, people experiencing homelessness. Providing adequate behavioral health supports among these populations and the general population is critical.

Alcohol-use disorders are the most common substance-use disorder, affecting 80,600 residents, and are the second-highest cause of morbidity in Pima County. Moreover, between 2012 to 2016, 32% of driving deaths were due to alcohol impairment, for a total of 496 deaths. Opium use is the fourth leading cause of morbidity in Pima County. Drug-induced death rates, including those due to opioid, heroin, and pharmaceutical use, are statistically higher in Pima County than Arizona overall.[39] The Pima County Medical Examiner reports that overdose deaths increased 52% overall from 2010 (222) to 2019 (337).[40]

Behavioral health disorders are among the most common causes of disability and can inhibit a person's ability to maintain good physical and emotional health. In Pima County, an estimated **52,000** residents have a serious mental illness.[38]

In Pima County, **98,800** residents have a substance-use disorder.

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Chronic Illnesses

The Pima County Health Department conducted a Community Health Needs Assessment for the county. Cancer and heart disease continue to be the two leading causes of death among Pima County residents. Heart disease surpassed cancer as the leading cause of death in Pima County, with 170.6 deaths per 100,000 people. The death rate for cancer is higher than the state of Arizona's rate of 142.2 per 100,000.[41]

Many people living with HIV/AIDS are low-income and most live in single or two-person households. The Southern Arizona AIDS Foundation (SAAF) estimates that there is a need for at least 195 additional units of tenant-based rental assistance for persons living with HIV/AIDS, and for approximately 83 units of transitional housing assistance to provide an intermediate level of support between short-term rent and utility assistance and permanent supportive housing units, with the assistance of case management and supportive services.[42]

There were an estimated **155** deaths from cancer per **100,000** population in 2016 in Pima County.

There are **2,963** people living with HIV/AIDS in Pima County.

CHALLENGE: HOMELESSNESS

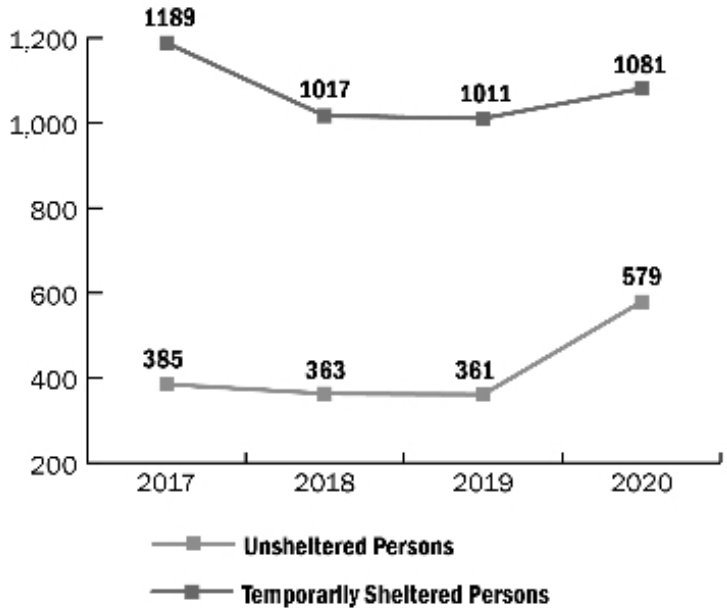
Homelessness is one of Tucson's most visible challenges. Yet service needs, outcomes, and access to housing resources vary across different populations, calling for unique and targeted approaches.

Rising Homelessness

After recording small decreases in the number of people experiencing homelessness on a given night from 2017 to 2019, data from Point in Time (PIT) Counts demonstrated a sharp increase from 2019 to 2020 (pre-COVID-19 pandemic). Between 2019 and 2020, unsheltered homelessness increased 60.3%.[43] When considering data reported through the unsheltered Point in Time count, sheltered Point in Time count, and shelter beds not included in the 2020 sheltered Point in Time count, the overall number of people experiencing homelessness on a single given night in Pima County rose by 20.9%, from 1,372 in 2019 to 1,660 in 2020.[44]

Each year at the end of January the **Point in Time Count** is conducted by assessing the number of persons experiencing homelessness over a one-night period.

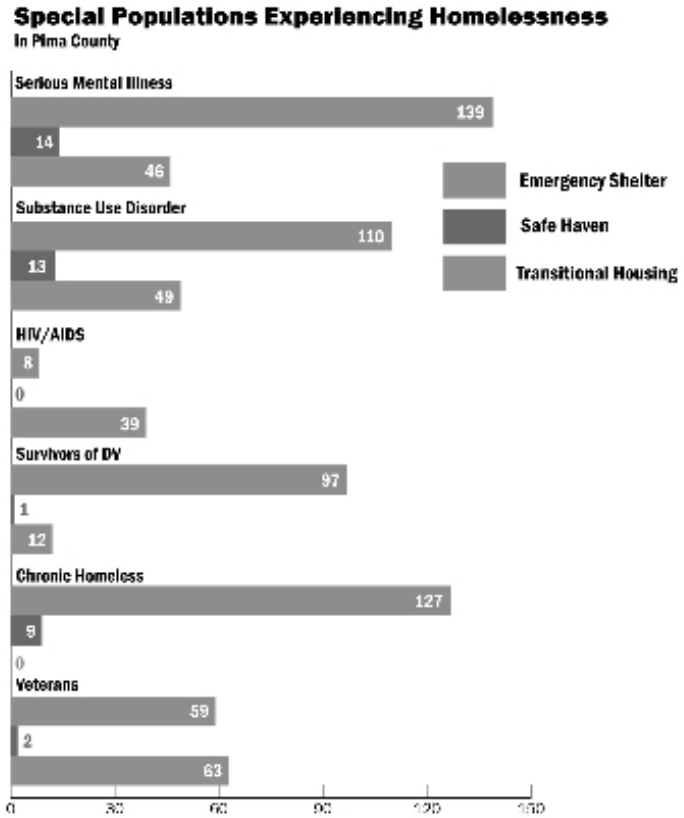
Annual Change in Homelessness Among All Persons Including Persons Residing in Temporary Shelters Not Included in 2020 Point in Time Count



Source: TPCH 2020 Homelessness Update and Community Data Report[45]

Vulnerable Populations

Factors related to one's age, race, or any number of lived experiences such as behavioral health or domestic violence history put populations at increased risk of experiencing homelessness as well as the most dangerous harms related to homelessness, up to and including death.



Source: Point in Time Count, 2020[46]

- Populations with a history of involvement in the criminal justice system and mental illnesses or substance abuse are particularly at-risk to experience homelessness. Between 10% and 25% of people exiting correctional institutions experience homelessness, and many experienced homelessness prior to incarceration. Research shows that formerly-incarcerated individuals reentering the community who suffer from mental health and/or substance abuse disorder face significant barriers in securing stable housing and necessary treatment, resulting in higher rates of recidivism, homelessness, and poor health outcomes.[47] Also, formerly-incarcerated sex-offenders experience several barriers to stable housing. There are currently 122 registered sex-offenders in Tucson that are experiencing homelessness.[48]

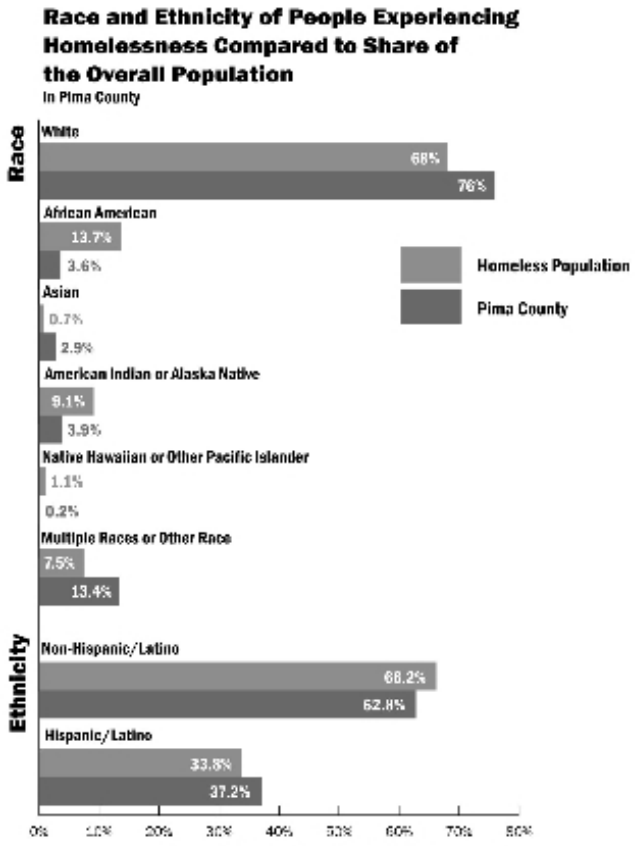
- The rate of unsheltered homelessness among adults with serious mental illness has increased faster than the rate of any other population. The Point in Time count revealed the percentage of adults with serious mental illness who are unsheltered has risen dramatically from 28.2% in 2017 to 53.2% in 2020.[49]

- Survivors of domestic violence and people living with HIV/AIDS experiencing homelessness are significantly more likely to be sheltered than unsheltered. Adult survivors of domestic violence experiencing homelessness were 2.5 times more likely to be sheltered than unsheltered in the 2020 Point in Time count. Adults living with HIV/AIDS experiencing homelessness were 7.8 times more likely to be sheltered than unsheltered in the 2020 Point in Time count.[50]

- Veterans experiencing homelessness comprised 8% of the emergency shelter beds in the 2020 Point in Time count. About a third (61 individuals) of the homeless veteran population (185 individuals) were reported unsheltered. Moreover, of those unsheltered veterans experiencing homelessness, 23 individuals were reported to be chronically homeless.[51]

Homelessness by Race/Ethnicity

Black/African American and Native American/American Indian communities are dramatically over-represented in the homeless population relative to their representation in the broader community.[52]



Source: Tucson Pima Collaboration to End Homelessness 2020 and ACS, 2015-2019[53]

Youth

In Pima County in 2020, there are an estimated 1,515 total unaccompanied youth at risk of or experiencing homelessness, 352 parenting/pregnant youth at risk of or experiencing homelessness, 669 youth at risk of experiencing homelessness, and 1,198 youth experiencing homelessness. There is a significant shortage of short-term crisis housing designated for unaccompanied youth, presenting obstacles to reducing youth homelessness (Source: Tucson Pima Collaboration to End Homelessness and American Community Survey data). Several specific youth populations experiencing homelessness encounter unique challenges, including LGBTQ+, youth of color, unaccompanied minors and youth involved in justice or child welfare, and pregnant and parenting minors.[54]

Evidence demonstrates it is critical to implement intervention as urgently as possible. 50% of chronically homeless adults reported being homeless between 18 and 24 years old.[43] Moreover, every additional day of waiting between assessment and housing placement is associated with a 2% increase in a youth's likelihood of returning to homelessness after entering a housing program.[55]

105 youth were experiencing homelessness including **27** youth experiencing chronic homelessness and **29** parenting youth with a total of **33** minor-aged children on the night of the 2020 Point in Time Count.[56]

Chronic Homelessness

The number of people experiencing chronic homelessness has steadily increased since 2017. On the night of the 2020 Point in Time count, a total of 383 persons experiencing chronic homelessness were identified, up from 225 in 2017.[57] People experiencing chronic homelessness are especially vulnerable to death on the streets.

Point in Time count data point to a growing population of unsheltered persons experiencing chronic homelessness and a relatively small proportion of persons experiencing chronic homelessness residing in longer-term supportive housing. This data indicates a critical need to improve the region's Coordinated Entry system through which persons are prioritized for housing based on vulnerability.

Homeless Response System

The goal of an effective homeless response system is to quickly identify persons experiencing or at risk of homelessness and provide housing and services through which they can achieve housing stability. The Mayor and Tucson City Council have emphasized the need for a "Housing First" approach as this model is proven to be a best practice in reducing homelessness. However, there is a need for shared definitions, communitywide planning, and clear expectations among funding providers with respect to the "Housing First" model and "low-barrier/low-demand" shelters. Without a clearly articulated definition or consistent expectations, projects operate along a continuum of approaches with limited oversight or monitoring.

There are a variety of community agencies currently providing housing and services to persons experiencing homelessness. See the following pages for charts of the estimated number of beds in the region by type of housing facility and key Homelessness Response System definitions.

About the Homeless Response System

Chronic homelessness: used to describe the experiences of people with one or more disabling conditions whose homelessness has lasted at least a year and/or who have experienced four or more episodes of homelessness in the past three years.

Housing First: is an approach to ending homelessness that centers on quickly moving people experiencing homelessness into independent and permanent housing and then providing additional supports and services as needed.

Low Barrier/Low Demand Shelter: A low barrier shelter means removing as many pre-conditions to entry as possible and responding to the needs and concerns of people seeking shelter, including flexibility related to pets, family households, sobriety, service participation, and other factors.

Safe Haven: A project that offers supportive housing that (1) serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services; (2) provides 24-hour residence for eligible persons for an unspecified period; (3) has an overnight capacity limited to 25 or fewer persons; and (4) provides low demand services and referrals for the residents.

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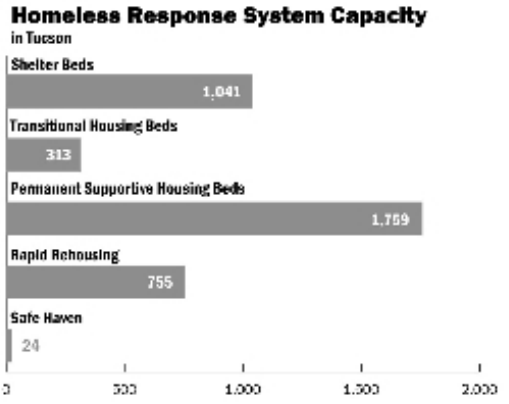
Shelter: A project that offers temporary shelter (lodging) for the homeless in general or for specific populations of people experiencing homelessness. Shelter is provided in a variety of settings including congregate "mass" shelter facilities, hotels/motels paid by government or community-based agencies, and scattered-site apartments.

Transitional Housing: A project that provides temporary lodging and is designed to facilitate the movement of homeless individuals and families into permanent housing within a specified period of time, but typically no longer than 24 months.

Permanent Supportive Housing: Permanent supportive housing is a form of permanent/longer-term supportive housing which includes rental subsidy and supportive services. Permanent supportive housing is not time-limited and available for persons with one or more disabling conditions. Many permanent supportive housing projects are dedicated for persons experiencing chronic homelessness and/or who meet other eligibility criteria indicating high acuity service needs.

Rapid Rehousing: Rapid rehousing is a form of supportive housing which provides time-limited rental subsidy and supportive services for periods of time ranging from 1-24 months.



Source: TPCH 2020 Homelessness Update and Community Data Report[58]

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An August 2020 HCD staff review of ongoing challenges and targeted solutions related to the effectiveness and efficiency of Tucson's homeless response system revealed the following takeaways:

- A shortage of and lack of formal coordination among outreach and housing navigator services contributes to long periods of time spent homeless before making contact with the homeless response system. On average, persons served through local homeless assistance programs spent 13.8 months in unsheltered or temporarily sheltered environments before moving into permanent housing.

- Underutilization of existing temporary shelter and supportive housing beds illustrates the need to maximize existing resources. On the night of the 2020 Point in Time count, the 581 unused temporary shelter and supportive housing beds in Tucson/Pima County outnumbered those experiencing unsheltered homelessness.

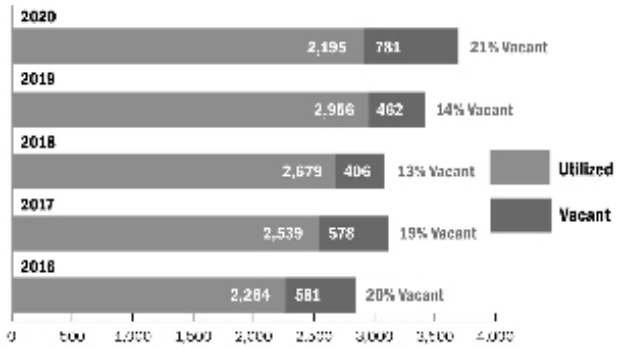
- Lack of real-time bed availability, direct referral pathways, and dynamic prioritization through the Coordinated Entry system leaves persons seeking shelter often unable to find an available opening.

- Unsheltered persons and those in temporary shelters on the night of the 2020 Point in Time count (1,324) outnumbered unoccupied longer-term supportive housing beds (240) by more than 5 to 1.

- A lack of affordable housing for extremely low-income renters in Tucson and rising housing costs as described below also contributes to homelessness in Tucson. A high rate of return to homelessness after receiving services indicates a need for more intensive supportive service interventions.

2,000 new units of supportive housing are needed in the next ten years to effectively move people from homelessness to housing stability.[59]

5 Year Shelter and Supportive Housing Bed Capacity and Utilization
In Tucson



Source: TPCH 2020[60]

OMB Control No: 2506-0117 (exp. 09/30/2021)

CHALLENGE: HOUSING INSTABILITY

Housing instability can be characterized by a variety of challenges, including difficulty making rent or mortgage payments, evictions and frequent moves, and crowded living conditions. Housing instability directly impacts economic insecurity and can contribute to poor health outcomes and higher mortality rates.[61] Housing supply and affordability directly impact housing stability for low-income residents, while economic shocks like unemployment or medical expenses can put a family at risk for experiencing increased housing instability.

In Tucson, housing growth has not kept pace with population growth, making it a challenge to find affordable housing. For example, from 2009 to 2015, Pima County population decreased 1.3%, while households have increased 2.3%, indicating a growth in single person or smaller households[62] and an increased demand for housing units.

While many cities are experiencing a housing crisis, Tucson is uniquely vulnerable due to factors such as high rates of poverty and rising costs of housing. Below are key data points that highlight these issues:

Evictions and Housing Support

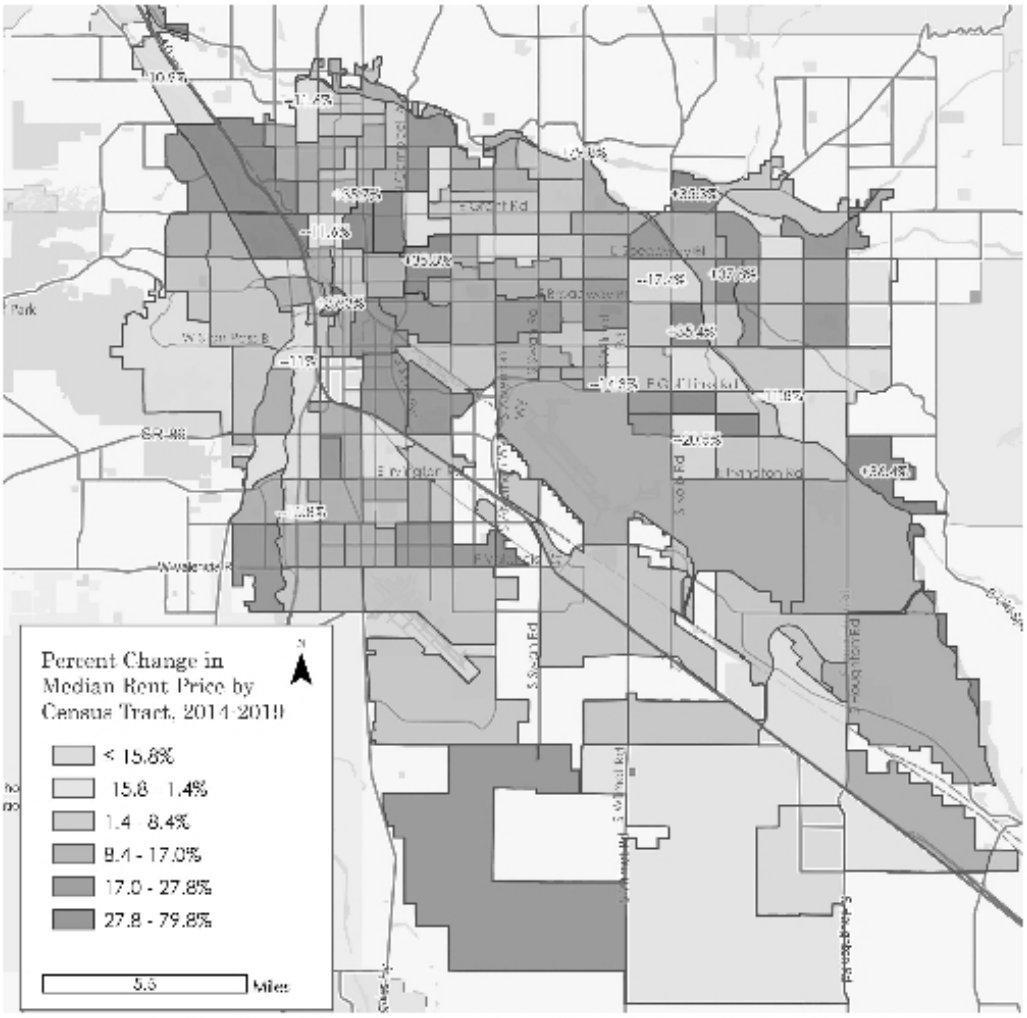
- Tucson experiences higher rates of eviction, 6.03% in Tucson (6,607 evictions out of 102,511 total renter occupied units in 2016), compared to 3.92% in Arizona, and 2.34% in the USA.[63] There were more than 13,000 evictions in Pima County in 2018.[64]
- In fiscal year 2020, there were over 10,000 evictions filed in the Pima County Consolidated Justice Court and approximately 96% of the filings were for non-payment of rent.[65]
- There are 15,058 individuals on the waiting list for public housing and another 5,047 applicants awaiting Section 8 tenant-based rental assistance.[66]
- With many people unemployed due to the COVID-19 Pandemic, housing instability has increased. In early November 2020, 23.5% of renters in Arizona reported not being current on their rent payments. This issue does not affect all racial and ethnic groups evenly. Nationally, roughly 18% of Hispanic/Latino renters and 33% of Black or African American renters reported not being current on rent.[67]

As of 2017, estimates show a need of approximately **11,835** rental units renting for less than $250/month and **5,534** renting for between $250 and $500/month. The estimated cost to develop 17,400 700-square foot units at $150/square foot is **$1.827 billion**.[68]

Housing Costs

Rental Market

- Renters account for 37.6% of households in the Tucson region (as of 2018). The proportion of renters to homeowners has increased over time.
- While rent prices vary around the region, rent price growth for the entire Tucson MSA was +10.9% between 2013 to 2018. In 2019, Tucson had the third-highest rent price growth among western peer cities at 5.1%.[69]
- The map below shows the median rent price change in different census tracts in Tucson.



