Fiscal Year 2027 (Program Year 2026) Tucson/Pima Annual Action Plan

(July 1, 2026 - June 30, 2027)

May 2026

CITY OF TUCSON

Executive Summary

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

1. Introduction

The City of Tucson, Arizona, receives an annual entitlement allocation from the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), and HOME Investment Partnership (HOME) Programs. The City of Tucson participates in collaborative long-range planning related to the use of HUD entitlement program funds in concert with Pima County. Long-range planning activities result in the development of a Joint Tucson/Pima County Consolidated Plan which is published every five years and defines community needs, priorities, and goals toward which entitlement funds will be directed to improve community and economic development, housing stability and affordability, and social services in the City of Tucson and throughout Pima County. The current Joint Consolidated Plan covers July 1, 2025 – June 30, 2030 and was developed with input from a diverse array of community stakeholders representing the Tucson community. Each year, the City of Tucson produces an Annual Action Plan which more specifically describes the intended use of HUD entitlement funds in furtherance of the Consolidated Plan goals. The overarching objectives of the Consolidated Plan, and associated Annual Action Plans, seek to address challenges related to affordable housing, homelessness, and community development. By centering these challenges within the City of Tucson's efforts, the City seeks to improve the quality of life experienced by low- and moderate-income Tucsonans, enhance the physical environment of Tucson neighborhoods, expand housing opportunity, and reinforce community safety nets, especially among special needs groups including youth, older adults, and persons with disabilities. Subject to HUD review and approval of the Program Year (PY) 2026 Annual Action Plan, the City of Tucson expects to receive the following HUD entitlement funds for the period of July 1, 2026 – June 30, 2027:

Community Development Block Grant: $4,962,047.00

The primary objective of the CDBG program is to develop viable communities by helping to provide decent housing, suitable living environments, and expanding economic opportunities principally for persons of low-to-moderate income.

HOME Investment Partnerships (HOME): $3,061,840.81 (City/County Consortium Amount)

The HOME program is dedicated to increasing the availability of and access to affordable housing among low-income households. The City of Tucson participates in a HOME Consortium with Pima County and

receives HOME Investment Partnership Program funding through the consortium. The City of Tucson acts as the Lead Agency for the Tucson/Pima County HOME Consortium.

Emergency Solutions Grant (ESG): $448,998.00

The primary purpose of the ESG program is to assist individuals and families experiencing homelessness to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

Housing Opportunities for Persons with AIDS (HOPWA): $1,140,597

The HOPWA program funds housing assistance and supportive services for low-income persons with HIV and their families who are experiencing homelessness, at risk of experiencing homelessness, or unstably housed.

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.

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The 2025-2030 Consolidated Plan* outlines key actions planned to address the housing and community development needs of low-/moderate-income and special needs Tucson households. The City's goals and objectives, defined in the Consolidated Plan, include seven key priority areas which include:

1. Community Sustainability

2. Public Services

3. Decent, Affordable Housing

4. Homelessness

6. Housing and Services for People Living with HIV/AIDS and Their Families

7. Program Administration

These are complex community issues, the needs associated with which far outweigh HUD entitlement resources. HUD entitlement funds are leveraged by a wide variety of other local, state, and federal funds to amplify the impact of the City's housing and community development efforts.

Key outcomes from PY 2025 are provided in the next section (Evaluation of Past Performance).

*The City of Tucson/Pima County 2025-2030 Joint Consolidated Plan is available for download at https://www.tucsonaz.gov/Departments/Housing-and-Community-Development/Documents/Plans.

3. Evaluation of past performance

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

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The information below provides a summary of City of Tucson entitlement program performance during the most recently completed program year (July 1, 2024 – June 30, 2025). A more detailed reporting of performance for the same period is available in the City's Consolidated Annual Performance Evaluation Report (CAPER) publicly available on the City of Tucson HCD website at www.tucsonaz.gov/hcd.

HIGHLIGHTED USE OF PROGRAM FUNDS – PROGRAM YEAR 2024 (July 1, 2024 – June 30, 2025)

- Homeowner Assistance (CDBG, HOME, Non-Entitlement Funds): The City's homeowner rehab programs prevent displacement; enable low-income homeowners to remain in safe, decent, and affordable housing; and improve neighborhoods through rehabilitation and repair of aging housing stock. The City provides down payment assistance through its HOME funding allocation, unlocking homeownership opportunity for low-income Tucsonans.
- Eviction and Homelessness Prevention (HOPWA, City General Funds): The City's HOPWA homelessness prevention program and City General Fund rent and utility assistance programs provide emergency rent and utility assistance to prevent homelessness among persons living with HIV/AIDS.
- Shelter and Supportive Housing (ESG, HOPWA, CDBG, Non-Entitlement): The City supports overnight and day shelter programs, street outreach, rapid rehousing, and permanent supportive housing to reduce unsheltered homelessness and promote transitions to permanent housing among people experiencing homelessness.
- Affordable Housing (HOME, CDBG): HOME funds are used to provide gap financing for small-scale development projects and larger projects competing for State Low Income Housing Tax Credit (LIHTC) to promote the development of affordable rental housing in the Tucson area. CDBG funds supported multi-family housing rehabilitation, including completed rehabilitation at the Stone Point Apartments and ongoing rehabilitation work at El Portal 5th and Dodge, the OPCS Center for Housing First, and Stone Avenue Youth Transitional Housing.

- Human and Public Services (CDBG): The City supports a wide array of services for low-income Tucsonans including but not limited to emergency food assistance, basic needs, domestic violence services, and programs for youth and older adults.
- Public Facilities and Infrastructure (CDBG): The City supports public facility improvement and community infrastructure focused on CDBG target areas and low-income neighborhoods.

SUMMARY OF ACCOMPLISHMENTS – PROGRAM YEAR 2024 (July 1, 2024 – June 30, 2025)

- Helping Low-Income Tucsonans Remain in their Homes: 35 low-income homeowners received assistance through the City's CDBG-funded Tucson Home Repair Program and Lead Hazard Reduction Program.
- Promoting Homeownership: 4 low-income households received down payment/homeownership assistance.
- Preventing and Responding to Homelessness: 348 people at risk of and experiencing homelessness received ESG crisis services, and 635 Tucsonans experiencing homelessness received emergency shelter services.
- Expanding the Affordable Housing Supply: 317 new units of rental and homeowner affordable housing were constructed with HOME funds (Newport at Rodeo Apartments, Rio Mercado Apartments, Cascade Apartments, and Milagro on Oracle).
- Public Facilities and Infrastructure: 2 public facility and infrastructure projects were completed in the Tucson area, in addition to 8 currently underway and ongoing projects which will be reported in subsequent reporting years. Projects include transit, temporary, and permanent housing.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Summary from citizen participation section of plan.

Participation of City of Tucson residents in the planning process is essential to ensuring that the City's use of HUD entitlement funds address the housing and community development needs identified and prioritized by individuals and families most affected by the funds. Citizen participation began with the creation of the five-year Consolidated Plan. During the formation of the Consolidated Plan, the City of Tucson and Pima County conducted extensive community outreach and participation activities which included 11 consolidated planning forums at which members of the public provided input into past and future uses of HUD and leveraged funds to address housing and community development needs. In total, 110 community members contributed to Consolidated Plan goals and strategies through participation in planning forums, the feedback from which provides the overarching framework for this Annual Action Plan. Community participation was furthered through the creation of the City of Tucson People, Communities, and Homes Investment Plan (P-CHIP) and the Housing Affordability Strategy for

Tucson (HAST) in Calendar Year 2024. These guiding City plans encompass the City's housing and community development needs, priorities, and goals inclusive of, but not limited to, activities funded through HUD entitlement programs. Both P-CHIP and HAST planning included extensive community consultation and input. P-CHIP, which provides guiding priorities for the use of HOME, ESG, HOPWA, CDBG, and City of Tucson human service fund dollars was informed by 479 unique responses to a community priority survey broadly distributed to area residents and stakeholders, and four public planning meetings which included stakeholder meetings with affordable housing and homeless service providers, as well as English and Spanish language public meetings for members of the public. HAST, which provides guiding priorities and strategies related to HOME and CDBG affordable housing, homeownership, and housing sustainable housing activities, was developed with community input from the City's Commission on Equitable Housing and Development, community stakeholders including housing advocates and developers, and the broader public through three public meetings conducted prior to plan adoption.

The PY 2026 Annual Action Plan continued citizen participation that informed these plans. The City conducted two public hearings related to the PY 2026 Annual Action Plan, one community consultation on March 10, 2026 and two public hearings, one in partnership with Pima County on March 12, 2026 (English language, Spanish language) the other being at Mayor and Council on April 21, 2026. In total, 8 individuals representing 11 organizations and community groups participated in these hearings at which City and County staff presented draft plan goals and funding allocations and received community input into key needs and priorities from stakeholder organizations including mandatory consultation partners, adjacent jurisdictions, and community advocates. Informed by input received through the consultation session and needs hearings, the draft PY 2026 Annual Action Plan was posted on the City of Tucson HCD website for a 30-day public comment period from March 26, 2026- April 25, 2026. Publication of the community consultation public hearings was announced on the City of Tucson website on February 23, 2026, and March 18, 2026, respectively and published in the Daily Territorial on February 20, 2026. Publication of the public comment period and final public hearing before Mayor & Council was published on the City of Tucson website and in the Daily Territorial on March 19, 2026.

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.

A summary of public comments received is provided as an attachment to this plan.

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

A summary of comments or views not accepted and the reasons for rejection is provided as an attachment to this plan.

7. Summary

As an entitlement community, the City of Tucson receives direct funding allocations from the U.S. Department of Housing and Urban Development through the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) Programs. The City of Tucson supplements these funds with other local, state, and federal resources to address housing and community development needs impacting low- and moderate-income households.

The City is required by HUD to develop an Annual Action Plan which outlines the specific activities to be undertaken with entitlement funds in furtherance of the goals and objectives of the prevailing Consolidated Plan each year. This Annual Action Plan covers City Fiscal Year 2027 (July 1, 2026-June 30, 2027) during which the City of Tucson will continue to work with City residents and community stakeholders to focus on promotion of housing stability and security by investing in development and rehabilitation of affordable rental housing, subsidizing home repairs and rehabilitation for low- and moderate-income homeowners, providing housing and services for persons experiencing or at risk of experiencing homelessness, and providing specialized supports for youth, older adults, and persons with disabilities, including persons living with HIV/AIDS and their families.

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

The City of Tucson and Pima County formed a HOME consortium in 1992. As a consortium, the City and County 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

City of Tucson Housing and Community Development Department

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Tucson, AZ 85726-7210

Phone: (520) 791-4171

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Email: HCDAdmin@tucsonaz.gov

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)).

The City of Tucson engages in community collaboration and coordination through a variety of approaches. Specifically, the City held community consultation sessions with housing providers, adjacent governments, health (including mental/behavioral health) and service agencies in preparation of the Annual Action Plan and the foundational plans on which it is built as more fully described under the Summary of Citizen Participation Process and Consultation Process heading in Section AP-05 of this Plan.

The Annual Action Plan is truly a result of year-round efforts to bolster community coordination and collaboration; however, and is supported by the following coordination activities:

Community Forums: HCD regularly partners with the local Continuum of Care, Pima County, and other stakeholders to conduct community forum activities which bring providers together to identify emerging and ongoing community needs and developed shared strategies.

Training: HCD provides training opportunities to strengthen the local housing and social services eco-system. During the past two years, these have included a variety of evidence-based and best practice training topics administered in classroom settings and through the Continuum of Care's Online Training Center which is administered by the HCD.

Public Housing: HCD acts as the City of Tucson Public Housing Authority and administers the Public Housing (PH) and Housing Choice Voucher (HCV) programs. HCD additionally maintains a consortium agreement with Pima County through which the department administers the County's PH and HCV programs.

Continuum of Care: HCD serves as the Collaborative Applicant/Lead Agency for the local Continuum of Care through which the department coordinates community-wide homeless service response, the local Coordinated Entry system, technical assistance, and the implementation of a regional homeless response system.

Intergovernmental Cooperation: HCD works closely and meets regularly with local, state, county, and Tribal governments in adjacent areas to coordinate strategic direction, resource allocation, and community activities. The City and County maintain consortium agreements through which HCD administers the Tucson-Pima County HOME Consortium and joint consolidated planning processes. The City and County recently established an inter-agency position focused on coordinating homelessness response between the jurisdictions, and HCD continues to administer HUD PHA programs on behalf of Pima County.

Affordable Housing Development: HCD has partnered with other City and County departments, affordable housing developers, and elected leaders to develop and advance strategies to increase and preserve affordable housing options. In December 2024 the City of Tucson, Pima County, and University of Arizona's Economic and Business Research Center through the MAP Dashboard published a regional housing market study 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. City staff participate on the Pima County Regional Affordable Housing Commission which aims to coordinate a regional approach to meeting the City's and County's housing needs. HCD supported the City's efforts to pass the Community Corridors Tool code amendment which supports affordable housing development by allowing for increased density on certain infill parcels. The City was the recipient of a Pathways to Removing Obstacles to Housing (PRO Housing) Grant in 2025. This grant will promote and enable the City and County to continue to come up with new and innovative ways to promote the development of affordable housing.

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 Tucson Pima Collaboration to End Homelessness (TPCH) is recognized by HUD as the Continuum of Care for Tucson/Pima County, Arizona. The City of Tucson HCD has been an active member of TPCH since its creation and has served as the Collaborative Applicant/Lead Agency for the Continuum of Care since 2019. TPCH is a coalition of community and faith-based organizations, government entities, businesses, and individuals working together to end homelessness and address the issues related to homelessness in Tucson and throughout Pima County.

The overarching goal of our city-county-community 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 aligning directly to the Continuum of Care strategic plan priorities and 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
- Supporting an efficient and effective services system based on evidence and data
- Increasing collaboration, transparency, and access to public information including collaboratively developing and implementing homelessness communications to provide better and more consistent information regarding homelessness to the public

The FY 2027 (PY 2026) Annual Action Plan was developed with direct input from the Continuum of Care. The overarching goals outlined in the Consolidated Plan were developed through a series of 9 community consultation sessions, including 5 sessions that specifically targeted TPCH member agencies, and ongoing coordination between the City of Tucson, Pima County, and the Continuum of Care promotes collaborative strategies to address the challenges of homelessness in our community.

In recent years, the City has worked closely with the Continuum of Care to identify critical needs and strategies to be prioritized for use of funds, improve consistency between City-funded homeless assistance program requirements and TPCH written standards, coordinate encampment response, improved Point in Time data collection, expand non-congregate shelter sites to reduce unsheltered homelessness, launch regional planning initiatives, and Coordinated Entry system improvements through HUD technical assistance including the Housing Central Command initiative.

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 City collaborates with and serves as the Collaborative Applicant/Lead Agency for the Tucson Pima Collaboration to End Homelessness (TPCH) which coordinates the HUD Continuum of Care program, oversees the local Homelessness Management Information System (HMIS) and administers the local Coordinated Entry system. 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. ESG, CDBG Public Service, and HOPWA funds were allocated through the formal P-CHIP grant solicitation. Continuum of Care members participated in grant review panels and made recommendations to HCD staff as to the allocation of resources and selection of grantees.

The Continuum of Care establishes annual performance benchmarks for ESG-funded programs in partnership with the City of Tucson, Pima County, and Arizona Department of Economic Security, each of which administer ESG funding within the region. Standard performance metrics allow for consistent measurement of ESG project performance by the Continuum of Care and entitlement jurisdictions. The Continuum of Care provides a quarterly ESG performance report to each jurisdiction which allows the City to conduct ongoing performance evaluation and monitoring using standardized HMIS data measurement.

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

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	Tucson Pima Collaboration to End Homelessness
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Publicly Funded Institution/System of Care Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy 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?	Organization leadership participated in public and one-on-one consultation survey regarding approaches to ending homelessness, preventing homelessness, system needs, and coordination strategy. Organization members were involved in selection of homeless assistance and human services projects to be funded through entitlement programs in previous PCHIP request for proposal.
2	**Agency/Group/Organization**	PIMA COUNTY
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Other government - County

	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
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in March 12, 2026 community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
3	**Agency/Group/Organization**	City of Tucson Department of Housing and Community Development
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization leadership participated in public and one-on-one community consultation survey. The consultation resulted in the identification of key priorities for the public housing authority and community service needs for Tucson area populations.

4	**Agency/Group/Organization**	City of Tucson - Housing First
	Agency/Group/Organization Type	Housing Services-homeless Services-Health Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization leadership participated in public and one-on-one community consultation survey. The consultation resulted in the identification of key priorities for the homeless community such as homelessness prevention, supportive housing needs, continued outreach and navigation needs, health needs for homeless individuals, and continued funding needs.
5	**Agency/Group/Organization**	El Pueblo Housing Development Corporation
	Agency/Group/Organization Type	Housing Planning organization
	What section of the Plan was addressed by Consultation?	Housing Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization leadership participated in public and one-on-one community consultation survey. The consultation resulted in the identification of key priorities for low-income housing development needs, creative housing solutions for middle housing such as duplexes, triplexes, and fourplexes. Increased infrastructure needs for bicycles, walking and additional housing developments.
6	**Agency/Group/Organization**	Tucson Food Share
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in March 10, 2026 community consultation session. The consultation resulted in the identification of food insecurity needs of the community that the organization is seeing in both the housed and homeless population.

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

All agency types were invited to participate. Low attendance (9 of 78 invited organizations) was due to lack of response, not intentional exclusion of any agency type.

