

STATE OF NEVADA

ANNUAL ACTION PLAN 2022-2023



Housing and Community Development Programs

CDBG
HOME
HTF
ESG
HOPWA



Prepared by the Governor's Office of Economic Development
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With the State of Nevada Housing Division and
the State of Nevada Health Division
For the U.S. Department of Housing and Urban Development (HUD)

EXECUTIVE SUMMARY

A. INTRODUCTION

The 2022 Annual Action Plan (AAP) is the third annual action plan of the state of Nevada's 2020-2024 Consolidated Plan, a five-year plan addressing the State's housing and community development needs.

The purpose of each annual action plan is to provide a summary of what the State proposes to do in the upcoming year to further the priorities and objectives of the Consolidated Plan. The plan is reviewed by the public; citizen comments are summarized in each annual action plan.

An annual plan also explains the State's method of distribution for the following programs:

- Community Development Block Grant (CDBG)
- Home Investment Partnerships Program (HOME)
- Emergency Solutions Grant Program (ESG)
- Housing Opportunities for People with AIDS (HOPWA)
- National Housing Trust Funds (HTF)

Activities funded from these programs must meet the priorities identified in the Consolidated Plan. Programs are administered by the Governor's Office of Economic Development (GOED): Rural Community & Economic Development Division, Department of Business & Industry's Nevada Housing Division (NHD), and the Department of Health & Human Services (DHHS): Division of Public & Behavioral Health.

Additionally, the annual plan reports on specific items required by the U. S. Department of Housing and Urban Development (HUD) including, but not limited to, lead-based paint actions and removal of barriers to affordable housing.

B. CITIZEN PARTICIPATION SUMMARY

Information for the 2022 Annual Action Plan is rooted in the 2020-2024 Consolidated Planning process and the approved plan. For the 2022 program year, CDBG staff members held virtual Application Workshops because of the on-set of the COVID-19 pandemic. Training generally occurs in late May or early June. While in-person workshops are preferred, virtual meetings remain an option, as they can be recorded. One-on-one training also can be arranged at the GOED office or at the applicants' city/county.

From July 1st, 2021, through the end of the year and until the February 18th, 2022, application due date, applicants must hold three public meetings in city and county jurisdictions to determine which projects were of greatest importance to their communities. A pre-application due date mid-October establishes that proposed projects meet HUD's National Objective and Eligible Activity requirements, as well as the focus of the GOED/CDBG Program. Of 21 potential projects, with a total request of \$4,867,745 projects were deemed eligible to develop as applications; 1 was not. The 19 projects requested a total of \$4,637,745. Notices via email were sent to applicants notifying them of eligibility

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or non-eligibility of their project(s). Those eligible developed the proposed projects as applications.

The 2022 HUD allocations for the four HUD formula programs were released May 13th, 2022. The CDBG allocation for 2022 is \$3,421,222. State Planning and Administration for 2022 is \$168,424 (2% of allocation + \$100,000); Technical Assistance is \$34,213 (1% of allocation). Funds available for the State rural area projects total \$2,735,797; an additional \$386,359 was recaptured and available to allocate for the 2022 grant cycle. Carson City manages a separate allocation process: its allocation amount is \$482,788 an additional \$76,538 was recaptures and available to allocate to the 2022 grant cycle. The HOME allocation for 2022 is \$3,000,039, the HTF allocation for 2022 is \$7,462,633 and the ESG allocation for 2022 is \$487,092.

The State's CDBG program Advisory Committee met on April 13th, 2022 and proposed recommended awards for the 2022 grant year. The eligible applications were reviewed and initially scored on-line by the CDBG Advisory Committee. City and county applicants presented projects to AC members, who asked questions to clarify any information not clear in the applications. Carson City has a separate but equal review process. All funding recommendations are formally approved by the Governor prior to issuance of grant awards. The program year start date is July 1st, 2022.

The 2022 Annual Action Plan includes all CDBG projects recommended for funding. The plan was presented in public hearings held virtually on June 8th, 2022, June 15th, 2022, and June 22nd, 2022. Meetings were publicly noticed: the 30-day period was from June 1st through June 30th. Public Notices were published and posted the week of May 27th.

As part of all planning processes, numerous outside agencies and individuals are contacted throughout the year by staff members of the four HUD formula programs, plus the HTF, to discuss regional planning efforts. These organizations and individuals are encouraged to provide statistics, data, and other information to aid in preparing the Annual Action Plan and related studies. The Citizen Participation Plan is included in Appendix A.

The 2020-2024 Consolidated Plan provided even broader opportunities to define priorities for the next five years. HUD's objectives for its formula programs are:

- to provide decent housing,
- a suitable living environment, and
- economic opportunities for low-moderate income residents.

The State strives to accomplish these goals by maximizing and effectively utilizing all available funding resources to conduct housing, community and economic development activities. These objectives are further explained as follows:

- Providing decent housing means helping homeless persons obtain appropriate housing and assisting those at risk of homelessness; preserving the affordable housing stock; increasing availability of permanent housing that is affordable to low- and moderate-income persons without discrimination; and increasing the supply of supportive housing, making down payment and closing cost assistance available for low- and moderate-income persons;

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- Providing a suitable living environment entail improving the safety and livability of neighborhoods; increasing access to quality facilities and services; and reducing the isolation of income groups within an area through integration of low-income housing opportunities.
- Expanding economic opportunities involves creating jobs that are accessible to low- and moderate-income persons; promoting long-term economic and social viability; and empowering low-income persons to achieve self-sufficiency.

To fulfill these objectives for housing, homelessness, and community and economic development programs, the 2020-2024 Consolidated Plan establishes seven goals. In pursuing these goals, the state of Nevada has established priorities for the use of its resources. The priorities emphasize targeting of activities, leveraging other resources and public investments, and promoting community changing impact.

The Action Plan for fiscal year 2022 continues allocating the state's resources toward these priorities and achieving the goals set forth in the Consolidated Plan.

I. Affordable Housing

- a. Improve access to the full spectrum of quality affordable housing for Nevadans in non-entitlement areas.
- b. Increase the supply of affordable housing opportunities through development of new housing units for rental or homeownership opportunities and preserve the long-term affordability of homes through rehabilitation of existing vacant or owner-occupied units.
- c. Provide direct housing assistance to help potential buyers purchase a home, rapidly house those who are homeless or prevent or divert homelessness or provide decent, affordable housing to persons living with HIV/AIDS.
- d. Provide housing services and supports in the form of counseling – homebuyer or rental and case management services to ensure persons are and remain stably housed.
- e. To expand housing and supportive services for people with disabilities.

II. Community Stabilization & Development

- a. Prevent and arrest the decline of Nevada neighborhoods and promote revitalization.
- b. Support targeted code enforcement.
- c. Demolish vacant, blighted buildings.
- d. Clean-up of contaminated properties.
- e. Support strategic acquisition and disposition activities.
- f. Support development and maintenance of the affordable housing stock throughout Nevada.

III. Public Facility and Infrastructure

- a. Acquisition, construction, installation, rehabilitation, or improvement of facilities to support safe, sustainable, resilient communities.
- b. Water/Sewer/Storm Systems.
- c. Park, recreation, youth, senior facilities.
- d. Streets and sidewalk improvements.
- e. Health and safety facilities.

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- f. Increase access to broadband infrastructure.
- IV. Public Services
 - a. Provide public services to ensure all Nevadans have access to opportunities to improve their quality of life (homeless).
 - b. Support public services to ensure low-income households and vulnerable populations have access to appropriate and needed resources.
 - V. Economic Development
 - a. Develop opportunities to improve the economic environment by creating or retaining business and employment opportunities for low-income and diverse Nevadans create and retain jobs.
 - b. Create and expand businesses.
 - VI. Community Planning and Capacity Building
 - a. Encourage local and regional planning activity to facilitate understanding of current housing, community development, and resiliency needs and develop a plan for their sustainable future.
 - b. Provide training and technical assistance to communities to build their capacity to address housing and community development need.
 - c. Assist communities to identify achievable goals to further community needs.
 - d. Align community goals with funding opportunities to meet those goals.
 - VII. Homelessness
 - a. Provide Rapid Re-housing services & financial supports.
 - b. Provide homeless supports and prevention.
 - c. Support shelter operations.
 - d. Increase and maintain supply and access of affordable and supportive housing.
 - e. Conduct outreach.

C. EVALUATION OF PAST PERFORMANCE

The Governor's Office of Economic Development and the state of Nevada Housing Division's evaluation of its past performance on CDBG, HOME, ESG and HOPWA has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER), most recently published for 2021. The 2022 CAPER is due September 30, 2022. This document states the objectives and outcomes identified in each Annual Action Plan and includes an evaluation of the past year's performance through measurable goals and objectives compared to actual performance. The document can be found on the Governor's Office of Economic Development's website at:

<http://www.diversifynevada.com/programs-resources/cdbg/division-documents>

Summary of citizen participation process and consultation process

D. CITIZEN PARTICIPATION SUMMARY (PR-15)

Information gathering for the 2022 Annual Action Plan is grounded in the 2020-2024 Consolidated Planning process and approved plan. For the 2022 program year, CDBG staff members held 2022 Virtual Application Workshops June 9th and 10th. Applicants unable to attend formal training sessions always have the option of one-on-one training at the GOED office or his/her city/county.