Source: University of Arizona Eller College of Management, Housing Market Study, Making Action Possible (MAP) Dashboard[70]

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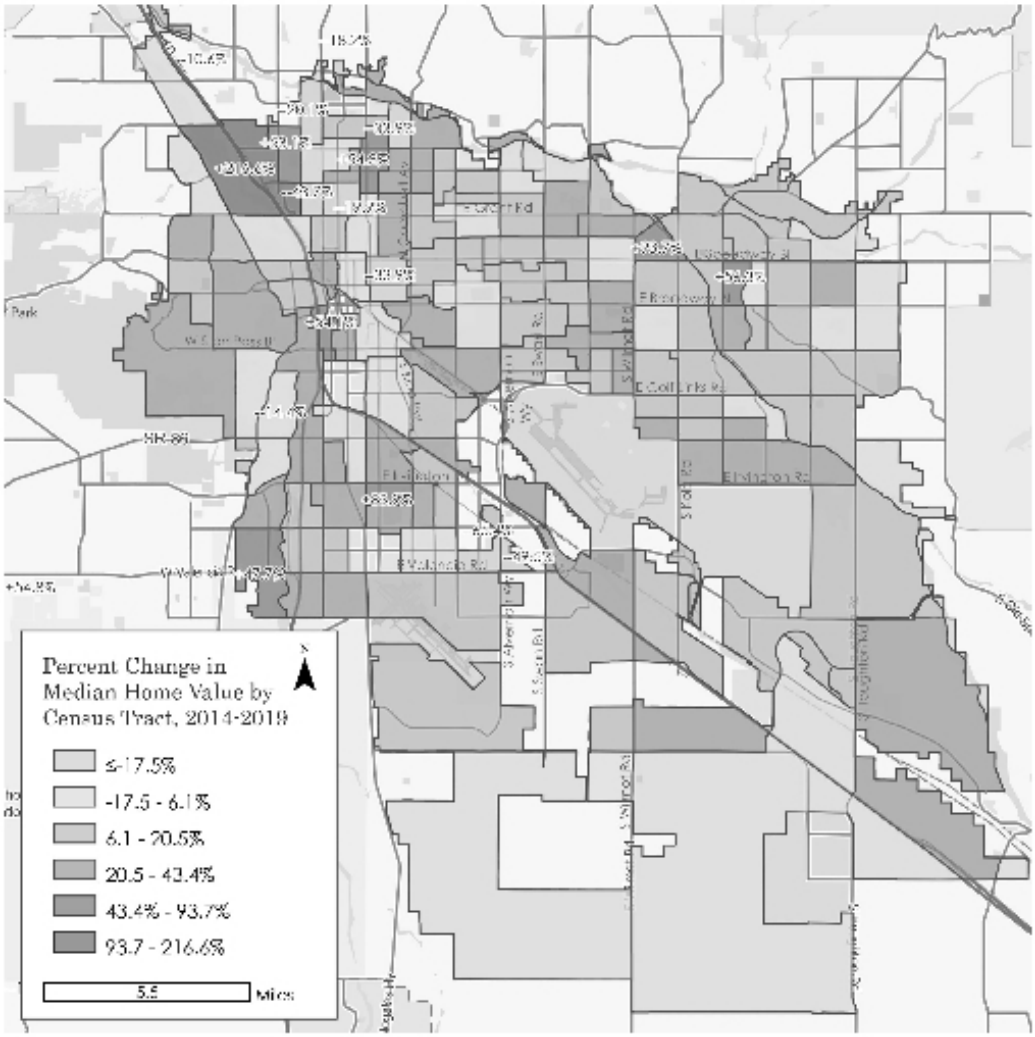
Home Prices

- The 2018 median home value in the Tucson MSA according the American Community Survey was $173,500, which was +3.6% between 2013 to 2018.[71] While this shows a home price growth, the median home value was still significantly below the 2010 median value.

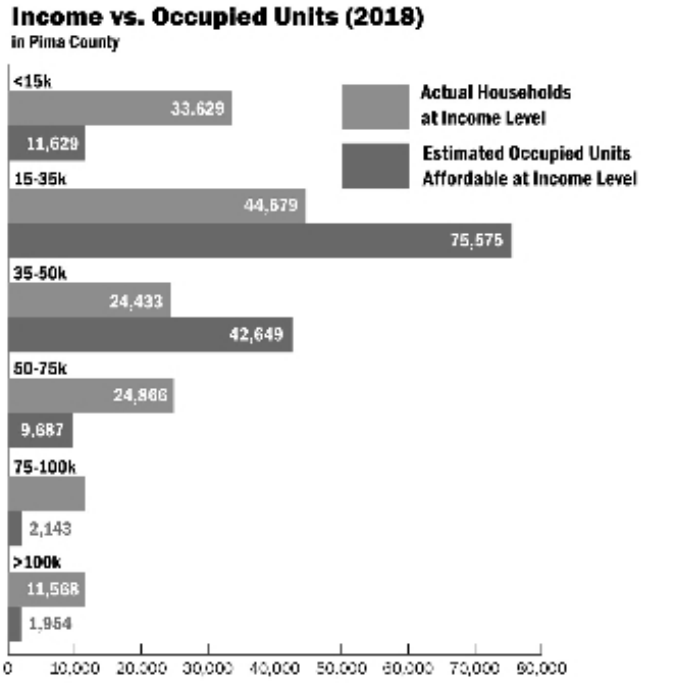
- Home prices also vary widely around the City of Tucson. The map below shows the home price growth by census tracts in Tucson.



Source: University of Arizona Eller College of Management, Housing Market Study, Making Action Possible (MAP) Dashboard[72]

Housing Cost Burden and Housing Demand

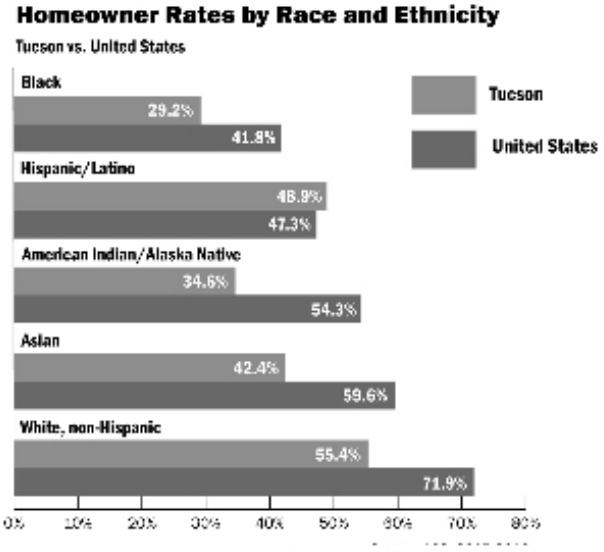
- More than 33% percent of households in Tucson are housing cost burdened, meaning they spend over 30% of their incomes on housing.[73]
- From 2014-2018, 22.4% of Pima County homeowners and 51.8% of renters were housing cost burdened.[74]
- Renters with incomes below $15,000 especially face a shortage of affordable rental units and must extend themselves financially to rent more expensive housing. The graph below compares actual rental household income levels (from the 2018 5-year ACS) to occupied rental units that are affordable in each income category.[75]



Source: University of Arizona Eller College of Management, Housing Market Study, Making Action Possible (MAP) Dashboard[76]

Homeownership and Race/Ethnicity

Homeownership rates in the U.S. and locally here in Tucson vary significantly by race and ethnicity.



Source: ACS, 2019 5-Year Estimates[77]

Gentrification and Displacement

Housing instability affects specific neighborhoods in addition to individuals and families. Development in Tucson's downtown core has driven community concerns about gentrification and its potential to displace low-income communities of color in nearby areas. Renters with low-income are particularly vulnerable to involuntary displacement from rising rents when neighborhoods change. While median rents rose nearly 11% overall between 2013 and 2018, price changes varied widely across the city, decreasing in some areas and more than doubling in others. Areas where rapidly rising housing costs overlap with measures of neighborhood vulnerability are in particular need of affordable housing and anti-displacement resources.

Aging in Place

Between 2010 and 2015, the general population of the City of Tucson grew by **1.59%**, while the population of those 60 and older grew by **12.43%**.[78]

Tucson and many other cities in the country are experiencing a shift in demographics, resulting in an increasingly older population. Nationwide, 20% of all people are 60 years of age or older. In Pima County, just under 25% of our population is 60 years or older, slightly higher than the national average. Housing to allow older adults to age in place must take into account unique challenges related to low fixed incomes, limited mobility, and access to healthcare.

- Almost 26% of older adult households in the Tucson metropolitan area, about 31,000 households, are at or below 50% median income for two people ($24,250 or less).

- In a 2016 needs assessment survey, Pima Council on Aging found that the ability to live independently and age in place ranked as the second highest concern among those asked. It was expressed as a concern by 65% of the survey respondents.[79]

- In a 2018 survey of adults age 50 and over, conducted by AARP, a majority of respondents expected to stay in their home or community as they get older. Older adults are more likely to own their homes, however 22% of respondents indicated that their home needs major repairs or modifications to enable them to remain in the home as long as possible.[80]

- According to 2015 HUD data, of the 143,032 households in Pima County with at least one person over age 62, 58,002 are low-to-moderate income (LMI). Among those households, 43,119 or 74% are housing cost burdened, including 18,848 renters and 25,721 owners. Single-person LMI renters over the age of 62 are the most likely to be cost burdened or severely cost burdened and are in need of affordable rental units.[81]

CHALLENGE: NEIGHBORHOOD INEQUITIES

Safe, resilient, healthy neighborhoods with quality and accessible community facilities like parks, green space, and transportation and mobility infrastructure are key components to an infrastructure of opportunity. Place-based investments are recognized across frameworks like the Social Determinants of Health and Age-Friendly Livability domains as essential to healthy, prosperous communities. However, in Tucson, investments in these public facilities have not been made and maintained equitably over time across the city. Furthermore, the need for targeted reinvestment is more acute in neighborhoods where multiple vulnerability factors overlap with historic patterns of housing segregation and discrimination.

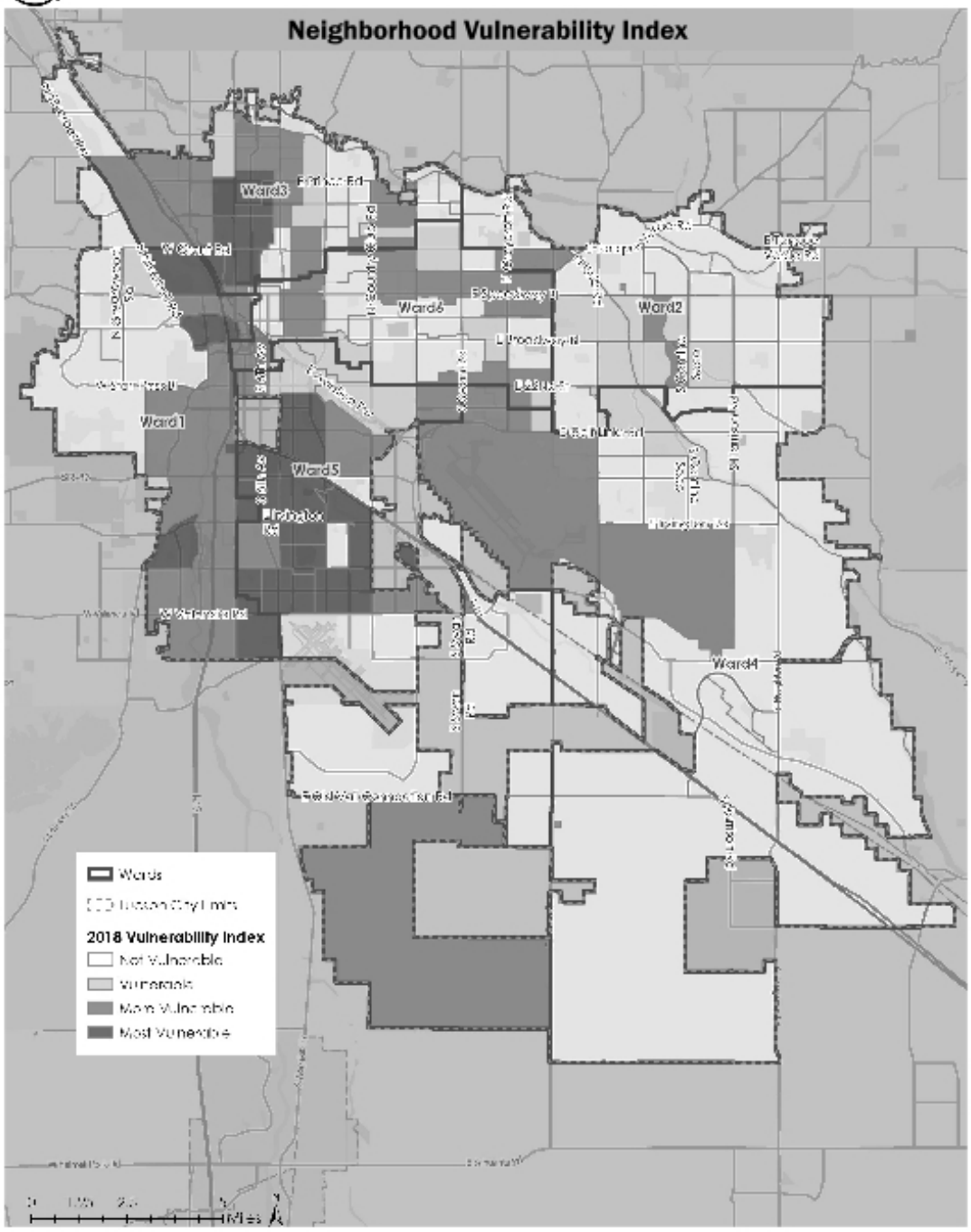
Neighborhood Vulnerability and Opportunity

Vulnerability to economic or environmental shocks and access to opportunity are often flip sides of the same coin, for individuals and communities. By mapping measures of neighborhood vulnerability and access to opportunity, patterns emerge and highlight the need for geographically targeted strategies to direct resources, policies, and programs to best meet the needs of Tucson's unique neighborhoods.

The City of Tucson, Pima County, and the Economic and Business Research Center at the University of Arizona have collaborated to study housing and neighborhood vulnerability within the City of Tucson and Pima County. The first phase of this study identified "vulnerable", or stressed, neighborhoods within our region by compiling a Neighborhood Vulnerability Index.

The index concluded there are 87 vulnerable census tracts within the City of Tucson boundary (out of 175). 55.4% of census tracts in Tucson were found to be vulnerable in some way.[62]

Vulnerability in this context refers to the differing ability of members of particular community groups to withstand threats to their livelihoods, security, and social, economic, and political networks. Measures of social vulnerability attempt to identify the characteristics of people and places that make them especially likely to be harmed by shocks, such as natural disasters or development and rising housing prices.



Source: University of Arizona Eller College of Management, Neighborhood Vulnerability Index, Making Action Possible (MAP) Dashboard[83]

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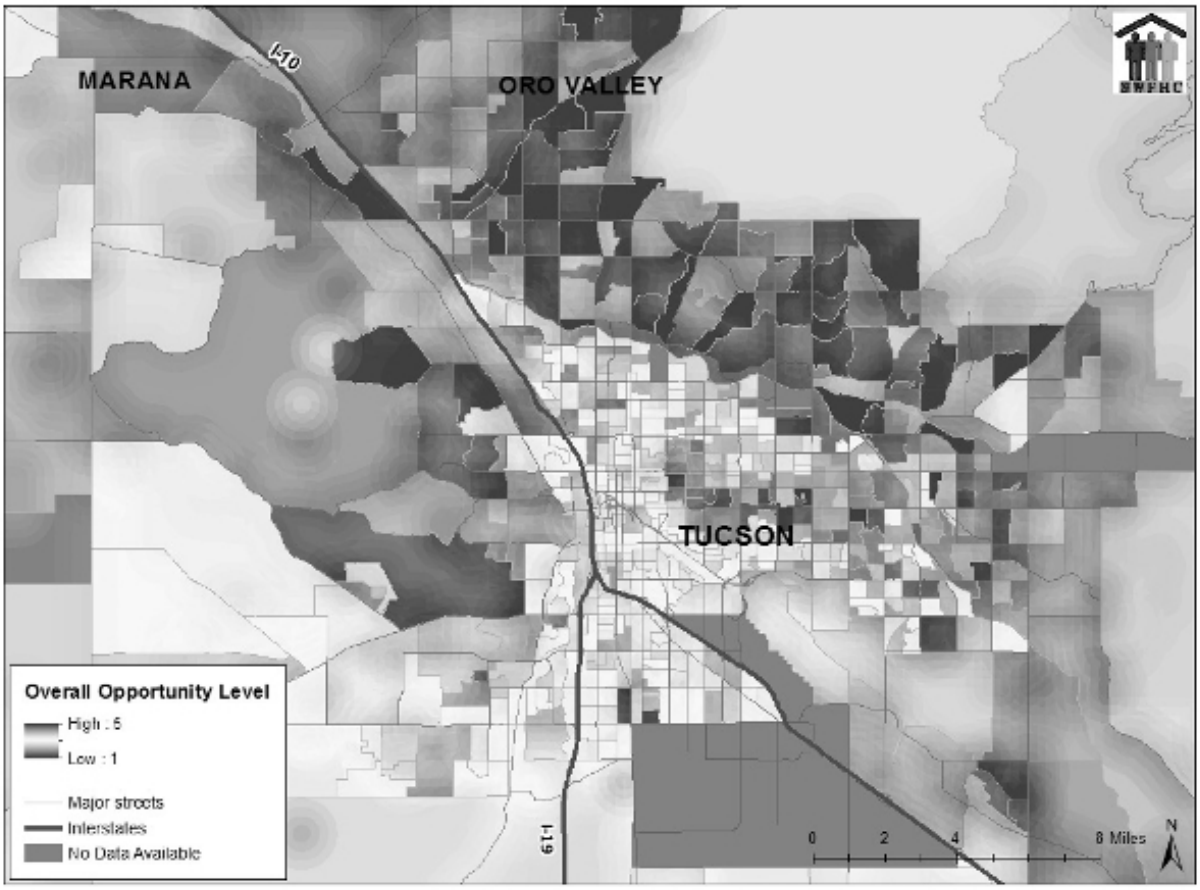
Areas of High and Low Opportunity

On the flip side of the coin, Southwest Fair Housing Council (SWFHC) conducted an Opportunity Mapping exercise for the Tucson Metropolitan Area to understand the geographic distribution of opportunity within the city. It noted "a sizeable body of research has shown that access to opportunity plays a critical role in quality of life and economic advancement. Neighborhoods of opportunity offer quality schools, decent-paying jobs, access to healthcare, adequate housing, and a variety of transit options." Maps of overall opportunity across Tucson show a mirrored pattern to the Neighborhood Vulnerability Index. Distribution of opportunity coincides heavily with patterns of historic housing segregation, where low opportunity neighborhoods tend to have a high level of residents of color.

Overall Opportunity Level, Tucson Metro Area



Source: Southwest Fair Housing Council, 2018[84]

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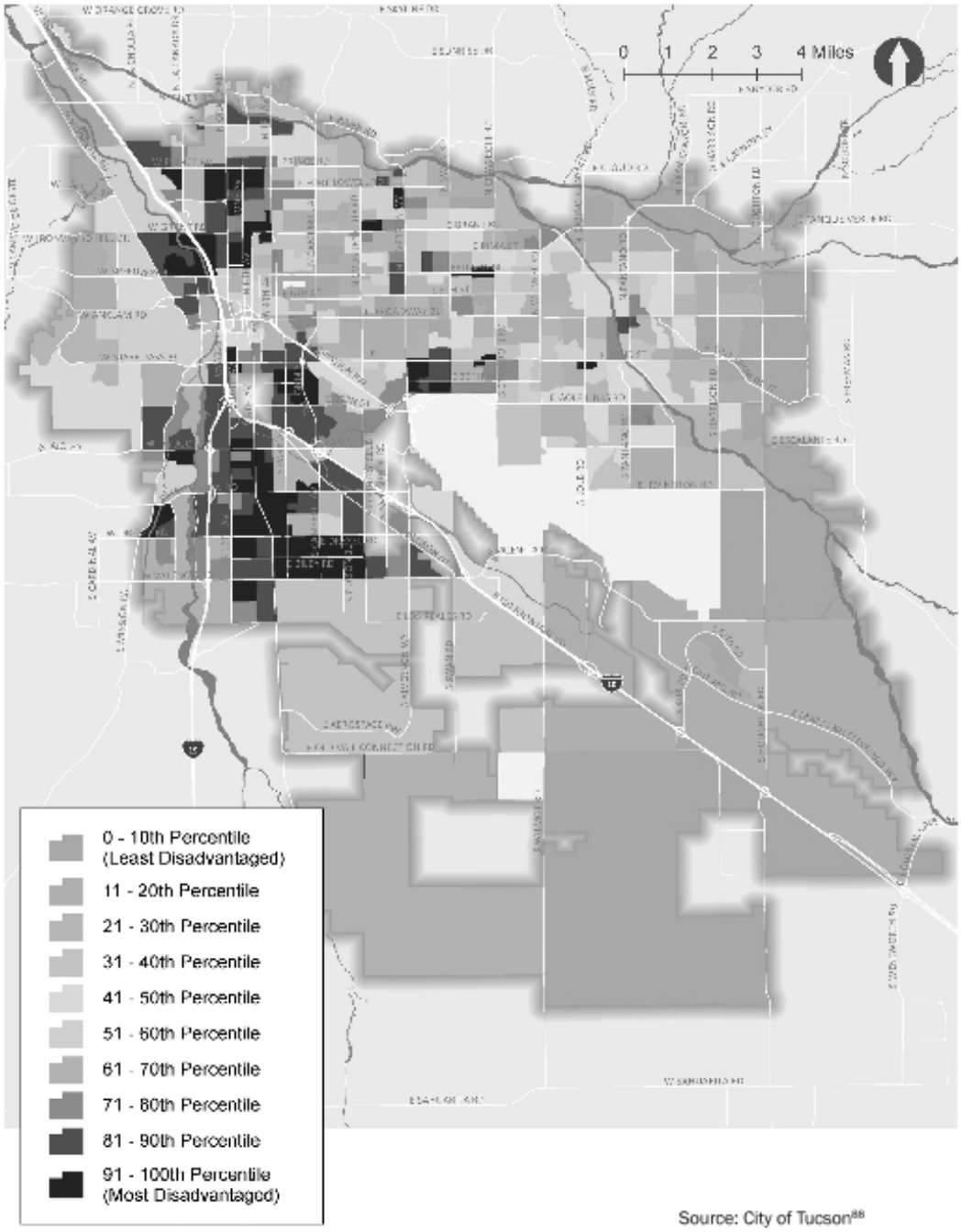
Transportation and Mobility

Each year, close to 4,000 Tucsonans are injured and more than 50 people lose their lives while traveling on city streets.[85] Improving roadway safety is a critical health issue in Tucson. Convenient, safe, and comfortable transportation infrastructure is especially vital for low-income Tucsonans. An estimated 11.9% of all Tucson households do not own a car,[86] relying more heavily on the city's network of transit routes, bicycle infrastructure, and pedestrian facilities like sidewalks and crosswalks to access everyday needs like shopping, jobs, and education.

Pedestrian Safety Action Plan

In Tucson, people walking are involved in 5% of reported collisions but are involved in 27% of fatal collisions. People walking are the most vulnerable users on our streets.[87] The Department of Transportation and Mobility created a Pedestrian Safety Action Plan to examine this critical issue and develop actionable items to reduce the number of collisions and to improve access. The City of Tucson's Pedestrian Safety Action Plan identified priority locations for pedestrian investment based on three main factors: 1) safety, 2) risk factors, and 3) equity. The equity analysis looked at socio-economic and demographic data to identify locations with a high relative "transportation disadvantage." See the next page for a map showing the distribution of "transportation disadvantage."