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	City of Tucson HCD/Tucson Pima Collaboration to End Homelessness	The TPCH Strategic Plan (Community Plan to Prevent and End Homelessness) was developed in tandem with the City's People, Communities, and Homes Investment Plan. The City's Plan includes funding priorities directly built on the planning goals identified by the Continuum of Care to promote coordination of efforts and resources between ESG, CoC, CDBG, and HOPWA grantmaking.
People, Communities, and Homes Investment Plan	City of Tucson	P-CHIP defines the City's overarching housing and community development goals and serves as the guiding framework for the City's use of HUD entitlement program funds, particularly as they relate to crisis housing, public services, homeless response, and community infrastructure projects.
Housing Affordability Strategy for Tucson	City of Tucson	HAST defines the City's policy and practice goals as they relate to advancing affordable housing inventory and opportunity in the Tucson area. The strategies outlined in HAST are embedded within this Annual Action Plan and drive the use of HOME, CDBG, and leveraged funds related to affordable housing creation and preservation.

Table 3 – Other local / regional / federal planning efforts

Narrative

All applicable agency types were invited to participate in the community consultation process. Invitations were extended to 78 organizations representing a broad cross-section of community partners. Despite these outreach efforts of 3 separate invitation email attempts, a community survey, and in-person reminders, and newsletter notification, attendance was limited, with only 16 participants attending and 9 that provided input and feedback. The low participation rate was not due to intentional exclusion of any agency type, but rather a lack of response or availability from invited organizations, with several agencies sending decline emails. Efforts will be made in future consultation cycles to increase engagement and participation.

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 goals to be pursued through the PY 2026 Annual Action Plan were established through the Consolidated Planning Process and refined through the creation of the City of Tucson's 2024 People, Communities, and Homes Investment Plan (P-CHIP) and 2022 Housing Affordability Strategy for Tucson (HAST). Outreach to public and stakeholder groups related to these plans is described in Section AP-05 of this Annual Action Plan and included English and Spanish language community meetings, direct community consultation with key stakeholder groups, and web-based citizen participation tools including an online budgeting tool and place-based story mapping to localize planning input, and community surveys.

To prepare the PY 2026 Annual Action Plan, the City of Tucson's Housing and Community Development (HCD) department conducted citizen participation activities for the purposes of re-affirming that the goals established in the Consolidated Plan and strategies defined through P-CHIP and HAST remain a priority to area residents. In doing so, HCD took additional steps beyond those required by the Citizen Participation Plan to ensure broad community participation, particularly among Spanish-speaking community members and partner organizations.

Citizen participation activities included all actions required by the Citizen Participation Plan: two public hearings and a 30-day public comment period. Public hearing notices and the public comment period notice were published in the Daily Territorial in accordance with applicable requirements. The first public hearing was conducted in a hybrid format, offered both in-person and online participation options, and included a Spanish-language interpreter to ensure accessibility for non-English speaking community members. The second public hearing was held in-person at the Mayor and Council Chambers. Closed captioning was provided for all virtual components of public hearings, and community accessibility accommodations were made available upon request. Beyond required activities, HCD conducted additional outreach efforts including social media posts and a community survey available in both English and Spanish.

While no public comments were received during either public hearing or the 30-day public comment period, the breadth of outreach efforts conducted demonstrates the City's commitment to meaningful citizen participation and transparent community engagement. The absence of public comment is noted and the City will continue to explore strategies to increase public engagement in future planning cycles. The goals and strategies established through the Consolidated Plan, P-CHIP, and HAST are carried forward into this Annual Action Plan, as they continue to reflect the priority needs of Tucson residents related to expanding affordable housing, supporting housing subsidy holders, continued implementation of rental housing rehabilitation activities, and continuing addressing the needs of unsheltered people experiencing homelessness, including older adults and families with children.

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	Email to Public Consultation List	community members, service providers, housing developers, advocates, and other stakeholders	121 Individuals invited over 78 different agencies of community members, service providers, housing developers, advocates, and other stakeholders for input.	Invitation for participation in Public Consultation Meeting.	Not applicable.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	community members, service providers, housing developers, advocates, and other stakeholders	A total of 8 community members, service providers, housing developers, advocates, and other stakeholders attended the public consultation meeting. Refer to the attached summary of comments received.	Refer to attached summary of comments received.	No comments were not accepted.	https://youtu.be/MMCQaxYcP80?si=PaqCglAo6AAGuVOD

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	Newspaper Ad	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	Notice for Public Hearing to be held on March 12th 2026. Outreach for all community members to attend public hearing following publication in the Daily Territorial on February 20th 2026.	Notice to public.	Not applicable.	
4	Internet Outreach	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	Notice for Public Hearing to be held on March 12th 2026. Outreach for all public members to attend public hearing.	Social Media Post to engage community members.	Not applicable.	https://www.instagram.com/p/DVg_Cg5EhWL/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Internet Outreach	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	City of Tucson HCD News List posted on February 23rd 2026 for public invitation to Public Hearing held on March 12th 2026.	External City of Tucson News List to engage community members.	Not applicable.	https://www.tucsonaz.gov/Departments/Housing-and-Community-Development/HCD-News/HCD-to-hold-public-hearing-on-2026-HUD-Annual-Action-Plan

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 Hearing	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	Public hearing was held on March 12th, 2026 with joint session being held with City of Tucson and Pima County to present plan to public with a total of 3 individuals attending in-person and 5 attending virtually. Spanish language interpreter present in meeting for Spanish translation.	Refer to attached summary of comments received.	No comments were not accepted.	https://youtu.be/0usr2v37hys?si=Z3i_HsLZs3J_9_fF

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Internet Outreach	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	Published on HCD News list on March 18th, 2026 for public outreach to alert community to public comments being accepted from March 26, 2026 and running to April 25, 2026.	External City of Tucson News List to engage community members.	Not applicable.	https://www.tucsonaz.gov/Departments/Housing-and-Community-Development/HCD-News/Notice-of-Public-Comment-Period-and-Public-Hearing-for-FY-2026-HUD-Ann

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)
8	Newspaper Ad	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	Public Notice Published in Daily Territorial on March 19th, 2026 informing public that public comments on PY26 Annual Action Plan would be accepted for 30 day period starting March 26th, 2026 through April 25th, 2026.	No public comments were received.	Not applicable	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Newspaper Ad	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	Public Notice Published in Daily Territorial on April 10th, 2026 informing public that public hearing being held at Mayor & Council on April 21st, 2026 starting at 5:30 pm for public comments and input into PY26 Annual Action Plan.	Notice to public.	Not applicable.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Public Hearing	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	Public hearing was held before Mayor & Council on April 21st, 2026 with no comments submitted.	No public comments were received.	Not applicable.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Tucson anticipates receiving CDBG, ESG, HOME and HOPWA funding over the next five years.

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	4,962,047.00	200,000.00	0.00	5,162,047.00	14,886,141.00	Community Development Block Grant (CDBG) funds may be used for a variety of activities that address the needs of low-and-moderate-income residents and communities. Eligible uses of funds include public improvements and services, housing, planning, and administration. All activities 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	3,061,840.81	500,000.00	0.00	3,561,840.81	9,185,522.43	HOME Investment Partnership Program (HOME) funds may be used to assist low-and-moderate-income owners and renters through new construction of housing, acquisition and/or rehabilitation of housing, tenant-based rental assistance, and homeownership assistance. The HOME Investment Partnerships Program requires Participating Jurisdictions (PJs) to set aside at least 15% of their annual allocation for affordable housing projects owned, developed, or sponsored by certified Community Housing Development Organizations (CHDOs). These funds support rental or homebuyer projects, such as new construction or rehabilitation.

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	1,140,597.00	0.00	0.00	1,140,597.00	3,421,791.00	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.

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	448,998.00	0.00	0.00	448,998.00	1,346,994.00	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

If appropriate, describe publically 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. Land and property may be developed through public-private partnerships using a variety of Consolidated Plan and leverage resources. City-owned land will primarily be used to develop affordable housing, and permanent supportive housing. Rehabilitation is planned for many city-owned properties to provide transitional housing, emergency shelter, and updated affordable housing.

Discussion

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. 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.
3. HOME funds for housing development on a competitive basis.
4. National Housing Trust Funds for rental housing serving extremely low-income households, on a competitive basis.
5. State Housing Trust Funds for development and preservation of housing benefiting low-and-moderate income renters and owners.

Local and private leverage and match resources include:

1. General Fund resources for human services, facilities, and infrastructure.
2. Federal Home Loan Bank resources that support savings for homeownership and provide financing for affordable housing development and preservation.

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	2025	2029	Non-Housing Community Development	Citywide	Community Sustainability	CDBG: $2,238,524.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 11000 Persons Assisted
2	Human and public services	2025	2029	Non-Housing Community Development	Citywide	Human and Public Services	CDBG: $738,703.00	Public service activities other than Low/Moderate Income Housing Benefit: 440000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Decent Affordable Rental and Homeownership Housing	2025	2029	Affordable Housing	Citywide	Decent Affordable Housing	CDBG: $992,410.00 HOME: $2,755,656.79	Rental units constructed: 6 Household Housing Unit Rental units rehabilitated: 30 Household Housing Unit Homeowner Housing Added: 20 Household Housing Unit Homeowner Housing Rehabilitated: 50 Household Housing Unit Direct Financial Assistance to Homebuyers: 12 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 240 Households Assisted
4	Prevent and Reduce Homelessness	2025	2029	Homeless	Citywide	Homelessness	ESG: $415,322.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 195 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 12 Households Assisted Homeless Person Overnight Shelter: 59 Persons Assisted Homelessness Prevention: 26 Persons Assisted

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	2025	2029	Non-Homeless Special Needs	Citywide	Housing and Services for People with HIV/AIDS	HOPWA: $1,075,729.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 45 Households Assisted Homelessness Prevention: 100 Persons Assisted
6	Program Administration	2025	2029	Program Administration	Citywide	Program Administration	CDBG: $992,410.00 HOPWA: $64,868.00 HOME: $306,184.02 ESG: $33,676.00	Other: 1 Other

Table 3 – Goals Summary

Goal Descriptions

1	**Goal Name**	Community Facilities and Improvements
	Goal Description	Improvements to community facilities and infrastructure to benefit low-to-moderate income residents and neighborhoods.

2	**Goal Name**	Human and public services
	Goal Description	Human and public services to benefit low-to-moderate income residents and neighborhoods.
3	**Goal Name**	Decent Affordable Rental and Homeownership Housing
	Goal Description	Rental and homeownership housing assistance and development.
4	**Goal Name**	Prevent and Reduce Homelessness
	Goal Description	Activities for individuals and families at risk of or experiencing homelessness.
5	**Goal Name**	Housing and Services for People with HIV/AIDS
	Goal Description	HOPWA funding to support housing and services for people with HIV/AIDS and their families, including administrative support for project sponsors.
6	**Goal Name**	Program Administration
	Goal Description	Administration of CDBG, ESG, HOME and HOPWA programs.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The City of Tucson selects projects by directly identifying community needs, a direct application process for individuals, and through a Call for Projects process approved by the City Mayor and Council.

#	Project Name
1	ESG26 City of Tucson
2	CDBG Human and Public Services
3	CDBG Community Facilities and Improvements
4	CDBG Decent Affordable Rental and Homeowner Housing
5	CDBG Administration and Planning
6	City of Tucson HOME Administration
7	City of Tucson HOME Decent Affordable Rental and Homeowner Housing
8	Pima County HOME Administration
9	Pima County HOME Decent Affordable Rental and Homeowner Housing
10	HOPWA Services for People Living with HIV/AIDS
11	HOPWA Administration

Table 4 – Project Information

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

The People, Communities, and Homes Investment Plan, or P-CHIP, established the strategic goals and objectives for Housing and Community Development (HCD) over the next four years. It provided a starting point, direction, and scope, creating a framework for decision-making. Through the P-CHIP distribution of funds, HCD aims to create pathways to opportunity, ensuring that all individuals, regardless of their background or circumstances, experience dignity, belonging, and the ability to thrive.

Obstacles to addressing underserved needs include:

- Lack of affordable housing options.
- Low-income and high poverty rates.
- Increased homelessness due to housing supply and cost.
- Neighborhood differences.

AP-38 Project Summary

Project Summary Information

1	**Project Name**	ESG26 City of Tucson
	Target Area	Citywide
	Goals Supported	Prevent and Reduce Homelessness Program Administration
	Needs Addressed	Homelessness Program Administration
	Funding	ESG: $448,998.00
	Description	ESG will be used for Street Outreach, Essential Services, Rapid Rehousing, Emergency Shelter, and Program Administration
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	ESG will provide assistance to 675 individuals experiencing homelessness
	Location Description	ESG activities are conducted City wide.
	Planned Activities	ESG will be used for Street Outreach ($29,464.00 - 6.6%), Rapid Rehousing ($78,321.00 - 17.4%), Emergency Shelter ($209,115.00 - 46.6%), Homelessness Prevention ($98,423.00 - 21.9%), and Program Administration ($33,675.00 - 7.5%)
2	**Project Name**	CDBG Human and Public Services
	Target Area	Citywide
	Goals Supported	Human and public services
	Needs Addressed	Human and Public Services
	Funding	CDBG: $738,703.00
	Description	Community Food Bank Emergency Food Assistance Program (LMC) Matrix Code 05WCommunity Bridges First Responder Navigation (LMC) Matrix Code 05ZSister Jose Women's Center Impact Project for Especially Vulnerable Women (LMC) Matrix Code 05ZPima County Community and Workforce Development Emergency Eviction and Legal Services-The Craycroft (LMC) Matrix Code 05ZPima Council on Aging Pima Meals on Wheels (LMC) Matrix Code 05AUnited Way of Tucson and Southern Arizona VITA (Volunteer Income Tax Assistance) (LMC) Matrix Code 05ZCity of Tucson Housing First Program City Street Outreach Program (LMC) Matrix Code 05ZZ
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	80,000 low-moderate income individuals will benefit from Community Food Bank. 225 low-moderate income individuals will benefit from Community Bridges. 100 low-moderate income individuals will benefit from Sister Jose Woman's Center. 460 low-moderate income individuals will benefit from Pima County Community & Workforce Development. 1,500 low-moderate income individuals will benefit from Pima Council on Aging, Inc. 7,500 low-moderate income individuals will benefit from United Way of Tucson and Southern Arizona. 392 low-moderate income individuals will benefit from City of Tucson Housing First Street Outreach.
	Location Description	The Community Food Bank is located at 3003 S Country Club Rd, Tucson, AZ 85713 Community Bridges, Inc. is located at 250 S. Toole Ave, Tucson, AZ 85701 Sister Jose Woman's Center is located at 1050 S. Park Ave. Tucson, AZ 85702 Pima County Community & Workforce Development is located at 1440 S. Craycroft Rd. Tucson, AZ 85711 Pima Council on Aging, Inc. is located at 8467 E. Broadway Blvd. Tucson, AZ 85710 United Way of Tucson and Southern Arizona is located at 330 N Commerce Park Loop #200 Tucson, AZ 85745 City of Tucson Housing First Program is located at 195 W. Irvington Rd. Tuson, AZ 85714

	Planned Activities	Human and Public Services ($738,703.00 - 15%) Emergency Food Assistance for Low-moderate income households. Community Housing Outreach and Navigation Services for low-moderate income individuals. Emergency Women Overnight Shelter and Case Management for low-moderate income individuals. Homeless Prevention and Legal Services for low-moderate income households. Emergency mobile food assistance for senior and disabled for low-moderate income households. Tax return preparation and filing for low-moderate income households. Street outreach and homeless navigation services for low-moderate income individuals.
3	**Project Name**	CDBG Community Facilities and Improvements
	Target Area	Citywide
	Goals Supported	Community Facilities and Improvements
	Needs Addressed	Community Sustainability
	Funding	CDBG: $2,238,524.00
	Description	Public and community facilities throughout the City of Tucson. Specific activities to be determined.
	Target Date	6/30/2031
	Estimate the number and type of families that will benefit from the proposed activities	Activities are to be determined.
	Location Description	Activities are to be determined.
	Planned Activities	Activities are to be determined.
4	**Project Name**	CDBG Decent Affordable Rental and Homeowner Housing
	Target Area	Citywide
	Goals Supported	Decent Affordable Rental and Homeownership Housing
	Needs Addressed	Decent Affordable Housing
	Funding	CDBG: $992,410.00

	Description	CDBG-funded homeowner (matrix code 14A) and rental housing development and rehabilitation (matrix code 14B).
	Target Date	6/30/2031
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 50 LMI owners and renters will benefit from the proposed activities.
	Location Description	Citywide
	Planned Activities	Rehabilitation of housing occupied by LMI owners (CDBG Matrix Code 14A). Acquisition and/or rehabilitation of affordable rental housing, including energy-efficiency, disability accessibility improvements, temporary or permanent relocation, and permanent supportive housing (CDBG Matrix Code 14B).
5	**Project Name**	CDBG Administration and Planning
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	CDBG: $992,410.00
	Description	These funds will be used to administer all CDBG activities and to support planning initiatives. Matrix codes 21A and 20.
	Target Date	6/30/2027
	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 and planning activities.
6	**Project Name**	City of Tucson HOME Administration
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	HOME: $220,452.52

	Description	Administration of HOME program in fulfillment of HOME activities and requirements.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Administration of HOME program in fulfillment of HOME activities and requirements.
7	**Project Name**	City of Tucson HOME Decent Affordable Rental and Homeowner Housing
	Target Area	Citywide
	Goals Supported	Decent Affordable Rental and Homeownership Housing
	Needs Addressed	Decent Affordable Housing
	Funding	HOME: $1,984,073.29
	Description	HOME funding and program income will be used for acquisition, development, and/or rehabilitation of rental and homeowner housing; rental assistance; and down payment assistance for low-/moderate-income homebuyers. This project includes $330,678.79 in CHDO set aside funds.
	Target Date	6/30/2031
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 32 low-moderate income homebuyers, 6 low-income renters, and 240 very low-income renters will benefit from activities.
	Location Description	Locations to be selected.
	Planned Activities	Construction of affordable rental housing, including permanent supportive housing and transitional housing. Security and utility deposits (TBRA). Downpayment assistance for first time home buyers. Homebuyer unit construction or acquisition and rehabilitation for resale.
8	**Project Name**	Pima County HOME Administration
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration

	Funding	HOME: $85,731.50
	Description	Administration of HOME program in fulfillment of HOME activities and requirements.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Administration of HOME program in fulfillment of HOME activities and requirements.
9	**Project Name**	Pima County HOME Decent Affordable Rental and Homeowner Housing
	Target Area	Citywide
	Goals Supported	Decent Affordable Rental and Homeownership Housing
	Needs Addressed	Decent Affordable Housing
	Funding	HOME: $771,583.50
	Description	HOME funding and program income will be used for acquisition, development, and/or rehabilitation of rental and homeowner housing; rental assistance; and down payment assistance for low-/moderate-income homebuyers. This project includes $ 128,597.25 in CHDO set aside funds.
	Target Date	6/30/2031
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 4 low-moderate income homeowners and 2 very low-income renters will benefit from the proposed activities.
	Location Description	Locations to be determined.
	Planned Activities	Construction of affordable rental housing, including permanent supportive housing and transitional housing. Downpayment assistance for first time home buyers. Mobile home replacement/owner-occupied housing rehabilitation.
10	**Project Name**	HOPWA Services for People Living with HIV/AIDS
	Target Area	Citywide
	Goals Supported	Housing and Services for People with HIV/AIDS

	Needs Addressed	Housing and Services for People with HIV/AIDS
	Funding	HOPWA: $1,106,379.00
	Description	Essential services for LMI persons with HIV/AIDS and their families. Monthly rental assistance and or security/utility deposits. HOPWA Project Sponsor administration.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 245 people living with HIV/AIDS and their families will benefit from HOPWA housing assistance and supportive services.
	Location Description	Locations confidential.
	Planned Activities	Essential services for LMI persons with HIV/AIDS and their families. Monthly rental assistance and or security/utility deposits. Project Sponsor administration.
11	**Project Name**	HOPWA Administration
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	HOPWA: $34,218.00
	Description	City of Tucson administration of the HOPWA program.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Administrative activities are primarily conducted at the City of Tucson Housing and Community Development Department offices (310 N. Commerce Park Loop, Tucson, AZ 85745).
	Planned Activities	City of Tucson HOPWA program administration.