From July 1st, 2021, through the end of the year and until the February 18th, 2022, application due date, applicants held three public meetings in city and county jurisdictions to determine which projects were of greatest importance to their communities. The pre-applications were reviewed by CDBG staff members to determine if each project met a National Objective and eligible activity, as well as the focus of the GOED/CDBG Program. Of 21 potential projects, with a total request of \$4,867,745 projects were deemed eligible to develop as applications; 1 was not. The 19 projects requested a total of \$4,637,745. Notices via email were sent to applicants notifying them of eligibility or non-eligibility of their project(s). Those eligible developed the proposed projects as applications.

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A variety of public outreach and citizen participation was used to develop the Consolidated Plan. The Housing and Community Development survey was used to help establish priorities throughout the State by gathering feedback on the level of need for housing and community development categories. A series of public meetings were held prior to the release of the draft plan to garner feedback on preliminary findings. The Plan was released for public review and a public hearing were held to offer

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residents and stakeholders the opportunity to comment on the plans prior to the Public Comment period for the month of July.

Summary of public comments

Comments made during the public review meetings are included in the form of transcripts in the Appendices.

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

Will be included after public comment period.

THE PROCESS

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
CDBG Administrator	NEVADA	Rural Community & Economic Development
HOPWA Administrator	NEVADA	Department of Health and Human Services, Division of Public and Behavioral Health, Community Health Services, Office of HIV
HOME Administrator	NEVADA	Nevada Housing Division
ESG Administrator	NEVADA	Nevada Housing Division
HTF Administrator	NEVADA	Nevada Housing Division

Narrative

The Governor's Office of Economic Development: Division of Rural Community & Economic Development Division is the lead agency for overseeing the development of the 2020-2024 Consolidated Plan and subsequent Annual Action Plans and CAPERs. Partnering agencies are: Governor's Office of Economic Development: Division of Rural Community & Economic Development Division [Responsible for CDBG]; the Department of Business & Industry, Nevada Housing Division [responsible for HOME, HTF and ESG]; the Department of Health and Human Services: Division of Public and Behavioral Health, Office of HIV [responsible for the HOPWA and Special Needs of Non-Homeless activities]

CONSULTATION AND COORDINATION

The State of Nevada's HUD-funded programs have established procedures for consultation with local governments, advisory groups, program stakeholders, Continuum of Care, community leaders and businesses, public institutions, faith-based organizations, other state agencies and interested citizens are consulted during preliminary development of the Consolidated and Action Plans. All are consulted in the event amendments are necessary to the Consolidated or Annual Action Plan. Consultation may occur in a variety of methods: surveys and/or meetings, public notices, mail, and/or by publication in

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one or more newspapers of general circulation.

CDBG, ESG, HOME and HTF program staff actively engaged housing and homeless providers, community leaders, and other interested parties throughout rural Nevada by conducting or participating in forums, community coalitions and planning meetings to gather input on housing, homeless, and community needs in rural communities. Input from the northern Continuums of Care was also obtained to ensure ESG funds passed through to the city of Reno funded activities that were locally supported.

The State has a strong working relationship with the Housing Authority in rural Nevada and provides State Low-income Housing Trust funds for tenant-based rental assistance for homeless households who were referred by Coordinated Entry lead agencies in rural Nevada. Funds were also used to provide security deposit assistance and emergency assistance for low-income households.

The State provides funding from either the federal ESG Program or the State Low-Income Housing Trust Fund Program to several county social services agencies and non-profits throughout Nevada. Activities funded include tenant-based rental assistance to eligible households, emergency rent and utility assistance and rapid re-housing programs for low-income households at risk of homelessness or eviction. Agencies receiving these funds are required to work closely with public institutions including hospitals, jails, and mental health clinics, which allows clients access to housing and supportive services. Memorandums of Understanding have been implemented to ensure cooperation between agencies, and staff from hospitals, jails, mental health, and other providers. All participate in community coalition meetings, also attended by Housing Division staff when possible.

The Housing Division has actively participated in the Rural Nevada Continuum of Care (RNCoC) for the past 14 years; NHD is a member of the RNCoC Governance Committee, as well as the Statewide CoC HMIS Governance Committee. Funding priorities and allocations for the ESG program are determined by a committee that includes members of the RNCoC and other board members. NHD staff work in conjunction with the RNCoC to develop performance standards for written standards for projects and activities funded through the ESG and other CoC programs; they work with the RNCoC to monitor performance of CoC sub-recipients.

The State also engages the Reno Area Alliance for the Homeless (RAAH) to ensure that programs and services funded through the alliance members are in alignment with RAAH goals and objectives. This is accomplished throughout the year during monthly Leadership Council meetings. The State also works with RAAH to develop performance standards and outcomes for programs.

The Division allocates a portion of State ESG funds to the HMIS Lead Agency in southern Nevada to support costs of the HMIS database throughout Nevada. The State ESG Program Manager participates in statewide HMIS subcommittee meetings and is an active participant in the development of policies and procedures for the operation and administration of the statewide HMIS. The Division also engages members from the southern Nevada CoC during statewide CoC meetings to gather information regarding the types of programs and services needed in the Clark County area.

General Allocation Priorities

Funds will be targeted to non-entitlement areas throughout the state. Homeless funds are available statewide. HOME funds are allocated annually statewide through a population distribution which considers how much funding each PJ is receiving directly from HUD. NHD then manages and distributes the activities funded throughout Rural Nevada. PI accrued through the PJs will be allocated back to the respective PJ in the subsequent year’s funding agreement. PI, EN, of funds accrued by means of recapture that are remaining from the previous years can be redistributed statewide by NHD during the competitive allocation and are not limited to the rural areas. CDBG funds are available to non-entitlement areas. HTF funds are available statewide. ESG funds are available for non-entitlement areas plus Carson City. For the new 2020 – 2024 Consolidated Plan period, the HOPWA grantee will be releasing a Request for Applications (RFA) or Request for Qualifications (RFQ) to interested stakeholders to provide HOPWA services, such as TBRA, STRMU, Supportive Services and Case Management. The current project sponsor subaward will be renewed for the 2022 performance period. Due to unforeseen circumstances, a previously planned RFA/RFQ was not released. The goal is to release an RFA or RFQ ahead of the next performance period of July 1, 2023 – June 30, 2024. This RFA/RFQ will be in conjunction with Ryan White Part B and AIDS Drug Assistance Program.

Priority Need

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 50 – Priority Needs Summary

1	Priority Need Name	Increase Supply and Access
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	Non-Entitlement Jurisdictions
	Associated Goals	Affordable Housing

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	Description	As shown throughout this Plan in data and public input, low to moderate income households is a high priority for the State of Nevada, particularly those facing housing problems and cost burdens, which account for almost a quarter of households in the non-entitlement areas of the State. Increasing the supply and access of affordable housing in the State is a high priority.
	Basis for Relative Priority	This priority is based on the Needs Assessment, Market Analysis, survey and public input.
2	Priority Need Name	Provide housing assistance
	Priority Level	High

Table 51 – Influence of Market Conditions

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SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Expected resources for the five formula programs remain relatively level, with the exception of the Housing Trust Fund and Carson City, an entitlement, reverting to the state program. For the CDBG program, additional funds are committed each year to newly funded projects by cities and counties, other state and federal funds, and/or other funding sources. Those leveraged dollars are difficult to project, as they vary greatly each year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available				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	\$3,421,222	0	0	\$3,421,222	\$6,983,361	2022 is the third year of the 2020-2024 Consolidated Plan.

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		Public Improvements Public Services						
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$3,000,039	\$800,000	\$3,000,000	\$3,800,000	\$6,000,000	The HOME Program, administered by the NHD, is expected to receive \$3,000,039 in HUD funds for the plan year beginning July 1, 2022. Additionally, the State HOME Program expects that grantees will generate approximately \$800,000 of program income and/or recaptured funds from previously awarded grants. HOME funds will be allocated throughout Nevada using a formula allocation. PI and HOME funds remaining from the previous year will be allocated throughout Nevada.

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HOPWA	federal	Permanent housing placement STRMU TBRA	\$488,333	0	\$63,956.85	\$552,289.85	\$1,889,375.15	Provides HOPWA services to reduce the risk of homelessness for northern Nevada HIV+ individuals and their families.
ESG	public - federal	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Homeless Prevention Homeless Outreach Rental Assistance Services Transitional housing	\$487,092	0	\$481,746	\$487,092	\$1,412,528	Agencies receiving ESG allocations must match 100% of their award.

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		HMIS Administration						
Housing Trust Fund	public - federal	Acquisition Housing Multifamily rental new construction Multifamily rental rehab	\$7,462,633	0	\$754,852	\$7,462,633	\$6,000,000	HTF funds will be allocated to one or more projects in the State. NHD will consider projects proposed statewide. 2022 is the third year of the 2020-2024 Consolidated Plan.
Other	public - state	Acquisition Admin and Planning Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab	\$10,404,596. 74	0	\$7,313,827. 93	\$10,404,596. 74	\$14,000,000	State Account for Affordable Housing Trust funds (AAHTF) that can be used for the following purposes: new and rehabilitation of multi-family projects, down payment assistance, homeowner rehabilitation, tenant-based rental assistance, and homeless prevention assistance.