Transportation Disadvantaged Score



Source: City of Tucson[88]

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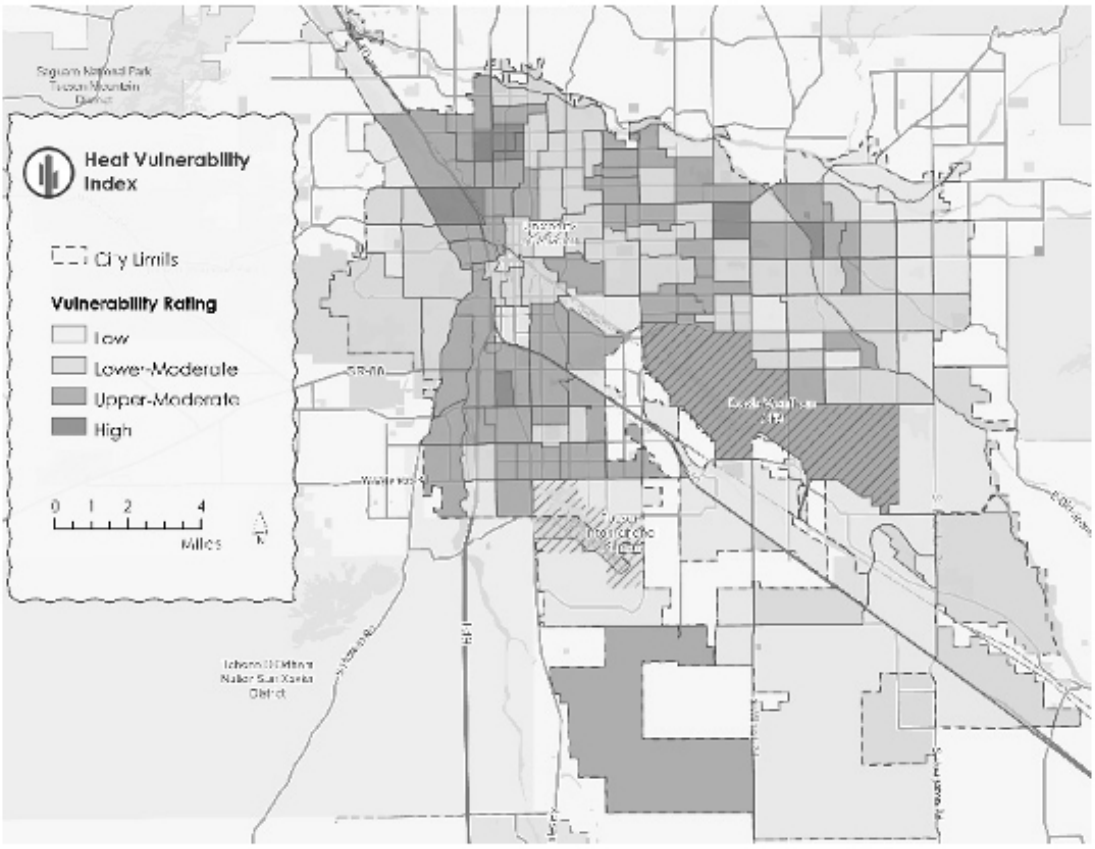
Shade Trees and Climate Resilience

Tucson is the third-fastest warming city in the United States. As climate change produces more extreme heat events, we know that low-income communities will be the most deeply impacted. Ensuring tree coverage is distributed across the city is a critical measure in Tucson due to the health implications of exposure to extreme heat.

Spatial analysis of the city's shade tree canopy and surface temperatures compared to neighborhood vulnerability factors demonstrate that low-income communities have fewer shade trees and experience higher temperatures. The map below demonstrates census tracts' level of heat vulnerability – the dark orange and orange signify areas of upper-moderate to high vulnerability and the lighter oranges represent areas of lower-moderate to low vulnerability. Tucson's extremely hot summer conditions impact infants and children under 4, people 65 and older, and people with chronic illness are more susceptible to heat-related illness.



Source: City of Tucson[89]

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Access to Parks and Open Space

The City of Tucson uses the Trust for Public Land's (TPL) 10-minute walk initiative and analysis for parcel acquisition and/or future park development. The 10-minute initiative aims to ensure every home is only within a 10-minute walk of a public park. Currently, 63% of Tucson residents live within a 10-minute walk of a park.[90] Access is about equal across demographic characteristics, such as race and ethnicity, age and income. Although the rates of accessibility are similar, vulnerable populations are often more negatively impacted when open space is inaccessible. Access to open space is a vehicle for increased mental and physical health. Exposure to nature or green space also has positive physical and mental health benefits, including lower rates of heart disease, stroke, obesity, stress, and depression.

Overall, the City of Tucson has a considerable number of parks and park acreage when compared to peer cities. This chart below shows that Tucson has 2,658 acres of developed parks or 5.44 acres of developed parks per 1,000 residents.

Developed Park Acres per 1,000 Residents

Agency	Total Acres of Developed Parks	Acres of Developed Parks per 1,000 residents
Tucson, AZ	2,658	5.44
Colorado Springs, CO	2,212	5.03
Albuquerque, NM	2,316	4.16
Mesa, AZ	1,901	4.13
Phoenix, AZ	4,218	2.92
Las Vegas, NV	1,750	2.85

Source: Tucson Parks and Recreation System Master Plan, 2016

Tucson Parks and Recreation by the Numbers:

Tucson's population: 526,116	Number of parks: 127
Acres of developed parks: 2,658	Number of recreation centers: 19
Number of regional parks (200 - 400 acres): 3	Number of metro parks (40 - 200 acres): 12
Number of community parks (15 - 40 acres): 13	Number of neighborhood parks (1 – 15 acres): 64
Number of school/park joint use agreements: 27	Number of mini-parks: 26
Number of greenways/trails: 4	Number of public plazas: 3
Number of skate parks: 3	Number of dog parks: 5
Number of pools: 18	Number of stand-alone splash pads: 2

Source: Tucson Parks and Recreation System Master Plan, 2016[91]

SECTION 3:

P-CHIP PRIORITIES AND GOALS

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The previous section outlines several complex challenges facing Tucson. This section outlines the key Priorities and Goals that will inform HCD's work moving forward. P-CHIP Priorities and Goals are based on the data and the other P-CHIP inputs including Mayor and Council Priorities, related plans, and community engagement. They describe a broad set of approaches to addressing the community-identified challenges discussed in this plan.

The City of Tucson cannot tackle these issues alone. In pursuit of an equitable Infrastructure of Opportunity, HCD relies on partnerships with residents, other city departments and government agencies, service providers, businesses, elected officials, and housing developers to pursue and fund community-based solutions. We are all one piece of a much larger picture. The P-CHIP Priorities and Goals are intended to serve as a road map for HCD investments for years to come. By "investments," we refer not only to the funding sources outlined in the following Implementation section, but also to the resources such as staff time, technical assistance, partnerships, and other supports that HCD can bring to the table.

We aim for the Priorities and Goals laid out in this section to serve as community-wide aspirations and invite partners who share common goals to pursue these strategies together. The following Implementation section will narrow down the Priorities discussed here into specific funding targets and strategies for HCD's focus in the near term.

P-CHIP Key Principles

Several key principles guided the development of the P-CHIP Priorities and Goals and will be used throughout implementation:

- Advance and center racial and social equity
- Ensure affected communities, best practices, and data drive services and funding decisions
- Optimize services to vulnerable individuals through local and regional collaboration
- Follow the Housing First approach to addressing homelessness
- Increase the transparency and accountability of funding allocations
- Leverage existing and complementary resources to maximize impact

P-CHIP Priorities and Goals Development

The development of the P-CHIP Priorities and Goals was informed by community input, research, and data. The P-CHIP Priorities and Goals focus on three primary Focus Areas: People, Communities, and Homes. Within each Focus Area, specific Priorities are identified with Goals highlighted for that specific Priority as well as Strategies on how to reach the Goals. Examples of metrics or performance indicators are provided to suggest how progress can be monitored over time.

The P-CHIP Priorities and Goals are not intended to be a comprehensive picture of all the priorities, goals, and strategies needed to address all of Tucson's challenges identified in the plan. Instead, the idea is to provide a framework for HCD's work that can be built upon and changed over time.

It is important to stress that the different components of the P-CHIP Priorities and Goals section (Focus Areas, Priorities, etc.) are interrelated — specific strategies within one priority area could often be included in a different area and often impact other priority areas. These issues cross scales and jurisdictions, spheres of expertise, and sources of funding, but are reflected in only one Priority or Focus Area for clarity and brevity.

Target Populations

This plan is focused on pathways to success for Tucson's low-income individuals and families. Everyone deserves to feel safe and have access to critical needs such as shelter, food, and healthcare. However, specific populations face unique challenges to accessing services, while others require tailored programs to meet their needs. In general, the service areas outlined in the P-CHIP Priorities and Goals could target many or all of these vulnerable population groups. However, where our research or community feedback lead us to believe that one population is particularly affected by a given need (e.g., the impact of poor nutrition on young children), we will call out that population as needing attention.

We must also acknowledge that vulnerability is intersectional. We know that people of color within the target populations discussed here experience additional, compounding barriers to accessing opportunity due to systemic racism. Throughout the P-CHIP, a key priority is to target historically disadvantaged groups – even within otherwise vulnerable groups – and work collectively to correct patterns of systemic discrimination.

Target groups include but are not limited to:

- Children and youth, from birth to adulthood
- Older Adults
- Veterans
- Individuals affected by the criminal justice system
- Persons with disabilities
- LGBTQ+ individuals
- People of color
- Persons with substance-use disorders
- Persons with HIV/AIDS & their families
- Victims of domestic violence and other unsafe living situations
- Refugees and immigrants
- People experiencing homelessness

Social Determinants of Health and Eight Domains of Livability

The P-CHIP Priorities and Goals focus on Tucson and the work of the Department of Housing and Community Development and community partners. However, their development drew from two related and important concepts: the Social Determinants of Health and the Eight Domains of Livability. Both of these frameworks recognize that health, well-being, and opportunity are interrelated to a range of environmental factors, social conditions, and access to resources. The concepts from these frameworks are interwoven throughout this plan.

Social Determinants of Health

The Social Determinants of Health (SDOH) are conditions in the places where people live, learn, work, and play that affect a wide range of health and quality-of-life risks and outcomes.[92] The SDOH are very relevant to the P-CHIP for many reasons, including the recognition that systemic social and economic inequities result in health disparities. The P-CHIP Priority Framework includes Goals and Strategies within the five key areas of the Social Determinants of Health:

Eight Domains of Livability

AARP identifies eight community features that impact the well-being of older adults. Similar to the Social Determinants of Health, the Domains of Livability recognize that environmental factors like housing and transportation are interrelated to health and social inclusion. The Age-Friendly Tucson Action Plan identifies specific goals for each of the eight domains. The P-CHIP Priority Framework reflects the eight Domains of Livability as well as the goals specified in the Age-Friendly Tucson Action Plan.

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PEOPLE

Thriving individuals and families with opportunities to lead self-sufficient and fulfilled lives. Equitable access to jobs and income, health, supportive services, and education for all Tucsonans.

Photo Credit: iStock

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As a community, we aim to create a vibrant and inclusive "infrastructure of opportunity" that allows everyone a pathway to health, dignity, and success. This starts with People – individuals, households, and families. It requires strengthening our collective safety net of services that support people in a time of crisis. Locally, our goal is to fill gaps in state and federal programs and foster innovation and efficiencies in the way we deliver services.

Key to building an infrastructure of opportunity is also looking beyond the safety net. It requires that we look upstream and downstream, prioritizing creation of a continuum of services that seeks to prevent or mitigate crises before they occur, as well as support households beyond a crisis while they work to achieve stability. It requires that we target resources to individuals who are vulnerable to certain shocks and need unique interventions. We must invest in those who bear the brunt of systemic racism, discrimination, and disinvestment. An infrastructure of opportunity should work to dismantle policies and practices that perpetuate inequitable access to resources and education.

The People Priorities and Goals below focus on strategies that target low-income individuals and families. Everyone deserves access to a set of programs and services that meet their individual needs. Meanwhile, the upcoming Communities Priorities and Goals focus on the physical environment of the neighborhoods in which low-income households live as well as the programs and policies that impact these communities and populations collectively.

Priority: Transition from Managing Homelessness to Ending Homelessness

Homelessness is devastating. Every person deserves a safe place to live and the opportunity to thrive. Achieving this requires a strong community safety net and strategies aimed at preventing low-income households from becoming homeless, quickly rehousing people experiencing homelessness, and removing the barriers that lead to repeat episodes of homelessness. Tucson's homeless response system possesses many of the essential elements of an effective system. However, there are many opportunities to improve its efficiency and impact.

Goal 1: Provide stable, accessible housing or shelter with a "Housing First" approach; housing that has no or few barriers to entry for those experiencing homelessness

- Optimize occupancy of existing shelter space
- Increase supply of longer-term supportive housing beds
- Strengthen coordination and collaboration of existing street outreach services and increase outreach capacity within the community
- Expand housing navigation services to leverage stable housing options outside of traditional shelter and housing programs

Goal 2: Coordinate a continuum of services to enable vulnerable populations to access and remain in stable housing with pathways to self-sufficiency

- Prioritize input and leadership among individuals with lived experience of homelessness when designing, providing, and evaluating services
- Expand homeless work programs and bridges to direct employment
- Expand support services that align with the Housing First model and result in self-sufficiency and improved quality of life (e.g. health care, food, substance abuse, behavioral health services, etc.)

Tucson Pima Collaboration to End Homelessness (TPCH) is a coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness and addressing the issues related to homelessness in our community. TPCH acts as the U.S. Department of Housing and Urban Development (HUD) **Continuum of Care** (CoC) for Pima County. The City of Tucson became the Collaborative Application for the Continuum of Care in April of 2019.

TPCH
Tucson Pima Collaboration To End Homelessness

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Goal 3: Prevent homelessness

- Identify and target vulnerable households for eviction prevention and other interventions to prevent loss of shelter
- Make resources available to quickly address emergency needs that will prevent households from losing shelter
- Prioritize homelessness prevention funding to organizations that offer the full scope of needed services beyond traditional case management to include housing counseling, legal services, credit repair/counseling, landlord mediation, and sufficient financial assistance to support stabilization credit repair/counseling, landlord mediation, and sufficient financial assistance to support stabilization

> "Minneapolis made a homeless shelter that allowed those living there to work their way up in society and earn better accommodations and privileges, this seems like it could be beneficial to Tucson."-**P-CHIP Survey Respondent**

Goal 4: Support an efficient and effective services system based on evidence and data

- Support Tucson Pima Collaboration to End Homelessness in their efforts to improve coordinated entry and assessment
- Improve accuracy of annual Point-in-Time counts of all persons experiencing homelessness, including youth and families
- Improve access to and utilization of real-time crisis housing bed availability and services to address urgent housing needs of people at risk of and experiencing homelessness
- Expand training and technical assistance offerings to better support use of evidence-based practices and other improvements to community housing and homelessness outcomes

Goal 5: Increase collaboration, transparency, and access to public information in the region's homelessness response

- Develop and implement a homelessness communications plan in partnership with community organizations and target populations to provide more better and more consistent information to the public regarding homelessness concerns and response
- Improve coordination among homeless response funding bodies and collaborative community planning to more efficiently address homelessness

Examples of Potential Performance Indicators: Time spent without shelter is minimized for anyone experiencing homelessness; use of existing shelter facilities is optimized; reduced eviction rates; Tucsonans better understand the issues around homelessness and what is being done to address them.

Priority: Optimize Health – Behavioral, Emotional, and Physical

There are many different factors that impact an individual's behavioral, physical, and emotional health. The Social Determinants of Health highlight factors affecting health outcomes and how structural social and economic inequities put many racial and ethnic minority groups at increased risk of serious illnesses. For example, having access to high-quality health care services, including preventive care and treatment for chronic illnesses is important. In Tucson there is disparate access to quality health insurance. The goals and strategies under this priority aim to address these inequities and improve the conditions that we know influence health and quality-of-life. While P-CHIP funds can help fill gaps in the local health services landscape, this Priority in particular must rely heavily on a much larger infrastructure of public and private programs at the local, state, and federal levels.

Goal 1: Improve equitable access to affordable, quality health care, including care for behavioral health and substance-use disorders

- Expand the number of people with affordable health insurance
- Increase the number of health care providers through recruitment of a diverse workforce
- Increase educational and training opportunities for health care providers, school personnel, and others (including best practices, cultural competency, multi-lingual services, early detection of behavioral health disorders etc.)
- Increase coordination of care among provider agencies
- Focus on prevention, early detection, and intervention for both behavioral and physical health issues
- Expand case management, referral services, and supportive services for older adults, caregivers, and family members
- Enhance access to health care services (i.e. mobile clinics, telehealth, transportation services)

> "Supplement insurance coverage for those that don't qualify for AHCCCS - that portion of people who just barely don't meet income criteria, but may waver from time to time to be above or below the line, moderate income households need help too." **- P-CHIP Survey Respondent**

Goal 2: Support healthy lifestyles, access to healthy, sufficient food, and programs that reduce health risk factors

- Expand food-based education and outreach programs that enable food self-sufficiency through gardening and cooking, especially those that recognize the diverse food traditions of Tucson and build the capacity of community-based food networks and the local food economy
- Expand access to food supplies to ensure that all residents have access to adequate food on a daily basis (includes emergency food support, increased access in food deserts, and expanded enrollment in SNAP), especially for youth and older people
- Expand programs (e.g. physical fitness opportunities) that help children, families, and older adults remain healthy and active

Goal 3: Promote personal enrichment, a sense-of-belonging, and community cohesion

- Expand social, educational, and employment opportunities to prevent social isolation, particularly for older adults and to optimize seniors as a community asset
- Promote volunteer opportunities for youth and older adults
- Promote opportunities for activity and play

Examples of Potential Performance Indicators: Reduced rates of chronic illnesses including diabetes and childhood obesity; increased early detection for potentially serious health issues; reduce ratio of population to health care providers; reduced rates of food insecurity, especially among children and youth; increased health insurance rates.

"Provide incentives for health food stores and grocery stores to build businesses in South Tucson and low-income neighborhoods to decrease food deserts"- **P-CHIP Survey Respondent**

Priority: Reduce Poverty and the Effects of Poverty on People

Poverty is closely linked with nearly all the challenges identified in the P-CHIP and is one of Tucson's greatest challenges. Tucson's poverty rate is significantly higher than that of Arizona and the United States. People living in impoverished households often struggle to afford basic needs, such as housing, food, transportation, health care, and childcare. Poverty destabilizes families, affects access to opportunity, and leads to undesirable outcomes, such as hunger and homelessness. Optimizing opportunity and enabling all people to perform to the best of their abilities benefits the entire community and improves well-being.

The P-CHIP emphasizes the need to reduce poverty as a key Priority Area. Addressing poverty is critical as a long-term solution to the other P-CHIP challenge areas.

Goal 1: Ensure equitable access to education and training opportunities

- Ensure school readiness and in-school success
- Expand out-of-school and after school educational, social, and cultural enrichment
- Support financial literacy, life skills, and other fundamentals of living self-sufficiently
- Expand access to computers and digital training
- Cultivate leadership and workforce readiness among members of vulnerable populations

Goal 2: Expand economic opportunities for low-income populations

- Expand targeted internship and apprenticeship opportunities
- Align industry clusters and workforce development programs to foster employment opportunities
- Establish a formal process to build and maintain support for workforce development and engage area businesses in identifying needed skill areas
- Explore livable wage policy initiatives and programs

"Fund collaborative partnerships to provide wrap-around services to improve economic mobility: job readiness training and other employment services + further education and certification + financial education, counseling and coaching to build assets + childcare" - **P-CHIP Survey Respondent**

Goal 3: Reduce barriers to self-sufficiency, work, and education

- Improve mobility services for target populations
- Improve access to affordable, quality child-care
- Support employability training (resume building, professional etiquette, etc.)
- Expand programs to ease re-entry for formerly incarcerated individuals

Examples of Potential Performance Indicators: Reduced rates of poverty; Reduced unemployment rates; Higher levels of educational attainment.

Photo Credit: iStock

COMMUNITIES

Vibrant and inclusive neighborhoods with safe and welcoming streets, sidewalks, bus shelters, parks, and other key infrastructure. A supportive community with quality nonprofit organizations, health clinics, and childcare facilities

Photo Credit: Tucson Clean and Beautiful

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Our vision of a vibrant and inclusive "infrastructure of opportunity" recognizes the interdependence of investments in individuals and the communities in which people live. While the previous People Priorities and Goals focused on the service needs of individual households, the Communities Priorities and Goals relate to investments in the physical environment in low-income neighborhoods and our community-level approach to ensuring equitable access to opportunity.

The Communities Priorities and Goals focus on ensuring that our neighborhoods will be resilient and safe, with welcoming streets and public spaces and equitable access to key services like health care and child care; that Tucson's communities can shape public safety solutions; that all areas of the community benefit from and participate in innovation, economic development, and entrepreneurship; and that our nonprofit organizations, service providers, and other key civic assets are sustainable.

Priority: Advance Social Equity and Inclusion

A socially equitable community ensures that everyone has fair, just, and equitable access to services, to decision making, and to opportunities. In this priority, we seek to both advance our understanding of the barriers that exist and work to prevent and mitigate them.

Goal 1: Participate in a growing communitywide understanding of equity and the differential barriers to opportunity across vulnerable populations

- Assess and mitigate disproportionate impacts of policies and programs
- Evaluate internal HCD policies and practices and develop a departmental equity action plan; participate in citywide efforts to advance racial and social equity

> "Hold monthly, permanent, ongoing forums on race issues." – **P-CHIP Survey Respondent**

- Work collaboratively with and in support of neighborhoods and community groups, building capacity around data and linking them to research entities and additional resources
- Strengthen protections and responses to discrimination and bias
- Develop relational and feedback pipelines to learn from affected communities' experiences

Goal 2: Facilitate the development of a robust, equitable infrastructure of opportunity

- Reduce barriers to education and training, especially for low-income and otherwise vulnerable learners and job seekers
- Support programs that provide equitable access to banking, loans, and other non-predatory financial services
- Support efforts aimed at achieving fair access to housing
- Support civic integration of and social/cultural exchange with immigrant and refugee residents

> "Establishing a 'mobile social/city services' on wheels that could actually move from neighborhood to neighborhood with a team that supports neighborhood networks to 'check-in' on each other and connect people to critical social services resources. People are going to be hurting and a "one-stop" shop with as little bureaucratic loopholes would be amazing."- **P-CHIP Survey Respondent**

Goal 3: Create opportunities for community- and neighborhood-driven planning processes that co-power residents to identify and enact the projects that best fit their needs

- Collaborate with community partners and different city departments to establish a pilot program based on equity principles that engages vulnerable Tucson neighborhoods in creating and implementing enhancement projects
- Optimize and scale the pilot program to create a community-wide program based on pilot results

> "Education for the larger Tucson community, particularly middle and upper socioeconomic class people. It starts with educating society about how these problems were created, how they play out and how they are connected to the entire community. Good, factual information that is made readily available." **- P-CHIP Survey Respondent**

Goal 4: Support programs that aim to address inequities in the criminal justice system

- Enhance opportunities and support for individuals coming out of jail or prison
- Expand the capacity of the public defense system
- Support the work of the Pima County Safety and Justice Collaboration

> "Increase in services to assist people released from incarceration." **- P-CHIP Survey Respondent**

Priority: Support safe, resilient, active, equitable, and sustainable neighborhoods

As Plan Tucson states, "At a fundamental level, sustainability of a community is interwoven with the sustainability of its neighborhoods."[93] The Goals and Strategies identified in this section are intended to help support and strengthen Tucson's neighborhoods. The Neighborhood Vulnerability Index, created as part of the Housing Market Study, can be used to prioritize investments in neighborhoods that are more susceptible to a "hazard event," such as natural, public health, or economic disaster.[94]

Goal 1: Develop safe, convenient, connected, and sustainable mobility options per Mayor and Council direction through the adoption of the Complete Streets policy

- Improve accessibility and safety for people walking, bicycling, and accessing transit
- Improve transit and ride sharing services for older adults, persons with disabilities, youth, and other vulnerable populations
- Leverage, enhance, and implement projects and priorities identified in Transportation and Mobility-related plans, such as the Pedestrian Safety Action Plan, Move Tucson, and the Parks + Connections Bond Program, and other existing funding
- Improve Sun Tran bus stops and transit centers

On February 5, 2019, the Mayor and City Council adopted the **Tucson Complete Streets Policy** to, "guide the development of a safe, connected, and equitable transportation network that promotes enhanced mobility for people of all ages and abilities..." A Complete Streets Coordinating Council was established to monitor progress on implementing the new policy.

complete streets TUCSON

Goal 2: Enhance outdoor, public spaces and improve resilience to extreme heat and to drought, fire, and other emergencies

- Increase green infrastructure and water catchment in vulnerable neighborhoods and community heat islands
- Promote shaded, walkable neighborhood streets
- Invest in public art and aesthetic improvements
- Enhance transportation connectivity and parks and recreation opportunities, including by leveraging and enhancing the investments of the Parks + Connections Bond
- Enhance safety of public spaces through the use of Crime Prevention Through Environmental Design (CPTED) principles
- Support litter/trash education and cleanup initiatives to promote personal responsibility for keeping Tucson beautiful, such as the local Team Up to Clean Up campaign

The City of Tucson, in partnership with **United Way and Tucson Clean & Beautiful**, has launched a campaign to encourage Tucsonans to help improve the visual appearance of Tucson by cleaning it up. A goal of the campaign is to work together to reduce litter for future generations by educating and embracing the need to make our community look wonderful. The campaign includes incentives such as giveaways to participate.