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

The City of Tucson will direct funds throughout the City (citywide target area). Funding to geographic areas emphasized in the People, Communities, and Homes Investment Plan (P-CHIP), including THRIVE Zones and the Miracle Mile/Oracle areas may be prioritized.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Tucson funds activities throughout the City that benefit low- and moderate-income households and neighborhoods.

Discussion

Affordable Housing

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

Introduction

The City of Tucson plans to provide affordable housing assistance for approximately 400 households. This includes rapid rehousing and permanent housing for persons experiencing homelessness, tenant-based rental assistance for the homeless, special needs populations and very low-income HCV holders, new construction and rehabilitation of rental and homeownership units, homeowner rehabilitation, and homebuyer assistance. In addition, the City will use General Fund dollars to provide low-income households with Acute Emergency Home Repairs as well as accessibility adaptation, home repair, and maintenance assistance for low-income older adults and persons with disabilities.

The City of Tucson anticipates achieving the following immediate outcomes during PY 2026 as they relate to affordable housing:

- Supporting 260 or more households experiencing homelessness (248 households assisted to enter voucher programs through HOME tenant-based rental assistance and 12 households to receive ESG rapid rehousing assistance).
- Supporting 84 or more non-homeless households to maintain stable housing through CDBG and HOME owner-occupied and rental housing rehabilitation activities.
- Supporting 45 special-needs households comprised of one or more persons living with HIV/AIDS to obtain and maintain stable housing through HOPWA tenant-based rental assistance.

One Year Goals Detail:

- Rental Assistance: 248 households - HOME tenant-based rental assistance; 45 households - HOPWA tenant-based rental assistance, 12 households - ESG rapid rehousing.
- Production of New Units: 15 rental and homeownership units created through HOME program.
- Rehab of Existing Units: 59 rental and homeownership units rehabilitated through HOME and CDBG programs.

One Year Goals for the Number of Households to be Supported	
Homeless	260
Non-Homeless	84
Special-Needs	45
Total	389

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	305
The Production of New Units	15
Rehab of Existing Units	59
Acquisition of Existing Units	10
Total	389

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

Discussion

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

Introduction

The City of Tucson Public Housing Program owns and operates 900+ public housing units and an additional 400+ affordable housing units throughout the City of Tucson and Pima County. The PHA provides housing to 2,069 public housing resident families. The information included in this section is from the HCD Annual HUD PHA Plan for 2026. A separate public hearing is held for the PHA Plan.

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

In the coming year, the City of Tucson intends to implement a long-term repositioning plan to include modernization, disposition, and purchasing of units based on the assessment completed by Praxis Consulting Group, LLC. Based on recommendations from Praxis, the City of Tucson's next action items are to move forward with asset repositioning for two projects based on the ranking of properties within the portfolio to create a pool of properties to reposition. The City of Tucson is moving forward with a Rental Assistance Demonstration Project for an 82-unit multi-family project. In addition, the City of Tucson is implementing a strategy for scattered site properties. That strategy includes phases of dispositioning including selling to a non-profit affiliate, collaborating with non-profit groups, and creating affordable ownership opportunities.

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

During the coming year, the PHA will continue to support PHA resident councils. Resident councils work in collaboration with PHA staff to support public housing operations and resident quality of life.

The PHA encourages public housing residents to participate in homeownership through the Family Self Sufficiency (FSS) Program. The FSS program provides financial literacy, budgeting, skill development, and supportive services to promote homeownership readiness. Participants establish an escrow savings account during participation that can be used for down payment and/or closing costs. This savings account may be supplemented with down payment assistance from other homeownership programs.

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

The Tucson Public Housing Authority is currently designated as troubled. CDBG, ESG, HOPWA, and/or HOME financial assistance provided to the Public Housing Authority, if any, will be subject to routine monitoring and oversight by the Community Development Division to ensure full compliance with federal program requirements. At this time, the Housing Authority receives no direct financial assistance through HUD entitlement programs; however, Housing Authority participants benefit from security deposit assistance provided through the HOME TBRA program and homelessness prevention assistance

through the ESG program.

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 Continuum of Care (CoC) will coordinate outreach activities through partnerships between the City of Tucson, Pima County, behavioral health entities, and local nonprofit outreach programs. These efforts have proven effective in reaching out to unsheltered homeless people. Outreach workers are trained to conduct Housing Questionnaire (HQ) screening in the field and use progressive engagement strategies with unsheltered individuals to encourage engagement with shelter, supportive housing, and available housing subsidies and services.

The City's Housing First program, supported by ESG, CoC, and CDBG program funds, conducts targeted outreach in high-concentration encampments to provide person-centered responses to unhoused persons while mitigating the negative impacts of unsheltered homelessness on surrounding neighborhoods.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Tucson will utilize ESG funding to support emergency shelter and transitional housing, homelessness prevention, and services for people experiencing homelessness. ESG funding will be leveraged with City funding and the activities of the Continuum of Care.

The City of Tucson owns and administers five emergency shelter/transitional housing facilities which are operated by the City, Pima County, and non-profit partners with a sixth currently under redevelopment. Together these facilities provide more than 300 beds of shelter/transitional housing nightly.

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

Aftercare and follow-up activities serve families with the aim of quickly identifying and addressing issues that could result in repeat homelessness. To shorten the time that individuals and families experience homelessness, the city will work to strengthen partnerships between workforce and supportive housing systems, accelerate the transition to PHA vouchers or alternate resources as soon as comprehensive case management is no longer needed, aid with early housing planning for people experiencing homelessness, and accelerate receipt of SSI/SSDI benefits when possible. The success of these efforts will however continue to be limited by the shortage of affordable and supportive housing.

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 may 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.) designed 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. Additionally, families may 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.

Discussion

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 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	45
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	3
Total	248

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 delays that increase costs. The City of Tucson and Pima County completed the HUD Regulatory Barrier Questionnaire and identified possible barriers.

The City of Tucson identified a need to update its estimates of current and anticipated housing demand, review of the corridor redevelopment code to determine its impact on housing development, and insufficient land zoned to meet the demand for additional housing in Tucson; however, many areas of Tucson cannot accommodate additional density without significant investment in infrastructure improvements, particularly water infrastructure.

Pima County identified multiple factors that require further exploration to determine their potential impact on housing affordability, housing choice, and access to opportunity for a range of households. These factors include assessment of the current and future estimated demand for housing by low-, moderate-, and middle-income households, examination of mechanisms to expand the availability of middle-missing development (duplexes, triplexes, and quadplexes), and smaller-lot single-family housing types, and examining density bonuses as a mechanism to offset the cost of building below market-rate units in development that includes affordable housing.

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

The City of Tucson has adopted its updated General Plan, Plan Tucson, which was approved by Mayor and Council and ratified by Tucson voters in November 2025. Pima County also adopted its updated Comprehensive Plan, Pima Prospers, in 2025. Together, these plans establish a coordinated regional framework focused on encouraging infill and redevelopment, expanding housing supply, and increasing diversity and affordability of housing options.

Within Plan Tucson, Goal 5: Expand Affordable and Accessible Housing Options provides a clear policy direction to increase public and private investment in housing, promote a wider range of housing types, and improve access to stable and attainable housing for residents of all incomes and abilities. Complementary policies throughout Goal 5, emphasize transit-oriented development, infrastructure investment to support new housing, and strategies to mitigate displacement.

The City completed a Housing Needs Assessment in late 2024, which identified a significant and ongoing housing shortage. The analysis estimates that Tucson will need to produce over 62,000 housing units by

2045 to meet current and future demand, including approximately 4,700 units to address homelessness, 8,000 units to address existing underproduction, and nearly 50,000 units to accommodate future population growth. Importantly, the greatest need is concentrated among lower-income households, with approximately 34,000 units needed for households earning 0-60% of Area Median Income. Near-term needs are also substantial, with over 20,000 units needed by 2028 and more than 35,000 units needed by 2033.

The City advanced several key land use and zoning reforms to facilitate housing development in 2025. The Community Corridors Tool (CCT), adopted in March 2025, modifies existing zoning along major corridors to allow more flexible development standards, encouraging mixed-use development, and support higher-density housing aligned with City goals. Additionally, the City adopted a Middle Housing code amendment in December 2025, allowing housing types such as duplexes, triplexes, fourplexes, townhomes, and cottage courts, in most residential zones citywide (excluding rural residential zones). These efforts collectively position the City to address identified housing needs to support infill and redevelopment, enable a broader range of housing types, and align local policies with regional housing demand and long-term growth projections.

In addition to the Comprehensive Plan update, Pima County will 1) examine mechanisms to expand the availability of middle-missing development (duplexes, triplexes, and quadplexes), and smaller-lot single-family housing types, and 2) examine density bonuses as a mechanism to offset the cost of building below market-rate units in development that includes affordable housing, and 3) work with a private sector firm to complete a housing market study, target market analysis, and multi-day visioning charette.

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.

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, and develop institutional structure for delivering housing and community development activities.

Actions planned to address obstacles to meeting underserved needs

The People, Communities, and Homes Investment Plan, or P-CHIP, establishes the strategic goals and objectives for Housing and Community Development (HCD). It provides a starting point, direction, and scope, creating a framework for decision-making and addressing obstacles to meeting underserved needs.

At the heart of P-CHIP is creating pathways to opportunity, ensuring that all individuals, regardless of their background or circumstances, experience dignity, belonging, and the ability to thrive. A critical step towards opportunity is providing safe, quality, affordable homes, and essential services that people need to thrive.

Actions planned to foster and maintain affordable housing

During the coming year, the City of Tucson will focus on the following housing objectives:

- Preserve, enhance and expand the supply of high-quality affordable rental housing;
- Prioritize building affordable housing and a variety of housing types to meet the various housing needs of Tucsonans;
- Transform city-owned housing;
- Reduce barriers to homeownership through homebuyer assistance, education, and counseling;
- Expand the supply of affordable housing for homeownership;
- Reduce threats to homeownership stability; and
- Reduce and mitigate evictions and foreclosures.
- Expand access to healthy, safe, and sustainable housing
- Reduce housing segregation and its effects
- Target affordable housing investments in areas of opportunity

Actions planned to reduce lead-based paint hazards

The City of Tucson administers HUD's Lead Hazard Reduction and Healthy Homes Grant provides lead hazard mitigation and other health and safety improvements to properties built before 1978 within the city limits of Tucson that are homeowner/rental occupied by households at 80% AMI or lower with children under age six that live/ frequently visit the home. Qualified applicants receive a free Lead

Inspection and Risk Assessment conducted by a state-certified lead inspector to test for lead inside and outside of the home. Properties that test positive for lead receive lead hazard mitigation services targeting the removal of lead based paint and lead dust, such as replacing windows, doors, and peeling paint; and will also benefit from additional health and safety improvements, such as roof replacement or installing a working HVAC system. The program is administered as a grant to homeowners at no cost and includes free blood testing for children under age six through a community health agency, as well as a partnership with a local nonprofit to raise awareness of the program and the dangers of lead poisoning.

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. The Consortium has licensed contractors available to perform appropriate abatement and/or removal procedures if lead-based paint is present. The Consortium 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 Consortium 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 be occupied by households that have a child under the age of six 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.

Actions planned to reduce the number of poverty-level families

P-CHIP established core funding priorities through review of guiding plans and existing community priorities, evaluation of data, and community input received through surveys, stakeholder meetings, and other public outreach. Reducing poverty and ensuring dignity for all is one of the P-CHIP funding priorities. By funding activities to reduce poverty, the city will optimize opportunity and enable people living in poverty to perform to the best of their abilities. Actions will focus on:

1. Expanding economic mobility opportunities for low-income populations;
2. Reducing barriers and ensuring access to quality education, work, self-sufficiency, and training opportunities.

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 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.
- Examine alternate methods of fair housing outreach and education to reach a broad range of individuals and organizations.
- Develop resources to reach landlords and encourage participation in tenant-based rental assistance and acceptance of households with unique backgrounds.
- Examine methods of increasing homelessness outreach in rural areas.

In addition, the City of Tucson will:

1. Expand the use of a new online electronic database system for accepting and reviewing grant applications, active contract management and long- term compliance monitoring.
2. Transition and transform the City's public housing in alignment with objective E.3 on the City's P-CHIP.
3. Coordinate with Constables to connect people with homelessness outreach staff to provide connection to housing and services.
4. Utilize Specialty Vouchers to assist people experiencing or at risk of homelessness, and HOME TBRA funds to provide move-in assistance.
5. Maintain the OPCS Homeless Work program at 5 days a week utilizing General Funds.
6. Invest in professional development, provide ongoing training, and ensure that HCD and community partner staff are equipped with the skills and knowledge necessary to meet community goals.

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

The City and County will continue to work together with public and private housing and social service agencies to build local capacity to address housing, homelessness and community services and development needs. Actions that may allow for co-funding of highly effective projects at significant levels may 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.

Discussion

No further discussion.

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.	70.00%

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.

- Resale provisions will be utilized for Pima County Community Land Trust units and for any investment in new construction or acquisition/ rehabilitation/ resale of homeownership housing, when the HOME assistance does not reduce the purchase price below fair market value.
- Recapture provisions will be utilized for down-payment and closing cost assistance, and investments in new construction or acquisition/ rehabilitation/ resale when the HOME assistance reduces the purchase price below fair market value.
- Recapture provisions are secured through a deed of trust and promissory note. Resale provisions are secured through a resale restriction agreement. 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. HUD-approved resale and recapture provisions have not been changed since approval.
- The Consortium (PJ) has determined the 95% of the median area purchase price for single family housing following the requirements of the HOME regulation at 92.254 (2) (iii) (A). Data supporting the calculation is included in the appendix. The homeownership value limits are:
- For existing housing - $304,000
- For new construction housing - $345,000

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 unit 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 may utilize HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds. When doing so, the consortium will utilize the following guidelines:

   1. The project must be in Pima County.
   2. HOME funds will not be used to refinance loans made or insured by any Federal program, including CDBG.
   3. Whether funded entirely or partially with consortium HOME funds, rehabilitation costs must be at least 110% of total refinancing costs. Refinancing costs are defined as the payoff amount plus closing costs.
   4. The proportional rehabilitation cost per unit must exceed the proportional refinanced debt per unit by at least 110%.
   5. A minimum 20-year period of affordability will be imposed. If the project is an existing affordable housing project subject to a use or affordability period, the period of affordability will be extended to meet the minimum required period.
   6. The investment must result in HOME units proportionate to the HOME investment.
   7. The consortium underwriting standards will be followed assuming the minimum 20-year period of affordability.

8. In addition to consortium underwriting standards, the project developer/owner must submit the following information to demonstrate that disinvestment in the property has not occurred.