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		New construction for ownership						
		Overnight shelter						
		Rapid re-housing (rental assistance)						
		Rental Assistance						
		TBRA						
		Transitional housing						

Table 52 - Anticipated Resource

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

ESG:

Some ESG sub-recipients will be allocated State Account for Affordable Housing Trust Funds (AAHTF) as match to the ESG program, which allows for more ESG funding to be allocated for case management, shelter operations, and data collection activities. In addition, AAHTF will be allocated to local housing authorities to provide Tenant-Based Rental Assistance, Emergency Assistance, and Security Deposit funding to the most vulnerable homeless clients and those who are at risk of becoming homeless, who are part of the coordinated entry process. Finally, local county and city funds, along with other federal program funds such as the Community Services Block Grant program, will be used to pay for staff and other eligible ESG activities. 100% of the match obligation will be provided with these other funding sources.

HOME:

NHD will leverage funds from the Low-Income Housing Tax Credit (LIHTC) program and funds from Rural Development with regard to affordable housing projects. Match requirements for the HOME program are fulfilled using property tax exemptions, LIHTCs, and AAHTF.

HTF:

NHD will leverage funds from the Low-Income Tax Credit program. No matching funds are required for this program.

CDBG:

Jurisdictions recommended for 2022 CDBG projects intend to commit \$782,775 cash contributions from other Federal, State or local funding sources and an estimated \$38,833 in-kind. Additionally, Carson City is working on a system to capture and report matching funds/leverage.

Housing Opportunities for Persons With AIDS:

No matching funds required. The Ryan White Part B program does complement HOPWA activities with Housing Services to assist Ryan White clients with short-term or emergency housing assistance to enable an individual or family to gain or maintain access to core medical and supportive care. Also, in limited capacity under the Ryan White Part B program, Emergency Financial Assistance is available as well.

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

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The NHD is proposing to use discounted Bureau of Land Management (BLM) land under the Southern Nevada Public Lands Management Act (SNPLMA) for affordable housing purposes. Between FY 2020-2024 NHD plans to put at least one Request for Proposal out for a multifamily housing development using land reserved through SNPLMA. NHD will also explore partnerships with local jurisdiction(s) Clark County, Washoe County, city of Las Vegas, North Las Vegas, and Henderson to identify tax foreclosed properties or donated land that can be transferred for affordable housing projects.

Discussion

The National Housing Trust Fund

The NHD will seek to leverage HOME funds, HTF, VASH vouchers and other funding sources while collaborating with the Southern Nevada Regional Housing Authority and other agencies.

CDBG:

When recommending projects for funding, the CDBG Advisory Committee takes into consideration the collaborative nature of the project. Projects with community support and/or public-private funding are encouraged. The Program is striving to increase the number of these partnerships and to collaborate across jurisdictions and regions.

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SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Nevada Housing Division	Government	Partners with local governmental entities, non-profit organizations and private entities to provide: - Home Ownership Programs - Rental Assistance Programs - Homeless Outreach and Prevention Services -Affordable Emergency Housing Assistance	Non-jurisdictions areas across the State
Rural Community & Economic Development	Government	Economic Development neighborhood improvements public facilities public services	Non-Entitlement
State of Nevada Dept. of Health and Human Services	Government	Non-homeless special needs	State

Table 53 - Institutional Delivery Structure

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Assess of Strengths and Gaps in the Institutional Delivery System

The State of Nevada is committed to continuing its participation and coordination with federal, state, county, local agencies, and the private and nonprofit sectors in order to serve the needs of low-income individuals and families across Nevada. The Governor’s Office of Economic Development, Department of Business and Industry, and the Department of Health and Human Services collaborate with various entities to continually improve coordination.

The Governor’s Office of Economic Development, Department of Business and Industry, and the Department of Health & Human Services all have individual institutional structures. Within each Office or Department, there are divisions that administer HUD programs. The Community Development Block Grant is managed by the Rural Community Development Division/CDBG of the Governor’s Office of Economic Development. The HOME, HTF, ESG, and NSP programs are managed by the Nevada Housing Division of the Department of Business and Industry. The HOPWA program is managed by the Office of HIV, housed within the Division of Public and Behavioral Health of the Department of Health and Human Services, under Community Health Services. Each Division has its institutional structure.

HUD funds pass through to local governments and other entities that are eligible to receive HUD program funding. These entities, when funded, are part of the institutional structure for each program. The scope of the institutional structure is from the state level to those at the community level where projects are implemented and/or managed.

The State of Nevada makes every effort to monitor and maintain the institutional delivery structure using monitoring procedures. Continued efforts to strengthen the institutional structure include efforts to maintain regular meetings among various players to remit vital information and voice any issues that may appear.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		X

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Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Rental Assistance	X	X	X
Utilities Assistance	X	X	X

Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X		
Other Street Outreach Services	X		

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			

Supportive Services			

Table 54 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Services targeted to persons experiencing homelessness are delivered by homeless service providers throughout the State. Each county in rural Nevada participates in its local coordinated intake and assessment system, which ensures homeless persons, including chronically homeless individuals and families, families with children, veterans and their families, and any unaccompanied youth, are referred to available resources.

Many of these agencies participate in the rural Continuum of Care (CoC), which governs service provisions and standards. Intake agencies utilize the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT) and the Family VI-SPDAT provided by the CoC to prioritize people who are considered high priority for housing and services. The Nevada Rural Housing Authority (NRHA) provides housing vouchers funded with AAHTF to persons who score highest in the VI-SPDAT until a Section 8 Housing Choice Voucher is made available. Households receiving these vouchers are case managed by county social services agencies and other homeless providers to ensure long term stability. Many agencies utilize ESG and Community Services Block Grant (CSBG) funds to pay for case management and other housing stabilization services.

All agencies receiving allocations through ESG and RNCOC funded programs are expected to assist homeless clients with obtaining long-term housing stability, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), mainstream services, and other federal, state, local, and private assistance available for such individuals. RNCOC and ESG Performance Standards include measures to encourage agencies to make every effort to ensure households obtain and maintain transitional or permanent housing, employment, increase or maintain earned income and other cash income, and increase access to mainstream benefits.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above.

In many rural areas of the state resources are limited for special needs populations, including frail elderly, persons with mental or physical disabilities, and other special needs populations. Transportation to and from appointments, medical treatment, and other service providers can be challenging, especially when required to travel long distance because a rural community is lacking available resources.

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Throughout rural Nevada, communities often face challenges with low vacancy rates, higher rents, and higher costs of products and services. When funding for rental assistance is made available it is often challenging for homeless persons and providers to find eligible units. However, in 2019 due to a change in ownership of several mines in rural Nevada, there are less jobs, people are leaving the area. Loss of jobs created more need for assistance. The only shelter in the area is several hours from any other services outside that community.

A strength in the service delivery system is a direct result of local participation of agencies in the RNCOC Steering Committee meetings, Technical Assistance meetings and the Coordinated Entry meetings. The sharing and education of what is available in local communities has resulted in agencies partnering together to address challenges of homelessness and poverty within their towns and connecting to agencies in their neighboring counties.

Another strength in the service delivery system is the utilization of the Homeless Management Information System database at a statewide level. Agencies can view a client's housing and service history, which should reduce duplication of services across the state.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The State will continue to work with local Continuum's of Care and other stakeholders to address gaps in the institutional delivery structure. The continued implementation of coordinated intakes, vulnerability indexing and assessment at the community level will help those experiencing homelessness in accessing multiple parts of the institutional delivery structure. ESG recipients will be required to participate in the Rural Continuum of Care, participate in local coordinated intake and assessment systems, and collaborate with other federal, state, and local programs to ensure the long-term success of clients served.

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SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2020	2024	Affordable Housing	Non-Entitlement Plus Carson City	Increase supply & access Provide housing services & supports	HOME: \$12,000 (includes statewide HOME funding) CDBG: \$5,232,805 HTF: \$15,000,000 (this funding is available statewide) Account for Affordable Housing Trust Funds: \$150,000	Rental units constructed: 40 Household Housing Units Rental units rehabilitated: 50 Household Housing Unit Direct Financial Assistance to Homebuyers: 60 Households Assisted

State of Nevada Non-Entitlement

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Community Stabilization/ Development	2020	2024		Non-Entitlement Jurisdictions	Code enforcement Slum/blight Environmental/cleanup Strategic acquisition & clearance	CDBG: \$2,256,746	
3	Public Facilities and Infrastructure	2020	2024		Non-Entitlement Jurisdictions	Water/sewer Parks/recreation/youth & senior (community) facilities Streets & sidewalks Health & safety Increase broadband access	CDBG: \$7,163,310	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50,000 Persons Assisted
4	Public Services	2020	2024	Homeless	Non-Entitlement Jurisdictions	Non-homeless services	CDBG: \$1,744,268	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted

State of Nevada Non-Entitlement

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Economic Development / Environment	2020	2024	Non-Homeless Special Needs	Non-Entitlement Jurisdictions	Create/retain jobs Create/expand businesses	CDBG: \$872,130	Businesses assisted: 625 Businesses Assisted Jobs created/retained: 125 Jobs
6	Community Planning and Capacity Building	2020	2024	Non-Housing Community Development	Non-Entitlement Jurisdictions	Training & technical assistance Assist UGLGs in identifying achievable goals Align goals with funding	CDBG: \$1,046,556	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1,000 Persons Assisted Other: 5 others

State of Nevada Non-Entitlement

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Homelessness	2020	2024	Non-Housing Community Development	Statewide	Homelessness	ESG: \$2,289,060	Homeless Person Overnight Shelter: 3,000 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 500 Households Assisted Homelessness Prevention: 2,500 Persons Assisted

Table 55 – Goals Summary

State of Nevada Non-Entitlement

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	The State will use HOME, CDBG, HTF, and AAHTF to increase affordable housing through the construction of new rental housing, the rehabilitations of rental housing and the rehabilitation of owner housing.
2	Goal Name	Community Stabilization/ Development Support Efforts to Combat Homelessness
	Goal Description	Support community stabilization through Code enforcement, Slum/blight removal, Environmental/cleanup, and Strategic acquisition & clearance.
3	Goal Name	Public Facilities and Infrastructure
	Goal Description	The State will fund public facility and infrastructure improvements, including Water/sewer, Parks/recreation/youth & senior (community) facilities, Streets & sidewalks, Health & safety, and Increase broadband access.
4	Goal Name	Public Services
	Goal Description	This is a public service goal to provide access to needed services.
5	Goal Name	Economic Development / Environment
	Goal Description	This goal provides employment opportunities for low- and moderate-income people and promote businesses in the State.
6	Goal Name	Community Planning and Capacity Building
	Goal Description	This goal is to provide infrastructure and other planning support for units of local government or sub-recipients.