Goal 3: Prevent or mitigate involuntary displacement of residents and local businesses

- Support community efforts to document and retain neighborhood cultural assets
- Expand and market existing programs that help prevent residential displacement, such as property tax relief programs and the Healthy Homes Rehabilitation Program that offers up to $40,000 to help low-income families with home repair
- Prioritize policies that enable current residents to share in the benefits of development in their neighborhoods rather than being displaced[95]
- Expand opportunities for incremental development to enable more participation by smaller-scale, locally based developers and investors
- Create a grant program to help rehabilitate existing rental housing to cover the cost of key maintenance upgrades. Such a program could allow landlords to make needed improvements without having to raise rents to cover the repairs

Through the **Thrive in the 05** collaborative and with the help of a HUD Choice Neighborhoods Planning and Action Grant, HCD is working directly with residents, businesses, and stakeholders to develop a shared vision for the Oracle Road / Miracle Mile area.

Goal 4: Prioritize and address environmental justice issues

- Understand and mitigate the differential effects of inadequate or unsafe street infrastructure on vulnerable populations, including its implications for people walking, biking, using wheelchairs, pushing strollers, etc.
- Understand and mitigate the disproportionate effects of extreme heat on vulnerable populations

> "There should be emphasis on tree planting and maintaining trees in Tucson, both in parks and in neighborhoods, to combat the brutal heat of six months of the year." - **P-CHIP Survey Respondent**

- Address exposure to per- and polyfluoroalkyl substances (PFAS), trichloroethylene (TCE), and other water, soil, and air contaminants
- Operationalize the concepts of "high opportunity neighborhoods" to both improve pathways to success for individuals and to enable existing neighborhoods to improve access to opportunities themselves[96]

Goal 5: Reduce crime and enhance safety

- Maintain and improve public safety through community-driven programs, including the Community Safety Pilot Program
- Explore innovative approaches to reducing crime and violence, including focused deterrence and community-led crisis intervention
- Support a restorative justice pilot program

Examples of Potential Performance Indicators: reduced pedestrian and bicycle fatalities for all groups, including vulnerable populations; Higher rates of walking and biking in target neighborhoods; Reduced greenhouse gas emissions; Reduced exposure to environmental contaminants and extreme heat; Improved retention of long-term and low-income residents in gentrifying neighborhoods.

> "Reinvestment of criminal justice funds into early childhood education, childcare, and localized safety priorities." - **P-CHIP Survey Respondent**

Priority: Support nonprofit organizations and important community assets

Nonprofit organizations and community facilities play a vital role in the infrastructure of opportunity in Tucson, building neighborhood resilience and connecting residents to services. Service agencies often establish and maintain trusting relationships with residents and neighborhood groups. Gathering places that support learning, economic mobility, and social interactions are also important pieces of the infrastructure of opportunity.

Goal 1: Ensure that key local nonprofit agencies are well-positioned to provide services safely, efficiently, and sustainably

- Address deferred maintenance backlogs and explore ways of preventing future backlogs through revolving loan programs or other strategies
- Enable basic energy and water-efficiency improvements
- Invest in ADA upgrades to ensure accessibility by all
- Invest in solar and other resilience-focused upgrades, especially those that will ensure continuity of critical services during times of crisis or disaster

> "CBDG funding going towards addressing the child care deserts in Tucson, i.e. repurposing buildings for high-quality early learning spaces, incentivizing early learning programs that are quality to expand more infant and toddler care, working with school districts to expand their early learning programming to serve more children" - **P-CHIP Survey Respondent**

Goal 2: Ensure that all populations have adequate access to critical services, including childcare and health care, and other community facilities, such as libraries and community centers

- Enable service expansions and facility improvements that will ensure continued quality service to vulnerable communities
- Explore innovative ways to stabilize and expand services and reach vulnerable populations with improved health precautions to address COVID-19 and future public health emergencies

Goal 3: Maintain and expand vital physical infrastructure for the safety and health of the community

- Support efforts to maintain a safe and sustainable water supply for all
- Expand broadband services and other tools that are required for connectivity, technical fluency, and success in the digital age

Examples of Potential Performance Indicators: increase in number of vulnerable clients served; reduced overhead expenses; improved access to critical services; number of low-income households connected to broadband and safe water services.

Priority: Actively Support Inclusive Economic Development

Local businesses employ Tucsonans, strengthen the resiliency of the region, and contribute to a sustainable economy. Investing in and supporting local businesses are key to fostering an inclusive economy.

Goal 1: Strengthen the small, local business sector in Tucson

- Facilitate stability and enhancement for businesses that are owned by and/or serve underserved populations and areas of the community, including through façade improvement programs and technical assistance
- Provide small business assistance (e.g., financial and technical help for microenterprises)

Goal 2: Cultivate an environment that fosters innovation and entrepreneurship and that is accessible and empowering to vulnerable populations

- Identify and reduce barriers to entrepreneurship in target communities, including by facilitating access to business incubators, banking and financial tools, training, data, and other resources that will increase the likelihood of business success
- Support re-skilling opportunities for displaced workers, formerly incarcerated individuals, and other facing barriers to employment
- Support social entrepreneurship and social enterprises that equally emphasize social benefit and financial goals
- Focus on endogenous, locally driven economic development that builds on local skills, cultures, and other assets
- Emphasize diverse viewpoints and input in economic planning and development plans, including opportunities for frontline communities and populations to articulate their own needs and plans
- Provide tools and resources in multiple languages, working with service organizations and community leaders to reach and support non-English-speaking entrepreneurs

Examples of Potential Performance Indicators: Increased numbers of businesses started or expanded by members of target populations; increased entrepreneurial activity in target neighborhoods; increased participation in internship programs, business incubators and other opportunities to develop entrepreneurship.

HOMES

Every Tucsonan has access to a safe, decent, and affordable home - the first steps toward life stability.

Photo Credit: City of Tucson Housing and Community Development

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The Housing First approach to homelessness holds that a safe and affordable roof over one's head is a prerequisite to health, economic well-being, and self-sufficiency. As such, adequate supply of and access to affordable housing is a key pillar of the infrastructure of opportunity. Given the high housing-cost burden on households in Tucson, emphasis is placed on the importance of affordable housing.

"Affordable housing" is defined by the federal government as "Housing in which the occupant(s) is/are paying no more than 30% of their income for gross housing costs, including utilities." To help address the need for housing that is affordable and available for low-income families, the U.S. Department of Housing and Urban Development (HUD) and other entities subsidize the development of units which are income-restricted to low- and moderate-income households. This subsidized or HUD-assisted housing is also often referred to simply as "affordable housing."

A comprehensive Housing Plan is vital for the development of strategies and policies that expand and improve the affordable housing stock in Tucson, as well as address the inequities of affordable housing in our community. By utilizing the newest Housing Market Study, collaborating with the Commission on Equitable Housing and Development (CEHD) and other community partners, the City of Tucson will develop a robust Housing Strategy in the next two years.

In the meantime, the P-CHIP offers the following principles to build upon in future planning efforts.

Priority: Increase affordable rental housing

Affordable housing emerged as the most critical challenge and highest priority for funding in the P-CHIP survey. The Housing Market Study gap analysis is identifying the estimated number of affordable housing units needed to meet the demand. HCD is committed to using its resources to partner in a community-wide effort to address the current shortfall.

Goal 1: Preserve and improve existing affordable rental housing units

- Expand or optimize occupancy of existing affordable housing
- Develop a plan to continue affordability terms with expiring low-income housing tax credit (LIHTC) and other affordable units
- Improve or rehabilitate substandard affordable housing for efficiency, resiliency, safety, accessibility, and other barriers to safe, sustainable occupancy

"Affordable housing" is defined by the federal government as "Housing in which the occupant(s) is/are paying no more than 30% of their income for gross housing costs, including utilities."

Goal 2: Expand the supply of affordable rental housing

- Facilitate the construction of affordable housing by reducing costs (impact fees, permits etc.), expediting permits, and exploring zoning and other code changes to promote denser residential construction in select locations
- Support zoning and development incentives that prioritize and encourage affordable and mixed-income developments
- Leverage local funding sources to best compete for state and national funding for affordable housing development, like Low-Income Housing Tax Credits
- Explore ways of minimizing costs and leveraging private funds to maximize the impact of public affordable housing dollars
- Research, compete for, support, and develop new funding sources for affordable housing development
- Increase participation in Section 8 and other housing assistance programs by landlords, including by identifying and addressing process barriers
- Experiment with innovative ways of expanding affordable rental options, including accessory dwelling units, tiny houses, etc.

"Purchase defunct malls and turn them into affordable housing apartments"- **P-CHIP Survey Respondent**

Priority: Expand affordable homeownership opportunities

Homeownership can have several benefits for households, including financial gains and security over time, stability, and a way to build intergenerational wealth. Investing in affordable homeownership opportunities, creating pathways to homeownership, and supporting current low-income homeowners are important components in addressing the affordable housing shortfall and advancing housing equity across the city.

Goal 1: Reduce barriers to homeownership

- Support down payment and closing cost assistance for low-income and first-time home buyers
- Provide homebuyer education and financial counseling to ensure success

> "Provide options for first-time home buyers to lower monthly payments to an attainable level. While a credit is helpful for a down payment, unrealistic payments are still prohibitive for many." **- P-CHIP Survey Respondent**

Goal 2: Reduce threats to stable homeownership

- Support and publicize financial assistance, property tax relief, utility assistance, etc. for low-income homeowners
- Expand Homeownership Rehabilitation and Repair Programs
- Promote and support 'green' and sustainable renovation programs such as the Tucson Water Rainwater Harvesting grant and free toilet replacement for low-income homeowners

Goal 3: Expand supply of affordable homeownership housing

- Explore ways to reduce the costs of housing development, including through permit fee waivers.
- Develop a tiered system of housing options, from low-barrier, low-cost "entry-level" housing, to mid-range and larger options that allow households to "graduate" as they become more established and self-sufficient
- Support and expand permanently affordable homeownership through land trusts and deed restrictions
- Explore innovative ownership arrangements including co-housing, cooperatives, community land trusts, etc. to expand ownership options to more people

> "Launch a $10 million Revolving Affordable Housing Loan Fund to help widen the capital pool for affordable housing projects." **- P-CHIP Survey Respondent**

Examples of Potential Performance Indicators: Number of affordable homeownership units, number of rehabilitated homes, Number of new homeowners; Increase in stability of ownership in target areas.

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Priority: Ensure stable, healthy, and safe housing

In addition to being affordable, housing must also support families' health and safety by reducing exposure to environmental hazards and increasing climate resiliency. Similarly, reducing threats to stable housing like evictions or foreclosures, and increasing the ability of older adults to stay in their homes as they age are important priorities of Mayor and Council that P-CHIP implementation can help address.

Goal 1: Ensure access to healthy, safe, and sustainable housing

- Remediate lead-based paint and other lead hazards in low-income homes, especially households with children under six years of age
- Support work of regulators and code enforcement officers to ensure minimum housing conditions are met across Tucson, including in mobile or manufactured homes

> "Environmentally-sound new construction that takes advantage of energy-saving design."- **P-CHIP Survey Respondent**

- Quickly and safely rehouse families displaced due to unsafe living conditions
- Provide emergency home repair services for acute needs that threaten a household's stability, as well as comprehensive home repairs that ensure the safe functioning of a home's major systems in the long term
- Encourage housing developers, homeowners, and landlords to incorporate green building practices and energy efficiency into their units

Goal 2: Reduce and mitigate evictions and foreclosures

- Improve and expand current HCD tenant-based rental assistance program (monthly rental assistance and security and utility deposits)
- Eliminate barriers to accessing rental assistance programs such as by allowing landlords to apply on behalf of their tenants
- Improve collaboration and access to shared information for all organizations working to prevent evictions (this could include creating or supporting a "One Stop Shop' to access all available resources)
- Continue efforts to work closely with constables to prevent evictions when possible
- Support foreclosure prevention programs

Goal 3: Support the ability of older people to age in place

- Explore and support a range of affordable housing options for older adults
- Provide home modifications and accessibility upgrades to allow older adults to age in place, and support persons with disabilities to live independently.

Priority: Increase Housing Equity

Structural racism in U.S. housing policies has contributed to racial disparities and housing segregation. Data presented in Section 2 of this report show that Tucson's residents are still largely segregated by ethnicity. Hispanic or Latino residents are predominately located on the south and west sides of the city. The P-CHIP goals of this section aim to address housing segregation and advance the city's equity initiative.

Goal 1: Reduce housing segregation and its effects

- Explore policy and funding options to increase housing choice, including housing voucher mobility programs, which allow low-income families to live in the neighborhoods of their choosing
- Investigate and enforce fair housing law abuses and educate the public, agency staff, landlords, and lenders about illegal housing discrimination
- Collaborate with Southwest Fair Housing Council and others to affirmatively further fair housing

Goal 2: Target affordable housing investments in priority areas

- Strategically acquire property for affordable housing development
- Align city investment in affordable housing with other key city priorities such as the Thrive in the 05 Choice Neighborhoods Initiative
- Prioritize equitable affordable housing development in areas near transit, resources, and job centers, as well as neighborhoods at risk of displacement due to rising housing costs and high opportunity areas to promote housing choice

Examples of Potential Performance Indicators: Number of low-income households in high opportunity areas; Number of fair housing complaints; Affordable units developed in target areas.

> "Address the racist legacy of housing segregation that continues to concentrate minorities in low-opportunity under-resourced neighborhoods."
> **- P-CHIP Survey Respondent**

SECTION 4:

IMPLEMENTATION

Photo Credit: Chronis Yan on UnSplash

As our Challenges section demonstrates, the needs in Tucson are extensive, and the funds available are never enough to meet them. The COVID pandemic and associated economic downturn have created immediate priorities that will affect plan implementation, but we aim to look long-term, and to work with our community partners to imagine what more comprehensive solutions look like as well. These challenges are not small or simple, but we have the ability to tackle them.

The P-CHIP Priorities and Goals provide a structure to tailor investment to support Tucson's Infrastructure of Opportunity both in the near-term as well as the long-term. This section outlines the funding anticipated to be available for the activities outlined in P-CHIP that can best address Tucson's challenges. This section also outlines the Call for Projects process which will result in programs and projects that best meet the current needs of the region. Finally, the section outlines accountability measures HCD plans to build into the funding allocation processes.

FUNDING AVAILABILITY

The Housing and Community Development (HCD) Department receives both federal and local funding to support the activities identified in the P-CHIP. Many of these sources are U.S. Department of Housing and Urban Development (HUD) formula funds from the HUD Office of Community Planning and Development (CPD) passed onto the City of Tucson by direct allocation. It is important to note that each of these funding sources comes with requirements and restrictions. This Funding Availability section attempts to 'demystify' the funding that HCD receives by providing an overview of the anticipated funding sources along with information about each funding source. The summary is an oversimplification of the requirements and nuances of each of the federal funding sources. More detailed information is available on the HUD website.[97]

This table below summarizes the total projected annual funding sources that the P-CHIP plan covers based on the City of Tucson/Pima County Consortium 2020-2024 HUD Consolidated Plan and the historical allocation of General Fund dollars for Human Services.

Funding Landscape

Revenue Source	Description	Annual Funding Estimate
PEOPLE		
CDBG Human/Public Services	HUD Community Development Block Grant Program (CDBG) 15% set-aside for Human Services	**$840,417**
GF Human Services	City of Tucson General Funds (GF) for Human Services	**$1,400,000**
ESG	HUD Emergency Solutions Grant Program (ESG)	**$447,381**
HOPWA	HUD Housing Opportunities for People with AIDS (HOPWA)	**$727,527**
		Estimated Total: $3,415,325
COMMUNITIES		
CDBG Community Facilities and Improvements	HUD CDBG- Community Facilities and Improvements	**$1,840,000**
		Estimated Total: $1,840,000
HOMES		
HOME	HUD HOME Investment Partnership Program	**$2,255,039**
CDBG Decent Affordable Rental and Homeowner Housing	HUD CDBG - Decent Affordable Rental and Homeowner Housing	**$1,801,806**
		Estimated Total: $4,056,845

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Community Development Block Grant Funding – Low-Moderate Income Benefit Requirement

The section below outlines Community Development Block Grant (CDBG) funding in each of the P-CHIP Focus Areas because this funding source can fund a broad array of programs and projects.

However, one important requirement of CDBG funding is that each activity meets one of three national CDBG objectives. The national objective that the City of Tucson focuses on with its distribution is benefiting low- and moderate-income (LMI) persons.

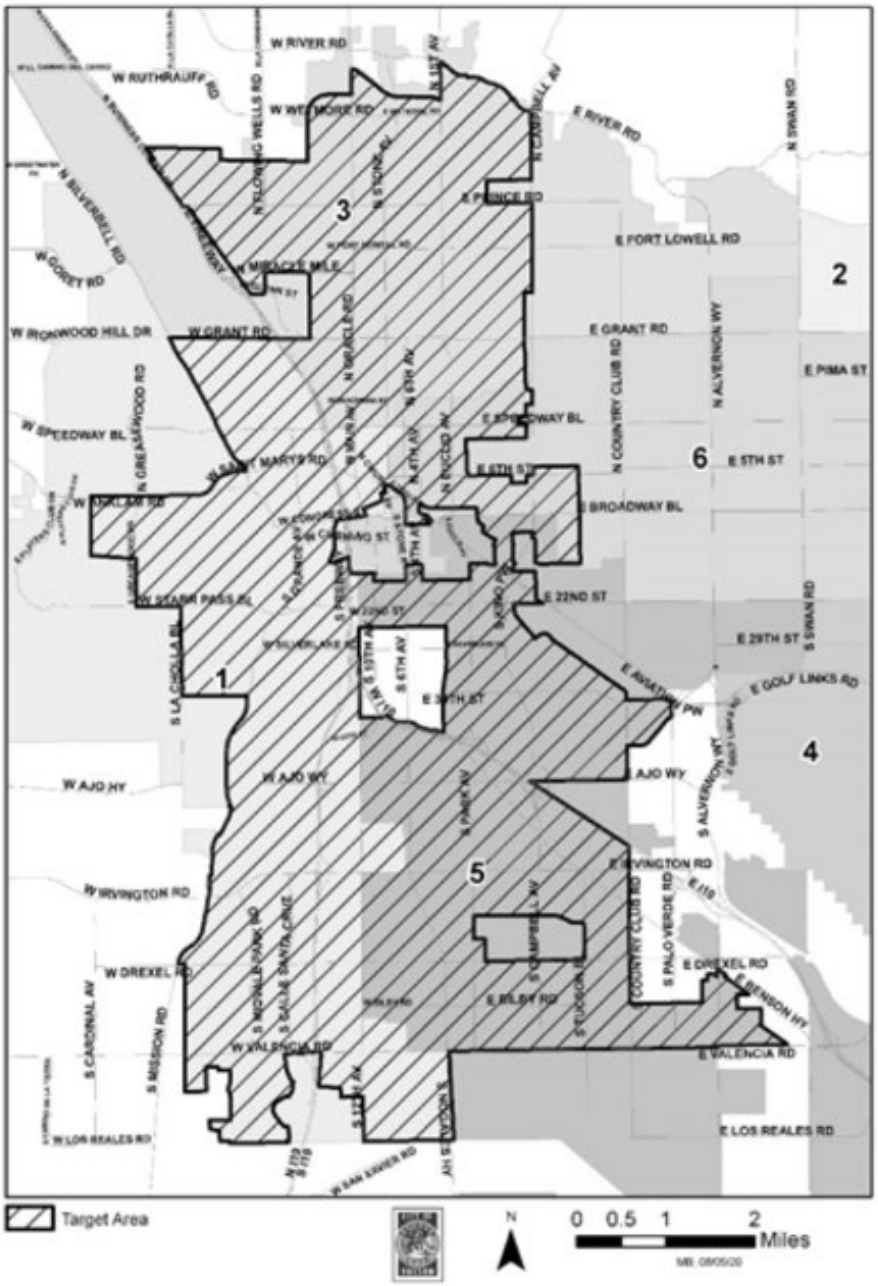
HUD outlines different ways to meet the LMI objective. For example, if a program or an affordable housing project primarily serves low-to-moderate income individuals, that activity likely will meet the LMI requirements.

Another way to demonstrate the LMI rule is met is through a Low Mod Area Benefit. An area benefit activity is one that benefits all residents in a particular area, where at least 51% of residents are LMI persons.

To help with identifying eligible projects and to ensure the funds are directed to areas of low-income concentration, the City of Tucson designated a target area with the largest proportion of low-and-moderate income households (see map below). The target area is current approximately 18% of the city (44 out of 242 square miles). At least 40% of the public facilities monies must be spent in the target area.

The term
Low to Moderate Income
("low-mod" or LMI) refers to those making less than 80% of the Area Median Income as defined by HUD. See Section 2 for information on the various measures of income.

City of Tucson CDBG Target Area



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Funding Sources by Focus Area

People

There are currently four different funding sources that fund activities within the People Focus Area.

1. CDBG Human/Public Services: HUD Community Development Block Grant (CDBG) 15% set-aside for Public Services[98]

HUD allows for up to 15% of CDBG funding be set aside to fund Public Services. The adopted City of Tucson – Pima County Consortium 2020-2024 HUD Consolidated Plan directs the full 15% of the funding be directed to Public Services. In HUD's words, "Public Services can strengthen communities by addressing the needs of specific populations, and by supporting economic development."[99]

CDBG Public Service Funds can address a range of individual needs including but not limited to:

- Job training and employment services
- Financial training
- Health care
- Child care
- Crime prevention and public safety
- Fair Housing activities
- Education programs
- Services for older adults
- Services for homeless persons
- Drug abuse counseling and treatment
- Recreation programs
- Homebuyer down payment assistance
- Emergency assistance payments

Examples of previously funded programs:

- Domestic Violence Hotline and Shelter
- Emergency Assistance and Emergency Shelter
- Homeless Youth Services Human Trafficking Program
- Investigative Services for Child Abuse Victims
- Home Delivered Meals and Home Care for Aging Adults

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2. General Fund Human Services

The City of Tucson budget traditionally includes general fund dollars which HCD allocates to Human Services. This funding source tends to be one of the most flexible with the least restrictions but is also very competitive.

Examples of previously funded programs:

- Home Delivered Meals for Low-Income older adults and Adults with Disabilities
- Supportive Programs for Deaf and Blind Persons
- Homeowner and Tenant Legal Protection Project
- STEM Education
- Homeless Youth Parent Education Program
- After Hours Homeless Outreach

Photo Credit: Southern Arizona Research, Science and Engineering Foundation (SARSEF)

3. ESG: HUD Emergency Solutions Grants Program[100]

Emergency Solutions Grants (ESG) funds support individuals experiencing homelessness to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. ESG funds can be used to provide a wide range of services and supports under five program components. HUD requires ESG priorities and awards be made with the Continuum of Care.

1. Street Outreach: Engage homeless individuals and families living on the street.
2. Emergency Shelter: Improve the number and quality of emergency shelters and help operate shelters.
3. Rapid Re-Housing: Rapidly re-house individuals and families experiencing homelessness.
4. Homelessness Prevention: Prevent families and individuals from becoming homeless.
5. Homeless Management Information System (HMIS): These activities are designed to fund ESG recipients' and subrecipients' participation in the HMIS collection and analyses of data on individuals and families who are homeless and at-risk of homelessness.

Examples of previously funded programs:

- Emergency Shelter Programs
- Rapid Rehousing Programs

In addition to ESG funding, the City of Tucson is also awarded Continuum of Care (COC) Grants from HUD. These funds are restricted to programs that assist the homeless and are administered through **Tucson Pima Collaboration to End Homelessness (TPCH).** Approximately **$8M** is allocated annually in COC funds.

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4. HOPWA: HUD Housing Opportunities for Persons with AIDS (HOPWA)[101]

Housing Opportunities for Persons with AIDS (HOPWA) program funds housing assistance and support services for low-income persons with HIV/AIDS and their families. HOPWA funds may be used for a wide range of housing, social services, program planning, and development costs.