1. Balance Sheets for the current and prior year that include:

1. Total current assets including:

    i. Cash on hand and in financial institutions

    ii. Tenant accounts receivable

    iii. Other accounts receivable, including subsidies receivable

    iv. Accrued interest

    v. Restricted funds:

1. Current liabilities including:

    i. Current loans payable

    ii. Accounts payable

    iii. Interest payable

    iv. Current distributions payable

    v. Tenant security deposits

2. Outstanding loan and distribution balances by debtor and/or type for the prior two years. 3. Profit and Loss Statement for the past twelve months. The Profit and Loss Statement may be a certified audit, third-party prepared statement, or internally-prepared and certified statement if the project contains fewer than twenty-five (25) total units. The profit and loss statement must, at a minimum, include total income, expenses, net income or loss, debt service paid (by debtor), other distributions by type, and cash flow after expenses, debt service, and distributions.

4. Ownership Summary, that discloses:

1. The names of all general partners, their percentage of ownership and the balance of the partner's capital.
2. The names of all limited partners, their percentage of ownership, and the balance of the partner's capital.
3. For nonprofit-owned properties, the names of all Board members, their positions, and terms.

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

   Not applicable.

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

   Not applicable.

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

   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 nonsegregated 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.

Emergency Solutions Grant (ESG)

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

   The Emergency Solutions Grant Policy Manual is attached.

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

   The 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 Housing Questionnaire (HQ) as the community's standardized common assessment tool. The HQ is a locally developed assessment instrument used to evaluate housing needs, vulnerability, and service prioritization for individuals and families experiencing homelessness.
- 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).

The City of Tucson receives 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.

The City of Tucson ESG subaward process is designed to align with the P-CHIP five-year strategic plan. It begins with a call for projects that address the objectives of the P-CHIP plan and a Request for Proposals (RFP), which is published on the Housing and Community Development (HCD) website. To ensure prospective subrecipients understand the application process, a pre-conference kickoff meeting is held, providing guidance on how to apply for ESG funding.

Once the RFP is released, subrecipients submit their applications through Neighborly Software Portal. These applications then undergo a two-tiered review process. The first stage is a threshold review conducted by City of Tucson staff. This initial review ensures that the applications meet ESG funding eligibility criteria and identify curable deficiencies in an application and reach out to the submitting agency to provide corrections or additional information.

Following the threshold review, the applications proceed to the second stage, where they are evaluated by a Community Review Panel. This panel, comprising community representatives, reviews and scores the applications. Once the scoring process is complete, a list of recommended projects is forwarded to the HCD Director for further review. The community panel recommendations are then submitted to the Mayor and Council for final review and adoption.

After the approval process is complete, all applicants are notified of their award status. Subrecipients whose applications are approved proceed to the final stage, where the Human Services Contracts team executes subrecipient agreements.

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

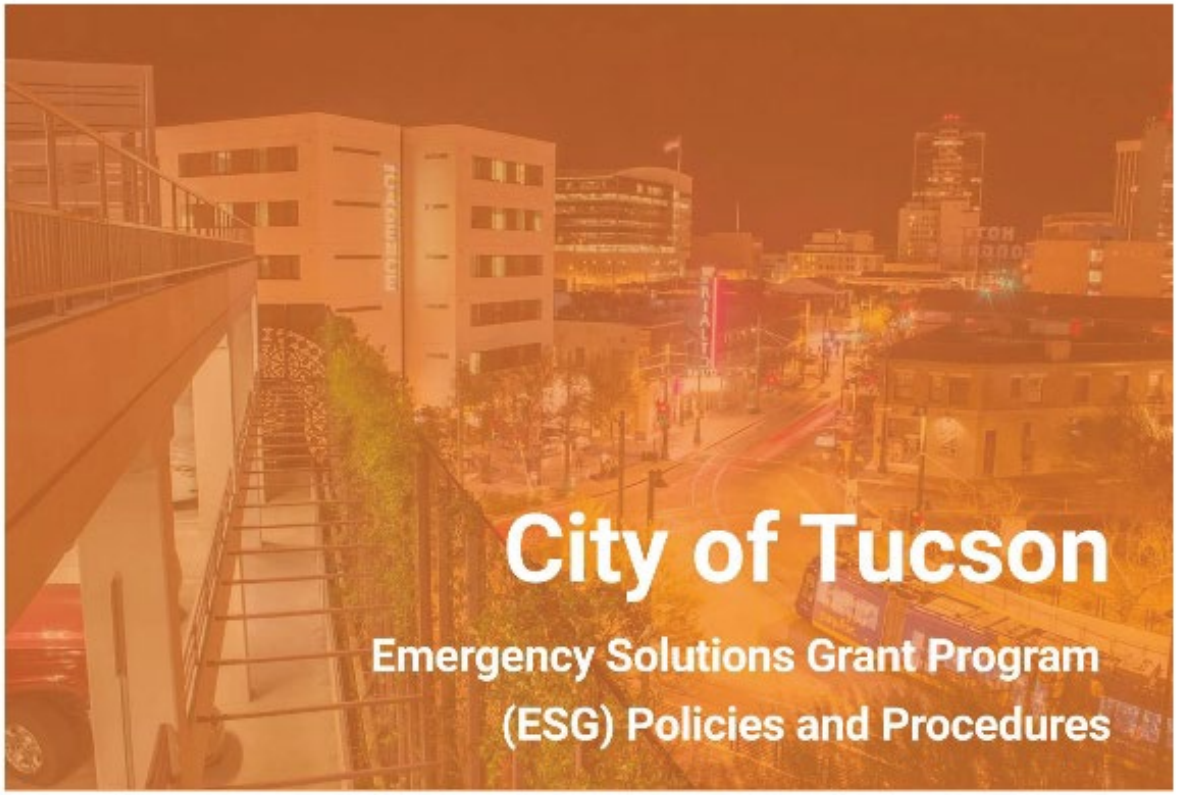
   The jurisdiction meets the homeless participation requirement in 24 CFR 576.405(a).

5. Describe performance standards for evaluating ESG.

   The Tucson Pima Collaboration to End Homelessness ESG Written and Performance Standards provide measures to evaluate the effectiveness of:

   1. Targeting resources to those most in need of assistance;
   2. Reducing the number of people living on the streets and in emergency shelters;
   3. Shortening the time people spend homeless; and
   4. Reducing program participants' housing barriers or housing stability risks.

Grantee Unique Appendices



City of Tucson

Emergency Solutions Grant Program (ESG) Policies and Procedures

March 2023

City of Tucson
Housing and Community Development Department
310 N. Commerce Park Loop, Tucson, AZ 85745
www.tucsonaz.gov/hcd

CITY OF TUCSON
HOUSING & COMMUNITY DEVELOPMENT

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INTRODUCTION AND OVERVIEW

This policy manual and desk guide describes the City of Tucson Housing and Community Development Department's (COT HCD) policies and procedures for the administration of U.S. Department of Housing and Urban Development (HUD) Emergency Solutions Grant (ESG) Program funds. These policies and procedures apply to all organizations administering COT ESG funds including, but not limited to:

- Not-for-profit and/or government organizations administering ESG funds through a subrecipient agreement (subrecipients);
- COT HCD program and administrative staff responsible for implementation, coordination, or management of ESG funds and/or activities; and
- COT divisions or departments administering ESG funds obligated through an inter-departmental memorandum of understanding (SCOs).

This manual is meant to be a supplement to the ESG regulations and HUD guidance. It is not exhaustive regarding all considerations affecting the use of ESG funds. Where a conflict of language or omission of requirements occurs, the requirements of Federal Notices and U.S. Department of Housing and Urban Development (HUD) CDBG and cross-cutting regulations and any amendments will prevail.

The City of Tucson may add, remove, or change policies, procedures or forms in this manual. Entities administering COT ESG funds are required to comply with these policies as published, including subsequent revisions. Entities administering COT ESG funds are also required to:

- Maintain organizational policies and procedures that demonstrate internal systems and controls sufficient to ensure compliance with ESG regulations and the policies and procedures contained in this manual; and
- Comply with any project-specific and/or general conditions outlined in the ESG funding subaward (subrecipient agency) or memorandum of understanding (City of Tucson departments).

1.1 APPLICABILITY

These policies and procedures apply only to ESG funds administered by the COT either directly or through its subrecipients, contractors, and partners utilizing ESG funds passed through to such entities by the COT. Organizations serving the COT service area may also receive ESG funding from the Arizona Department of Economic Security (ADES) and/or Pima County. ADES and Pima County maintain separate written standards for the administration of ESG funds.

1.2 Relationship to Tucson-Pima Collaboration to End Homelessness (TPCH) Continuum of Care Governing Documents

These COT ESG Program policies and procedures overlap significantly with the Tucson-Pima Collaboration to End Homelessness (TPCH) governing documents, including the TPCH Written Standards, Coordinated Entry Policies and Procedures, and HMIS Policies and Procedures. These documents are referenced throughout these policies and procedures and are found at https://tpch.net/about/tpch-governing-documents/.

1.3 Emergency Solutions Grant (ESG) Program Background

The Emergency Shelter Grant Program (predecessor to the Emergency Solutions Grant Program) was originally established by the Homeless Housing Act of 1986, in response to the growing issue of homelessness among individuals, families, and children in the United States. In 1987, the Emergency Shelter Grant Program was authorized by Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378). On May 20, 2009, President Obama signed the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act which reauthorized the U.S. Department of Housing and Urban Development (HUD) Homeless Assistance programs. The HEART Act renamed the Emergency Shelter Grant Program, now known as the Emergency Solutions Grant Program, to better reflect the variety of solutions authorized for implementation under the program.

1.4 Definitions

These definitions explain the roles and structure of the COT ESG program. Additional definitions relevant to ESG program components or activities, and other aspects of ESG can be found in the corresponding sections of this manual.

1. **Recipient** – The ESG recipient is the entity that receives ESG funding directly from HUD. In the context of this manual, the City of Tucson is the recipient.
2. **Subrecipient** –Organizations that receive City of Tucson ESG funds and are not a City of Tucson Department, Division, or Office.
3. **Sponsoring City Office (SCO) –** COT Departments, Divisions or Offices, including the Housing First Division, that administer or deliver ESG program activities. Sponsoring City Offices are required to comply with subrecipient requirements regardless of whether ESG funds were awarded through a competitive or noncompetitive process.

4. **Program Participant –** Individuals and families experiencing or at risk of experiencing homelessness who receive ESG services from subrecipients and Sponsoring City Offices.
5. **Program Component** – ESG regulations permit the implementation of five types of eligible projects, known as program components. These include street outreach, emergency shelter, rapid rehousing, homelessness prevention, and Homeless Management Information System (HMIS) component types.

1.5 The COT ESG Funding Process

HUD allocates ESG funds to state and local governments (Recipients) using approved entitlement formula

City of Tucson HCD (Recipient) distributes funds to subrecipients and Sponsoring City Offices to deliver ESG program components (activities)

Funds non-competitively allocated to Sponsoring City Offices (SCOs)	Funds allocated competitively to subrecipients and Sponsoring City Offices through competitive funding process
SCOs deliver ESG activities to benefit eligible program participants	subrecipients and SCOs deliver ESG activities to benefit eligible program participants

1.6 COT ESG Philosophy and Approach

The COT HCD's approach to implementing ESG is rooted in five evidence-based philosophies and guidelines. These philosophies and guidelines reflect the COT's values, underpin these policies and procedures, and reflect the City's expectations of ESG subrecipients and SCOs:

1. Housing First;
2. Housing-Focused Program Alignment
3. Real-Time, Quality Data
4. Equity and Inclusion
5. Community-Wide Collaboration

1.6.1 Housing First

The City of Tucson endorses a Housing First approach aimed at quickly and successfully connecting individuals and families experiencing homelessness to permanent housing without preconditions or barriers to entry, such as sobriety, treatment, or mandatory service participation. Supportive services must be offered to maximize housing stability and prevent returns to homelessness, but participants are not required to participate in such services in order to receive or maintain assistance.

The Housing First philosophy recognizes stable housing as a foundational necessity to address underlying challenges to long-term stability, health, wellness, and financial security. subrecipients and SCOs administering ESG permanent housing projects (rapid rehousing) must do so using a Housing First approach which incorporates all core elements of the Housing First model as described in Exhibit 2.1 – Core Elements of Housing First.

EXHIBIT 2.1 - CORE ELEMENTS OF HOUSING FIRST	
Immediate access to permanent housing with no housing readiness requirements	The Housing First approach involves providing program participants with assistance in finding and obtaining safe, secure, and permanent housing as quickly as possible. The key to the Housing First philosophy is that individuals are not required to demonstrate that they are 'ready' for housing. Housing is not conditional on sobriety or abstinence. Program participation is also voluntary. This approach runs in contrast to what has been the orthodoxy of 'treatment first' approaches whereby people experiencing homelessness are placed in emergency services and must address specific personal issues (addictions, mental health) before being deemed 'ready' for housing.
Consumer choice and self-determination	The Housing First model offers a rights-based, participant-centered approach that emphasizes client choice in terms of housing and supports. Housing - Participants are able to exercise choice regarding the location and type of housing they receive (e.g. neighborhood, congregate setting, scattered site, etc.). Choice may be constrained by local availability and affordability.

EXHIBIT 2.1 - CORE ELEMENTS OF HOUSING FIRST	
	Services – Participants have choices in terms of what services they receive, and when to start using services. Service participation is 100% voluntary (excluding mandatory monthly case management participation in homelessness prevention and rapid rehousing programs).
Recovery orientation	Housing First practice is not simply focused on meeting basic participant needs – Housing First is not Housing Only. A recovery orientation focuses on individual well-being, and ensures that program participants have access to a range of supports that enable them to nurture and maintain social, recreational, educational, occupational and vocational activities.
Individualized and participant-driven supports	A participant-centered approach recognizes that individuals are unique, and so are their needs. Once housed, some people will need minimum supports while other people will need supports for the rest of their lives (this could range from case management to assertive community treatment). Supports may address housing stability, health and mental health needs, and life skills. It is important to remember that a central philosophy of Housing First is that people have access to the supports they need, if they choose. Access to housing is not conditional upon accepting a particular kind of service.
Social and community integration	Part of the Housing First strategy is to help people integrate into their community and this requires socially supportive engagement and the opportunity to participate in meaningful activities. If people are housed and become or remain socially isolated, the stability of their housing may be compromised. Key features of social and community integration include: • Separation of housing and supports (except in the case of supportive housing) • Housing models that do not stigmatize or isolate clients. This is one reason why scattered site approaches are preferred.

EXHIBIT 2.1 - CORE ELEMENTS OF HOUSING FIRST	
	• Opportunities for social and cultural engagement are supported through employment, vocational and recreational activities.

1.6.2 Housing-Focused Program Alignment

Although ESG street outreach, homelessness prevention, and emergency shelter programs do not provide permanent housing subject to Housing First requirements, all ESG-funded subrecipients and SCOs are required to maintain a Housing Focused Program Alignment that applies the underlying principles of Housing First to emergency services as described in Exhibit 2.2 below.

EXHIBIT 2.2 – HOUSING FOCUSED PROGRAM ALIGNMENT	
Housing Focused Case Management	Case management and complementary supportive services are timely and targeted to overcome barriers to obtaining and maintaining permanent housing. Program services are not designed to "fix" participants but instead to help participants define and achieve housing permanency goals.
Low Barrier Services	Projects do not require service participation, sobriety, abstinence, or service participation in order to obtain or maintain ESG assistance. Projects pro-actively eliminate identification and other barriers to the greatest extent possible, and provide a welcoming service environment in areas frequented by and accessible to potential program participants. The City of Tucson prohibits the use of breathalyzing, drug testing, family separation, identification requirements not specifically required under federal program rules, or service participation agreements as a requirement to receive or maintain ESG services. Additionally, the City requires ESG-funded projects to permit companion animals and/or develop formal operating agreements with a local animal welfare program to arrange for safe, temporary care of a participant's companion animals during their period of stay in ESG-funded shelters. Such operating agreements shall

EXHIBIT 2.2 – HOUSING FOCUSED PROGRAM ALIGNMENT	
	provide for the resident's regular and unsupervised access to visitation with their companion animal and the immediate and unconditional return of companion animals to the participant upon exit from the shelter unless prevented to do so by court order.
Progressive Engagement	Assistance is tailored to each individual or household's needs and assessing what works best for them, with their specific strengths, and in their specific situation. Assistance is provided at the minimum dosage needed to address presenting challenges and increased as needed to avoid housing loss and promote stability.
Trauma-Informed Approach	Service models reflect the widespread impact of trauma on victims and understand potential paths for healing; recognize the signs and symptoms of trauma in staff, clients, and others involved with the system; and respond by integrating knowledge about trauma into policies, procedures, practices, and settings.
Harm Reduction	Program models incorporate pro-active education and services aimed at reducing the harm associated with risky behaviors such as substance use without requiring abstinence.
Evidence-based and Evidence-informed Approaches	Program models incorporate approaches and skills, such as motivational interviewing, asset- and strengths-based practices, individual choice, critical time intervention, and other evidence-based and evidence-informed practices.

1.6.3 Real Time, Quality Data

Real-time, quality data allows organizations and communities to understand the scale of homelessness, determine whether strategies are effective, and improve programs, policies, and systems. Real-time, quality data can:

1. Capture information around racial, ethnic, geographic, and other inequities and disparities;
2. Improve accountability and transparency;

3. Create a complete picture of homelessness to understand whether strategies are driving down the number of people experiencing homelessness;
4. Create a shared understanding of individual housing needs, available housing options, and strategic resource allocation (e.g., using a real-time, by-name list);
5. Equip organizations with shared information so that they can coordinate resources, develop strategic plans, and build adequate systems;
6. Allow organizations to understand exactly how their services interact with each other and with other systems (e.g., inflow into and outflow out of homelessness);
7. Streamline access to services and service delivery;
8. Prevent inefficiencies, such as retroactive data entry and data user errors;
9. Be used as a tool to implement evidence-based practices;
10. Promote informed policy, program, and funding decision-making; and
11. Be leveraged to build cross-sector partnerships

ESG projects must adhere to the applicable data timeliness standards established by the Tucson Pima Collaboration to End Homelessness (TPCH) as it relates to the Homeless Management Information System (HMIS) data entry. Such requirements are articulated in the TPCH Written Standards, HMIS Policies and Policies and Procedures, and Coordinated Entry Policies and Procedures.