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7	Goal Name	Homelessness
	Goal Description	<p>ESG and AAHTF will be allocated to agencies to pay for homeless outreach, homeless prevention, rapid re-housing assistance for up to 24 months, along with tenant based rental assistance vouchers for homeless who are referred by the coordinated entry lead agencies.</p> <p>ESG and AAHTF will be provided to emergency and domestic violence shelters to offset the costs of operating their shelters. Funding will also be allocated for essential services to residents of these shelters. In communities without access to a shelter, funds will be allocated to pay for motel/hotel vouchers that are used as an emergency shelter.</p> <p>ESG funds will provide funding to offset costs of the Homeless Management Information System (HMIS) and Administration of the programs. Goal is 95% data quality.</p>

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The State estimates it will provide affordable housing for 150 households throughout rural Nevada for the duration of this consolidated plan using the above indicated funding sources.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable. The state of Nevada does not directly operate or maintain public housing units. The state's housing agencies: Reno Housing Authority (RHA), Nevada Rural Housing Authority (NRHA), and the Southern Nevada Rural Housing Authority (SNRHA) are responsible for increasing the number of accessible units. The Nevada Housing Division supports the effort of these agencies to increase the number of accessible units in the public housing inventory.

Activities to Increase Resident Involvements

The RHA, NRHA and the SNRHA are responsible for assessing the need for activities to increase resident involvement. The state of Nevada supports their efforts but is not directly involved in this activity.

Is the public housing agency designated as troubled under 24 CFR part 902?

Plan to remove the 'troubled' designation

Not applicable. The state of Nevada is not a designated public housing agency and therefore is not designated as a 'troubled' designation under 24 CFR part 902.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The Housing and Community Development survey found that the biggest barriers to the development of affordable housing include the cost of lot or land, the cost of materials, the cost of labor, and the Not In My Back Yard (NIMBY) mentality.

Table MA-40.1 Providing Decent and Affordable Housing State of Nevada Housing and Community Development Survey	
Question	Response
Do any of the following act as barriers to the development or preservation of affordable housing in your community:	
Cost of land or lot	349
Cost of materials	289
Cost of labor	287
Not in My Back Yard (NIMBY) mentality	269
Lack of affordable housing development policies	250
Construction fees	211
Permitting process	209
Lack of qualified contractors or builders	188
Permitting fees	188
Lack of available land	170
Impact fees	170

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Density or other zoning requirements	168
Lack of water	140
Lack of other infrastructure	138
Lack of sewer system	98
Lack of water system	94
Building codes	87
Lot size	71
ADA codes	55

In addition, the State conducted its 2020 Analysis of Impediments to Fair Housing Choice and identified several contributing factors and fair housing issues. These are described in further detail in section SP-55.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The State's strategy to remove barriers to affordable housing are shown in the Table SP-55.2, on the following page.

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Table SP-55.2

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
<p>Promote homeownership and rental opportunities in high opportunity areas</p>	<p>Moderate to high levels of segregation</p> <p>Access to low poverty areas</p> <p>Insufficient affordable housing in a range of unit sizes</p> <p>Black, Pacific Islander, American Indian, and Hispanic households have disproportionate rates of housing problems</p> <p>Discriminatory patterns in Lending</p>	<p>Segregation</p> <p>R/ECAPs</p> <p>Disproportionate Housing Need</p>	<p>Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG, HOME, and HTF funds. Over the next five (5) years:</p> <p>40 rental units added</p> <p>50 rental units rehabilitated</p> <p>60 households receive homeowner down payment assistance</p> <p>Homeowner rehabilitation programs will no longer be funded through HOME funds but with AAHTF.</p> <p>Track activities annually in the State’s PER</p>
<p>Promote community and service provider knowledge of ADA laws</p>	<p>Insufficient accessible affordable housing</p>	<p>Disability and Access</p>	<p>Increase outreach and education for housing providers in the state, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations. Record activities annually.</p>
<p>Enhance community services in R/ECAPs</p>	<p>Access to low poverty areas</p> <p>Access to job proximity</p> <p>Access to school proficiency</p>	<p>Disparities in Access to Opportunity</p>	<p>Encourage increased public services and public investment in poverty areas in the State. Record activities annually.</p>

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Table SP-55.2

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
<p>Increase outreach and education for housing providers in the state</p>	<p>Moderate to high levels of segregation</p> <p>Access to low poverty areas and concentrations of poverty</p> <p>Moderate to high levels of segregation</p> <p>Discriminatory patterns in Lending</p>	<p>Fair Housing Enforcement and Outreach</p>	<p>Continue to raise awareness and educate buyers through enhanced home purchase and credit education, through seminars, webinars and other outreach efforts. Record activities annually.</p> <p>Enhance outreach and education to units of local government, as well as housing consumers, as it relates to affirmatively furthering fair housing and the duty to affirmatively further fair housing. Record activities annually.</p> <p>Conduct outreach and education of prospective housing consumers on how to acquire and keep good credit, in partnership with local civic organizations (i.e., churches, schools, etc.) Record activities annually.</p> <p>Continue to partner with the Silver State Fair Housing Council, conduct outreach and education with managers of new and existing rental housing complexes. Record activities annually.</p>

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

The NHD does provide ESG funds for outreach to homeless providers. The NHD requires agencies to engage homeless persons within a community so that they have access to available resources through Homeless Connect activities, veteran outreach functions, and by engaging households who have children in the programs at local schools. Several communities have created a coalition of agencies, including social services agencies, hospitals, police, fire, and mental health providers, who are meeting monthly or quarterly to identify the most frequent users of community emergency services and collaborates in shared case management to meet the most urgent needs of the individuals identified. Clients are then engaged and provided access to available housing and services. Many ESG sub-recipients also receive other HUD Homeless funding and act as lead agencies for this process.

Several rural ESG sub-recipients are also the local Coordinated Entry Lead Agency and are working with community providers to access available programs and services for homeless clients. As part of the coordinated entry process agencies complete an assessment in the Homeless Management Information System (HMIS) database which will provide information on the client's vulnerability. As part of the process clients are referred to Nevada Rural Housing Authority to see if they are eligible to receive a limited number of Tenant-Based Rental Assistance vouchers funded with AAHTF. If accepted, the client will receive up to 24 months of rental subsidy and will be "fast-tracked" into the Housing Choice Voucher program once a voucher is available. The Housing Authority has made the homeless population a priority to receive assistance in their HCV program as part of the coordinated entry process.

Addressing the emergency and transitional housing needs of homeless persons

The NHD continues to provide allocations to rural emergency and domestic violence shelters since communities have indicated that there is still a need for these types of programs. In communities that do not have access to shelters, ESG and AAHTF pay for motel vouchers so that homeless individuals and families have access to a safe and secure place to stay. Shelters provide case management to clients residing in the shelter, or who are accessing services offered by the provider, and will issue referrals to transitional and permanent housing programs. The NHD will allocate no more than 60% of its annual allocation to emergency shelter and essential services activities, as mandated by program regulations. It is anticipated that 300 homeless persons will have access to emergency and domestic violence shelters supported through the NHD's ESG program.

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

affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The Rural Nevada Continuum of Care has developed a Coordinated Entry process that requires lead agencies to utilize the VI-SPDAT assessment tool to determine the most vulnerable residents. Applicants who are “harder to serve” will score higher on the VI-SPDAT and will receive priority access to available housing and mainstream resources. Agencies with staff trained in SOAR practices will assist clients applying for Social Security Disability.

Agencies are encouraged to reduce lengths of homelessness episodes, and new and returned entries into homelessness. Recipients of ESG and CoC funds shall also be required to increase jobs, income, and self-sufficiency of program participants, and shall be measured annually to ensure that these objectives are met.

The State ESG Program has also encouraged agencies to increase the number of veterans provided access to permanent housing, and to increase the number of families with access to rapid rehousing and homeless prevention assistance.

Funding for case management to ensure the long-term stability of program participants will be provided with ESG.

Finally, Coordinated Entry Lead Agencies will facilitate access for homeless individuals and families to available affordable housing units. Databases such as the one located at NVHousingSearch.org offers free access to a rental database that matches units with the needs of the clients. Case managers can access a portal for social services agencies that provides information about landlords who have asked to be connected to agencies working with special needs groups such as veterans, frail and elderly, physically disabled and more.