These include, but are not limited to:

- Acquisition, rehabilitation, or new construction of housing units
- Costs for facility operations
- Rental assistance and short-term payments to prevent homelessness
- Case management
- Substance abuse treatment
- Mental health treatment
- Nutritional services
- Job training and placement assistance
- Assistance with daily living

Examples of previously funded programs:

- Rent, mortgage, and utility assistance
- Case management and support services
- Transportation

Communities

There are currently two different funding categories that fund activities within the Communities Focus Area:

1. HUD Community Development Block Grant (CDBG) Community Facilities and Improvements Funding[102]

CDBG can fund a variety of neighborhood and community projects that are integral to thriving communities. CDBG funding is designed to benefit low-to-moderate-income individuals, and the Community Facilities and Improvement Funding falls into two main categories:

Neighborhood Improvements:

These are improvements to publicly owned infrastructure that includes but is not limited to:

- Streets, including bicycling and walking facilities as well as bus shelters, signs, traffic and streetlights
- Underground utilities and fire hydrants
- Tree plantings
- Park improvements, including playgrounds, shade structures, and others
- Installation of broadband infrastructure
- Public art installations and aesthetic improvements such as decorative street lighting, sculptures, fountains, benches, and planters

Public Facilities: These are improvements to public facilities, or that are owned by a non-profit and open to the general public and provide services for low-to-moderate-income individuals.

Eligible public facility projects include but are not limited to:

- Centers for older adults
- Youth and child care centers,
- Neighborhood/community centers
- Health clinics
- Facilities/housing for persons with special needs (e.g. persons with disabilities, domestic violence shelters, nursing homes, homeless shelters, group homes, and halfway houses).
- Fire stations

Eligible costs associated with public facility activities include:

- Energy efficiency improvement
- Improvements to improve accessibility for Persons with Disabilities

Examples of recently funded projects:

- S. 12th Streetscape Project
- Solar Installation at a local women's shelter
- Downtown Accessible Restrooms
- Accessible Bus Stop Shelters

2. HUD Community Development Block Grant (CDBG) Economic Development Funding[103]

CDBG can fund select economic development projects including:

- Streets, including bicycling and walking facilities as well as bus shelters, signs, traffic and streetlights
- Underground utilities and fire hydrants
- Tree plantings
- Park improvements, including playgrounds, shade structures, and others
- Installation of broadband infrastructure
- Public art installations and aesthetic improvements such as decorative street lighting, sculptures, fountains, benches, and planters.

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Homes

There are currently two different funding categories that fund activities within the Homes Focus Area:

1. HOME: HUD Home Investment Partnerships Program[104]

The HUD HOME program provides funding to the City of Tucson to implement local housing strategies designed to increase homeownership and affordable housing opportunities for low and very low-income households.

Eligible uses of funds include but is not limited to:

- Acquisition and/or rehabilitation of affordable rental housing, including energy-efficiency, disability accessibility improvements, temporary or permanent relocation
- Construction of or acquisition/rehabilitation/resale of affordable homeownership housing
- Construction of new affordable rental housing including site acquisition, site improvements, and demolition
- Assistance for first time home buyers (Downpayment Assistance)
- Permanent supportive housing and transitional housing
- Tenant-based rental assistance (monthly rental assistance and security and utility deposits)

The adopted City of Tucson – Pima County Consortium 2020-2024 HUD Consolidated Plan directs 15% of HOME funds for development activities carried out by Community Housing Development Organizations (CHDO).

Examples of Recently funded Projects:

- Down Payment Assistance
- Tenant Based Rental Assistance
- Affordable Rental Housing Projects

2. CDBG Decent Affordable Rental and Homeowner Housing[105]

Eligible uses of funds include but is not limited to:

- Homeowner Rehabilitation
  - Can include emergency repair programs, spot rehabilitation, or full house rehabilitation.
  - Energy Efficiency
  - Accessibility improvements (e.g. ramps, grab bars)
  - Weatherization
  - Lead Based Paint
- Homeowner Counseling
- Home Purchase Activities
  - Downpayment Assistance
  - Closing Costs
  - Principal write-down assistance
  - Subsidize interest rates
- Rental Housing Activities
  - Acquisition
  - Rehabilitation
- New Construction of rental housing by a Community Based Development Organization
- Services in Connection with Housing

Examples of Recently Funded Projects:

- Major and Minor Home Repair
- Home Accessibility Improvements
- Mobile Home Repair
- Lead Hazard Reduction
- Affordable Housing Rehabilitation

P-CHIP CALL FOR PROJECTS

People, Communities, and Homes Funding Allocation

The P-CHIP Priorities and Goals are implemented through the allocation of HCD funding. The designated funding will be allocated via a P-CHIP Call for Projects. The Call for Projects process will be used to allocate 1) human services and HOPWA funding; 2) community facilities funding, as described in the "Funding Availability" section above; and 4) Home Investment Partnerships Program (HOME) funds.

In previous years, a Request for Proposals (RFP) process occurred every two years to allocate the funding. The P-CHIP Call for Projects may continue to follow a two-year cycle or may occur more frequently if new money becomes available (e.g., COVID-19 relief or stimulus dollars) or if emerging needs arise.

The full details of the process, including the application, funding available, scoring criteria, and the funding schedule will be included with the **P-CHIP Call for Projects**.

In alignment of the P-CHIP principles, throughout the P-CHIP Call for Projects, HCD will prioritize accountability and transparency with a public-facing decision process. Local nonprofits, community groups, neighborhoods, and developers will be encouraged to apply for these funds. A citizen-and-staff committee will review the applications and make funding recommendations to be finalized and adopted by Mayor and Council.

Evaluation Committee and Criteria

A scoring panel made up of citizens, City staff, Pima County staff, and persons with expertise in the different P-CHIP focus areas will evaluate the proposals and provide funding recommendations. To avoid a conflict of interest, no person associated or employed with an agency that applies for funding will participate on the committee.

Key features of the Call for Projects process:

- Community-facilities-eligible funding will be allocated via this open process
- There will be a minimum grant level of $50,000
- The Call for Projects process will also gather information to help develop a longer-term vision. So many of the truly transformative approaches that are needed will take more than one funding cycle to develop. What do agencies see in our future, and how do we plan proactively to get there?
- Funding will be targeted toward Tucson's most-vulnerable neighborhoods (as identified by the Neighborhood Vulnerability Index) and its CDBG-eligible area map (based on Census data)

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Resolution No. 23260

Resolution No. 23260 adopted by the Mayor and Tucson City Council dated November 4, 2020 established policy relating to the awarding of funding for human services:

"As part of any agreements that the City enters into with providers for human services, the agreements shall include provisions that prohibit the provider from engaging in discrimination based on race, color, religion, ancestry, sex, age, disability, national origin, sexual orientation, gender identity, familial status, and/or marital status."

This policy language will be included in each Call for Projects that allocates human services dollars and will be incorporated into the contract agreements.

Evaluation Committee and Criteria

A scoring panel made up of citizens, City staff, Pima County staff, and persons with expertise in the different P-CHIP focus areas will evaluate the proposals and provide funding recommendations. To avoid a conflict of interest, no person associated or employed with an agency that applies for funding will participate on the committee.

Proposals will be evaluated according to the following criteria:

- Potential for meaningful positive impact on the target issue or population (results/outcomes)
- Project readiness
- Proposal and budget completeness, clarity, and quality
- Leverage of additional funding or resources, including commitment from other funding sources
- Organizational and team experience and capacity to support the proposed activity within the required time period
- Alignment with the highest funding priorities (outlined below)
- Inclusion of all required application elements and adherence to the Call for Projects requirements
- Other criteria as identified

Weights and other details will be shared as part of the P-CHIP Call for Projects.

Funding Priorities

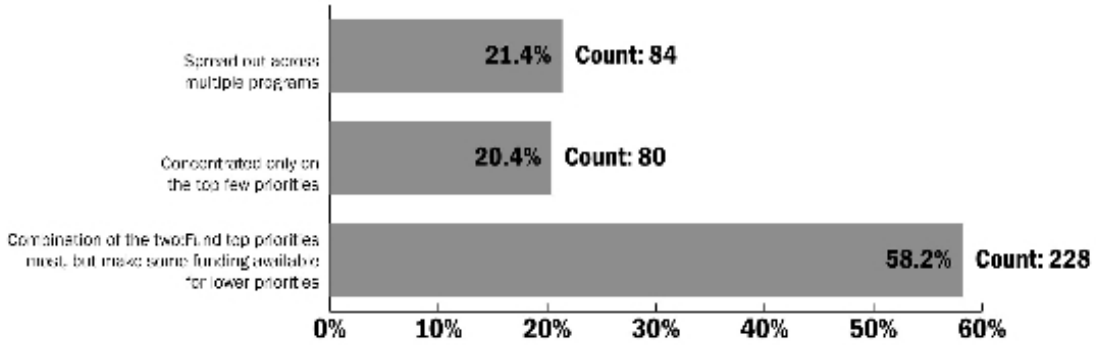
Based on the review of guiding plans and existing community priorities, evaluation of data, and the feedback we received from our surveys, stakeholder meetings, and other public outreach, several issue areas emerged as clear priorities:

- Addressing and preventing **homelessness**, through the Housing First approach, both with improved services and improved access to shelters
- Access to **health care** (including behavioral and physical) and **food security**, both priorities exacerbated by the COVID pandemic
- Equitable access to opportunities for **training, education, and housing** as a pathway out of poverty
- **Transportation and mobility** for all forms of travel, including improved access to public transit, improved bike and pedestrian infrastructure, improved ADA compliance, and improved roadways (lighting, shade trees, etc.)
- Access to quality **affordable housing**, both through increasing the supply and through improving existing housing

Among the many target populations, **children and youth**, **people experiencing homelessness**, and **older adults** were identified by survey respondents as particularly high priority.

Balancing Needs

In the funding selection process, an attempt will be made to balance immediate needs with programs that look to address root causes and long-term solutions. Similarly, a goal of P-CHIP is to balance the conflicting interests of supporting a broad array of programs across numerous priority areas with more narrowly targeting investments on fewer high priority items for greater impact. This challenge was highlighted by the incredibly even split to the survey question, "Given the limited funding available, how should the City seek to distribute funds across priorities you have identified?" Responses below:



"There comes a point where we need to stop just pulling people out of the river. We need to go upstream and find out why they're falling in." – **Bishop Desmond Tutu**

Call for Projects Timeline

As mentioned, the details of the funding schedule and timeline will be released with the Call for Projects. Below is an Example of a Timeline for a Call for Projects with a contract start date the beginning of the fiscal year, July 1. The Timeline is connected to the HUD Annual Action Plan process.

HCD P-CHIP Call for Projects and HUD Annual Action Plan (AAP) Timeline*	
September/October	Call for Projects released for People, Communities, and Homes Investment Plan Funding
October	Applicant orientation and technical assistance (CDBG, General Fund, ESG, HOPWA, and HOME)
October	Pre-application deadline (determines eligibility)
December	Application deadline
January/February	Selection committee reviews and recommends funding, incorporate into draft Annual Action Plan
February/March	HCD Annual Action Plan study session to review and provide tentative approval of final funding recommendations (public meeting)
March/April	30-day public comment begins for Annual Action Plan
April	Annual Action Plan public hearing and Mayor and Council approve Annual Action Plan
May 15	Annual Action Plan submitted to HUD
July 1	New fiscal year funding year begins

**The timeline for the fiscal year 2021-2022 funding will begin in January upon adoption of P-CHIP.*

Leveraging Opportunities

Creating the necessary impacts will require leveraging outside investment, seeking synergies among our many priorities that will allow us to achieve more than one goal at once, and tapping into innovative ideas everywhere. Leveraging opportunities may be available through the private sector, community foundations or community partners, or through related City of Tucson and other government initiatives. Below are examples of some of the related City of Tucson efforts that offer opportunities for leveraging investments for the implementation of the P-CHIP Priorities and Goals.

- Community Public Safety Pilot Program: The Mayor's Office will be launching this innovative program in 2021
- Parks + Connections Bond Program (Prop 407): Approved by voters in November of 2018, a $225 million bond package to improve City parks amenities and connections

- Green Stormwater Infrastructure Program: Adopted by Mayor and Council via ordinance in February 2020, this program established a monthly fee for Tucson Water customers, which will raise an estimated $3.2 million each year to fund capital investments in green infrastructure
- Mayor of Tucson Million Trees Initiative: Prioritizes tree planting throughout Tucson as an extreme heat, climate change mitigation and adaptation, and neighborhood investment measure

- City of Tucson Community Wireless Program – A program to provide free wireless access to members of the community to support remote learning, telework, and access to virtual services
- Complete Streets Ordinance: City ordinance that requires transportation projects to accommodate all forms of transportation

- Choice Neighborhoods: A HUD-funded planning grant that is part of the Thrive in the 05 collaboration to support locally driven strategies that address challenges in a select Tucson area (Oracle/Miracle Mile) through a comprehensive approach to neighborhood transformation. Key improvements identified to-date that the transformation plan will focus on are rehabilitation of the Tucson House, neighborhood beautification and crime reduction, supporting local business, services, and schools

- Slow Streets - The Department of Transportation and Mobility (DTM) piloted Tucson Slow Streets, an initiative to reconfigure streets to support social distancing and encourage physical activity. The Slow Streets program temporarily closes certain streets to all but local traffic, giving Tucsonans more space to safely walk, bike, roll, and run

Accountability and Performance Monitoring

Another key principle of the P-CHIP, accountability, is critical to maintaining public trust. The City of Tucson is accountable to the taxpayer, to ensure the funding the City receives and distributes is well spent and leads to desirable outcomes. Agencies who receive funding from the Call for Projects process will be expected to co-develop performance indicators (both quantitative and qualitative) and regularly report on the status of the indicators. For programs using Emergency Solutions Grant funding, ESG services are to be evaluated using standard performance measures developed in partnership with the Continuum of Care and ESG partners at Pima County and the Arizona Department of Economic Security.

The P-CHIP website will be updated regularly to track progress on meeting the goals identified. The website will continue to host stories and pictures to highlight successful programs and projects.

P-CHIP NEIGHBORHOOD PILOT PROGRAM

In addition to the Call for Projects Funding Allocation Process, HCD is interested in partnering with local neighborhoods, other City departments, and community partners on a pilot program that focuses on community-led engagement and decision-making.

HCD understands that often, social and government programs are constrained by funding restrictions and agency practices rather than fully guided by community needs. For example, if the Department of Transportation and Mobility learns during a program targeting road safety that a community is most concerned about access to health care, there is little they can do. Tucson Water can't redirect funds intended for green stormwater infrastructure to affordable housing, even if that is a neighborhood's first priority.

While organizations and government agencies can gather and share this information with each other, it's rare that a program can immediately translate such communication into a response – there simply isn't enough flexibility in typical funding programs.

Also, the disparities referenced throughout this plan as well as historical decisions that has eroded trust in local government, often means there is low participation in planning processes led by government.

With the P-CHIP, we aim to explore ways to better understand and respond more effectively to the needs of our most-vulnerable populations and neighborhoods through a truly "community-driven" pilot program. As part of P-CHIP implementation moving forward, HCD is interested in partnering on a pilot program that will support community-based leaders to work with the residents of vulnerable neighborhoods to determine their key needs, identify key stakeholders, and identify solutions that work best for them.

HCD will explore using CDBG funds (and potentially other funds) to support the project(s) or program(s) the community identifies as most important. While no funding is completely without constraints, the intention is that the process will involve multiple partners that will enable maximum flexibility for a community-driven response.

Details of the program will be developed in full once the P-CHIP has been finalized.

MOVING FORWARD

Further Exploration

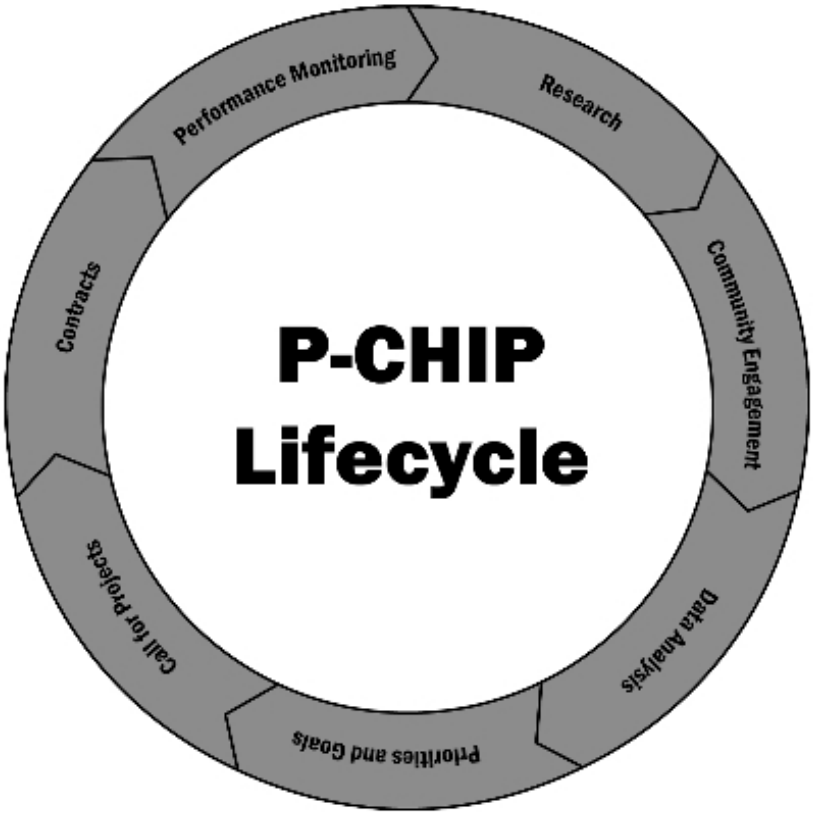
The P-CHIP is a starting point for HCD. The Priorities and Goals are not comprehensive and there will need to be updates moving forward. Comprehensive solutions – and the creation of a fairer, more just, more sustainable, and more equitable Tucson – will require a great deal more clarity about what we want to look like in the future, and more focus on root causes rather than crisis response. As part of the action plan emerging from the P-CHIP process, we'll build off of the P-CHIP development. The core focus areas: People, Communities, and Homes are the goalposts for HCD into the future. The P-CHIP identified major challenges looking at data, important Priorities and Goals, and outlined activities to continue to address the challenges. More needs to be done in terms of identifying metrics to track, obtaining more personal stories for greater understanding and public awareness, and collaborating on the next update of Plan Tucson, the General Plan, to help shape Tucson's long-term vision. The following questions are examples of need to be explored further:

- How will Tucson create a sufficient system of decent transitional, affordable, and attainable housing to serve a mix of needs and incomes?
- What needs to happen to ensure everyone has access to the behavioral and physical health care they need?
- Are we truly reducing the disparities outlined in P-CHIP and eliminating the environmental justice issues associated with pollution, extreme heat and climate change, and making sure everyone can get where they need to go, safely, conveniently, and by whatever mode of transportation they choose?
- Will vibrant businesses and entrepreneurs in every corner of Tucson have access to opportunities over the next decade?

Whatever that Future Tucson looks like, we won't be able to get there without collaboration, innovation, and communication. How do we truly build an infrastructure of opportunity so that everyone can thrive?

P-CHIP Lifecycle

Given there is still much to do, P-CHIP should not be viewed as a one-time planning effort. P-CHIP is designed to allow for flexibility and changes in the way HCD does business to learn as we move forward. The P-CHIP website will serve as the hub for updates, performance monitoring, the Call for Projects, and more. Below is a graphic that represents the cyclical nature of P-CHIP and how the steps along the way will inform decisions and new programs.



Endnotes

[1] US Census Bureau, American Community Survey, 1-Year Estimates, Demographic and Housing Estimates, Table ID DP05

[2] US Census Bureau, 2010 and 2019 American Community Survey, 1-Year Estimates, Demographic and Housing Estimates, Table ID DP05

[3] US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates, Industry by Sex for the Civilian Employed Population 16 Years and Older, Table ID S2403

[4] US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates, Educational Attainment, Table ID S1501

[5] US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates, Demographic and Housing Estimates, Table ID DP05; 2000 and 2010 US Census

[6] City of Tucson, Poverty and Urban Stress Report, 2020. Data source: US Census Bureau, 2014-2018 American Community Survey 5-Year Estimates

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APPENDIX A, B, C:

A: Mayor and Council 2020 Priorities – Strategies for HCD

B: Guiding Plans

C: Public Engagement Summary

Photo Credit: Shelly Paul on UnSplash

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APPENDIX A. MAYOR AND COUNCIL 2020 PRIORITIES

Create Housing First Coordinator

New: Will provide coordination with City departments on all homeless efforts and recommend best practices to reduce homelessness.

Cost/Resources: $106,800, General funds or split GF/Federal Funds

Reduce Evictions

New: Develop coordination with Constables to connect persons who are evicted and have no other resources to homeless outreach staff who can provide connection to housing and services. Utilize vouchers committed for homeless or at risk of homelessness through existing set-aside vouchers with service providers called Specialty Vouchers.

Cost/Resources: Utilize Existing Specialty Vouchers

Reduce Evictions

Underway: Collaborate with Pima County who coordinates the Emergency Services Network. This is made up of Service Providers that assist with Eviction Prevention and look at how we can bring resources together to fund this program.

Cost/Resources: No financial costs but explore greater coordination

Reduce Evictions

Underway: We currently fund Interfaith Community Services $50,000 to provide eviction prevention services which is used for deposits, utilities and eviction prevention.

Cost/Resources: $50,000, Human Service Funds

Reduce Evictions

Underway: Currently provide move-in deposit assistance for persons experiencing homeless who get a Specialty Voucher. Without this assistance the individual could not get into the unit or could be evicted for failing to pay move-in deposit.

Cost/Resources: $45,126, HOME Funds

Reduce Evictions

Underway: Fund Legal Aid for homeowner and tenant protection with evictions and foreclosures.

Cost/Resources: $53,269, Human Service Funds

Expand Homeless Work Program

New: Expand the Tucson Homeless Work program operated by Old Pueblo Community Services from 4 days to 5 days. Would need to fund with General Funds due to CDBG Public and Human Service dollars not available until July 2021

Cost/Resources: $34,000, General Funds

Focus on Housing First Model

New: Expand low barrier shelter beds- Acquisition of two properties in progress. One facility will provide shelter for adult (TPD/FD and Homeless Outreach referred) and the other for homeless youth. Sales price is $1.9 million which will come out of CDBG funds. Need to identify funding for services to operate additional shelter beds. Estimated funding need is $125,000/month, $1,5 million/year.

Cost/Resources: $1,900,000 Purchase, CDBG Funds, $1,500,000 Services, Identify other federal/grant funds

Focus on Housing First Model

New: Hire two Homeless Navigators $55,800/each. This function is valuable in connecting persons experiencing homelessness to housing and services. There is demonstrated success in other communities using navigators in the following areas/departments:

Courts

Police MIHST Unit

Homeless Protocol

Cost/Resources: $111,600, General Funds or other Funds

Anti-Displacement & Gentrification

Underway: The Poverty Urban Stress report will be completed by 2/28.

Cost/Resources: Developed in coordination between HCD and IT.

Anti-Displacement & Gentrification

Underway: Additional work is being done by U of A Eller College to provide greater information on communities that are vulnerable to displacement and gentrification. The study titled, Vulnerable Neighborhood Index, will be done in phases. The first phase is a heat map identifying vulnerable neighborhoods which will be produced in March 2020. Two additional phases with additional information will be completed by Summer 2020.

Cost/Resources: Existing PDSD Contract with Eller College

Anti-Displacement & Gentrification

Underway: A Commission will be formed to address and recommend solutions to mitigate displacement and gentrification. The Commission will be overseen by HCD. Staff will present to Mayor and Council in March on the draft plans for the Commission.

M & C direction to City Staff

Increase Voucher Utilization

Underway: Increase Staffing

8 Temporary Staff – $6,650/week – 6 months $173,000

Temporary Assistance Quadel (Vendor) Experienced housing staff to assist with backlog – 5 staff members -Cost $400,000 4 months (includes travel and lodging)

4 permanent Housing Specialist II new hires will start on March 9, 2020 which will leave 1 vacancy. Cert list has been exhausted.