ESG shelter projects must maintain real-time data entry (within 1-2 hours) for shelter entrance and exits, and must establish public visibility of shelter bed availability through the HMIS Community Point/Shelter Point functionality to enable direct shelter referral and coordination by community agencies, outreach workers, Coordinated Entry access points, COT staff, and first responders, as well as self-referral by individuals and families in need of shelter assistance.

1.6.4 Equity and Inclusion

The COT HCD is committed to addressing systemic racism and disparate outcomes that are evident among people experiencing and at risk of homelessness in our city and region. HCD works with area agencies focused on racial justice to ensure ESG policies align with existing and planned racial justice efforts. Additionally, HCD is committed to using data to quantify ESG outcomes based on racial and ethnic demographics (including individuals and families served, housed, and still experiencing homelessness), and providing targeting assistance and tools that subrecipients and SCOs can use to measure the impacts of equity and inclusion efforts. These measurements are fully incorporated into HCD's grantmaking, subrecipient and program monitoring, and program evaluation efforts.

1.6.5 Community-Wide Collaboration

Data consistently show that collaboration is central to ending homelessness. For that reason, HCD is committed to working alongside ESG subrecipients and SCOs, other non-profits and local governments, the Continuum of Care, mainstream service and housing providers, and other internal and external stakeholders. HCD encourages collaboration among ESG subrecipients and SCOs, including coordination of services and active participation within the Continuum of Care. To ensure required coordination, ESG subrecipients must participate in the local Coordinated Entry system and contribute data to the statewide HMIS.

1.6.6 Continuum of Care and Coordinated Entry Involvement

These ESG written standards are strategically aligned with the Continuum of Care standards and Coordinated Entry system. All ESG-funded programs and activities must participate in the Coordinated Entry system and maintain documentation evidencing participation. The Coordinated Entry system allows for collaboration between homeless services providers and housing programs, and allows for a formal prioritization process for referrals to ensure the most vulnerable persons are matched quickly and efficiently to programs that best fit their needs.

2 ESG PROGRAM COMPONENTS AND ELIGIBLE ACTIVITIES

Prior to recommending an activity for funding to the Mayor and City Council, the City of Tucson Housing and Community Development Department (COT HCD) will review the subrecipient activity application to determine whether it:

1. Is an eligible activity;
2. Addresses a priority need identified in the city's current 5-year Consolidated Plan; and
3. Meets the criteria and requirements specified for the activity in any city-issued request for proposals or applications, or notice of funding availability.

2.1 Eligible Activities

Prior to approval of ESG funding for an activity, COT HCD will require a complete subrecipient or city department application to determine activity eligibility. The process of selecting projects is described in each Call for Projects, Request for Proposals or other solicitation. When selected for funding, an activity is given a title and may be given an internal identification number. In some cases, COT HCD may non-competitively award ESG funds to a Sponsoring City Office (SCO), including the Housing First Division.

ESG-eligible activities fall within six categories, each of which is described in a chapter of this manual.

1. Street Outreach;
2. Emergency Shelter;
3. Homelessness Prevention;
4. Rapid Rehousing; and
5. Homeless Management Information System (HMIS).
6. Administration

2.2 Ineligible Activities and Uses of ESG Funds

Ineligible activities include:

1. Replacement of existing mainstream resources;
2. Payments made directly to program participants;
3. Payments on a mortgage or land contract;

4. Payment of rent for eligible individuals or families for the same period of time and for the same costs assisted through any other federal, state, or local housing subsidy program. Financial assistance, such as payment of security deposits, is allowed if that cost is not eligible under the other subsidy program;
5. Pet deposits;
6. Payments on credit card bills, other consumer debt, or other obligations, including child support or garnishments;
7. Cash assistance;
8. Purchase of gifts cards for participants for any purpose;
9. Payment for costs of discharge planning programs in mainstream institutions such as hospitals, nursing homes, jails, or prisons;
10. Improvements to sanctuaries, chapels, or other rooms used principally as a place of worship; and
11. Payment for religious activities. While organizations that are religious or faith- based are eligible to receive ESG funds, religious activities must be conducted separately, in time and location, from ESG-funded activities and participation must be voluntary for program participants.

2.3 Consolidated Plan Priority Needs

Every five years the city completes a Consolidated Plan that identifies priority needs that will be addressed by HUD CPD resources. Proposed ESG activities must address a priority need identified in the city's current Consolidated Plan.

2.4 Annual Action Plans (AAPs)

The Consolidated Plan is carried out through Annual Action Plans (AAPs). The AAPs provide a concise summary of the actions, activities, and specific federal and non-federal resources that will be used during the coming year to address the priority needs and specific goals identified in the Consolidated Plan. The AAP essentially serves as the annual application for HUD CPD entitlement funds, including ESG.

Annual Action Plans encompass federal program years (PY), which are different than city fiscal years. For example, the PY2023 AAP covers program funds that will be received by the city in fiscal year 2024 (July 1, 2023 through June 30, 2024). Annual Action Plans are generally submitted in IDIS by May 15th of each year for the fiscal year beginning July 1st. An AAP cannot be submitted until after the program allocation amounts are known, so the actual timing of the

AAP submission depends on when the federal budget is passed, the timing of HUD program allocation calculations, and HUD guidance.

3 PROGRAM ADMINISTRATION, INDIRECT COSTS, AND ACTIVITY DELIVERY

3.1 PROGRAM ADMINISTRATION (§ 576.108)

The COT may utilize up to 7.5% of its annual allocation for program administration, planning and reporting activities:

1. General management, oversight and coordination, including:
    a. Reasonable costs of overall program management, coordination, monitoring, and evaluation.
    b. Consolidated Plans, Annual Action Plans, and Consolidated Annual Performance Evaluation Reports.

Administrative activities do not include staff and overhead costs directly related to carrying out eligible ESG components or activities.

The City of Tucson does not pass Program Administration funding through to subrecipients as a standard practice. Any deviation from this practice must be approved by the Housing and Community Development Department Director as it results in a direct reduction in Program Administration funds available for direct use by the COT in its administration of the ESG program.

3.1.1 Indirect Costs (§ 576.109)

Indirect costs may be charged to and recovered by subrecipients and SCOs within each eligible ESG program component (street outreach, homelessness prevention, rapid rehousing, emergency shelter). The charges and cost recovery must be charged and recovered according to a current federally negotiated indirect cost agreement or the de minimis indirect cost rate subject to the limitations and conditions established by 2 CFR 200, Subpart E and HUD's Indirect Cost Toolkit for CoC and ESG Programs. Such costs are not subject to the 7.5% administrative cap as clarified in HUD's Indirect Toolkit for CoC and ESG Programs.

3.2 ACTIVITY DELIVERY COSTS

Staff and overhead costs directly related to carrying out eligible ESG activities are considered activity delivery costs and are charged to the actual activity being carried out. When charged as

activity delivery costs, the staff and overhead costs are not subject to the 7.5% administrative cost cap.

To be treated as an activity delivery cost, the cost must be attributed to implementing an eligible ESG activity and approved as part of the written agreement. Activity delivery costs include, but are not limited to:

1. Staff time devoted to implementing or carrying out a specific ESG activity, such as reaching out to people experiencing unsheltered homelessness, delivering services in an emergency shelter setting, assisting people at risk of homelessness, and providing case management services to individuals receiving rapid rehousing assistance.
2. Travel costs incurred specifically for an ESG activity such as traveling to locations where people experiencing homelessness congregate or accompanying program participants on public transportation.
3. Materials necessary to carry out an activity, such as paper for program participant applications.

When allocating staff and overhead costs to ESG activities, staff must consistently maintain timesheets that document the hours directly allocated to each activity.

3.3 ESG Matching Funds Requirements (§ 576.201)

ESG funds must be matched dollar for dollar. The COT contributes a portion of the required match, and requires subrecipients and SCOs to also contribute. Specific match requirements are detailed in each call for projects, request for proposals, or solicitation. Eligible sources of matching funds include:

1. Other federal funds for which ESG is not used as match;
2. The fair market value of buildings donated for ESG use for not less than 10 years as evidenced by a recorded deed or use restriction;
3. Building depreciation or fair rental charges for the land for buildings donated by third parties, for each year the building is used in the ESG program;
4. Cash contributions expended for allowable subrecipient and SCO ESG costs including the contracted reimbursement rate for ESG-eligible services provided to persons enrolled in the ESG program and billed to Medicaid or another fee for service contract;
5. Noncash contributions, including:
    a. Materials, buildings, and leases calculated at fair market value;

b. Services provided by individuals, valued at rates consistent with those ordinarily paid for similar work by subrecipient or SCO staff or consistent with those ordinarily paid by other employers for similar work;

c. Real property, equipment, goods, or services that would have been indirect costs, when the subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions;

d. Eligible ESG costs paid with ESG program income.

3.4 Subrecipient Management

Subrecipient management includes monitoring and written agreements. The COT HCD maintains and follows a separate document that describes the application and monitoring procedures for ESG-funded activities. The COT subrecipient Management and Monitoring Policies and Procedures are used for ESG subrecipient monitoring. This chapter focuses on written agreements with subrecipients and SCOs utilizing ESG funds.

3.4.1 Written Agreements

The Housing and Community Development Department (HCD) utilizes written agreements to manage activities approved for funding using Emergency Solutions Grant (ESG) funds. Written agreements are used with organizations that are not city departments (subrecipients), and Memorandums of Understanding (MOU) are used with SCOs.

When selected for funding, subrecipients will receive an initial award letter, while city departments will receive an email from the assigned project coordinator.

Receipt of an award letter or email notice does not imply approval of all proposed activities or specific costs. The proposed activities and budget are subject to negotiation and modification.

3.4.1.1 Subrecipient Written Agreement and Sponsoring City Office MOU Negotiation

The written agreement/MOU negotiation process includes:

1. Defining project objectives and measurable outcomes;
2. Finalizing the program budget;
3. Finalizing the implementation schedule; and
4. Identifying special conditions to be included in the written agreement.

While the negotiation process is underway, no funds can be obligated until after:

1. Execution of a Grant Agreement between HUD and the COT;
2. Completion of an Environmental Review; and
3. Execution of the written agreement or MOU.

3.4.1.2 Written Agreement/MOU Contents

The written agreement or MOU is the legal document governing the administration of the ESG funding. Each written agreement or MOU consists of provisions common to ESG, generally

referred to as 'boilerplate' language, as well as provisions specific to the activity or project, including:

- Amount of funding;
- Termination, modification and amendment;
- Method of payment;
- Minimum 'match' requirements;
- Policy requirements;
- Activity or project budget;
- Activity or project implementation schedule;
- Requirement to comply with applicable laws and regulations;
- Scope of work;
- Incorporation by reference of HCD policies and procedures; and
- The subrecipient or SCO application.

3.4.1.3 De-obligation, Recapture, and Amendments

ESG funds must be used according to the written agreement or MOU budget, scope of work, and schedule of completion. When there are deviations from these provisions, HCD may:

1. De-obligate funds;
2. Recapture funds; or
3. Amend the Written agreement or MOU.

3.4.1.3.1 De-obligation of Funds

De-obligation is the action of removing funds from a written agreement or MOU because:

1. The scope of work is completed using less ESG funds than anticipated and leaving a balance of unexpended funds;
2. An activity was changed or cancelled (for reasons other than performance) resulting in excess funding; and/or
3. Expenditures are disallowed.

When HCD de-obligates funds, it will reallocate funding to another ESG-funded activity that has demonstrated need for additional funding.

3.4.1.3.2 Recapture of Funds

Recapture is the action of removing funds from a written agreement or MOU because:

1. HCD has determined that ESG funds were not used in compliance with the written agreement, MOU, or federal regulations; or
2. The subrecipient or SCO fails to perform according to the performance criteria outlined in the scope of work, schedule and/or other specified performance criteria.

When HCD recaptures ESG funds, it will reallocate funding to another ESG-funded activity that has demonstrated need for additional funding.

3.4.1.3.3 Written Agreement and MOU Amendments

Either party may request modifications in the scope of services, or terms and conditions of the written agreement or MOU. Proposed modifications that are mutually agreed upon will be incorporated by written amendment. Amendments are required for:

1. Scope of work changes;
2. Changes to the activity or project location or beneficiaries;
3. Introduction of new activity or project funding;
4. Changes in staff or a project team member; and
5. Schedule changes.

Changes must be requested in writing at least thirty days prior to implementation of the change. All change requests must specifically state the reason(s) for the request and documentation/justification supporting the change. HCD will accept no more than two revisions to the project schedule before de-obligating or recapturing funds. De-obligation and recapture shall be determined on a case-by-case basis.

Some changes will require a minor or substantial amendment to the Annual Action Plan before allowing the subrecipient or city department to proceed with proposed changes. Minor amendments can generally be accomplished within thirty days. Substantial amendments will take not less than sixty days. Changes that will require an Annual Action Plan substantial amendment are:

1. Changes in the use of ESG funding from one eligible activity to another in an amount greater than twenty percent (20%) of the annual ESG allocation, including project deletions, and reprogramming funds from one activity or project to another.

2. Funding an activity not described in the Annual Action Plan.

When a substantial amendment is made to the Consolidated Plan or Annual Action Plan after its formal adoption, the city will:

1. Provide reasonable public notice of the proposed amendment(s) in a newspaper of general circulation to enable review and comment by the public for at least thirty (30) days.
2. Make the amendment available for public review and comment, and post the amendment on the city website.
3. Conduct a public hearing on the subject of the proposed amendment.
4. Obtain City Council approval of the amendment.
5. Submit the amendment to HUD for approval.

3.4.1.4 Contract Termination

If a subrecipient or SCO is unable or fails to comply with any of the provisions of the written agreement or MOU, the written agreement or MOU may be terminated. subrecipients and SCOs may be required to return all or a portion of funding to the city. Individual written agreements or MOUs will detail the specifics of termination.

4 EVALUATING AND DOCUMENTING ELIGIBILITY (§ 576.400)

Individuals and families are eligible ESG participants when they meet either one of the category definitions of homeless or one of the category definitions of at-risk of homelessness. Documentation of eligibility is required.

4.1 HOMELESS DEFINITION (§ 576.2)

There are four ESG category definitions of homeless that may document participant eligibility. Definitions for each category and documentation requirements are found in the TPCH Written Standards, which may be accessed at https://tpch.net/about/tpch-governing-documents/ .

1. Literally homeless (Category 1);
2. Imminent risk of homelessness (Category 2);
3. Homeless under other Federal statutes (Category 3); or
4. Fleeing or attempting to flee domestic violence (Category 4).

4.2 AT-RISK OF HOMELESSNESS DEFINITION (§ 576.2)

There are three category definitions of at-risk of homelessness that may document participant eligibility:

1. Individuals and Families;
2. Unaccompanied Children and Youth; or
3. Families with Children and Youth.

4.2.1 Category 1: Individuals and Families

1. Has an annual income below 30% of median household income, adjusted for household size; *and*
2. 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*
3. Meets one of the following conditions:
    a. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; *or*
    b. Is living in the home of another because of economic hardship; or

c. 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*

d. 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*

e. 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*

f. Is exiting a publicly funded institution or system of care; *or*

g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the City of Tucson-Pima County Consortium Consolidated Plan.

4.2.1.1 Required Documentation (§ 576.500)

For individuals and families that qualify as at-risk of homelessness because they are extremely low-income, lack sufficient resources, and meet one of the qualifying conditions, required documentation includes:

1. Annual income certification verification following 24 CFR Part 5.609 evidencing household income is below 30% of the AMI, adjusted for housing size; *and*
2. The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks, which may include:
    a. Source documents (e.g., notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears); *or*
    b. To the extent source documents are unobtainable, a written statement by a third party (e.g., former employer, public administrator, relative) or written certification by intake staff of the oral verification by the relevant third party; *or*
    c. To the extent that source documents and third-party verification are unobtainable, a written statement by intake staff describing the efforts taken to obtain the required evidence; *and*
3. Source documents that evidence one or more qualifying conditions; *or*

4. To the extent source documents evidencing one or more qualifying conditions are unobtainable written statement by a third party (e.g., former employer, property owner, hotel or motel manager, public administrator) or written certification by intake staff of the oral verification by the relevant third party; *or*
5. To the extent that source documents and third-party verification are unobtainable, a written statement by intake staff describing the efforts taken to obtain the required evidence.

4.2.2 Category 2: Unaccompanied Children and Youth

A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statue.

4.2.2.1 Required Documentation (§ 576.500)

For individuals that qualify as at-risk of homelessness because they are a child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statue, required documentation includes:

1. Certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable.

4.2.3 Category 3: Families with Children and Youth

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.

4.2.3.1 Required Documentation (§ 576.500)

For families with children and youth that qualify as at-risk of homelessness because they are unaccompanied youth who does not qualify as homeless under the homeless definition, but qualify 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, required documentation includes:

1. Certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable.

4.3 Prioritizing Individuals and Families and Assessing and Reassessing Housing and Services Needs

Subrecipients and SCOs may request to target funds to a specific segment of individuals or families otherwise eligible for ESG assistance. If approved, targeting of ESG funds will be included in the written agreement. If no targeting is approved, the COT ESG Program will use the TPCH Coordinated Entry Policies and Procedures to prioritize individuals and families for assistance.