The goal is to help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education, or youth needs.

Service providers in local communities are working closely with each other to ensure low-income individuals and families avoid becoming homeless. Communities have implemented informal and formal Memorandums of Understanding with local jails, health care facilities, mental health providers, Division of Child and Family Services (DCFS), Child Protective Services, (CPS) schools, and other facilities and programs so that providers are engaged when a homeless or at-risk of homeless person or family has been identified.

Community Coalition meetings are held throughout the year as the forum to develop protocols to ensure the homeless and low-income households have access to programs and services, including

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housing if available. Participants include local hospital staff, Sheriff's deputies, Fire Department Emergency management Systems staff, emergency shelter staff, behavioral health, family resource centers, and public guardians. The coalitions work together to identify the most vulnerable residents that are repeatedly using emergency services without a long-term plan

Homeless liaisons at local school districts are also working closely with providers to help families gain access to housing and supportive services. Community meetings have identified the need for at-risk of homelessness assistance. Agencies will utilize funding sources such as ESG and AAHTF to insure individual and families at most risk of homelessness are assisted.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

HOME:

All units funded that were built prior to 1978 are tested. NHD will continue to ensure that all housing projects funded with HOME funds will comply with the Federal guidelines regarding notification and abatement requirements.

HTF:

NHD ensures that all units built prior to 1978 are tested. If HTF is used for new construction, lead-based hazards should be mitigated.

CDBG:

The Governor's Office of Economic Development: Rural Community Development/CDBG ensures that homes built prior to 1978 that are rehabilitated with CDBG funds are tested for lead-based paint hazard by the Rural Nevada Development Corporation (RNDC) staff. Any chipped, peeling, or flaking paint is tested with an XRF analyzer. If lead-based paint is present, the contractor is tasked with setting up proper containment areas during construction and with proper clean up. Any hazardous lead paint areas must be encapsulated. In some instances, the components, such as door and window frames, are replaced. Other times the peeling paint is scraped and peeled away, and a special paint is used to seal the area. One hundred percent of the homes rehabilitated with CDBG funds are LMI households.

How are the actions listed above related to the extent of lead poisoning and hazards?

How are the actions listed above integrated into housing policies and procedures?

Lead based paint requirements are integrated into HOME and CDBG requirements to help ensure that follow all procedures relating to lead-based paint testing and abatement.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Nevada's anti-poverty strategy is based on helping families to move to economic self-sufficiency. Providing low-income households with assistance through the CDBG and HOME, ESG and AAHTF programs allows them to live in safe, decent, attractive housing. This helps to provide a base for them to maintain employment, provides a nurturing environment to raise children, and helps them become a part of the community where they work.

NHD continues to fund projects that support emergency shelters, transitional housing, and supportive programs. There are several nonprofit organizations that have and continue to develop services and facilities to move very low-income and homeless persons to self-sufficiency.

Other continued efforts to move lower-income, poverty-level, and homeless households into self-sufficiency include improvements to transportation services that provide access to job training, employment opportunities, and counseling services. The State of Nevada continues to integrate additional services into the welfare to work program. The State of Nevada also offers family resource centers. These centers are located throughout the state in most of the larger communities and provide a variety of support services to lower-income families. The family resource centers, in conjunction with local social service offices, are generally the initial point of contact for many persons and families seeking assistance.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The State of Nevada integrates housing services and social services by working closely with local jurisdictions, non-profits, and services agencies. Many programs meet the needs of low- and moderate-income households, and those with special needs. The State is involved in planning and prioritizing needs to ensure that households have adequate access to services. This plan serves as a guide to implement strategies to help alleviate poverty and coordinate efforts to combat poverty for households within the State.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Overview

To ensure that all statutory and regulatory requirements are being met for activities with HUD funds, the State uses various monitoring standards and procedures. Following are Program Specific Monitoring Standards and Procedures.

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HOME, HTF, & ESG Program Monitoring Plans NHD will monitor recipients for compliance with applicable HOME, HTF, and ESG regulations based on the following processes annually or once every three years (ESG), unless risk assessments require more frequent on-site reviews: Application Process, Contractual Agreement, Draw Process, On-Site Review, Financial Monitoring, and Programmatic Monitoring. Development projects funded with HOME and HTF will be monitored during LIHTC monitors which will be annually to meet all program requirements. Annual monitors are subject to change due to changes in program requirements or depending on level of risk. Monitoring continues with the Draw Down Process. All requests must have the correct supporting documentation; requests are reviewed by two staff members. Monthly and Quarterly Reports provide additional updates on the progress of each project.

HOPWA Monitoring Plan Annual monitoring occurs to ensure that programmatic and fiscal guidelines are followed. Monthly fiscal reconciliations are submitted to and reviewed by the state of Nevada. The current project sponsor ensures eligibility criteria and completes all required documentation prior to providing housing services to any individual. Eligibility to other local housing resources is conducted prior to a client being placed on the program. Case files are maintained per regulations and project sponsor policy and procedures. DHHS and project sponsor receives technical assistance when needed and remain up to date on all regulations and policies related to the HOPWA program.

CDBG Program Monitoring Plan is to ensure that all Federal and State statutory and regulatory requirements are met for activities with HUD/CDBG funds, the Rural Community Development Division/CDBG has established the following monitoring standards and procedures.

The formal CDBG Monitoring Plan is a three-step process: 1) Risk Analysis, 2) Desk Monitoring, 3) On-Site Monitoring. Risk Analysis is conducted annually on all grantees and open files. The second step of monitoring is Desk Monitoring, which occurs throughout the life of the grant. Daily, weekly, and on-going technical assistance is offered prior to application submission, during project implementation, and through close out of the grant. The CDBG Program Administrator conducts reviews of the single audits to determine compliance with applicable accounting regulations.

All projects have an Environmental Review.

Monitoring continues with the Draw Down Process. All requests must have the correct supporting documentation; requests are reviewed by two staff members.

Quarterly Reports provide additional updates on the progress of each project.

The CDBG Program Administrator conducts reviews of the single audits to determine compliance with applicable accounting regulations.

On-Site Monitoring is a structured review conducted at the location where the project activities are carried out or where project records are maintained.

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Close-Out of Grants: Once a grant file has been monitored for closing, it is closed in IDIS.

Grant Maintenance: In addition to monitoring, CDBG staff review reporting formats used by sub-recipients to ensure ease of use, while gathering the required data and information.

To avoid future problems with projects, the CDBG Advisory Committee members were advised to give priority in the allocation of funds to communities that were clearly “project ready.”

State of Nevada Non-Entitlement

2020 Annual Action Plan

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

Expected resources for the four formula programs remain relatively level, with the exception of the new Housing Trust Fund and Carson City, an entitlement, reverting to the state program. For the CDBG program, additional funds are committed each year to newly funded projects by cities and counties, other state and federal funds, and/or other funding sources. Those leveraged dollars are difficult to project, as they vary greatly each year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				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	\$3,421,222	0	0	\$3,421,222	\$6,983,361	2022 is the third year of the 2020-2024 Consolidated Plan.

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HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$3,000,039	\$800,000	\$3,000,000	3,800,039	\$6,000,000	The HOME Program, administered by NHD, is expected to receive \$3,000,000.00 in HUD funds for the plan year beginning July 1, 2022. Additionally, the State HOME Program expects that grantees will generate approximately \$800,000 of program income and/or recaptured funds from previously awarded grants. HOME funds will be allocated throughout Nevada using a formula allocation. PI and HOME funds remaining from the previous years will
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State of Nevada Non-Entitlement

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
								be allocated throughout Nevada.
HOPWA	federal	Permanent housing placement STRMU TBRA	\$488,333	0	\$63,956.85	\$522,289.85	\$1,889,375.15	Provides HOPWA services to reduce the risk of homelessness for northern Nevada HIV+ individuals and their families.

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ESG	public - federal	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Homeless Prevention	\$487,092	0	\$481,746	\$487,092	\$1,800,000	Agencies receiving ESG allocations must match 100% of their award.
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State of Nevada Non-Entitlement

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
		Homeless Outreach Rental Assistance Services Transitional housing HMIS Administration						

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Housing Trust Fund	public - federal	Acquisition Housing Multifamily rental new construction Multifamily rental rehab	\$7,462,633	0	\$6,754,852	\$7,462,633	\$6,000,000	HTF funds will be allocated to one or more projects in the State. NHD will consider projects proposed statewide. 2022 is the third year of the 2020-2024 Consolidated Plan.

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Other	public - state	Acquisition Admin and Planning Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Overnight shelter Rapid re-housing (rental assistance) Rental Assistance	\$10,404,596.74	0	\$7,313,827.93	\$10,404,596.74		State Account for Affordable Housing Trust funds (AAHTF) that can be used for the following purposes: new and rehabilitation of multi-family projects, down payment assistance, homeowner rehabilitation, tenant-based rental assistance, and homeless prevention assistance. It is estimated that \$10,000,000 will be available for FY 2021.
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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
		TBRA Transitional housing						

Table 52 - Anticipated Resources

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

ESG:

ESG sub-recipients are often allocated State Account for Affordable Housing Trust Funds (AAHTF) to be used as match to the ESG program, which allows for more ESG funding to be allocated for case management, shelter operations, and data collection activities. In addition, AAHTF funds will be allocated to local housing authorities to provide Tenant-Based Rental Assistance for the most vulnerable homeless clients who are part of the coordinated entry process. Finally, local county and city funds, along with other federal program funds such as the Community Services Block Grant program, is used to pay for staff and other eligible ESG activities. 100% of the match obligation will be provided with these and other funding sources including in-kind and donations.