Inspections – 3 vacancies. Estimate to open recruitment April. Using nonprofit, Old Pueblo, to assist us with inspections for Specialty/Homeless programs.

Housing Specialist I recruitment closes on 3/3/20 (3) vacancies

10 vacancies will remain for HCD after these hires

Cost/Resources: $573,000, HCD Administrative Funds for Temporary Assistance, Filling of vacancies covered by HCD Budget

Increase Voucher Utilization

Underway: HCD has issued 191 vouchers since January. Will increase voucher issuance to 250 per month minimum from March through September. This will result in over 1,750 vouchers being issued but is necessary to reach 105% utilization by Dec 2020.

Cost/Resources: Utilize Existing Vouchers

Increase Voucher Utilization

New: There is a cost with the plan to issue vouchers as described above. The financial impact is as follows:

CY 2020 – Estimate to overspend by $2,132,000. The excess will be covered by reserves which is at $4,771,000. This will put us at 105% of budget authority and 98% of unit months eligible.

CY 2021 – Estimate to overspend HUD funding by $2,100,000. There are enough HUD reserves to cover this but HUD may require us to use non-federal funds which is the HCD Reserve Funds to cover this amount because we will have exceeded the allowable units leased. We project the reserves for Section 8 at end of 2021 to be $450,000.

CY 2022- Will maintain utilization at 100% of unit months eligible and 98.5% of budget authority. Will not require any non-federal funding. Project reserves at end of 2022 to be $450,000.

Cost/Resources: $2,132,000, Section 8 Reserve Funds (2020), $2,100,000, Possible cost HCD Administrative Reserve Funds (2021)

Partnerships and Collaborations

New: HCD Department has many programs and partnerships with the County and nonprofits. There are additional collaborations that have not been explored such as the City and County Industrial Development Authorities that have a focus on housing. HCD will reach out to these organizations and explore ways to work together.

Cost/Resources: No financial costs but explore new collaborations

Grant Writer

Underway: HCD has a grant writer position that is tasked with identifying additional funding opportunities specific for TPCH and homeless programs. We have other staff who also provide grant writing for any new HUD funding opportunities.

Cost/Resources: Existing staff resources

Outreach and Retain Landlords

New: Hire one Housing Navigator. There is a segment of voucher holders who would be considered hard to house because of a variety of issues like credit, criminal or other challenges to finding units in the community. A Housing Navigator is someone who has made great relationships with landlords and knows landlords who will work with those who are hard to house.

Cost/Resources: $55,800, HCD Administrative Funds

Current Commitments

Underway: Choice Neighborhoods / Thrive in the 05 Planning and Action Grant, HCD has committed to:

- A multi-year planning process to develop a community-driven Transformation Plan in the Oracle Road/Miracle Mile area, including redevelopment of the Tucson House,
- Participation and leadership in the Thrive in the 05 collaboration between Choice Neighborhoods, Community-Based Crime Reduction, and Workforce & Economic Development efforts,
- Applying for a $35M Choice Neighborhoods Implementation Grant and other funding to achieve the vision set out through this planning.

Cost/Resources: $1.3 million, HUD Funds, Existing staff resources and partners

Other Needs

New: HCD Leadership

In addition to the Deputy Director recruitment underway, add a second Deputy Director. This position would focus on strategic planning, building partnerships and collaborations, serve as Department's PIO.

Cost/Resources: $150,000, HCD Administrative Funds

APPENDIX B. GUIDING PLANS

Guiding Plans

Eviction and Homelessness Prevention Task Force

Pima County

Plan Year: 2020

Source Background: A 23-member community-based Task Force on Evictions and Homelessness Prevention

Plan Background: Plan centers on five recommendations: 1) Preventing Evictions: Rental Assistance; 2) Mitigating Consequences of Evictions & Housing Insecurity; 3) Affordable Housing (Preservation and Production); 4) Improving the Delivery of Judicial Services; 5) Research and Evaluation

As Relates to the P-CHIP: Strategies in recommendations on increasing affordable housing

Where to Find It: https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/CSET/CSET%20newsroom/2020/Eviction%20Task%20Force/Final%20Task%20Force%20ereport1208.pdf

Community Data Report and Update on Homelessness in Pima County, Arizona

Tucson Pima Collaboration to End Homelessness

Plan Year: 2020

Source Background: Coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness and addressing the issues related to homelessness in Tucson and Pima County

Plan Background: Covers the existing homeless response system and key challenges

As Relates to the P-CHIP: Addresses challenges and implications involving outreach and engagement, coordinated entry, homeless prevention and diversion, emergency shelter and interim housing, behavioral health services, supportive and affordable housing, coordinated community planning

Research & Methodology: A synthesis of data reported through annual HUD Point in Time counts conducted in Tucson/Pima County, system performance reports that highlight trends and progress in key drivers of ending homelessness, inventories of temporary shelter and supportive housing capacity dedicated to individuals

and families experiencing homelessness, and counts of persons served through longer-term rapid rehousing and permanent supportive housing subsidy programs in the region.

Where to Find It: https://tpch.net/wp-content/uploads/Tucson-Pima-County-2020-Community-Data-Report-Update-on-Homelessness.pdf

Coordinated Community Plan to Prevent & End Youth Homelessness

Tucson Pima Collaboration to End Homelessness

Plan Year: 2020

Source Background: Coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness and addressing the issues related to homelessness in Tucson and Pima County

Plan Background: Created as a part of Tucson/Pima County Continuum of Care's selection as a Youth Homelessness Demonstration Program Round 3 Community in August 2019 by the U.S. Department of Housing & Urban Development

As Relates to the P-CHIP: Increase educational engagement and income generation among youth; increase access to and use of medical, behavioral, dental, and social/emotional well-being resources; better identify and immediately assist youth at risk of homelessness; improve housing permanency and decrease repeat homelessness among youth; engage youth in leading and implementing strategies to address youth homelessness

Research & Public Outreach: A core operations group guides more than 150 individuals representing dozens of community agencies, stakeholder groups, and youth communities to create this plan.

Where to Find It: https://tpch.net/wp-content/uploads/Tucson-Pima-County-Coordinated-Community-Plan-to-Prevent-and-End-Youth-Homelessness.pdf

Scaling Smart Resources, Doing What Works: A System-level Path to Producing Supportive Housing in Tucson and Pima County. TPCH Gaps Analysis

Tucson Pima Collaboration to End Homelessness

Plan Year: 2019

Source Background: Coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness and addressing the issues related to homelessness in Tucson and Pima County

Plan Background: Assessment of the community's efforts to reduce homelessness. Makes recommendations on strategies to improve outcomes and develops a unit goal to meet existing gaps in housing availability in the region

As Relates to the P-CHIP: Focuses on supportive housing (i.e., combining affordable housing with supportive services)

Research & Public Outreach: Uses the 2018 Point in Time Count of Homelessness (PIT Report), and Coordinated Entry System data

Where to Find It: https://tpch.net/2019gapsanalysis/

Age-Friendly Tucson

Pima Council on Aging, City of Tucson, ELDER Alliance, AARP Arizona

Plan Year: 2019

Source Background: In response to City of Tucson Mayor & Council resolution to participate in AARP's and the World Health Organization's Network of Age-Friendly Cities and Communities, the City formed a working group with ELDER Alliance, AARP Arizona, and Pima Council on Aging to research and compile report

Plan Background: From survey findings, key issues that impact the plan include: affordability and feasibility of aging in place; housing and transportation concerns; availability of shaded access; home upkeep and maintenance; rental costs; the need for affordable, safe, and accessible activities; lack of quality sidewalks and poorly maintained infrastructure leading to the risk of falling; difficulty in accessing preventative medical care

As Relates to the P-CHIP: Areas of infrastructure, housing costs, quality and safe infrastructure, affordable medical care; the plan's focus on the 8 Domains of Livability is incorporated into the Priority Framework

Research & Public Outreach: Both AARP Arizona and Pima Council on Aging conducted telephone surveys of residents age 50 and older. A total of 518 telephone interviews were conducted by Alan Newman Research in 2017.

Where to Find It: https://www.pcoa.org/wp-content/uploads/2019/04/Age-Friendly-Tucson-Plan_Web.pdf

Aging in Pima County; A Report to the Community

Pima Council on Aging

Plan Year: 2017, updated every three to four years

Source Background: Since 1975, Pima Council on Aging has conducted the only needs assessment of its kind in Pima County, identifying needs of individuals aged 60 and older

Plan Background: Through research, identifies the concerns facing Pima County's elderly

As Relates to the P-CHIP: Addresses aging well, affordability and accessibility of healthcare, home maintenance, community infrastructure

Research & Public Outreach: Data comprised of 2,269 written survey responses from individuals age 60 and older, four focus groups comprised of professionals working with and providing services to older adults, 12 public meetings held throughout Pima County

Where to Find It: https://www.pcoa.org/pdfs/PCOA_CommunityReport_2017.pdf

Comprehensive Economic Development Strategy

City of Tucson, Office of Economic Development

Plan Year: 2015

Background: A comprehensive analysis of Tucson's current economic position, and goals going forward

As Relates to the P-CHIP: Development and retention of a talented workforce; cultivation of an environment that fosters innovation and entrepreneurship; investment in key commercial areas, increasing the quality of life of Tucson residents

Research & Public Outreach: The Strategy report incorporated information and stakeholder input from numerous entities including: Sun Corridor, Inc.'s Strategic Analysis Report, Pima Association of Governments, Arizona Commerce Authority, Tucson Industrial Development Authority, Regional Transit Authority, Pima County Workforce Investment Board, Tech Launch Arizona, Downtown Tucson Partnership, Desert Angels, and Startup Tucson.

Where to Find It: https://www.tucsonaz.gov/files/business/CEDS2015.pdf

Pima Community Health Assessment

Pima County Health Department, Area Stakeholder Planning Committee

Plan Year: 2018, updated every five years

Background: Defines and analyzes health priorities and identifies opportunities for optimizing improvements for health and wellbeing in the community

As Relates to the P-CHIP: Behavioral health (suicide, alcohol, drug use, mental health providers), obesity and related chronic diseases (cancer and heart disease, tobacco use, diet, physical activity), access to services (provision of services, location and distance, availability)

Research & Public Outreach: 18 key informant interviews, 5 focus groups (n=48), 1 electronic survey (n=174), 2 community forums (n=134)

Where to Find It: https://www.healthypima.com/community-health-needs-assessments

Housing Market Study

Economic & Business Research Center at the University of Arizona, The City of Tucson, Pima County

Study Year: 2020

Source Background: Data driven process using American Community Survey, Zillow, and other sources

Plan Background: The study is made up of three phases:

Phase 1: Neighborhood Vulnerability Index: Identifies "vulnerable", or stressed, neighborhoods within the region. Vulnerability meaning "differing ability of members of particular socio-demographic groups to withstand threats to their livelihoods, security, and social, economic, and political networks

Phase 2: Housing Market Assessment: Summarizes extensive housing market data for both rental and owner-occupied housing

Phase 3: Gap Analysis: Identifies gaps in the housing market based on existing and future demand

As Relates to the P-CHIP: Provides an updated baseline on housing conditions that is referenced in the P-CHIP; the Neighborhood Vulnerability Index is incorporated into the implementation processes.

Research & Methodology: The Neighborhood Vulnerability Index utilizes a statistical analysis, in the form of the City of Austin, Austin Uprooted, study. Methodology for that study can be found at https://sites.utexas.edu/gentrificationproject/files/2018/10/app3.pdf

Where to Find It: https://mapazdashboard.arizona.edu/article/

neighborhood-vulnerability-study

Pedestrian Safety Action Plan

City of Tucson Department of Transportation & Mobility

Plan Year: 2020, Five-Year Traffic Safety Plan

Plan Background: Developed as part of the overall City of Tucson Department of Transportation & Mobility (DTM) Five-Year Traffic Safety Plan, this plan outlines strategies to improve pedestrian safety, manage vehicular speeds, etc.

As Relates to the P-CHIP: Strategies to improve pedestrian safety, provide adequate street lighting for pedestrians, leveraging paving projects for cost-effective pedestrian improvements, etc. as well as a vision centered around accessibility and walkability for everyone with safety, equity, and connectivity key goal

Research & Methodology: Created from collected efforts of city staff, consultants, community members, and stakeholders

Where to Find It: https://www.tucsonaz.gov/files/bicycle/documents/23710_Tucson_Pedestrian_Safety_Action_Plan_20200408_Final.pdf

Analysis of Opportunity in the Tucson Metropolitan Area

Southwest Fair Housing Council

Plan Year: 2016

Source Background: Non-profit, tax exempt fair housing organization based in Tucson, AZ that provides services throughout Arizona. SWFHC advocates for and facilitates the enforcement of the Federal and State Housing Acts in addition to the Non-discriminatory Ordinances of different Arizonan municipalities

Plan Background: Spatial analysis of the level of opportunity throughout areas of Tucson created as an educational and policy-making tool

As Relates to the P-CHIP: Identifies areas within the city with low opportunity and prioritizes strategies to connect people to opportunity

Research & Methodology: Twenty-two different metrics, categorized by education, housing and neighborhood, economy, transportation, and health and the environment, were spatially mapped and analyzed. Data came from multiple sources – National Historical Geographic Information System, the U.S. Department of Housing and Urban Development, Pima County Geographical Information Systems, the U.S. Census and additional data was collected in-house and geocoded

Where to Find it: https://static1.squarespace.com/static/50202d7584ae954efd2f646d/t/58585c65893fc0cdff4c63d5/1482185855472/Tucson+Opportunity+Index+-+Working+Draft+-+10.18.16.pdf

Parks and Recreation System Master Plan

City of Tucson Parks & Recreation Department

Plan Year: 2016

Source Background: City of Tucson Parks & Recreation Department

Plan Background: Department Master Plan to guide decision making, provide insight into changing community needs and perspectives, assess the level of service being provided to the community, evaluate available resources and how to most strategically invest, develop a prioritized action plan that is Mayor and Council approved, reinforce Plan Tucson, support accreditation from CAPRA (Commission of Accreditation of Park & Recreation Agencies)

As Relates to the P-CHIP: Covers open space, shade, and improving parks

Research & Methodology: Review of four regional plans related to parks and recreation, 44 in-person meetings consisting of staff focus groups, stakeholder focus groups, city-wide public open houses, City of Tucson public events. Questionnaires, comments cards, and email comments were received. Survey of 1,225 households conducted by ETC Institute

Where to Find It: https://www.tucsonaz.gov/files/parks/masterplan/Tucson_Parks_and_Recreation_System_Master_Plan_10_5_16.PDF

APPENDIX C. PUBLIC ENGAGEMENT SUMMARY

Public meeting summaries

The following are topics that were mentioned by more than one participant, agreed upon by multiple participants, or generated discussion from participants.

Public Meetings

- Size of the budget for the P-CHIP vs the amount of need in Tucson
- Length of the public input period
- When and how will the survey results be made public
- How citizens can help with the P-CHIP goals
- How can homeless individuals participate in the P-CHIP
- Opportunity Zones and their relation to affordable housing in Tucson
- How nonprofits can make a plea of consideration for funding
- The follow-up functions to ensure the success of funded projects

Stakeholder Meetings

- The need for community provider collaboration and integration of data efforts
- Leveraging data usage overall
- Special needs pertaining to elderly Tucsonans
- The need for creative and outside-the-box solutions and thinking
- Issues with the traditional discrepancies in neighborhood investments
- The effect COVID has had on providing services to clients
- The balance between funding core services and funding emerging needs
- The need for facility infrastructure improvements

- Improvements they've seen within the City of Tucson
- Areas they'd like to see improved within the City of Tucson
- Issues and solutions for the City of Tucson to consider regarding affordable housing development
- Financing affordable housing
- HOME Investment Partnership funding
- Low-Income Housing Tax Credit
- Assessing the affordable Housing stock in Tucson
- How the RFP process affects their business
- Housing vouchers

Spanish Meeting

- Housing is the biggest need across the board. Issues discussed are as follows:
- Lack of affordability
- Landlords raising rents during pandemic
- People at risk of eviction
- History of discriminatory practices towards persons of color has had an impact on poverty and housing choice. Example used that loans were not given to people with a Hispanic surname.
- Lack of equity in providing services to the community. Need to evaluate existing programs to ensure underserved communities have knowledge and access to the programs.
- There are barriers for residents to get into rental units and programs. Example of barriers include:
- Requirement to have three times the monthly rent in income to qualify for rental unit. This makes it impossible for many who have low wage or limited income like Social Security.
- Policies for social service programs often have a lot of bureaucratic requirements that make it difficult for residents to navigate.

- Transportation is difficult especially for seniors. Many don't know how to get information on how to plan their routes and usage of transit.
- Education issues were raised which included:
- Need for internet and computers for families with children
- Pandemic has made it difficult for many families and children with limited classes and no ability to get assistance or tutoring with schoolwork
- Need more investment in youth and sports activities for them
- Seniors have the most barriers and needs which include affordable housing, health and medical services
- Down payment mortgage assistance is needed and more education to the public on its availability
- Need centralized location to get information on programs and services for the community
- Need more protections for tenants who are being taken advantage of by landlords

Public Survey

Total Number of Responses: 392

Question 1

What do you see as Tucson's biggest challenges in creating equitable access to opportunity for all its residents?

Please rank your top 5 choices below.

1. Lack of affordable or attainable housing options
2. Inequitable access to services and community resources, including education
3. Poverty
4. Homelessness
5. Lack of safe, connected, convenient transportation options for all
6. Barriers to good health (inadequate access to health care, barriers to healthy lifestyles, etc.)

7. Crime and safety
8. Lack of economic mobility and opportunity
9. Struggling small, local businesses
10. Extreme heat, drought, and other environmental impacts
11. Racial and social injustice
12. Gentrification and displacement
13. Lack of Digital Access (devices, internet service, and training)
14. Lack of welcoming, livable parks and public spaces
15. Other

Question 2

IF you selected "Other" above, what challenge(s) would you add to the list?

69 total responses summarized with the word cloud

Question 3

Would your rankings above change in light of the COVID-19 pandemic? If yes, please explain how and/or discuss additional COVID-19-related challenges you would add to the list.

Approximately 150 responses to this question indicated COVID-19 has impacted their ranking of the greatest challenges Tucson faces. Here are common themes that emerged from the responses:

- COVID-19 has exacerbated Tucson's key challenges.
- Access to good healthcare is more important than ever.

- More support for small businesses is needed given the impact the pandemic has had.
- COVID-19 has spotlighted disparities

Question 4

What should the P-CHIP fund to address the challenges you listed above? Please list up to 5 programs, human services, neighborhood enhancements, and/or housing opportunities you think would make an impact.

There were 1,000 individual responses provided on projects, programs, or ideas that the City of Tucson should consider funding.

Responses per Priority Area:

People

Homelessness: 107

Health:

- Access to Health Care: 94
- Food Security and Physical Activity: 43
- Social Isolation: 7

Poverty:

- Education and Training: 97
- Economic Training/Support: 29
- Reducing other barriers (childcare, etc.): 67

Specific Target Population Comments:

- Older Adults: 22
- Domestic Violence Survivors: 6
- Children/Youth: 35
- Other: 56

Communities

Equity and Inclusion: 64

- Prevent Displacement: 22
- Environmental Justice/Equitable Access: 41

Transportation and Mobility Options: 94

Public Space Enhancements (includes climate resilience, shade, parks): 73

Beautification/Cleaning Up Neighborhoods: 37

Reform Criminal Justice System: 27

Reduce Crime/Enhance Safety: 39

Improve Public Facilities (including internet access): 59

Support Local Businesses/Economic Development: 43

Homes

Affordable Housing: 177 (most of these did not specify rental vs. homeowner but only indicated the need for more affordable units)

Homeownership Affordable Housing: 42 (separate from above, these did specify home ownership rehabilitation and construction)

Emphasis on Sustainable Design for affordable homeownership: 10

We received a huge number of thoughtful responses. Examples include:

- "[L]aunch a $10 million Revolving Affordable Housing Loan Fund to help widen the capital pool for affordable housing projects."
- "[A]s a community we could better serve homeless populations and criminals by taking the time to ask them what happened. Taking the time to do this could potentially give the city valuable data points to address common problems. I also think this would go a long way for the individual, as most people just want to be heard in the end."
- "Build the missing middle housing. Find ways to incorporate small scale development into neighborhoods, flexible zoning, ADUs, etc. Provide the resources, education, to put it into the hands of existing, local property owners instead of depending on developers to do all the work."
- "Minneapolis made a homeless shelter that allowed those living there to work their way up in society and earn better accommodations and privileges, this seems like it could be beneficial to Tucson."

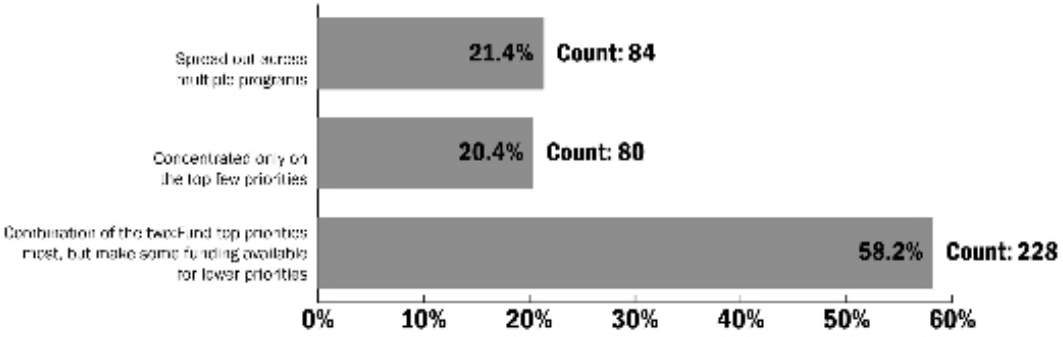
- "There should be emphasis on tree planting and maintaining trees in Tucson, both in parks and in neighborhoods, to combat the brutal heat of six months of the year."
- "Fund collaborative partnerships to provide wrap-around services to improve economic mobility: job readiness training and other employment services + further education and certification + financial education, counseling and coaching to build assets + childcare
- "Establishing a ""mobile social/city services"" on wheels that could actually move from neighborhood to neighborhood with a team that supports neighborhood networks to ""check-in"" on each other and connect people to critical social services resources. People are going to be hurting and a ""one-stop"" shop with as little bureaucratic loop-holes would be amazing."

In addition to impacting the priority areas in the Implementation Section, the open-ended responses resulted in:

- Adding a strategy related to a livable wage
- Added a strategy to support neighborhood and community clean ups
- Enhanced the language around affordable housing construction incorporating Sustainable/green design
- Adding language to the affordable housing goal to explore zoning changes to promote denser residential construction in select locations

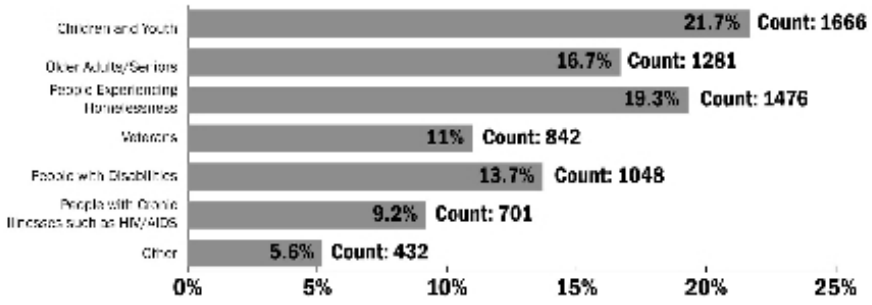
Question 5

Given the limited funding available, how should the City seek to distribute funds across the priorities you have identified?



Question 6

How would you allocate funds for services that support the following vulnerable low-income populations? You have 20 dots to 'spend'



Participant Demographic Information

Question 8

I represent...