Subrecipients and SCOs, regardless of approved population targeting, must use the TPCH Coordinated Entry Policies and Procedures to guide assessment and reassessment of housing and services needs. The TPCH Coordinated Entry Policies and Procedures may be accessed at https://tpch.net/about/tpch-governing-documents/.

The Coordinated Entry system is a client-centered process of standardized access and assessment and uniform referral priorities for coordinated referral and housing placement. The system is designed to ensure that people experiencing homelessness or at imminent risk of homelessness receive appropriate assistance with both immediate and long-term housing and service needs.

The Coordinated Entry system employs a phased approach to assessment, which segments the collection of participant information into the following stages:

- Initial Triage – resolving the immediate housing crisis, identifying whether the CoC crisis response system is the appropriate system to address the potential participant's immediate needs.
- Diversion and/or Prevention Screening – the examination of existing participant resources and options that could be used to avoid entering the homeless system of care.

- Crisis Services Intake – information necessary to enroll the participant in a crisis response project such as emergency shelter or other homeless assistance projects.
- Initial Assessment – information to identify a participant's housing and service needs with the intent to resolve participant's immediate housing crisis.
- Comprehensive Assessment – information necessary to refine, clarify, and verify a participant's housing and homeless history, barriers, goals, and preferences. Assessment information supports the evaluation of participant's vulnerability and prioritization for assistance.
- Next Step/Move-On Assessment – information revealed or known after an Initial Assessment is conducted when that new information may suggest a revised referral strategy. Alternatively, reevaluating participants who have been stably housed for some time and who may be ready for less intensive housing and service strategies.

4.3.1 Diversion

Diversion is a service that helps individuals and families find safe and appropriate alternatives to using shelters and housing projects by trying to resolve problems through natural supports. The TPCH Coordinated Entry Policies and Procedures emphasize diversion and provides tools that must be followed when first interacting with an individual or family requesting assistance.

5 STREET OUTREACH COMPONENT (§ 576.101)

Street outreach includes 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. Subrecipient and SCO street outreach activities are limited to those approved in the COT written agreement.

5.1 Eligible Program Participants

Eligible program participants are individuals and families who are unsheltered and are either literally homeless (Category 1) or fleeing or attempting to flee domestic violence (Category 4) and also meet the criteria for Category 1. Program participants must be:

1. Living on the streets or another place not meant for human habitation; and
2. Unwilling or unable to access services in emergency shelter.

5.2 Essential Services

Street Outreach Essential Services include engagement, case management, emergency health and mental health services, transportation, and services for special populations.

5.2.1 Engagement

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

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

5.2.2 Case Management

Case Management activities focus on assessing housing and service needs and arranging, coordinating and/or monitoring the delivery of individualized services. Eligible costs include:

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

When an individual or family is provided case management services as part of street outreach is housed within 30 days using rapid rehousing assistance, the case management services should be charged to the rapid rehousing component.

5.2.3 Emergency Health Services

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

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

5.2.4 Emergency Mental Health Services

Emergency mental health services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community; i.e.; outpatient treatment of urgent mental health conditions by licensed professionals in community-based

setting (e.g.; streets, parks, and campgrounds) to those eligible participants unable or unwilling to access emergency shelter or an appropriate health care facility. Eligible costs include:

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

5.2.5 Transportation

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

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

5.2.6 Services for Special Populations

Services for special populations are essential services that have been tailored to address the special needs of homeless youths, victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers, domestic violence shelters, and persons living with HIV/AIDS. Eligible costs include:

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

6 EMERGENCY SHELTER COMPONENT (§ 576.102)

Emergency shelter is an appropriate facility that provides temporary or transitional shelter to eligible participants without a lease or occupancy agreement requirement. ESG funds can be used to provide essential services; shelter operations; and facility rehabilitation, renovation or conversion. Subrecipient and SCO emergency shelter activities are limited to those approved in the COT written agreement.

6.1 Eligible Program Participants

Eligible program participants are individuals and families who meet the HUD definition of homeless in Categories 1, 2, 3, and 4.

6.1.1 Admission, Referral, Diversion and Discharge

Emergency shelter providers may establish admission, referral and discharge policies at the shelter level. The TPCH Coordinated Entry Policies and Procedures must be followed for emergency shelter admissions, referrals, diversion, and discharge.

Admission criteria may be established and approved at the shelter level as long as the criteria comply with Equal Access and Family Non-separation requirements. In addition to admission criteria, shelter providers may establish standards regarding length of stay, if any.

6.2 Essential Services

Emergency shelter essential services are services provided to individuals and families while in emergency shelters. Subrecipients and SCOs must have written standards for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter using the TPCH Coordinated Entry Policies and Procedures. Services needs must be reassessed every 90 days.

6.2.1 Case Management

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

- Using coordinated entry;
- Conducting initial evaluations including, verifying and documenting eligibility;
- Counseling;

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

When an individual or family is provided case management services as part of emergency shelter and housed within 30 days using rapid rehousing assistance, the case management services should be charged to the rapid rehousing component.

6.2.2 Child Care

Child care may be provided only in licensed child care facilities for children under the age of 13, or for children with disabilities under the age of 18. Eligible costs include:

- Childcare costs;
- Providing meals and snacks; and
- Comprehensive, coordinated, and appropriate developmental activities.

6.2.3 Education

Education is instruction or training focused on obtaining and maintaining housing, consumer education, health education, substance abuse prevention, literacy, ESL, GED preparation and various life skills. Eligible costs include:

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

6.2.4 Employment Assistance and Job Training

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

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

6.2.5 Outpatient Health Services

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

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

6.2.6 Legal services

Legal advice and representation are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Legal services are limited to those that interfere with a program participant's ability to obtain and retain housing. Legal issues would include child support, guardianship, paternity, emancipation, legal separation, orders of protection and other civil remedies for victims of domestic violence,

dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and resolution of outstanding criminal warrants. Eligible costs include:

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

Legal services to address immigration, citizenship, and mortgage issues are not eligible. Legal services may not be paid on a retainer- or contingency-fee basis.

6.2.7 Life Skills Training

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

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

6.2.8 Mental Health Services

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

- Crisis intervention;
- Individual, household, or group therapy sessions;

- Prescription of psychotropic medications and explanation about the use and management of medications; and
- Combinations of therapeutic approaches to address multiple problems.

6.2.9 Substance Abuse Treatment

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

- Project participant intake and assessment;
- Outpatient treatment for up to 30 days;
- Group and individual counseling; and
- Drug testing.

6.2.10 Transportation

Transportation activities include travel by program participants to and from medical care, employment, childcare or other facilities that provide eligible essential services. Eligible costs include:

- Staff travel costs incurred to provide essential services or visit program participants;
- Public transportation for participants; and
- Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes, and maintenance for purchased or leased vehicles.

6.2.11 Services for Special Populations

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

- Case management;
- Childcare;

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

6.3 Shelter Operations

Shelter operations includes the necessary costs of operating and maintaining emergency shelter or providing hotel or motel vouchers when no emergency shelter is available. Eligible costs include:

- Minor or routine maintenance;
- Facility rent;
- Security;
- Fuel;
- Equipment;
- Insurance;
- Utilities;
- Food;
- Furnishings;
- Supplies necessary for shelter operation; and
- Hotel/Motel vouchers.

6.4 Shelter Facility Rehabilitation or Conversion

Facilities owned by a nonprofit organization or government entity that will be used as emergency shelter for a minimum period of time may be rehabilitated or converted using ESG funds. Eligible costs include:

- Labor;

- Materials;
- Tools; and
- Other related costs, including soft costs.

6.4.1 Ineligible Activities

ESG funds may not be used for the acquisition of buildings or for new construction of emergency shelter facilities.

6.4.2 Minimum Use Period

The minimum use period for emergency shelter rehabilitation or conversion is calculated based on the appraised value of the property before and after rehabilitation or conversion. For rehabilitation activities the minimum use period is calculated using the before-rehabilitation value. For conversion activities the minimum use period is calculated using the after-rehabilitation value. Value must be based on an appraisal or similarly-documented value assessment.

Activity	Criteria	Minimum Use Period
Conversion	≤ 75% of the after-conversion value	3 years
	> 75% of the after- conversion value	10 years
Rehabilitation	≤ 75% of the before-rehabilitation value	3 years
	> 75% of the before-rehabilitation value	10 years

The use period begins the day the facility is first occupied by an eligible individual or family after completion. The COT secures the use period with a Land Use Restriction Agreement, Covenants, Conditions and Restrictions and a Deed of Trust.

6.4.3 Required Capacity

To carry out an ESG-funded Emergency Shelter conversion or rehabilitation, the City department or nonprofit organization must demonstrate capacity to manage the development process, including:

1. Permitting;
2. Contractor procurement and oversight;

3. Cross-cutting Federal regulations;
4. Construction and site inspections; and
5. General project management.

6.5 Assistance Under the Uniform Relocation Assistance Act (URA)

Relocation of any kind for an ESG-funded activity will trigger assistance under the Uniform Relocation Assistance Act (URA). Approval from the COT Housing and Community Development Department Director is required before the COT, subrecipients, or SCOs engage in or commit to any activities that may result URA assistance.

Any tenant, business or farm that is required to move temporarily or permanently due to an ESG-funded rehabilitation or conversion must be treated as permanently displaced and provided relocation assistance and payments consistent with the URA. This requirement includes tenants, businesses or farms that temporarily move belongings, temporarily move to another unit in the same building or complex, and tenants whose lease is not renewed, except for cause.

The subrecipient or SCO must keep records documenting compliance with the displacement, relocation, and acquisition requirements of the ESG program as defined in 24 CFR 576.408.

7 HOMELESSNESS PREVENTION (§ 576.103) AND RAPID REHOUSING (§ 576.104) COMPONENTS

The homelessness prevention and rapid rehousing components share many of the same eligible activities, yet participant eligibility is different. Eligible homelessness prevention and rapid rehousing activities include housing relocation and stabilization services, financial assistance, and short- and/or medium-term rental assistance necessary to prevent the individual or family from moving to emergency shelter, a place not meant for human habitation, or another place described in in paragraph (1) of the homeless definition (literal homelessness).

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing. Subrecipient and SCO homelessness prevention and rapid rehousing activities are limited to those approved in the COT written agreement.

7.1 Eligible Program Participants – Homelessness Prevention

Eligible homeless prevention program participants are individuals and families who are not literally homeless. Eligible participants must:

1. Have annual household income below 30% of the area median income; *and*
2. Meet the HUD definition of:
    a. At-risk of homelessness (any category); or
    b. Homeless in Categories 2, 3, or 4.

7.1.1 Prioritizing Individuals and Families for Assistance

The COT requires subrecipients and SCOs to utilize the following TPCH Guidelines for ESG homelessness prevention and rapid rehousing activities:

1. TPCH Coordinated Entry Policies and Procedures for homelessness prevention activities; and
2. TPCH Written Standards for rapid rehousing activities.

7.2 Eligible Program Participants – Rapid Rehousing

Eligible rapid rehousing program participants are individuals and families who are literally homeless or are fleeing or attempting to flee domestic violence and living in an emergency shelter or are literally homeless. Initially, program participants must meet the HUD definition of homeless in Category 1 or 4. There is no initial income limit or requirement. To retain rapid rehousing assistance after re-assessment or recertification, program participants must evidence income below 30% of the area median income.

7.2.1 Maximum Amount and Length of Assistance

Participants in ESG homelessness prevention and rapid rehousing assistance activities may receive not more than 24 months of assistance within any three-year period. In no case may a participant be provided more assistance than necessary to be stably housed.

7.3 Housing Relocation and Stabilization Services (§ 576.105)

Eligible housing relocation and stabilization services include financial assistance and services.

7.3.1 Financial Assistance

Financial assistance necessary to stabilize the household in their current housing or other permanent housing includes:

- One-time payment of up to six months of rental arrears, including late fees and charges;
- Short-term (up to 3 months) or medium term (4 to 24 months) rental assistance;
- Lease break fees when necessary for a participant who meets the criteria for an emergency transfer under the Violence Against Women Act (VAWA);
- For participants who will move to other permanent housing to achieve stability:
  - Rental application fee charged by the landlord to all applicants for tenancy;
  - Security deposit, equal to not more than 2 month's rent;
  - Last month's rent, paid to landlord at the time the security deposit and first month's rent are paid. The amount must not exceed one month's rent and is included in calculating the program participant's total rental assistance;
  - Moving costs, including truck rental, hiring a moving company, and temporary storage fees. Storage fees may be up to 3 month's rent, providing costs are not incurred until after program participation begins and before move-in. Moving costs may not include arrearage temporary storage fees;

- Standard utility deposits for gas, electric, water, and/or sewer required by the utility company for all customers;
- Utility payments for gas, electric, water and/or sewer, including up to 6 months of utility payments in arrears, per service. Utility payments may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.

7.3.1.1 Limitations on Financial Assistance

There are multiple limitations on financial assistance provided to program participants:

- Program participants may not receive more than 24 months of rental or utility assistance in any 3-year period. Rental assistance includes last months' rent. Utility assistance includes up to 6 months of arrears per eligible utility. A partial utility payment counts as a full month.
- Except for a one-time payment of rental arrears, rental assistance cannot also be provided to a program participant who is receiving tenant-based rental assistance through other public sources.
- Rental assistance may not be provided to a program participant who has received replacement housing payments under the URA during the period of time covered by the URA payments.

7.3.2 Stabilization Services

Housing stabilization services are:

- Housing search and placement including assessment of project participant housing barriers, needs, and preferences; housing search and landlord recruitment, assistance with rental applications and agreements, ensuring housing compliance with habitability and other housing related requirements;
- Housing Stability Case Management including project participant eligibility and service needs assessment, development of individualized housing and service plans, conducting required re-evaluations and follow-up, and coordinating access to other federal, state and local benefits;
- Mediation services to prevent the tenant from losing their housing including mediation between tenant and landlord, household members, neighbors or others impacting the tenant's housing stability;

- Legal Services pertaining to certain legal matters as identified in 24 CFR 576.102(a)(1)(vi) that are necessary to resolve in order for program participant to obtain or maintain stable housing; and
- Credit Repair including credit counseling, household budgeting, money management, obtaining credit reports and resolving credit related barriers to housing stability.

7.4 Rental Assistance (§ 576.106)

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

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

7.4.1 Occupancy and Rent Standard

Occupancy standards provide consistent criteria for determining the size of the permanent housing unit for which a program participant is eligible. The occupancy standard limits the amount of gross unit rent to the Fair Market Rent (FMR) established for the unit size determined by the occupancy standard, in turn establishing the maximum amount of assistance that may be provided.

The subrecipient or SCO must determine the appropriate number of bedrooms for each ESG-eligible household, using the following guidelines:

Voucher Size	Minimum & Maximum Persons in Household
1 bedroom	1-2
2 bedrooms	3-4
3 bedrooms	5-6
4 bedrooms	7-8
5 bedrooms	9-10

The following requirements apply when determining the appropriate unit size:

1. Size must provide the smallest number of bedrooms needed for all members without overcrowding.
2. Size must be consistent with space requirements under the Housing Quality Standards.
3. Size must be applied consistently for all households of like size and composition.
4. A child who is temporarily away from the home because of placement in foster care is considered a member of the household in determining the size.
5. A pregnant woman will be treated as two people in determining the size.
6. Small children (less than 2 years of age) may share a one-bedroom unit with a single parent.
7. Live-in aides will be allocated a separate bedroom; no additional bedrooms will be provided for the live-in aide's family.
8. Two elderly or disabled household members may be given separate bedrooms.
9. Foster children in the care of the participant will be included in determining unit size.
10. Single person households will be allocated a studio or one bedroom.

Adult only households receiving ESG assistance may be supported to maintain co-living relationships with other households provided that each household maintains a separate lease and a structured process established or approved by the COT is followed to support roommate matching activities based on participant preferences and needs. This approach is strongly encouraged to support long-term housing stability among adult only households with limited earning potential.

7.4.2 Rental Assistance Agreement and Lease

Both a rental assistance agreement between the subrecipient and landlord and a lease between the program participant and landlord are required to provide short- and medium-term rental assistance.

7.4.2.1 Rental Assistance Agreement

Subrecipients must make rental assistance payments only to a landlord with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement sets out the terms under which rental assistance will be paid. A rental assistance agreement is a separate document from the rental lease. There is no requirement that the term of the lease

coincide with the term of the rental assistance agreement as long as they are both in effect during the time ESG-funded rental assistance is provided.

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

- The landlord must provide the subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint issued under state or local law to commence an eviction action against the program participant;
- The payment due date, grace period, and late payment penalty requirements must be the same as documented in the program participant's lease;
- If the subrecipient incurs late payment penalties for the rental assistance, the subrecipient will pay the penalties. Note that subrecipients must use non-ESG funds for any penalties or fees paid;
- If the subrecipient requires the program participant to pay a portion of the monthly rental cost, the amount of rent to be paid by the subrecipient and the amount of rent to be paid by the program participant;
- If rental arrears are being paid by the subrecipient, the number of months covered, any other terms and conditions of the payment.

7.4.2.1.1 Rental Assistance Agreement Termination

The subrecipient must terminate the rental assistance agreement and provide no further rental assistance payments when:

- The program participant moves out of the leased housing unit;
- The lease terminates and is not renewed; or
- The program participant becomes ineligible to receive ESG rental assistance.

7.4.2.2 Lease

The lease must set forth the terms under which the program participant will occupy the unit. The lease must comply with Arizona law and must not contain any of the following provisions:

- *Agreement to be sued.* Agreement by the tenant to be sued, to admit guilt or to a judgment in favor of the owner in a lawsuit brought in connection with the lease
- *Treatment of property.* Agreement by the tenant that the owner may take, hold, or sell personal property of household members without notice to the tenant and a court decision on the rights of the parties (Note: This prohibition does not apply to an

agreement by the tenant concerning disposition of personal property remaining in the housing unit after the tenant has moved out of the unit. The owner may dispose of this personal property in accordance with state law.)