HOME:

NHD will leverage funds from the Low-Income Housing Tax Credit program and funds from Rural Development with regard to home ownership projects. Match requirements for the HOME program are fulfilled using property tax exemptions and Low-Income Housing Trust Funds.

HTF:

No matching funds are required for this program.

CDBG:

Jurisdictions recommended for 2022 CDBG projects intend to commit \$782,775 cash contributions from other Federal, State or local funding sources and an estimated \$38,833 in-kind. Additionally, Carson City is working on a system to capture and report matching funds/leverage.

Housing Opportunities for Persons With AIDS:

No matching funds required. The Ryan White Part B program does complement HOPWA activities with housing services to assist Ryan White clients with short-term assistance to enable an individual or family to gain or maintain medical care.

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

NHD is proposing to use discounted Bureau of Land Management (BLM) land under the Southern Nevada Public Lands Management Act (SNPLMA) for affordable housing purposes. NHD will also explore partnerships with local jurisdiction(s) Clark County, Washoe County, City of Las Vegas, North Las Vegas, and Henderson to identify tax foreclosed properties or donated land that can be transferred for affordable housing projects.

The National Housing Trust Fund:

NHD will seek to leverage HOME funds, VASH vouchers and other funding sources while collaborating with the Southern Nevada Regional Housing Authority and other agencies.

CDBG:

When recommending projects for funding, the CDBG Advisory Committee takes into consideration the collaborative nature of the project. Projects with community support and/or public-private funding are encouraged. The program is striving to increase the number of these partnerships and to collaboration across jurisdictions and regions.

State of Nevada Non-Entitlement

AP-20 Annual Goals and Objectives

Goals Summary Information

State of Nevada Non-Entitlement

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2020	2024	Affordable Housing	Non-Entitlement Plus Carson City	<p>Increase supply & access</p> <p>Provide housing assistance</p> <p>Provide housing services & supports</p> <p>Homeless supports and prevention for persons with disabilities</p>	<p>HOME: \$3,488,537 (includes the PJs portion)</p> <p>CDBG: \$5,323,805</p> <p>Housing Trust Fund: (funding available statewide)</p> <p>Nevada Housing Trust Fund: \$4,115,728.26 (funding available statewide)</p>	<p>Rental units constructed:</p> <p>10 rental units newly constructed</p> <p>18 Household Housing Unit</p> <p>Rental units rehabilitated:</p> <p>10 Rental units rehabilitated Unit</p> <p>Homeowner Housing Rehabilitated:</p> <p>5 Household Housing Unit</p> <p>Direct Financial Assistance to Homebuyers:</p> <p>12 Households Assisted</p> <p>Rental Assistance</p>

State of Nevada Non-Entitlement

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Community Stabilization/ Development	2020	2024	Non-Housing Community Development	Non-Entitlement Jurisdictions	Code enforcement Slum/blight Environmental/cleanup Strategic acquisition & clearance Development and maintenance of the affordable housing stock throughout Nevada	CDBG: \$2,256,746	
3	Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Non-Entitlement Jurisdictions	Water/sewer Parks/recreation/youth & senior (community) facilities Streets & sidewalks Health & safety Increase broadband access	CDBG: \$7,163,310	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,000 Persons Assisted

State of Nevada Non-Entitlement

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Services	2020	2024	Non-Housing Community Development	Non-Entitlement Jurisdictions	Non-homeless services Shelters Affordable housing services	CDBG: \$1,744,268	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
5	Economic Development / Environment	2020	2024	Non-Homeless Special Needs	Non-Entitlement Jurisdictions	Create/retain jobs Create/expand businesses	CDBG: \$872,130	Businesses assisted: 125 Businesses Assisted Jobs created/retained: 25 Jobs
6	Community Planning and Capacity Building	2020	2024	Non-Housing Community Development	Non-Entitlement Jurisdictions	Training & technical assistance Assist UGLGs in identifying achievable goals Align goals with funding	CDBG: \$1,046,556	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Other: 1 other

State of Nevada Non-Entitlement

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Homelessness	2020	2024	Homeless	Statewide	Provide rapid re-housing services & financial supports Homeless supports and prevention Support shelter operations Increase and maintain supply & access of affordable and supportive housing Outreach	ESG: \$481,746	Homeless Person Overnight Shelter: 60 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted Homelessness Prevention: 30 Persons Assisted

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	The State will use HOME, CDBG, Housing Trust Fund, and Nevada AAHTF to increase affordable housing through the construction of new rental housing, the rehabilitations of rental housing and the rehabilitation of owner housing.
2	Goal Name	Community Stabilization/ Development Support Efforts to Combat Homelessness

State of Nevada Non-Entitlement

	Goal Description	Support community stabilization through Code enforcement, Slum/blight removal, Environmental/cleanup, and Strategic acquisition & clearance.
3	Goal Name	Public Facilities and Infrastructure
	Goal Description	The State will fund public facility and infrastructure improvements, including water/sewer, parks/recreation/youth & senior (community) facilities, streets & sidewalks, health & safety, and increase broadband access.
4	Goal Name	Public Services
	Goal Description	This is a public service goal to provide access to needed services.
5	Goal Name	Economic Development / Environment
	Goal Description	This goal provides employment opportunities for low- and moderate-income people and promote businesses in the State.
6	Goal Name	Community Planning and Capacity Building
	Goal Description	This goal is to provide infrastructure and other planning support for units of local government or sub-recipients.
7	Goal Name	Homelessness

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Goal Description	<p>ESG and AAHTF will be allocated to agencies to fund rapid re-housing assistance for up to 24 months, along with tenant based rental assistance for homeless who are referred by the coordinated entry lead agencies.</p> <p>ESG and AAHTF will be provided to emergency and domestic violence shelters to offset the costs of operating their shelters. Funding will also be allocated for essential services to residents of these shelters. In communities without access to a shelter, funds will be allocated to pay for motel/hotel vouchers that are used as emergency housing.</p> <p>ESG funds will provide funding to offset costs of the Homeless Management Information System (HMIS). Goal is 95% data quality</p>
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Table 55 – Goals Summary

State of Nevada Non-Entitlement

Introduction:

Funding Allocation Priorities

Table 1 – Funding Allocation Priorities

	Increase Availability of Affordable Housing (%)	Support Efforts to Combat Homelessness (%)	Provide Support to Those at Risk of Homelessness (%)	Support Data Collection for Homeless Services (%)	Improve Infrastructure (%)	Improve Access to Public Services (%)	Provide Infrastructure and Planning Support (%)	Enhance Access to Quality Facilities (%)	Encourage Economic Development (%)	Increase availability rental housing for ELI (%)	Total (%)
CDBG	30	0	0	0	51	10	6	13	5	0	100
HOME	90		0	0	0	0	0	0	0	0	100
HOPWA	0	0	100	0	0	0	0	0	0	0	100
ESG	0	50	25	25	0	0	0	0	0	0	100
Housing Trust Fund	0		0	0	0	0	0	0	0	100	100
Other Nevada Housing Trust Fund	25	0	15	0	0	0	0	0	0	60	100

State of Nevada Non-Entitlement

Reason for Allocation Priorities

ESG: Funding continues to be limited for homeless activities in rural Nevada. Communities believe that there is a need to fund emergency and domestic violence shelters to ensure that homeless individuals and families have access to safe shelter. Rapid re-housing is a category that is prioritized as the largest number of people on the community que regularly fall under the rapid re-housing category.

HOME: NHD chose to give Low Income Housing Tax Credit projects allocation priority because it ensures that the HOME funds are being leveraged to the greatest extent possible. NHD feels that Down Payment Assistance programs are important programs to have in the non-entitled areas where there is more housing stock in the rural areas.

HTF: NHD chose to give Low Income Housing Tax Credit projects allocation priorities because it ensures that the HTF funds are being leveraged to the greatest extent possible.

CDBG: As reflected in this table, the CDBG program primary focus is on improving and upgrading infrastructure. While not direct job creation projects, improved infrastructure enables communities to expand economic development opportunities through improved and expanded infrastructure.

HOPWA: As indicated in this table, HOPWA funds are used to assist HIV positive individuals at-risk of homelessness with rental, mortgage, and utility assistance, also assistance with move-in costs associated with securing permanent housing.

How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?

ESG: The Consolidated Plan identified the need to support existing homeless and domestic violence shelters due to the limited number of resources available for housing. There is also a need for homeless prevention activities, and the bulk of those programs will be funded through the AAHTF Welfare Set-Aside program. The State Consolidated Plan, local Continuum of Care Strategic Plans, and the Governor's Interagency Council on Homelessness identified the need for permanent housing, including rapid re-housing. As a result, both ESG and AAHTF will have allocations primarily focused on those activities. Tenant-based rental assistance programs will be managed by counties, and the Nevada Rural Housing Authority as part of the Rural Nevada Coordinated Entry process.

HOME: The proposed distribution will address the need of multi-family housing by ensuring that affordable multi-family complexes will have the funding needed to be built. NHD will also be able to continue a down payment assistance program.