	%	Count
Myself, a resident and community member	95.7%	375
Nonprofit Agency or Service Provider	4.3%	17
Business Owner	2.3%	9
Government Agency or Department	0.8%	3
Neighborhood Association or HOA	1.0%	4
Other	2.8%	11

Question 9

Do you identify as Hispanic or Lantino/a/x

	%	Count
Yes	17.5%	65
No	82.5%	307

Question 10

Ethnicity/Race:

	%	Count
African American/Black	2.7%	10
American Indian/Alaskan Native	2.2%	8
Native Hawaiian/Other Pacific Islander	0.8%	3
Asian	2.2%	8
Hispanic/Latino	13.8%	51
White	81.9%	303
Other	6.2%	23

Question 11

Age:

	%	Count
15-19	0.8%	3
20-24	5.1%	19
25-34	19.1%	72
35-44	19.7%	74
45-54	14.9%	56
55-59	6.4%	24
60-64	11.2%	42
65-74	16.8%	63
75-84	4.8%	18
85 +	1.3%	5

Question 12

Gender:

	%	Count
Female	61.2%	227
Male	34.0%	126
Non-binary	1.9%	7
Genderqueer	1.1%	4
Transgender	0.3%	1
Other	1.6%	6

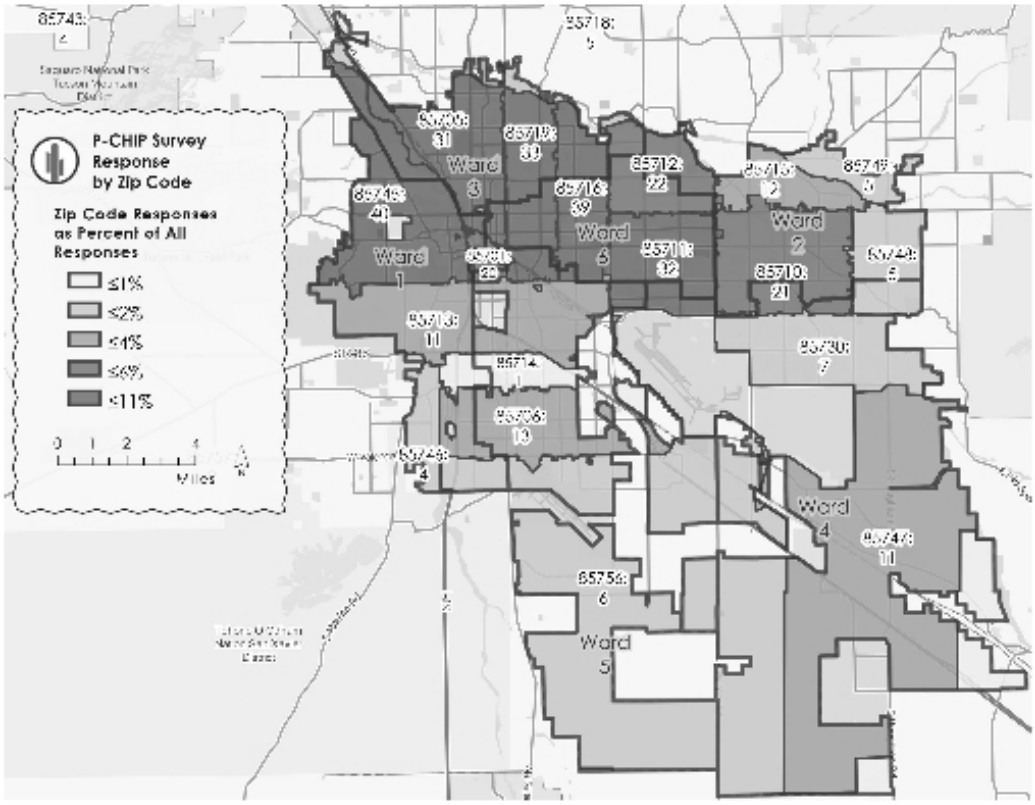
Question 13

What is the highest level of education you have completed?

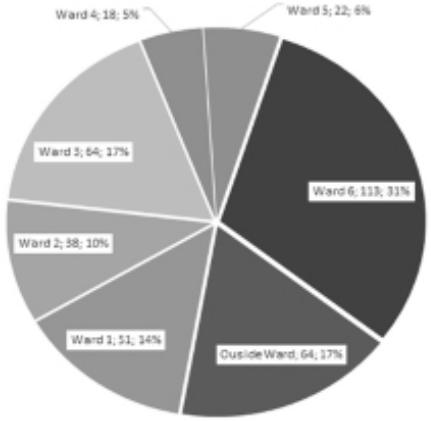
Associate degree	10.1%	38
Bachelor's degree	32.4%	122
Master's degree	30.3%	114
Professional degree	3.7%	14
Doctorate degree	8.2%	31
Prefer not to say	3.2%	12
Some high school	1.3%	5
High school	6.1%	23
Trade/technical/vocational training	4.5%	17

Question 14

Responses by Zip Code Map



Responses by Ward



***It is important to note this is an estimate as zip codes do not align with ward boundaries.**

Appendix F

AP-90 City of Tucson and Pima County HOME Resale and Recapture Provisions

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)
HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.420, 91.220(2)

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

City of Tucson HOME Resale/Recapture Provisions:

Homeownership - Recapture
Homeownership development and down-payment assistance activities funded with City HOME funds will utilize Recapture Provisions, which meet or exceed HOME Program Affordability requirements. For FY 17-18, the HOME funds allocated to homeownership activities are assigned to our jointly funded City-County Down Payment Assistance Program that will provide direct assistance of 3.5% of purchase price (maximum $3700) which will carry zero interest with a 5 year affordability requirement. If the property is sold or ceased to be primary residence during the affordability period then the HOME funds will be recaptured. In the event of a sale, HOME funds are recaptured from the available net sales proceeds, which are defined as the sales price, less first mortgage pay-off, less homeowner's equity & less closing costs. If HOME funds are used to fund down payment assistance on other development projects or CHDO projects, the City will follow the same recapture provisions described above – except that the amount of direct assistance may vary based on homebuyer underwriting and may exceed the 3.5% utilized for the City-County DPA program. Affordability period will vary from 5 to 15 years based on the amount of direct assistance provided to the homebuyer – following HOME Regulations at 92.254

Homeownership - Resale
The City will utilize Resale provision in the event a non-profit or profit organization and developer contract with the City for homeowner development for first-time home buyers. The City's Resale restriction will require that if the home is sold during the affordability period, it must be sold to another low-income household. The Affordability period will vary from 5 to 15 years based on the amount of the HOME funds invested the housing as per the HOME regulations at 92.254. The resale requirement will ensure that the price at resale provides the original HOME-assisted owner a fair return on investment (including the homeowner's investment and any capital improvement) and ensure that the housing will remain affordable to a reasonable range of low- income homebuyers. "Fair return on investment" means that the original homeowner shall be permitted to recuperate the amount they invested for down payment, principal paid on mortgage as well as value of any property improvement paid for by the assisted owner. "Affordability" to a reasonable range of low-income homebuyers," means that the mortgage payment including principal, interest, taxes and insurance –will not exceed 30% of the low-income buyer's income; and low-income buyers are defined as households earning at or below 80% of AMI. Additional HOME funds may be used to provide direct down payment assistance for a subsequent buyer in order to provide for the required level of Affordability; and if so the Affordability period will be based on the new assistance provided.

Rental

Rental Development projects funded with City HOME funds will utilize HOME Recapture provisions which meet the HOME Program Affordability Requirements. City staff with contracted consultant will complete required project underwriting to determine a reasonable interest rate and terms that are supported by the underwriting. In most case the funds invested will be at level that will require a minimum 20 year affordability period that will be secured the recorded Covenants Conditions and Restrictions (CCR's).

Pima County HOME Resale/Recapture Provisions:

Homeownership - Recapture

Homeownership preservation, development and down - payment assistance activities funded with County HOME funds will utilize Recapture Provisions which meet or exceed HOME Program Affordability requirements. For FY 17-18, a majority of County's HOME funds allocated to homeownership activities are assigned to our jointly funded City-County Down Payment Assistance Program that will provide direct assistance of 3.5% of purchase price (maximum $3700) which will carry zero interest with a 5 year affordability requirement. If the property is sold or ceased to be primary residence during the affordability period then the HOME funds will be recaptured. In the event of a sale, HOME funds are recaptured from the available net sales proceeds which are defined as the sales price, less first mortgage pay-off, less homeowner's equity & less closing costs.

If HOME funds are used to fund down payment assistance on other development projects or CHDO projects, County will follow the same recapture provisions described above – except that the amount of direct assistance may vary based on homebuyer underwriting and may exceed the 3.5% utilized for the City-County DPA program. Affordability period will vary from 5 to 15 years based on the amount of direct assistance provided to the homebuyer – following HOME Regulations at 92.254.

Homeownership - Resale

In the event HOME funds are combined with General Obligation Affordable Housing Bond Funds or with homes purchased through the Pima County Community Land Trust, the HOME funds may be provided utilizing Resale provisions in compliance with HOME Program regulations. The County's Resale restriction will require that if the home is sold during the affordability period, it must be sold to another low-income household. The Affordability period will vary from 5 to 15 years based on the amount of the HOME funds invested the housing as per the HOME regulations at 92.254. The resale requirement will ensure that the price at resale provides the original HOME-assisted owner a fair return on investment (including the homeowner's investment and any capital improvement) and ensure that the housing will remain affordable to a reasonable range of low- income homebuyers. "Fair return on investment" means that the original homeowner shall be permitted to recuperate the amount they invested for down payment, principal paid on mortgage as well as value of any property improvement paid for by the assisted owner. "Affordability" to a reasonable range of low-income homebuyers," means that the mortgage payment including principal, interest, taxes

and insurance –will not exceed 30% of the low-income buyer's income; and low-income buyers are defined as households earning at or below 80% of AMI. Additional HOME funds may be used to provide direct down payment assistance for a subsequent buyer in order to provide for the required level of Affordability; and if so the Affordability period will be based on the new assistance provided.

Rental

Rental Preservation and Development projects funded with County HOME funds will utilize HOME Recapture provisions, which meet the HOME Program Affordability Requirements. County staff will complete required project underwriting to determine a reasonable interest rate and terms that are supported by the underwriting. In most case, the funds invested will be at level that will require a minimum 20 years affordability period that will be secured the recorded Covenants Conditions and Restrictions (CCR's). Recaptured Funds will be used to fund other HOME eligible homeownership assistance, rental development or TBRA activities.

Appendix G

Policy Manual for Emergency Solutions Grant (ESG) Program

POLICY MANUAL

EMERGENCY SOLUTIONS GRANTS (ESG) PROGRAM

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- E. Location of Policy Manual
- F. Revisions and Updates

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- D. Rapid Re-Housing
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IV. ESG Program Administration

VI. Performance Standards
V. Summary of ESG Program Performance Standards

I. INTRODUCTION

BACKGROUND AND PROGRAM DESCRIPTION

A. Description of Emergency Solutions Grants (ESG) Program

On May 20, 2009, President Obama sighted the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. Beginning FY 2011 the U.S. Government has allocated $250 million in funds to eligible recipients to (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless. Pima County and the City of Tucson may provide ESG funds to projects operated by units of general purpose local government or private nonprofit organizations. The Continuum of Care within these jurisdictions must be consulted when determining how to allocate the ESG funds.

All funded agencies are required to follow federal guidelines in the implementation of ESG funding. The City of Tucson and Pima County have written the following policies and procedures to facilitate the agencies in implementing the ESG guidelines as set by the U.S. Department of Housing and Urban Development. Agencies will provide assistance related to housing of persons at risk of becoming homeless and housing persons that are currently homeless, as well as provide housing relocation and stabilization services.

B. ESG Program Awards to City of Tucson and Pima County

The City of Tucson's Department of Housing and Community Development and Pima County's Department of Community Development and Neighborhood Conservation have both received an ESG formula grant. The City of Tucson and Pima County have decided to collaborate in the development of the policies and procedures regarding the disbursement of funds and data collection to promote consistent standards and avoid duplicate and unnecessary assistance. There are differences between the jurisdictional requirements and procedures due to jurisdictional target area differences. Pima County is focused on unincorporated areas whereas the City of Tucson is focused on the population within city limits.

C. Community Input for Program Development

The participation of homeless or formerly homeless individuals will assist in the allocation process and provide input to the evaluation of performance measures where at all possible.

D. Process for Sub-Awards

Funds will be awarded by the ESG Grantees on a competitive basis. The Request for Proposal Notice is released through the Continuum of Care as well as through the City Participation Process. The City of Tucson and Pima County jointly make the funding allocations. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum. Every effort is made to involve a homeless or formerly homeless person in the process. The committee ranks the proposals individually and then reviews them as a committee and makes the final funding recommendations.

A HUD Technical Assistance provider is assisting the Continuum to determine a process where performance standards will be set, as well as a process to evaluate outcomes.

E. Location of Policy Manual

The Policy Manual will be available as electronic documents located on both the Pima County and the City of Tucson website. A hard copy will also be available for review at the City of Tucson's Department of Housing and Community Development and Pima County's Department of Community Development and Neighborhood Conservation.

F. Revisions and Updates

The Policy Manual is a living document. As policies or procedures are modified, these revisions will be updated in the Policy Manual. The most recent version of Policy Manual will be posted online and able for viewing at the respective locations mentioned above.

II. ESG Program General Overview

The ESG program funds are intended to target two populations of persons facing housing instability: (1) individuals and families who are experiencing homelessness (residing in emergency or transitional shelters or on the street) and need temporary assistance in order to obtain housing and retain it, and (2) individuals and families who are currently in housing but are at risk of becoming homeless and need temporary rent and utility assistance to prevent them from becoming homeless or assistance to move to another unit.

A. ELIGIBLE PROGRAM COMPONENTS

a. Street outreach: Essential services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, and transportation. Street outreach includes services that are unable to be provided to individuals or families due to their unwillingness to come to a shelter.

b. Emergency Shelter: Essential services such as case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

   Shelter operations include maintenance, rent, repair, security, fuel, equipment, insurance, utilities, relocation, and furnishings. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

c. Homelessness Prevention: Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from becoming homeless if:

i. Annual income of the individual or family is below 30 percent of median family income
ii. Assistance is necessary to help program participants regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.

Eligible costs include utilities, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

d. Rapid Re-Housing: Housing relocation and stabilization services and short and/ or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing. Eligible costs also include utilities, rent application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

e. Data Collection (HMIS): Grant funds may be used for the costs of participating in an existing HMIS of the Continuum of Care where the project is located. Eligible costs include computer hardware, software, and software licenses. Also, office space, utilities, equipment and obtaining technical support may be paid for. Salaries for operation of HMIS may also be paid.

f. Emergency Solutions Grant Administration: Up to 7.5 percent of a recipient's allocation can be used for general management, oversight, coordination, and reporting on the program.

B. HOMELESS DEFINITION
   a. Category 1: Literally Homeless
      i. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
         1. Has a primary nighttime residence that is a public or private place not meant for human habitation;
         2. Is living in a publicly or privately operated shelter designed to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
         3. Is exiting an institution where (s)he has 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.
   b. Category 2: Imminent Risk of Homelessness
      i. Individual or family who will imminently lose their primary nighttime residence, provided that:

1. Residence will be lost within 14 days of the date of application for homeless assistance
2. No subsequent residence has been identified; and
3. the individual or family lacks the resources or support networks needed to obtain other permanent housing

c. Category 3: Homeless under other Federal Statutes
   i. Unaccompanied youth under 25 years of age, or families with children or youth, who do not otherwise qualify as homeless under this definition, but who:
      1. Are defined as homeless under the other listed federal statutes;
      2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application
      3. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
      4. Can be expected to continue in such status for an extended period of time due to special needs or barriers
d. Category 4: Fleeing/ Attempting to Flee DV
   i. Any individual or family who:
      1. Is fleeing, or is attempting to flee, domestic violence;
      2. Has no other residence; and
      3. Lacks the resources or support networks to obtain other permanent housing.

C. ELIGIBILITY BY COMPONENT: HOMELESS

a. Street Outreach: Individuals defined as homeless under the following categories are eligible for assistance in Street Outreach:
   i. Category 1 = Literally Homeless
   ii. Category 4 = Fleeing/ Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
      1. Additional limitation on eligibility: Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter.
b. Emergency Shelter: Individuals and families defined as Homeless under the following categories are eligible for assistance in Emergency Shelter projects:
   i. Category 1 = Literally Homeless
   ii. Category 2 = Imminent Risk of Homeless
   iii. Category 3 = Homeless Under Other Federal Statues
   iv. Category 4 = Fleeing/ Attempting to Flee DV
c. Rapid Re-housing: Individuals defined as Homeless under the following categories are eligible for assistance in Rapid Re-Housing projects:
   i. Category 1 = Literally Homeless
   ii. Category 4 = Fleeing/ Attempting to Flee DV (where the individual or family also meets the criteria for Category 1
d. Homelessness Prevention: Individuals and Families defined as Homeless under the following categories are eligible for assistance in Homeless Prevention projects:
   i. Category 2 = Imminent risk of Homeless

ii. Category 3 = Homeless Under Other Federal Statutes
iii. Category 4 = Fleeing/ Attempting to Flee DV
    1. Individuals and Families who are defined as Homeless under the following categories are eligible for assistance in Homelessness Prevention projects
    2. Homelessness Prevention projects have the following additional limitations on eligibility with homeless and at risk of homeless:
        a. Must only serve individuals and families that have an annual income below 30% of AMI.

D. CATEGORIES OF AT RISK OF HOMELESSNESS
    a. Category 1: Individuals and Families
        i. Has an annual income below 30% of median family income for the area; AND
        ii. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND
        iii. Meets on of the following conditions:
            1. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
            2. Is living in the home of another because of economic hardship; OR
            3. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
            4. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
            5. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half person per room; OR
            6. Is exiting a publicly funded institution or system of care; OR
            7. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan
    b. Category 2: Unaccompanied Children and Youth
        i. A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statue.
    c. Category 3: Families with Children and Youth
        i. An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

E. PROGRAM GOVERNANCE

City of Tucson and Pima County work with the HUD Regional Office and the Continuum of Care- represented by the Tucson Pima Collaboration to End Homelessness (TPCH), to ensure successful implementation and performance. The TPCH Emergency Solutions committee will review policies, procedures and performance measures.

F. FUNDS REALLOCATION AND RECAPTURE

Quarterly, the City and County ESG Program Coordinators will:

- Review financial reports and budget allocations for the eligible program components, and will re-allocate resources if necessary;
- Review service data on subpopulations to ensure that the program is serving groups such as military veterans or people with disabilities which is part of the Consolidated Annual Performance Evaluation Report (CAPER). Annually, this information will be provided to the Emergency Solutions committee.

G PROGRAM POSITION DESCRIPTIONS

The following is a summary of each Emergency Solutions Grant Program position related to grant administration and program delivery. Further details about specific program procedures are found in Part III.

1. City of Tucson Project Coordinator

This position is responsible for administering the ESG grant that was awarded to the City of Tucson. In collaboration with the Pima County Project Coordinator, guides the program by acting as liaison with the Continuum of Care and other contractors, and also monitors agency subcontracts, ensures coordination with other mainstream services and prepares quarterly and annual performance reports to HUD.

2. Pima County Program Coordinator

This position is responsible for administering the ESG grant that was awarded to Pima County. In collaboration with the City of Tucson Project Coordinator, guides the program by meeting regularly with the Emergency Solutions committee and other contractors, and also monitors agency subcontracts, ensures coordination with other mainstream services and prepares quarterly and annual performance reports to HUD.

H. MARKETING, OUTREACH, AND CLIENT ACCESS

1. Outreach Activities

The ESG Program staff will conduct informational presentations about the ESG Program, and will provide regular reports to Tucson Pima Collaboration to end Homelessness (TPCH), which

is the local HUD Continuum of Care. Sub-recipients conduct outreach to support ESG component goals and activities to persons who are homeless or near homeless so that they are aware of the program and its services.

I. COORDINATION AMONG PROVIDERS

Assistance is targeted to housing stabilization, linking program participants to mainstream resources and assisting them to develop a plan to increase future housing stability.
Sub-recipients provide eligible services and activities which may include: case management, counseling, developing, securing and coordinating services, linkage with mainstream resources, monitoring and evaluation of program participant progress. Sub-recipients also assure that program participants' rights are protected, and develop individualized housing and service plans, including a path to permanent housing stability once ESG program assistance is no longer available.

Each sub-recipient is required to read and follow ESG guidelines as set forth by HUD. The procedures contained herein serve to simplify the implementation of the regulations and identify allowable activities.

Sub-recipients will serve the population and provide the financial assistance and stabilization services as identified in the budget and scope of work as found in each of their contracts. Preliminary steps to be taken in implementing the ESG activities are as follows:

All sub-recipients receiving ESG assistance are required to participate in the local Homeless Management Information System (HMIS) or a comparable database and execute all Homeless Management Information System required documents as needed. These sub-recipients are also required to actively participate in the Tucson Pima Collaboration to End Homelessness (TPCH). TPCH is the local Continuum of Care and has over 50 member agencies including the local Veteran Administration, Open Inn, Gospel Rescue Mission, and the Primavera Foundation. TPCH continues to encourage mainstream providers such as the Social Security Administration and the Arizona Department of Economic Security to actively participate. It is suggested that agencies participate in the committees that directly relate to their clients to assist in coordinating services.

In the case of projects that provide housing or services to families, that sub recipients will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act;

Sub-recipients are required to participate in the centralized or coordinated assessment and intake system when it becomes available in our community.

J HMIS: ESG PROGRAM DATA COLLECTION

Client and services information will be collected and recorded using paper forms, and will be entered into the Homeless Management Information System (HMIS) as described in the Procedures section of this manual. Client data on clients served, housing status, and services received must meet HUD standards of completeness and sufficiency. Staff will follow procedures to enter data into HMIS, and will ensure data quality and completeness. Staff will also keep paper forms in a hard copy client file. Any data or documentation not directly entered into or uploaded to the HMIS will be maintained in the paper file.

Program staff may use client records in HMIS for program verification requirements. For example, if a person presents for services and the intake worker is able to view records in HMIS to confirm that the participant came directly from an emergency shelter (e.g. was in emergency shelter the night before), the intake worker does not need to document housing status (e.g. literally homeless), since the HMIS record provides documentation that the person meets HUD's homeless definition.

If the Program staff member is not able to view the HMIS records for a client, then other documentation will be required, and this will be entered into HMIS

K. PROPERTY VERIFICATIONS AND INSPECTIONS: REQUIREMENTS FOR HOMELESSNESS PREVENTION AND RAPID RE-HOUSING

The ESG Program will conduct housing verifications and inspections as required by HUD.

1. Rent Reasonableness
   A rent reasonableness assessment will be conducted by the city/county staff prior to paying back rent and emergency rent assistance for a current or new rental property to ensure the rental rates are fair market rates.
   Habitability Inspection
   When a re-housing client will move into a new rental, a Habitability Inspection is required to ensure minimum habitability standards and will be conducted by a trained City of Tucson or Pima County inspector. Habitability inspections are also required periodically for emergency shelters.
4. Lead-based Paint
   A Lead-based Paint visual inspection is required for housing and shelters and will be conducted by a trained City of Tucson or Pima County inspector. Housing will be inspected when both of the following conditions exist for a household that has been approved to receive financial assistance from Project Action:
   a. The rental property is older then 1978, as shown by Pima County property records; and
   b. The client household includes a child less than 6 years of age.
   A lead-based paint inspector must be HUD-certified to do a visual assessment for lead based paint.
5. Repeat Inspections
   Inspections will be conducted no more than two times. If unit does not pass inspection, one more inspection can be ordered. If the unit doesn't pass inspection a second time, Emergency

Solutions Grant staff will assist the client to move to another property that will satisfy these requirements.

L. GRIEVANCE POLICY

If a client or prospective client disagrees with an ESG Program decision, he/she will be provided with a clearly-defined grievance process. The client will use the grievance process that is in effect at the contracted provider agency that provided the ESG Program service that the client wishes to dispute.

M. FRAUD PREVENTION AND RESPONSE

1. ESG Program intake forms that are used to determine eligibility must be signed by the client, and have statements adjacent to the signature area that inform clients that untruthful information may be considered as fraudulent and can lead to investigation and punishment under federal law.