- *Excusing owner from responsibility.* Agreement by the tenant not to hold the owner or the owner's agents legally responsible for any action or failure to act, whether intentional or negligent
- *Waiver of notice.* Agreement by the tenant that the owner may institute a lawsuit without notice to the tenant
- *Waiver of legal proceedings.* Agreement by the tenant that the owner may evict the tenant or household members without instituting a civil court proceeding in which the tenant has the opportunity to present a defense, or before a court decision on the rights of the parties
- *Waiver of right to appeal court decision.* Agreement by the tenant to waive the tenant's right to appeal, or to otherwise challenge in court, a court decision in connection with the lease
- *Tenant chargeable with cost of legal actions regardless of outcome.* Agreement by the tenant to pay attorney's fees or other legal costs even if the tenant wins in a court proceeding by the owner against the tenant (Note: The tenant may be obligated to pay costs if the tenant loses.)
- *Payment of additional rent or fees to owner.* Agreement by the tenant to pay additional rent or fees to the owner out of pocket once occupancy takes place

7.4.3 Rental Arrears Only - Rental Assistance Agreement and Lease

If rental arrears are being paid by the subrecipient, the subrecipient must certify that:

- The program participant is eligible;
- The landlord has provided sufficient evidence of the rent arrears; and
- That payment of such arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing.

If the only cost being paid with ESG funds is rent arrears, a rental assistance agreement is needed, but a current lease is not.

7.4.4 Rent Reasonableness and Fair Market Rent (FMR)

Before entering into a rental assistance agreement, the subrecipient must ensure the gross unit rent is reasonable and does not exceed the Fair Market Rent (FMR). Gross rent is the amount due under the lease plus any tenant-paid utilities. If the gross rent for the unit exceeds either the rent reasonableness standard or FMR, the subrecipient is prohibited from using ESG funds for any portion of the rent, even if the program participant is willing and/or able to pay the difference.

The rent standard may not exceed the HUD-published Fair Market Rent (FMR) or HUD-approved exception rent as published by the PHA for the voucher size allocated to the family. The rent standard includes both rent and utilities (gross rent). Utilities included in gross rent are electricity, fuel (e.g., natural gas, oil), water, sewer, and trash removal. Telephone, internet, and cable are not included. When determining whether a proposed unit is within the rent standard, subrecipients and SCOs need to know the amount of several costs, including:

1. Rent being requested by the owner;
2. Basic utilities included in the rent to the owner; and
3. Basic utilities to be paid separately in addition to the rent paid to the owner.

When choosing the applicable rent standard for a beneficiary household, subrecipients and SCOs must refer to the Occupancy Standards to determine the number of bedrooms a household qualifies for, then select the corresponding rent standard. A household may occupy a unit that is smaller or larger than specified by the Occupancy Standards, but in such instances, subrecipients and SCOs must use the rent standard for the lower of either the number of bedrooms allowed by the Occupancy Standards or the actual number of bedrooms in the proposed unit. For example, if a household qualifies for a one-bedroom unit, but occupies a two-bedroom unit, the project sponsor must use the rent standard for a one-bedroom unit. Similarly, if a household qualifies for a two-bedroom unit, but occupies a one-bedroom unit, the project sponsor must use the rent standard for a one-bedroom unit.

The gross rent must also be reasonable in relation to rents for comparable unassisted units in the private market and must not be in excess of rents charged by the owner for comparable unassisted units. subrecipients and SCOs should not assume that if the gross rent of an assisted unit is within the established rent standard that the rent being charged for the unit is reasonable. It is possible that a unit may be within the established rent standard, but not considered rent-reasonable. subrecipients and SCOs must document for each unit that a reasonable rent is being charged compared to other units in the private market and must verify, if applicable, that the rent charged for the unit is reasonable compared to the rent of other

comparable unassisted units owned by the same owner. Proposed units must be compared with two similar units. subrecipients and SCOs should account for unit location, size, type, age, amenities, and utilities provided by the owners. Proposed units should be compared to:

1. Units with similar bedrooms, bathrooms, and square feet.
2. Similar unit types (e.g., house, duplex, apartment, etc.).
3. Units with similar amenities (appliances, patios, etc.).
4. Units in the same neighborhood.

Subrecipients and SCOs must review rent standards annually and adjust them if necessary to correspond with annual updates to FMRs or exception rents. When the rent standard changes, newly-leased units and units leased upon household recertification must not have rents that exceed the new standard.

7.4.4.1.1 Utility Allowances

When determining whether a unit meets the FMR requirement, tenant-paid utilities must be included in the calculation of gross rent. A utility allowance is a projection of the monthly utilities costs the program participant will pay. The COT maintains a utility allowance chart that takes into account the number of bedrooms and types of utilities in a unit (e.g.; gas and/or electric, water, sewer, and trash). Any utilities included in the rent payment must not also be included in the utility allowance calculation. Telephone, cable or satellite television service, and internet service are not counted as utility costs. The COT utility allowance may be found at https://www.tucsonaz.gov/files/hcd/S8_Landlords/2021_Utility_Allowance_Schedules.pdf.

7.4.5 Participant Monthly Contribution to Rent and Utilities

Participants in ESG homelessness prevention and rapid rehousing activities must pay not more than the maximum amount of gross monthly household income defined in the TPCH Written Standards which apply to ESG programs. The participant contribution must not exceed monthly rent, including utilities.

7.4.6 Eligibility Recertification – Homelessness Prevention

Recertification of eligibility for homeless prevention assistance is required every 90 days and must be documented in the participant file. The recertification must verify the participant household continues to:

- Have annual income at or below 30% of the AMI, adjusted for household size; and
- Lack the resources or support necessary to retain or obtain appropriate permanent housing.

At the time of recertification, the participant contribution to rent and utilities must be modified to reflect any changes in income.

7.4.7 Eligibility Recertification – Rapid Rehousing

Recertification of eligibility for rapid rehousing assistance is required not less than every twelve months and any time the subrecipient or SCO becomes aware of change to the household's income and/or composition. Recertification must be documented in the participant file. The recertification must verify the participant household:

- Has annual income at or below 30% of the AMI, adjusted for household size; and
- Lacks the resources or support necessary to retain or obtain appropriate permanent housing

At the time of recertification, the participant contribution to rent and utilities must be modified to reflect any changes in income.

7.4.8 Additional Requirements for Project-based Rental Assistance

A subrecipient or SCO may enter into a rental assistance agreement with an owner to reserve a unit for an eligible ESG participant. The subrecipient or SCO then subsidizes the rent subject to the following requirements:

1. The rental assistance agreement may cover one or more permanent housing units in the same building.
2. Each unit covered by the rental assistance agreement must be occupied by eligible program participants.
3. The subrecipient or SCO may pay up to 100 percent of the first month's rent, provided that a program participant signs a lease and moves into the unit before the end of the month for which the first month's rent is paid. The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the

program participant's lease and must be included when determining that program participant's total rental assistance.

4. The subrecipient or SCO may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant. When a program participant moves out of an assisted unit, the subrecipient or SCO may pay the next month's rent, *i.e.,* the first month's rent for a new program participant.
5. The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the subrecipient or SCO must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the subrecipient or SCO may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG requirements.
6. The rental assistance agreement must have an initial term of one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible.
7. The subrecipient or SCO may not commit ESG funds to be expended beyond the expenditure deadline in their COT written agreement or memorandum of understanding.

7.5 Housing Stability Case Management

Housing stability case management is designed to ensure that program participants maintain permanent housing stability after ESG assistance ends. ESG funds may be used to pay the cost of assessing, arranging, coordinating and monitoring the delivery of individualized housing stabilization services to a program participant:

1. Already in permanent housing, for up to 24 months; or
2. While still literally homeless and seeking housing using Rapid Rehousing assistance, for up to 30 days.

a. *If after 30 days the program participant has not yet secured housing, the housing stability case management must be recategorized as either a street outreach or emergency shelter service*. If the case management is recategorized, it is subject to the cap on street outreach and emergency shelter expenditures.

While providing homelessness prevention or rapid rehousing assistance to a program participant, the subrecipient must:

- Develop a participant-driven plan to assist the program participant to retain permanent housing after the ESG assistance ends. The plan must take into account the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and is likely to receive; the relative affordability of available housing, and any other considerations relevant to the program participant's situation.; and
- Require the program participant (except participants who are eligible due to their status as fleeing or attempting to flee violence) to meet with a case manager not less than once per month to evaluate progress towards and reassess goals.

Eligible case management activities and costs include:

- Coordinated entry assessment;
- Conducting initial evaluation, including verification and documentation of eligibility;
- Developing, securing and coordinating services;
- Obtaining federal, state, and local benefits;
- Monitoring and evaluating participant's progress in the program;
- Developing an individualized, project participant driven housing stability service plan; and
- Conducting re-evaluations of participant's eligibility and types and amounts of assistance needed.

8 HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) (§ 576.107)

ESG subrecipients and SCOs are required to utilize the Homeless Management Information System (HMIS). ESG funds can be used for costs of contributing data to the HMIS, including the costs of:

- Purchasing or leasing computer hardware;
- Purchasing software or software licenses;
- Purchasing or leasing equipment, including telephones, fax machines, and furniture;
- Obtaining technical support;
- Leasing office space;
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- Paying salaries for operating HMIS, including:
  - Completing data entry;
  - Monitoring and reviewing data quality;
  - Completing data analysis;
  - Reporting to the HMIS Lead;
  - Training staff on using the HMIS or comparable database; and
  - Implementing and complying with HMIS requirements;
- Costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;
- Paying staff travel costs to conduct intake; and
- Paying participation fees charged by the Tucson Pima Collaboration to End Homelessness' HMIS Lead, if applicable. At the time of this publication, TPCH does not charge participation fees for ESG grantees and request for budget authority for such costs are therefore unallowable.

8.1 TPCH HMIS Policies and Procedures

The Tucson-Pima Collaboration to End Homelessness HMIS Policies and Procedures must be followed for ESG. These policies and procedures may be found at https://tpch.net/about/tpch-governing-documents/. To ensure an effective, efficient, and secure system, the policies and procedures include:

1. General parameters for the system;
2. Confidentiality and security practices;
3. Network operations; and

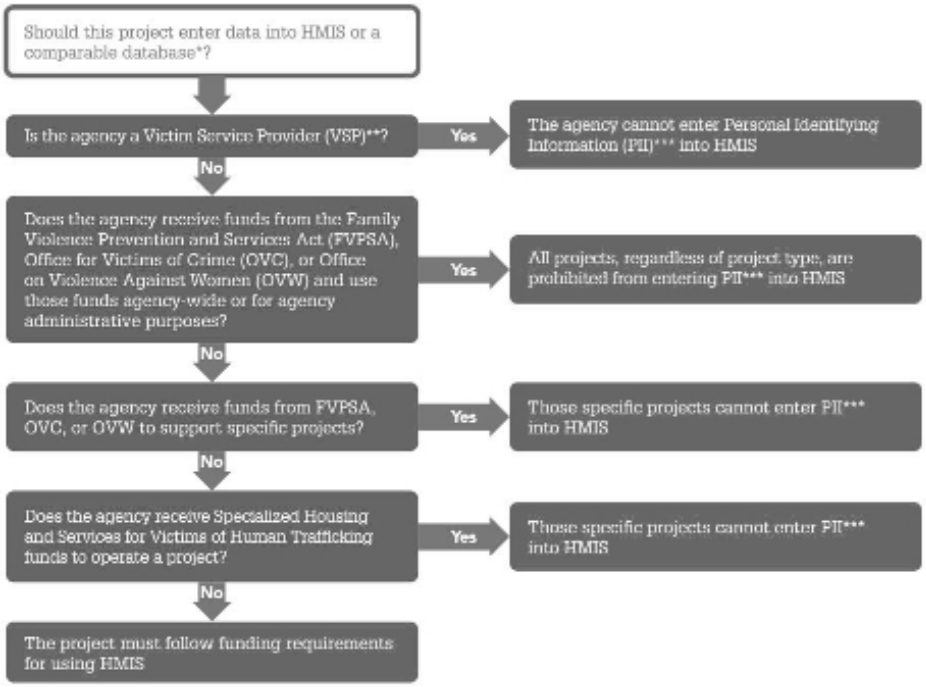
4. HMIS user training availability.

8.2 Comparable Database Requirements

A comparable database is a relational database that meets HMIS data standards and the minimum standards of HMIS privacy and security, including HUD's most recent reporting standards and comma-separated (CSV) format specifications. A comparable database may be used by a Victim Service Provider. A Victim Service Provider is a subrecipient that is a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, data violence, sexual assault, or stalking, including Human Trafficking. Neither HUD nor the COT have authorized the use of a comparable database for any projects/organizations which do not meet the requirements outlined in the HMIS Comparable Database Decision Tree.

The determination as to whether a project shall be required to enter data into the HMIS or to use a comparable database shall be made by the COT with information provided by the subrecipient or SCO and in consultation with the Tucson Pima Collaboration to End Homelessness' HMIS Lead Agency. The COT will utilize HUD's HMIS comparable database decision tree when determining whether the subrecipient will enter program or project data into HMIS or a comparable database.

The decision tree may also be found at https://files.hudexchange.info/resources/documents/HMIS-When-to-Use-a-Comparable-Database.pdf



The Tucson Pima Collaboration to End Homelessness' HMIS Lead Agency (Pima County Department of Community and Workforce Development) is responsible for the oversight and certification of all comparable databases utilized within the COT's service area. Agencies authorized to utilize a comparable database are required to meet specifications and requirements provided by the HMIS Lead.

All costs associated with the use of a comparable database are the responsibility of the Victim Services Provider. Costs which meet HMIS component eligibility as described above are eligible for ESG funding provided that such costs are included within the approved COT project budget and grant agreement.

9 GENERAL PROGRAM AND CROSS-CUTTING REQUIREMENTS

The following general program and cross-cutting requirements apply to all ESG-funded activities, subrecipients and SCOs.

9.1 2 CFR 200 Uniform Administrative Requirements (§ 576.407)

ESG subrecipients must comply with the financial management, audit and procurement requirements of 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Additional guidance is included in the COT subrecipient management and monitoring policies and procedures and the regulations are found at https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1.

9.2 Affirmatively Furthering Fair Housing (§ 576.500)

Subrecipients and SCOs must affirmatively further fair housing opportunities for classes protected under the Fair Housing Act, including race, color, national origin, religion, sex, disability, and familial status.

9.2.1 Affirmative Outreach

Affirmative outreach procedures must include:

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.

9.2.2 Limited English Proficiency

ESG subrecipients and SCOs must be prepared to respond appropriately to the needs of the diverse communities they serve. This response includes:

1. Ensuring that every person receives high-quality care regardless of their cultural, ethnic, linguistic, or religious background or beliefs; and
2. Making services available in the preferred language of the program participants and, whenever possible, by persons who reflect the culture and/or linguistic traditions of the participant. Translation services must be made available to all participants at no cost to the participant and programmatic forms must be provided in participants' preferred language upon request.

9.2.3 Nondiscrimination and Equal Access

Subrecipients and SCOs that operate single-sex/gender projects using ESG funds are required to provide all individuals, including transgender individuals and other individuals that do not identify with the sex/gender they were assigned at birth with access to programs, benefits, services and accommodations in accordance with their gender identify without being subjected to intrusive questioning or being asked to provide documentation.

In addition, the "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule," requires that ESG activities are open to all eligible individuals and families regardless of actual or perceived sexual orientation, gender identity, or marital status. Any group of people that present together for assistance and identify themselves as a family – regardless of relationship, age, disability, or other factors – are considered to be a family and must be served together. Subrecipients and SCOS cannot discriminate against a group of people presenting as a family based on the composition of the family, the age or disability of any family members, or the actual or perceived sexual orientation, gender identity, or marital status of any family members. The definition of "family" is flexible and, as such, HUD has broadly implemented the term "household" in place of "family."

9.3 Confidentiality (§ 576.500)

Each subrecipient and SCO must have organization confidentiality policies demonstrating the organization will not release participant information to outside parties without informed consent except when compelled by the courts and/or for monitoring and audit by funding or other oversight bodies, including, at a minimum:

- All records containing personally identifying information of any individual or family who applies for and/or receives assistance will be kept secure and confidential;
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted will not be made public, except with written authorization of the person responsible for the operation of the shelter; and

- The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

9.3.1.1 Release of Information

Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance or services, data collection, reporting, and monitoring. Participants may be asked to sign a Release of Information; however, refusal to sign an authorization to release information cannot be the basis for denying program services to otherwise eligible participants. Participant refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting in HMIS or to the COT.

Personally identifiable information may be disclosed to or shared with the COT without written authorization when necessary to carry out the intent of an ESG activity for the benefit of the person applying for or receiving assistance. For all other purposes of collecting personally identifiable information, subrecipients must follow state and federal laws for the collection, use and sharing of project participant information.

9.4 Conflict of Interest (§ 576.404)

Under ESG-funded Rapid Rehousing, a subrecipient may provide tenant-based rental assistance to a program participant that chooses a unit in which the subrecipient has an ownership interest. However, the subrecipient cannot exclusively direct a program participant to a unit it owns, nor can it carry out the initial evaluation to determine eligibility for the assistance - another agency must make that determination. The participant's file must include documentation that the program participant had a choice of other units.