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CDBG: Funding from CDBG supports CDBG priorities as noted in the Consolidated Plan for the State of Nevada.

HTF: The distribution from HTF will not change the priority needs and specific objectives described in the Consolidated Plan, however, the additional funding will enhance the current objectives and facilitate completion.

HOPWA: Funding for HOWPA supports the activities and priorities as noted in the Consolidated Plan for the State of Nevada.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

Distribution Methods

Table 2 - Distribution Methods by State Program

	State Program Name:	Community Development Block Grant Program
	Funding Sources:	CDBG

State of Nevada Non-Entitlement

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>CDBG: The Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community and economic development needs. Beginning in 1974, the CDBG program is one of the longest continuously run programs at HUD. Through the CDBG program, HUD provides annual grants on a formula basis to 1,209 general units of local government and States.</p> <p>The CDBG entitlement program allocates annual grants to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons.</p> <p>The State of Nevada is a recipient of the State Administered CDBG program, also known as the Small Cities' CDBG program. States award grants to smaller units of general local government that carry out community development activities. Annually, each State develops funding priorities and criteria for selecting projects. Nevada's priorities are established by the consolidated planning process, state priorities, and the regional community and economic development needs of the communities.</p> <p>The State of Nevada's CDBG Program is designed to meet the priority needs that have been identified by the State and local communities.</p> <p>The 5-Year Consolidated Plan identified the following as priorities: Improve infrastructure by assisting with sidewalk/path, street, water and wastewater system upgrades and development projects; enhance access to quality facilities to serve the population throughout rural Nevada; Provide infrastructure and other planning support for units of local government; retain and expand existing businesses; support recruitment and attraction of</p>
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State of Nevada Non-Entitlement

	<p>new businesses to Nevada; provide employment opportunities for low- and moderate-income people. By funding these priorities, State CDBG funds will be allocated to support these priorities.</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>CDBG: The CDBG Program implemented a revised ranking criterion form for use by the CDBG Advisory Committee. The ranking form is reviewed during the CDBG Application Workshop for the current application cycle. Refer to hard copy of the Annual Action Plan for details of the Method of Distribution and criteria.</p>

State of Nevada Non-Entitlement

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria. (CDBG only)</p>	<p>CDBG: Potential applicants can access application manuals and the ranking criteria on the Governor's Office of Economic Development: CDBG web pages. Applicants also are encouraged to work with CDBG staff members in developing applications to ensure project eligibility and answer any questions applicants may have about the process.</p> <p>Non-profit organizations work with the 27 eligible CDBG cities and counties to develop applications to be sponsored by the city or county. Notices are posted and/or published in the various cities/counties to inform the non-profit organizations about CDBG and the application process. Sponsored organizations also are encouraged to attend the CDBG Grant Application Workshop in their areas. For the 2017 Program Year, Carson City, an entitlement, chose to revert to the state CDBG program. Carson City has a separate but similar review and allocation process and is on the same timeline as the state program. For 2018, Carson City applications were submitted through the on-line system, ZoomGrants; reviewers also used the on-line system.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>CDBG: Funds are awarded through a competitive application process that is reviewed during CDBG Application Workshops held in the spring and summer months each year. Applications are due in January or February and reviewed by CDBG staff members for eligibility. Once verified as eligible, applications are distributed to an Advisory Committee (AC) for ranking. The AC generally meets in March/April, in an open meeting process, to review and recommend applications for funding. During this open meeting process, external reviewers provide input regarding potential projects; project applicants also make presentations about the proposed projects. The AC recommendations are submitted to the GOED Director for review and approval before forwarding to the Governor for final approval of projects.</p>

State of Nevada Non-Entitlement

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>HOPWA only. Not applicable to CDBG. However, projects from non-profits can be sponsored by a city/county for CDBG funding. A two-year Request for Applications (RFA) or Request for Qualifications (RFQ) will be issued late 2022 for agencies interested in providing HOPWA services to clients. The RFA/RFQ will be widely released and available to interested parties such as grassroots faith-based and other community-based organizations.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>CDBG: Resources are allocated among funding categories based on community need and responsiveness to the state's CDBG's program goals. Needs also reflect and respond to changes occurring at the local level.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>CDBG: CDBG does not have a threshold factor or grant size limit.</p>

State of Nevada Non-Entitlement

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The CDBG Outcome Measures are (1) Availability/Accessibility, (2) Affordability; and (3) Sustainability relating to (1) Suitable Living Environments; (2) Decent Housing; and (3) Economic Opportunity. An estimated 92,723 individuals will benefit from the 2021 projects recommended for funding.</p>
2	<p>State Program Name:</p>	<p>Emergency Solutions Grant</p>
	<p>Funding Sources:</p>	<p>ESG</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The State is allocated an annual distribution of ESG funds that are distributed and managed through NHD. The annual allocation of ESG funds for 2022 is estimated to be \$487,092. NHD will distribute these funds through a competitive application which will open in May 2022, pending HUD’s announcement of fund allocation. Programs in non-entitled areas of the State are prioritized since the PJs throughout the State receive their own ESG distribution from HUD. In the event the state determines the city of Reno is in further need of ESG funds in addition to their allocation from HUD (determined through their competitive allocation) the state may fund the city of Reno ESG funds. The ESG funds will be mostly or entirely allocated to programs serving those in rural areas of the state.</p>

State of Nevada Non-Entitlement

<p>Describe all the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Programs in non-entitled areas of the State are prioritized. In the event the State determines the city of Reno is in further need of ESG funds in addition to its allocation from HUD (determined through its competitive allocation) the state may fund the city of Reno ESG funds. The ESG funds will be mostly or entirely allocated to programs serving those in rural areas of the state. In addition, Rapid Re-housing programs will be prioritized for funding, however, all categories allowable under the ESG program will be considered.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describe the application criteria? (CDBG only)</p>	<p>This section is not applicable since ESG is not CDBG. All information on the ESG program is available through the NHD website and through contacting the ESG administrator.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>The ESG funding is available to all units of local governments, non-profit organizations, including community and faith-based organizations within the rural communities and the city of Reno through the competitive application process.</p>

State of Nevada Non-Entitlement

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>This section is not applicable since ESG is not HOPWA. ESG does not utilize sponsors but utilizes the CoC partnerships to strengthen their programs and impact.</p> <p>HOPWA only. Not applicable to CDBG. However, projects from non-profits can be sponsored by a city/county for CDBG funding. A two-year Request for Applications (RFA) or Request for Qualifications (RFQ) will be issued mid-late 2022 for agencies interested in providing HOPWA services to clients. The RFA/RFQ will be widely released and available to interested parties such as grassroots faith-based and other community-based organizations.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Although ESG funding will be prioritized for Rapid Rehousing programs, all ESG allowable categories will be considered for funding. To adhere to ESG requirements no more than 60% of the overall allocation will distributed to shelter programs and 10% of the overall allocation may be set aside for program administration.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>NHD normally receives applications from eligible programs that exceed its funding by \$200,000. ESG funding is very competitive and valuable to the programs located in the rural areas of the state and to the city of Reno.</p>

State of Nevada Non-Entitlement

	What are the outcome measures expected as a result of the method of distribution?	NHD expects to be able to fund all priority programs and existing programs in good standing, likely not for their full ask but in part.
3	State Program Name:	HOME Program
	Funding Sources:	HOME

State of Nevada Non-Entitlement

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The HOME funds are allocated to all Participating Jurisdictions (PJ's) in the State. The State has decided to allocate the HOME funds based on population to ensure that each Nevadan receives an equitable amount of funding. If the State were to only distribute HOME funds in the non-entitled areas, they would receive approximately several times the amount of funding that other PJ's receive. Therefore, the State takes into consideration all of the HOME funds coming into the State and distributes the State funds based on a population formula. 10% of the award is used for administration of the grant.</p> <p>The allocation for other Participating Jurisdictions in the State are as follows:</p> <p>Clark County HOME Consortium-\$759,738</p> <p>City of Henderson-\$182,769</p> <p>City of Las Vegas-\$371,138</p> <p>Washoe County HOME Consortium-\$268,156</p> <p>Non-entitled area of the State-\$1,118,199</p> <p>PI received within each jurisdiction will be allocated back to the respective PJ in the subsequent year's funding agreement. Old PI, EN, and/or recaptured funds remaining from previous funding years originally slotted for a certain PJs or non-entitlement areas can be opened through the normal application process for projects statewide.</p> <p>In the non-entitlement areas, NHD will facilitate a competitive application. If older funds are released for statewide applications, these applications will go through the same competitive application process.</p>
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State of Nevada Non-Entitlement

<p>Describe all the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The State will allocate the non-entitled portion of the HOME funds to non-entitled areas. We will make funding Low Income Housing Tax Credit projects as its first priority and will evaluate remaining projects and make selections based on need and funding remaining.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describe the application criteria. (CDBG only)</p>	<p>This is not applicable because this program is HOME not CDBG. Information on the HOME program is available on the NHD website and by contacting the HOME program administrator.</p>
<p>Describe the process for awarding funds to State recipients and how the State will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>This is not applicable because this program is HOME not ESG. Details on the HOME allocation and distribution can be found in a section above.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>This is not applicable because this program is HOME not HOPWA. The HOME program does not involve sponsors but does utilize investors and partners. HOPWA grantee works with The Trudy Larson MD Institute for Health Impact and Equity at the University of Reno and the Nevada Faith & Health Coalition which is tasked with working with faith-based and other community-based organizations, when the next HOPWA funding proposal is released, it will be disseminated to this body as well.</p>