2. If a staff member suspects that a client has provides fraudulent information, she will inform her supervisor. If necessary the Supervisor will inform the City and County Program Coordinators. The Program Coordinator can consult with the City Attorney and/or County Attorney, and the HUD Inspector General to resolve and report the matter, or to conduct further investigation or prosecution.

N. CONFIDENTIALITY

The ESG Program protects client confidentiality in the following ways.

1. Most clients interact solely with their case manager and do not have personal contact with other Emergency Solutions Grant personnel. The case manager will keep client names and personal information confidential except as it is necessary to discuss cases with a supervisor or with other Emergency Solutions Grant personnel for the purpose of case coordination.
2. When Emergency Solutions Grant staff communicates about client services via email they will not share names or social security numbers. Instead they use client I.D. codes that are used in HMIS.
3. Emergency Solutions Grant staff members and contracted personnel will sign confidentiality agreements, and will not discuss Emergency Solutions Grant clients with anyone except as necessary with Emergency Solutions Grant staff.
4. HMIS data reports will present project data in aggregate form with no identifying information.
5. HMIS data systems will be encoded so that client information is kept secure.
6. Clients are informed about their rights regarding personal information and sign consent forms:

- Informed Consent form, with accompanying Terms of Service form. By signing this form, the client consents to provide information necessary for determining eligibility and providing services.
- Authorization for Use and Sharing of Information. By signing this form, the client consents to have selected information shared with other providers in order to obtain other services or to coordinate care.
- Client Authorization Form for HMIS data.

O. CONFLICTS OF INTEREST

No person who is an employee, agent, consultant, officer, or elected or appointed official of the City of Tucson or Pima County and who exercises or has exercised any functions or responsibilities with respect to ESG activities, or who is in a position to participate in an ESG decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds there under, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.

P. NONDISCRIMINATION & EQUAL OPPORTUNITY REQUIREMENTS

The ESG Program will ensure that information about ESG Program assistance is made available to all on a nondiscriminatory basis and ensure that all who seek services are provided equal access using the following methods.

1. Outreach information will be provided to a wide range of services providers and community based organizations.
2. To ensure that outreach materials and services are accessible to persons with limited English proficiency, ESG Program will provide information about the program on both the City and Count Websites as well as maintain a hard copy in the respective offices. Staff members will be available who are bilingual in English and Spanish. When persons seeking services speak languages other than English or Spanish, or have vision or hearing disabilities, ESG Program staff will utilize other translation services to ensure fair access.

Q. AFFIRMATIVELY FURTHERING FAIR HOUSING

The ESG Program will ensure that policies and procedures affirmatively further fair housing opportunities for classes protected under the Fair Housing Act, including race, color, national origin, religion, sex, disability, and familial status. Fair housing procedures will include the following:

1. Marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency;
2. Making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities
3. Providing fair housing counseling services or referrals to fair housing agencies;
4. Informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1800-669-9777; and

5. Recruiting landlords and service providers in areas that expand housing choice to program participants.

III. ESG PROGRAM COMPONENT POLICIES

A. STREET OUTREACH

The ESG Program may provide the following services to eligible clients in order to connect unsheltered homeless with emergency shelter, housing, or critical services.

- Engagement
- Case Management
- Emergency health and mental health services
- Transportation
- Services for special populations (special populations include homeless youth, homeless persons with HIV/AIDS, and homeless victims of domestic violence, sexual violence, and stalking).

2) Shelter Stay Procedures

3) Essential Services

4) Shelter Outreach Performance Measures
Number of persons:
- Placed in shelter or safe havens
- With more non-cash benefits at program exit
- Participating in case management

B. EMERGENCY SHELTER

The ESG Program may provide for the following services to maintain or convert homeless shelter sites, provide essential services or assist with shelter operations.

- Case management
- Childcare
- Education
- Employment
- Life skills services
- Legal services
- Health
- Mental health
- Substance abuse services
- Transportation
- Services for special populations
- Operations (e.g., maintenance, utilities, furniture, food)

1) Policy for Admission

2) Policy for Diversion

3) Policy for Referral and Assessment of Needs

4) Policy for Discharge

5) Emergency Shelter Performance Measures
Number of persons:
- Exiting to temporary or transitional housing destinations
- Exiting to permanent housing destinations
- Participating in case management

C. HOMELESSNESS PREVENTION

The ESG Program funds may be used to provide housing relocation and stabilization services and rental assistance to those who earn 30% or less of the Area Median Income. Financial assistance will not be provided to a household for a purpose and time period supported by another public source.

- Housing relocation and stabilization services
- Short-and medium-term rental assistance
- Short-term = up to 3 months
- Medium-term = 4 to 24 months
  - Up to 24 months of rental assistance during any 3-year period, including one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent.
- Moving costs
- Rent application fees
- Security deposits
- Last month's rent
- Utility deposit
- Utility payments
- Housing search/ placement
- Housing stability case management
- Mediation and legal services
- Credit repair/ budgeting/ money management

1) Evaluating Eligibility for Assistance for Homelessness Prevention

Minimum requirements to be eligible for Rapid Re-Housing Assistance:

Client eligibility will be assessed in-person. Appointments will be made with the designated providers. During these appointments the clients will be informed about the resources within their community and offered suggestions.

Clients must meet eligibility requirements and provide documentation described below.

Client must:

1. Clients are permitted to have some assets, e.g. car, retirement plan, with maximum of $3,000 (not including checking and/or savings).
2. Have resided in Pima County for the past three months or longer.
3. Be either
    1. Homeless (based on current HUD homelessness definition), or
    2. Are about to lose their housing due to scheduled eviction or foreclosure, and have no other networks or resources to avoid homelessness, i.e., would become homeless but for this assistance.
4. Have experienced a sudden and significant change making it hard to pay rent or utilities, and, after a short or medium period of assistance, be likely to sustain stable housing on his/her own. Examples of sudden and significant changes include, but are not limited to:
    1. Sudden loss of income
    2. Unforeseen finance set back or life change
    3. Loss of job or reduced hours
    4. Medical issues
    5. Medical bills caused inability to pay other bills
    6. Car repairs
    7. Student Financial Aid disrupted
    8. Divorce or break up of a relationship
    9. Death in family
    10. Lost roommate or other living arrangements
5. Be willing to participate in a case plan that includes goals for improving his/her situation, such as job search activities.
6. Must provide verification documents:
    1. Picture I.D.
    2. Social Security Card
    3. Birth Certificate
    4. Proof of income
    5. Bank statement
    6. Bills that show cause/ need
    7. Proof of residency
    8. Eviction notice or a copy of the Notice of Trustee's sale and has a written lease agreement or a deed that corresponds with the foreclosure documents
    9. Utility disconnect bill or proof of delinquent amount
    10. Invoice for moving assistance
7. Demonstrates ability to maintain their housing and household expenses after assistance

Examples of Reasons the client eligibility may be denied:

- Client does not meet eligibility requirements listed above
- Client did not provide required verification documents
- Client did not agree to having a case plan, or did not follow steps in case plan
- Client used maximum time or assistance allotment
- There were substantiated landlord complaints, and the client did not comply with a correction plan.

- All sub-grantees must evaluate and certify the eligibility of ESG program participants at least once every three months for all household receiving homelessness prevention assistance, and once annually for households receiving rapid re-housing assistances
  - Initial Consultation
    - Sub-recipients must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.
    - Documentation to verify requirements of this section have been met including completing a client in-take form. All sub-grantees must keep verification of this requirement in each client file.
    - Sub-grantees must verify Income below 30% the Area Median Income.
    - Verification of Homelessness or Risk of Homelessness using the HUD definition as described in Section II. B.
    - The sub-grantee must confirm that the individual or family does not have sufficient resources or support networks.
      - To receive assistance under Homeless Prevention, a client(s) must be at risk of becoming homeless and rental assistance is only necessary to prevent the individual or family from moving into an emergency shelter or another place.

2) Determining and Prioritizing Homeless Prevention Assistance

The purpose of the ESG program is to provide assistance to as many individuals and families who face obstacles to sustaining housing as possible. An individual or family's ability to sustain housing is not a threshold requirement. The program will focus on helping individuals and families overcome their immediate housing obstacles and connect them with the resources they need to stay housed when the program ends.

Sub-grantees will target assistance to families and individuals who are homeless or who are about to spend their first night at in a shelter or on the street. These families and individuals will be prioritized as follows.

Priority 1: Homeless Families
- Priority 1(a): The homeless family who is in the emergency shelter for less than 30 days
- Priority 1(b): The homeless family who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 1 (c): the homeless family who has been in the emergency shelter for over 30 days
- Priority 1 (d): The homeless family or who has been living on the streets for over 30 days

Priority 2: Homeless Youth
- Priority 2(a): The homeless youth who is in the emergency shelter for less than 30 days
- Priority 2(b): The homeless youth who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 2 (c): the homeless youth who has been in the emergency shelter for over 30 days
- Priority 2 (d): The homeless youth or who has been living on the streets for over 30 days

Priority 3: Homeless Individual

- Priority 3(a): The homeless individual who is in the emergency shelter for less than 30 days
- Priority 3(b): The homeless individual who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 3 (c): the homeless individual who has been in the emergency shelter for over 30 days
- Priority 3 (d): The homeless individual or who has been living on the streets for over 30 days

3) Rent & Utilities Policy: Homeless Prevention

Rent

Sub-grantees will require program participants to pay a portion of the rent expense based on the individual or families' available income (up to thirty percent 30%). Participants are expected to contribute a portion of their income to pay for rent. Household income and rent contribution will be calculated based on household available income at the time of certification. Any household income increase must be reported to the sub-grantee within seven (7) days and the new rent contribution amount adjusted. Income shall be reassessed every three months for medium term rental assistance.

Sub-grantees my increase the household's contribution to the rent and utility cost as they acquire more financial independence and stability. An increase will be documented in the client's plan.

Rental assistance may be used to pay up to 3 months of rental arrears for eligible program participants. Rental arrears may be paid if the payment enables the program participant to return to the housing unit for which the arrears are being paid or move to another unit.

Rental arrears may be paid regardless of when they were incurred, provided that the existence of arrears prevents the eligible participant from obtaining housing. Payment for rental arrears must be included in determining the total period of the program participant's rental assistance, which may not exceed 24 months in a 3 year period.

Rental assistance cannot exceed the actual rental costs. Rental assistance payments cannot be made on behalf of eligible participants for the same period of time that rental assistance is being provided through another federal, state or local housing subsidy program.

Sub-grantees providing rental assistance for homeless prevention will be required to conduct initial and any appropriate follow-up habitability inspections of housing units into which a program participant will be moving. Units must be inspected on an annual basis and upon a change of tenancy. In addition, Lead Based Paint requirements must be met when applicable.

When a rental unit has been located, sub-grantees may need to assist the client in contacting the landlord to complete the appropriate paperwork and conduct a habitability standards inspection. Agencies must have acceptable documentation showing a participant in need of rental assistance. Documentation may be in the form of an eviction notice from a landlord or a letter stating intent to evict.

Sub-grantees must use fair market rent standard to determine eligibility. Sub-grantees should assist program participants to locate a rental unit at or below fair market rent.

Security Deposits and Utility Deposits

ESG Program funds may be used to pay security deposits and utility deposits. Security and utility deposits may only be paid with ESG funding if the program participant will otherwise be homeless without assistance.

Security and utility deposits covering the same period of time in which other assistance is being provided through another housing subsidy program are eligible, as long as they cover different costs types.

Security and utility deposits may be paid as a one-time grant not to exceed the monthly rental amount. Information documenting the need for a security deposit should be obtained at the same time the required rental paperwork is being completed by the client and landlord.

Sub-grantees must conduct a habitability standards inspection on any unit that a program participant will be moving into using ESG program funds for a security or utility deposit. Agencies must certify that the unit has passed habitability standards before any ESG program funds will be released.

Utility Payments

ESG Program funds may be used for up to 6 months of utility payments, including up to 3 months of utility payments in arrears. The program participant, or a member of the participant's household, must have an account in his/her name with a utility company. The participant must have a lease with their name on it to prove residency and verify address of utility service. Copies of the proof of responsibility should be obtained and maintained in the client file. Utility payments will be made directly to the utility company. Documentation must be made to verify that the participant is not receiving the same type of assistance from another agency for the same period. Also, if utility assistance payments are available from another agency this source should be used first before ESG funds are provided.

4. Standards for Determining Length and Level of Assistance for Homeless Prevention
   - No participant may receive more than 24 months of assistance within a 3 year period.
   - The maximum amount of assistance is based on FMR less the households 30% of monthly income.
   - The maximum number of times the program participant may receive assistance is based on need but may not exceed more than 24 months of assistance in a 3 year period.
   - Short-term rental assistance is to be limited to a maximum of 3 months of rent
   - Medium-rental assistance shall extend for more than 3 months but not more than 24 months of rent.
   - Only the assistance that is needed for a client to become stabilized will be provided.

5. Homeless Prevention Performance Standards
   Number of persons:
   - Who maintained their permanent housing for 6 months or longer
   - Exiting to permanent housing destinations
   - With higher income at program exit
   - With more non-cash benefits at program exit
   - Participating in case management

D. RAPID REHOUSING

The ESG Program can be utilized to fund housing relocation and stabilization services and rental assistance to individuals and families who can quickly be transitioned into permanent housing and a stable environment. Financial assistance will not be provided to a household for a purpose and time period supported by another public source.

- Housing relocation and stabilization services
- Short-and medium-term rental assistance
  - Short-term = up to 3 months
  - Medium-term = 4 to 24 months
    - Up to 24 months of rental assistance during any 3-year period, including one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent.
- Moving costs
- Rent application fees
- Security deposits
- Last month's rent
- Utility deposit
- Utility payments
- Housing search/ placement
- Housing stability case management
- Mediation and legal services
- Credit repair/ budgeting/ money management

1) Evaluating Eligibility for Assistance for Rapid Re-Housing

Minimum requirements to be eligible for Rapid Re-Housing Assistance:

Client eligibility will be assessed in-person. Appointments will be made with the designated providers. During these appointments the clients will be informed about the resources within their community and offered suggestions.

Clients must meet eligibility requirements and provide documentation described below.

1. Clients are permitted to have some assets, e.g. car, retirement plan, with maximum of $3000 in liquid assets (readily available money).

2. Have resided in Pima County for the past three months or longer.

3. Be either
    1. Homeless (based on current HUD homelessness definition), or
    2. Are about to lose their housing due to scheduled eviction or foreclosure, and have no other networks or resources to avoid homelessness, i.e., would become homeless but for this assistance.

4. Have experienced a sudden and significant change making it hard to pay rent or utilities, and, after a short or medium period of assistance, be likely to sustain stable housing on his/her own. Examples of sudden and significant changes include, but are not limited to:
    1. Sudden loss of income
    2. Unforeseen finance set back or life change
    3. Loss of job or reduced hours
    4. Medical issues
    5. Medical bills caused inability to pay other bills
    6. Car repairs
    7. Student Financial Aid disrupted
    8. Divorce or break up of a relationship
    9. Death in family
    10. Lost roommate or other living arrangements

5. Be willing to participate in a case plan that includes goals for improving his/her situation, such as job search activities.

6. Must provide verification documents:
    1. Picture I.D.
    2. Social Security Card
    3. Birth Certificate
    4. Proof of income
    5. Bank statement
    6. Bills that show cause/ need
    7. Proof of residency
    8. Eviction notice or a copy of the Notice of Trustee's sale and has a written lease agreement or a deed that corresponds with the foreclosure documents
    9. Utility disconnect bill or proof of delinquent amount
    10. Invoice for moving assistance

7. Demonstrates ability to maintain their housing and household expenses after assistance

Examples of Reasons the client eligibility may be denied:

- Client does not meet eligibility requirements listed above
- Client did not provide required verification documents
- Client did not agree to having a case plan, or did not follow steps in case plan
- Client used maximum time or assistance allotment

- There were substantiated landlord complaints, and the client did not comply with a correction plan.

- All sub-grantees must evaluate and certify the eligibility of ESG program participants at least once every three months for all household receiving homelessness prevention assistance, and once annually for households receiving rapid re-housing assistances
  - Initial Consultation
    - Sub-recipients must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.
    - Documentation to verify requirements of this section have been met include completing a client in-take form. All sub-grantees must keep verification of this requirement in each client file.
    - Verification of Homelessness or Risk of Homelessness using the HUD definition as described in Section II. B.
    - The sub-grantee must confirm that the individual or family does not have sufficient resources or support networks.
      - To receive assistance under HOMELESSNESS PREVENTION client(s) must be at risk of becoming homeless and rental assistance is only necessary to prevent the individual or family from moving into an emergency shelter or another place.

2) Determining and Prioritizing Rapid Re-Housing Assistance

The purpose of the ESG program is to provide homeless prevention assistance to as many homeless individuals and families who face obstacles to obtaining and sustaining housing as possible. An individual or family's ability to sustain housing is not a threshold requirement. The program will focus on helping individuals and families overcome their immediate housing obstacles and connect them with the resources they need to stay housed when the program ends.

Sub-grantees will target assistance to families and individuals who are homeless or who are about to spend their first night at in a shelter or on the street. These families and individuals will be prioritized as follows.

Priority 1: Homeless Families
- Priority 1(a): The homeless family who is in the emergency shelter for less than 30 days
- Priority 1(b): The homeless family who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 1 (c): the homeless family who has been in the emergency shelter for over 30 days
- Priority 1 (d): The homeless family or who has been living on the streets for over 30 days

Priority 2: Homeless Youth
- Priority 2(a): The homeless youth who is in the emergency shelter for less than 30 days
- Priority 2(b): The homeless youth who has been living on the streets (places not meant for human habitation) for less than 30 days

- Priority 2 (c): the homeless youth who has been in the emergency shelter for over 30 days
- Priority 2 (d): The homeless youth or who has been living on the streets for over 30 days

Priority 3: Homeless Individual

- Priority 3(a): The homeless individual who is in the emergency shelter for less than 30 days
- Priority 3(b): The homeless individual who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 3 (c): the homeless individual who has been in the emergency shelter for over 30 days
- Priority 3 (d): The homeless individual or who has been living on the streets for over 30 days

3) Rent & Utilities Policy: Rapid Re-Housing

Rent

Sub-grantees will require program participants to pay a portion of the rent expense based on the individual or families' available income thirty percent (30%) or less. Participants are expected to contribute a portion of their income to pay for rent. Household income and rent contribution will be calculated based on household available income at the time of certification. Any household income increase must be reported to the sub-grantee within seven (7) days and the new rent contribution amount adjusted. Income shall be reassessed every three months for medium term rental assistance.

Sub-grantees my increase the household's contribution to the rent and utility cost as they acquire more financial independence and stability. An increase will be documented in the client's plan.

Rental assistance may be used to pay up to 3 months of rental arrears for eligible program participants. Rental arrears may be paid if the payment enables the program participant to return to the housing unit for which the arrears are being paid or move to another unit.

Rental arrears may be paid regardless of when they were incurred, provided that the existence of arrears prevents the eligible participant from obtaining housing. Payment for rental arrears must be included in determining the total period of the program participant's rental assistance, which may not exceed 24 months in a 3 year period.

Rental assistance cannot exceed the actual rental costs. Rental assistance payments cannot be made on behalf of eligible participants for the same period of time that rental assistance is being provided through another federal, state or local housing subsidy program.

Sub-grantees providing rental assistance for rapid re-housing will be required to arrange initial and any appropriate follow-up habitability inspections of housing units into which a program participant will be moving. Units must be inspected on an annual basis and upon a change of tenancy. In addition, Lead Based Paint requirements must be met when applicable.

When a rental unit has been located, sub-grantees may need to assist the client in contacting the landlord to complete the appropriate paperwork and conduct a habitability standards inspection. Agencies must have acceptable documentation showing a participant in need of rental assistance. Documentation may be in the form of an eviction notice from a landlord or a letter stating intent to evict.

Sub-grantees must use fair market rent standard to determine eligibility. Sub-grantees should assist program participants to locate a rental unit at or below fair market rent.
Security Deposits and Utility Deposits
ESG Program funds may be used to pay security deposits and utility deposits. Security and utility deposits may only be paid with ESG funding if the program participant will otherwise be homeless without assistance.

Security and utility deposits covering the same period of time in which other assistance is being provided through another housing subsidy program are eligible, as long as they cover different costs types.

Security and utility deposits may be paid as a one-time grant not to exceed the monthly rental amount. Information documenting the need for a security deposit should be obtained at the same time the required rental paperwork is being completed by the client and landlord.

Sub-grantees must conduct a habitability standards inspection on any unit that a program participant will be moving into using ESG program funds for a security or utility deposit. Agencies must certify that the unit has passed habitability standards before any ESG program funds will be released.

Utility Payments
ESG Program funds may be used for up to 6 months of utility payments, including up to 6 months of utility payments in arrears. The program participant, or a member of the participant's household, must have an account in his/her name with a utility company. The participant must have a lease with their name on it to prove residency and verify address of utility service. Copies of the proof of responsibility should be obtained and maintained in the client file. Utility payments will be made directly to the utility company. Documentation must be made to verify that the participant is not receiving the same type of assistance from another agency for the same period. Also, if utility assistance payments are available from another agency this source should be used first before ESG funds are provided

4) Standards for Determining Length and Level of Assistance for Rapid Re-Housing
   - No participant may receive more than 24 months of assistance within a 3 year period.
   - The maximum amount of assistance is based on FMR less the households 30% of monthly income.
   - The maximum number of times the program participant may receive assistance is based on need but may not exceed more than 24 months of assistance in a 3 year period.
   - Short-term rental assistance is to be limited to a maximum of 3 months of rent
   - Medium-rental assistance shall extend for more than 3 months but not more than 24 months of rent.
   - Only as much assistance needed to become stabilized will be provided.

5) Rapid Re-Housing Performance Standards
Number of persons:
- Who maintained their permanent housing for 6 months or longer
- Exiting to permanent housing destinations
- With higher income at program exit
- With more non-cash benefits at program exit
- Participating in Case Management

E. INELIGIBLE SERVICES NOT PROVIDED BY THE ESG PROGRAM

- Mortgage costs
- Credit card bills or other consumer debt
- Pet care
- Entertainment activities
- Cash assistance directly to participants

F. TERMINATION OF ASSISTANCE

A sub-grantee may terminate assistance to a program participant who violates program requirements. Sub-grantees may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the sub-grantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law.

For Homeless Prevention and Rapid Re-Housing rental assistance the process of termination, at minimum, must consist of:

A. Written notice to the program participant containing a clear statement of the reasons for terminations;
B. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person who made or approved the termination decisions; and
C. Prompt written notice of the final decision to the program participant

IV. ESG PROGRAM ADMINISTRATION

3. Procedures for Annual Plan and CAPER Reports
4. Use of IDIS
5. Monitoring Direct Service Contractors
   a. Purpose
   b. Frequency
   c. Findings
   d. Follow-up Procedures

V. SUMMARY OF ESG PROGRAM PERFORMANCE STANDARDS

Pima County and the City of Tucson in consultation with the Continuum of Care will develop performance standards that will provide measures to evaluate the effectiveness of 1) Targeting

those who need the assistance the most; 2) reducing the number of people living on the streets and emergency shelters; 3) shortening the time people spend homeless; and 4) reducing each program participant's housing barriers or housing stability risks.

ESG Program Performance Standards	
Activity	Outcome/ Outputs
Street Outreach	Number of persons: • Placed in shelter or safe havens • With more non-cash benefits at program exit • Participating in case management
Emergency Shelter	Number of persons: • Exiting to temporary or transitional housing destinations • Exiting to permanent housing destinations • Participating in case management
Homelessness Prevention	Number of persons: • Who maintained their permanent housing for 6 months or longer • Exiting to permanent housing destinations • With higher income at program exit • With more non-cash benefits at program exit • Participating in case management
Rapid Re-Housing	Number of persons: • Who maintained their permanent housing for 6 months or longer • Exiting to permanent housing destinations • With higher income at program exit • With more non-cash benefits at program exit • Participating in Case Management

Appendix H

City of Tucson Annual Action Plan Checklist

will be added prior to submittal to HUD

Grantee SF-424's and Certification(s)

Grantee SF-424’s and Certifications

Will be provided in final submittal to HUD