A subrecipient must receive a HUD approved waiver to provide project- based assistance for a unit where the subrecipient has ownership interest. A waiver is also required to provide Homelessness Prevention rental assistance to a participant residing in a unit owned by the subrecipient. The waiver is necessary because the rental agreement is in the name of the subrecipient and it is not possible for the subrecipient to create such an agreement with itself. Waiver requests must be submitted to the COT for review and submission to HUD.

9.5 Data Requirements (§ 576.107)

To meet the federal requirements for HUD funding, the COT utilizes HMIS to collect client information, to prepare annual reports, and to report aggregate community-wide data as required. HUD requires that all HUD-funded projects participate in HMIS and comply with HUD Data and Technical Standards. Data requirements are frequently updated by HUD in concert with the US Departments of Health and Human Services and Veterans Affairs. HMIS data and technical standards are defined in the TPCH HMIS manual at https://tpch.net/about/tpch-governing-documents/ and at https://www.hudexchange.info/programs/hmis/hmis-data-and-technical-standards/.

9.6 Educational Rights

ESG subrecipients and SCOs may not make decisions regarding the educational participation of children receiving services and may not require or limit educational decision-making of parents/guardians except where required to do so by Federal or State regulation or statute. ESG subrecipients and SCOs assisting families with children or unaccompanied youth must:

1. Take into account the educational needs of children when placing families in housing and, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt children's education;
2. Inform families with children and unaccompanied youth of their educational rights, including providing written materials, and providing 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; and
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; and

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.

9.7 Environmental Review (§ 576.407)

ESG activities are subject to the 24 CFR Part 58 environmental review requirements. Subrecipients and SCOs may not undertake any ESG activity or expend ESG program funds, including costs that will be reimbursed with ESG funding, until environmental clearance has been obtained. When an ESG activity includes conversion or substantial rehabilitation, a Phase I environmental report may also be required.

9.8 Family Admission and Non-Separation

Families may not be involuntarily separated. The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives 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 ESG funds.

9.9 Habitability Standards (§ 576.403)

All housing units and shelter facilities supported with ESG funds must meet HUD Habitability Standards. The habitability standards are different from HUD's Housing Quality Standards (HQS). The habitability standards checklist may be found at: https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/

9.9.1 Permanent Housing

The housing unit must meet habitability standards before the lease is signed and the household moves in when the household is moving. For households already residing in a unit, the unit must meet habitability standards before financial or rental assistance can be provided. Minimum habitability standards for permanent housing include requirements for:

- structure and materials;
- personal space and security;

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

9.9.2 Shelters

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

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

9.10 Homeless Participation (§ 576.405)

ESG-funded projects must provide regular opportunities for individuals who are currently or have previously experienced homelessness, including current and former program participants, to participate meaningfully in policies and decisions regarding facilities, services and other ESG-funded assistance. At a minimum, all subrecipients and SCOs must maintain at least one individual experiencing homelessness on the organization's Board of Directors and/or, in the case of SCOs, oversight Commission or other appropriate advisory body. In addition,

subrecipients must involve individuals and families experiencing homelessness in the day-to-day operations of the organization and in the evaluation and continuous quality improvement activities related to the organization's ESG activities. This requirement may be met through employment, volunteer opportunities, lived experience advisory/action councils, regular focus groups, and/or rehabilitation, maintenance and facility operations.

9.11 Income Certification

When providing homelessness prevention or rapid rehousing assistance, subrecipients and SCOs must follow the income certification requirements of 24 CFR 5.609 and are encouraged to use the CPD Income Eligibility and Income Limits tool found at https://www.hudexchange.info/incomecalculator/.

Full guidance regarding income determinations is also found in Chapter 6 and related appendices of the City of Tucson Housing Choice Voucher Administrative Plan at https://www.tucsonaz.gov/files/hcd/2022_HCV_Admin_Plan.pdf.

9.12 Lead-Based Paint

When a living space or housing unit assisted with ESG funds was built prior to 1978, the living space or housing unit is subject to federal lead-based paint requirements. A living space or housing unit is exempt from this requirement only when the living space or housing unit is a 0-bedroom unit or is limited for occupancy by elderly persons or persons with disabilities over the age of 6.

9.13 Obligation and Expenditure Deadline (§ 576.203)

The COT HCD will commit ESG program funds for eligible activities within 180 days of executing a program-year grant agreement with HUD. Commitment may be evidenced by a subrecipient award letter or written agreement, and SCO MOU, or a procurement contract.

The COT will ensure that ESG program year funds are expended within 24 months of executing a program-year grant agreement with HUD.

9.14 Termination and Grievance Procedures (§ 576.402)

ESG participants may be voluntarily or involuntarily terminated from assistance, when the participant violates written program requirements or conditions of assistance or occupancy. When terminating assistance to any participant for violation of requirements, subrecipients and

SCOs must provide a formal process that recognizes the rights of households receiving assistance to due process of law. This must consist of:

1. Serving the household with a written notice containing a clear statement of the reasons for termination (failure to participate in supportive services and/or maintain sobriety is not an eligible cause for termination);
2. Permitting the participant to have a review of the decision, in which the participant is given the opportunity to confront opposing witnesses, present written objections, and be represented by their own counsel, before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
3. Providing prompt written notification of the final decision to the household.

9.15 Violence Against Women Act (VAWA) (§ 576.409)

The Violence Against Women Act (VAWA) provides protections and remedies for program applicants and participants who are survivors of domestic violence, dating violence, sexual assault, or stalking. Despite the name of this law, VAWA protections and remedies are available regardless of sex, gender identity, or sexual orientation. An applicant or beneficiary of the ESG Program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the unit on the basis or as a direct result of the fact that the applicant or beneficiary is or has been a survivor of domestic violence, dating violence, sexual assault, or stalking, if the applicant or beneficiary otherwise qualifies for admission, assistance, participation, or occupancy.

The COT ESG program uses the VAWA policies, procedures and forms identified in the Housing Choice Voucher Administrative Plan. These policies and forms are available in Spanish and include a certification form, emergency transfer form, emergency transfer plan, lease addendum, and notice of occupancy rights. Policies, procedures and forms are found at: https://www.tucsonaz.gov/files/hcd/2022_HCV_Admin_Plan.pdf.

1. Subrecipients and SCOs must enter the agreement number or a neutral program name in each document used to attribute its use to the ESG program and participant confidentiality.
2. Owners must use the VAWA Lease Addendum to lease a unit to an eligible individual. The Addendum incorporates eviction prohibitions, lease construction provisions, and the confidentiality of documentation submitted by survivors requesting emergency transfers and of each survivor's housing location. The Addendum provides that the survivor may terminate the lease without penalty if the survivor has met the requirements for emergency transfer. Additionally, owners must provide the VAWA

Notice of Occupancy Rights and VAWA Certification Form with any notification of eviction they provide to the household.

Grantee SF-424's and Certification(s)

OMB Number 4040-0004
Expiration Date: 03/31/2029

Application for Federal Assistance SF-424

* 1. Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application	* 2. Type of Application: ☒ New ☐ Continuation ☐ Revision
* If Revision, select appropriate letter(s):	* Other (Specify):
* 3. Date Received: 02/03/2026	4. Applicant Identifier: AZ-004
5a. Federal Entity Identifier:	5b. Federal Award Identifier: B-26-MC-04-0535
State Use Only:	
6. Date Received by State:	7. State Application Identifier:
8. APPLICANT INFORMATION:	
* a. Legal Name: City of Tucson	
* b. Employer/Taxpayer Identification Number (EIN/TIN): 86-6000256	* c. UEI: X3U7LNJQEQN6
d. Address:	
* Street1: 310 N. Commerce Park Loop	
Street2:	
* City: Tucson	
County/Parish:	
* State: AZ: Arizona	
Province:	
* Country: USA: UNITED STATES	
* Zip / Postal Code: 85745-9210	
e. Organizational Unit:	
Department Name: Housing & Comm. Development	Division Name: Community Development Division
f. Name and contact information of person to be contacted on matters involving this application:	
Prefix:	* First Name: Ann
Middle Name:	
* Last Name: Charlesworth	
Suffix:	
Title: Director of Housing & Community Development	
Organizational Affiliation: City of Tucson	
* Telephone Number: 520-791-4171	Fax Number:
* Email: Ann.Charlesworth@tucsonaz.gov	

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

A: City or Township Government

Type of Applicant 2: Select Applicant Type:

B: County Government

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Department of Housing and Urban Development

11. Assistance Listing Number:

14.218

Assistance Listing Title

Community Development Block Grant (CDBG)

* 12. Funding Opportunity Number:

N/A

* Title:

Community Development Block Grant

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

* 15. Descriptive Title of Applicant's Project:

The federal program year 2026: Public Facilities, Public Services, Planning Activities, Housing Rehabilitation and Repair, Economic Development, and Administrative activities.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

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

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: AR04,7 | * b. Program/Project: 5206,7

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2025 | * b. End Date: 06/30/2026

18. Estimated Funding ($):

* a. Federal	4,362,047.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	283,000.00
* g. TOTAL	4,645,047.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. "By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix	
* First Name	Ann
Middle Name	
* Last Name	Chaneske
Suffix	
* Title	Director, Housing and Community Development
* Telephone Number	520-791-1171
Fax Number	520-791-5100
* Email	Ann.Chaneske@tucsonaz.gov
* Signature of Authorized Representative	Ann Chaneske
* Date Signed	05/13/2025

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

OMB Number: 4040-0004
Expiration Date: 08/31/2029

Application for Federal Assistance SF-424

* 1. Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application	* 2. Type of Application: ☒ New ☐ Continuation ☐ Revision	* If Revision, select appropriate letter(s): * Other (Specify):

* 3. Date Received: 2026-02-26	4. Applicant Identifier: 86-6000266
5a. Federal Entity Identifier:	5b. Federal Award Identifier: M-26-MC-04-0025

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:	City of Tucson
* b. Employer/Taxpayer Identification Number (EIN/TIN):	86-6000266
* c. UEI:	XCBTLMJQDJW8

d. Address:

* Street1:	310 N. Commerce Park Loop
Street2:	
* City:	Tucson
County/Parish:	
* State:	AZ: Arizona
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	85745-9210

e. Organizational Unit:

Department Name:	Division Name:
Housing & Comm. Development	Community Development Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	* First Name: Ann
Middle Name:	
* Last Name:	Chanecka
Suffix:	
Title:	Director of Housing & Community Development
Organizational Affiliation:	City of Tucson
* Telephone Number:	520-791-4171
Fax Number:	
* Email:	Ann.Chanecka@tucsonaz.gov

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

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

A: City or Township Government

Type of Applicant 2: Select Applicant Type:

B: County Government

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Department of Housing and Urban Development

11. Assistance Listing Number:

14.239

Assistance Listing Title:

HOME Investment Partnerships Program (HOME)

* 12. Funding Opportunity Number:

N/A

* Title:

Home Investment Partnership Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

* 15. Descriptive Title of Applicant's Project:

For federal program year 2026: HOME Project-Owner Housing Development, Rental Housing Development, and Tenant Based Rental Assistance

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

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

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: AR04, 2 | * b. Program/Project: AR04, 2

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2026 | * b. End Date: 06/30/2027

18. Estimated Funding ($):

* a. Federal	3,667,840.81
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	530,300.00
* g. TOTAL	3,667,840.81

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

[ ] a. This application was made available to the State under the Executive Order 12372 Process for review on

[X] b. Program is subject to E.O. 12372 but has not been selected by the State for review.

[ ] c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

[ ] Yes [X] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

[X] ** I AGREE

** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	
* First Name:	Ann
Middle Name:	
* Last Name:	Chaneche
Suffix:	
* Title:	Director, Housing and Community Development
* Telephone Number:	501-791-5401
Fax Number:	501-791-5401
* Email:	Ann.Chaneche@arkansas.gov
* Signature of Authorized Representative:	Ann Chaneche
* Date Signed:	05/11/2026

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

OMB Number: 4040-0004
Expiration Date: 03/31/2026

Application for Federal Assistance SF-424

* 1. Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application	* 2. Type of Application: ☒ New ☐ Continuation ☐ Revision	* If Revision, select appropriate letter(s): * Other (Specify):
* 3. Date Received: 09/03/2025	4. Applicant Identifier: n/a 004	
5a. Federal Entity Identifier:		5b. Federal Award Identifier: B25MC040002
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	
8. APPLICANT INFORMATION:		
* a. Legal Name: City of Tucson		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 86-6000366	* c. UEI: X4RTJA9QQNA	
d. Address:		
* Street1: Street2:	320 N. Commerce Park Loop	
* City: County/Parish:	Tucson	
* State: Province:	AZ: Arizona	
* Country: * Zip / Postal Code:	USA: UNITED STATES 85706-5910	
e. Organizational Unit:		
Department Name: Housing & Comm. Development		Division Name: Community Development Division
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Middle Name: * Last Name: Suffix:	* First Name: Ann Chanoski	
Title: Director of Housing & Community Development		
Organizational Affiliation: City of Tucson		
* Telephone Number: 520 791 4171	Fax Number:	
* Email: Ann.Chanoski@tucsonaz.gov		

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Department of Housing and Urban Development

11. Assistance Listing Number:

14-241

Assistance Listing Title:

Housing Opportunities for Persons with AIDS (HOPWA)

* 12. Funding Opportunity Number:

N/A

* Title:

Housing Opportunities for Persons with AIDS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

* 15. Descriptive Title of Applicant's Project:

For federal program year 2026: HOPWA Project Housing, Social Services, Program Planning, and development costs for the benefit of individuals living with HIV/AIDS and their families.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

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

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 4208.7 | * b. Program/Project: 4208.7

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2026 | * b. End Date: 06/30/2027

18. Estimated Funding ($):

* a. Federal	1,140,367.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	1,140,367.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on:

☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach:

Add Attachment | Delete Attachment | View Attachment

21. By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	* First Name: Ann
Middle Name:	
* Last Name:	Chevedden
Suffix:	
* Title:	Director, Housing and Community Development
* Telephone Number:	213-761-4171 Fax Number: 213-978-5107
* Email:	ann.chevedden@lacity.org
* Signature of Authorized Representative:	Ann Chevedden
* Date Signed:	05/11/2026

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

OMB Number: 4040-0004
Expiration Date: 03/31/2026

Application for Federal Assistance SF-424

* 1. Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application	* 2. Type of Application: ☒ New ☐ Continuation ☐ Revision	* If Revision, select appropriate letter(s): * Other (Specify):
* 3. Date Received: 03/25/2026	4. Applicant Identifier: AZ-004	
5a. Federal Entity Identifier:	5b. Federal Award Identifier: B-26-MC-04-0505	
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	

8. APPLICANT INFORMATION:

* a. Legal Name: City of Tucson	
* b. Employer/Taxpayer Identification Number (EIN/TIN): 86-6000288	* c. UEI: KJDYLJSJQN45

d. Address:

* Street1:	310 S. Commerce Park Loop
Street2:	
* City:	Tucson
County/Parish:	
* State:	AZ: Arizona
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	85726-7210

e. Organizational Unit:

Department Name: Housing & Comm. Development	Division Name: Community Development Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	* First Name: Ann
Middle Name:	
* Last Name: Chanoska	
Suffix:	
Title: Director of Housing & Community Development	
Organizational Affiliation: City of Tucson	
* Telephone Number: 520-791-4171	Fax Number:
* Email: Ann.Chanoska@tucsonaz.gov	

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Department of Housing and Urban Development

11. Assistance Listing Number:

14.231

Assistance Listing Title

Emergency Solutions Grant (ESG)

* 12. Funding Opportunity Number:

N/A

* Title:

Emergency Solutions Grant

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

* 15. Descriptive Title of Applicant's Project:

For federal program year 2026: ESG funded services - Rapid Rehousing, Emergency Shelter, Homeless Prevention

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: AR-4, 7 | * b. Program/Project: AR-4, 7

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2026 | * b. End Date: 06/30/2027

18. Estimated Funding ($):

* a. Federal	448,938.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	448,938.00

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	* First Name: Ann
Middle Name:	
* Last Name: Chereck	
Suffix:	
* Title:	Director, Housing and Community Development
* Telephone Number:	520-791-4171 Fax Number: 520-791-5407
* Email:	Ann.Chereck@tucsonaz.gov
* Signature of Authorized Representative:	Ann Chereck * Date Signed: 05/12/2026

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

Applicant and Recipient Assurances and Certifications

U.S. Department of Housing and Urban Development

OMB Number: 2501-0044
Expiration Date: 02/28/2027

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

*Authorized Representative Name:

Prefix: | *First Name: Ann

Middle Name:

*Last Name: Chevedden

Suffix:

*Title: Director, Housing and Community Development

*Applicant Organization: City of Tucson, Housing and Community Development

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8; the American Disabilities Act (42 U.S.C. §§ 12101 et.seq.) and implementing regulations at 28 CFR part 35 or 36, as applicable; and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance, except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et.seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

*Signature: Ann Charnock

*Date: 05/11/2026

Form HUD-424-B (03/23)

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601–4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

Ann Chance

Signature of Authorized Official

05/11/2026

Date

Director, Housing & Community Development

Title

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

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) _____2026_____[a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Ann Chavez

Signature of Authorized Official

05/11/2026

Date

Director, Housing & Community Development

Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Ann Chaneca

Signature of Authorized Official

05/11/2026

Date

Director, Housing & Community Development

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Ann Chancellor

Signature of Authorized Official

05/11/2026

Date

Director, Housing & Community Development

Title

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

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Ann Charach
Signature of Authorized Official

05/11/2026
Date

Director, Housing & Community Development
Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities – Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building – Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility.

2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Ann Chaneck

Signature of Authorized Official

05/11/2026

Date

Director, Housing & Community Development

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.