State of Nevada Non-Entitlement

	Describe how resources will be allocated among funding categories.	HOME funds and Low-Income Housing Tax Credits will prioritize multi-family rental projects whether they be new construction or rehabilitation. HOME funds will also be used for down payment assistance. The State will use the majority of its AAHTF for tenant based rental assistance, security deposit assistance, and emergency assistance in the non-entitled areas of the state.
	Describe threshold factors and grant size limits.	Threshold factors are mainly based on the amount of funding the State has for the project and how many projects are successful in obtaining Low Income Housing Tax Credits. The average amount of HOME funds that it takes to fund a tax credit project is usually about \$400,000.00. The State usually allocates \$300,000 to a down payment assistance program. Further, the State receives the State minimum allocation of HOME from HUD \$3,000,000.
	What are the outcome measures expected as a result of the method of distribution?	NHD expects that it will be able to fund all its priorities using this method of distribution. We foresee funding multi-family new construction projects, multi-family rehabilitation projects and a down payment assistance program.
4	State Program Name:	HOPWA
	Funding Sources:	HOPWA

State of Nevada Non-Entitlement

	Describe the state program addressed by the Method of Distribution.	The HOPWA program is designed to assist HIV positive individuals at-risk of homeless with rental, mortgage, and utility assistance; as well as assistance with move-in costs associated with securing permanent housing.
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State of Nevada Non-Entitlement

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The Request for Applications (RFA) for the HOPWA program have not been released since 2011, due to northern Nevada having limited organizations expressing interest in bidding on the project. Northern Nevada HOPES (NNHOPES) submitted a completed proposal due to its HIV/AIDS specialty services, proven track record and expertise in the field and was approved to be the sole HOPWA project sponsor. To fall in line with the current Con Plan, the HOPWA grantee has no plans to release an (RFA) until 2022, which will coincide with the program outcomes of the 2020-2024 Con Plan.</p> <p>Once the RFA is released and in the event that more than one agency submits a request for funding for the HOPWA program preference will be given to agencies that are current or past recipients of HOPWA funds; can demonstrate successful implementation of the HOPWA program; have chosen to utilize HOPWA funds on activities that will prevent homelessness amongst the HIV positive community and are actively helping to meet the objectives of NHD and HUD.</p> <p>Funds may be used in the following focus areas:</p> <ol style="list-style-type: none">1. Provide short-term Rental and mortgage assistance (STRMU) for 21 weeks out a 52-week calendar year;2. Provide Tenant Based Rental assistance (TBRA) for individuals who will need long-term financial assistance in order to prevent homelessness and Project Based Rental Assistance (PBRA); and3. Provide Permanent Housing Placement (PHP) assistance to individuals who need financial assistance with unit move-in costs such as first month's rent and deposits.
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State of Nevada Non-Entitlement

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	N/A
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	N/A

State of Nevada Non-Entitlement

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>To apply for a subgrant from the DPBH, RWPB Program, an organization must be a 501(C)(3), a for-profit corporation (if services are not immediately available in a designated service area), educational institution, a state agency, a religiously affiliated organization, or a local governmental agency performing or anticipating performing a function relevant to program goals of the RWPB.</p> <p>Each proposal submitted must contain the following sections:</p> <p>PFS Application Cover Sheet: This page identifies the PFS and requires the applicant to fill in the basic information; this is to be signed by an organization staff with the authority to make a binding contract or agreement on behalf of that organization.</p> <p>Project Data Sheet: This section includes identifying information about the applicant; project information; project funding formula; contact information and signature authority.</p> <p>Project Outline: This section includes general information and a description of the project being proposed. The applicant will respond to a set of statements and provide responses that clearly states the goals and major activities of the proposed project and the impact it will have on fulfilling the goals and objectives of the RWPB; a description of the organization’s qualifications to implement the proposed project; a detailed narrative about the proposed project including specific information on the methodology to be used, an overview of project activities, the expected accomplishments of the project, and a timeline for completion.</p> <p>In addition to the above criteria, please include in your project outline plans for community collaboration; identify any key organizations which may be involved in the coordination of services, interagency policy development, comprehensive networking, or system integration. Provide a brief summary of how your project would be sustained in future years if the project were to continue.</p>
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State of Nevada Non-Entitlement

	<p>Project Work Plan: This section details the Objectives, Activities, Benchmarks, Performance Measures and Evaluation for the project. Applicants should enter as many objectives and activities, including detailed performance measures, as necessary to support expected outcomes of the project.</p>
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State of Nevada Non-Entitlement

State of Nevada Non-Entitlement

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Project Budget Request & Justification Form: This section includes a summary and itemized section containing projections of costs for personnel, travel, equipment, supplies, contractual, other direct costs, and indirect costs.</p> <p>Successful applicants will be required to complete RWPB program forms, signed assurances of compliance with federal and state laws, and original signatures of individuals authorized to accept grants on behalf of the organization.</p> <p>Supplemental Information, Attachments: You can include “up to” five pages of relevant support materials, including samples of newspaper articles, letters of support, etc. In addition, any charts, graphs, statistical information, or substantiating documentation of statements listed in the text of the proposal should be included in the list of attachments.</p> <p>Applicants shall be consistently evaluated and scored based upon a two-step evaluation process. Each application will be evaluated and scored using the following criteria:</p> <ul style="list-style-type: none">Applicant’s understanding of background, need for, and scope of services/project;Adequacy of proposed project approach;Adequacy of proposed plan of action;Adequacy of proposed evaluation;Qualification and experience with similar work;
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State of Nevada Non-Entitlement

	<p>Reasonableness of cost; and</p> <p>Such other factors deemed relevant in determination of the best value for the State.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>HOPWA funds will be passed through the State of Nevada Health and Human Services (DHHS): Division of Public & Behavioral Health and will be allocated to local for-profit and non-profit organizations in only Northern Nevada because Clark County (Las Vegas) receives funding for housing assistance from HUD HOPWA separately and Las Vegas TGA receives Ryan White Part A program. HOPWA funds are solely allocated to Northern Nevada and the rural areas. Northern Nevada HOPES, project sponsor, receives the entire HOPWA grant minus three percent that is retained for State Administration.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The HOPWA program does not have formal Threshold Factors or Grant Size Limit. Threshold factors are mainly based on the amount of the State funding award. Size of the award to the project sponsor also depends on the quality of the application. The average amount awarded to the project sponsor is \$400,000.</p>

State of Nevada Non-Entitlement

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The overarching outcome is to establish a seamless system to immediately link people diagnosed with HIV to continuous and coordinated quality care; enhance the number and diversity of available providers of clinical care and support services for people with HIV; and support people with HIV with co-occurring health conditions and those who have challenges meeting their basic needs.</p> <p>Specific outcomes to housing include:</p> <p>progress in carrying out its 1) local and 2) statewide strategic plan and initiatives set-forth by the Nevada Economic Development office, Annual Action Plan, Con Plan, HIV/AIDS Integrated Plan,</p> <p>increase percentage of clients in stable housing,</p> <p>increase percentage of clients retained in care.</p>
5	<p>State Program Name:</p>	<p>National Housing Trust Fund</p>
	<p>Funding Sources:</p>	<p>Housing Trust Fund</p>

State of Nevada Non-Entitlement

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The National Housing Trust Fund (HTF) is an affordable housing production program that will complement the existing federal, state, and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low (ELI) and very low income (VLI) households, including families experiencing homelessness. Established under Title I of the Housing and Economic Recovery act of 2008, HTF will be distributed through the U.S. Department of Housing and Urban Development (HUD) on a formula basis to the states.</p> <p>The State of Nevada has appointed NHD as the State Designated Entity (SDE) to administer the program.</p> <p>NHD is expecting to receive \$7,462,633 in HTF. NHD will open a statewide competitive application for this funding in May 2022, pending HUD allocation announcement. NHD anticipates receiving multiple HTF applications for this funding for rental projects located throughout the state of Nevada.</p>
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State of Nevada Non-Entitlement

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Selection of projects will be mirrored to the NHD QAP which sets forth selection criteria to be used to determine housing priorities and gives preference among selected projects to:</p> <p>Projects serving the lowest income tenants,</p> <p>Projects obligated to serve qualified tenants for the longest periods,</p> <p>Projects which are in qualified census tracts and the development of which contributes to a concerted community revitalization plan.</p> <p>And</p> <p>Includes the following selection criteria: Project location</p> <p>Housing needs characteristics Project characteristics Applicant characteristics</p> <p>Tenant populations with special housing needs Public housing waiting lists</p> <p>Tenant populations of individuals with children the energy efficiency of projects</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>This is not applicable to this section since HTF is not CDBG. All HTF information and manuals are available through the NHD website and/or by contacting the HTF administrator.</p>

State of Nevada Non-Entitlement

<p>Describe the process for awarding funds to State recipients and how the State will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>This is not applicable to this section since HTF is not ESG. Please see an above section for allocation and distribution details.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>This is not applicable to this section since HTF is not HOPWA. HTF does not utilize sponsors as HOPWA does, HTF utilizes investors and partners.</p> <p>HOPWA only. Not applicable to CDBG. However, projects from non-profits can be sponsored by a city/county for CDBG funding. A two-year Request for Applications (RFA) will be issued mid-late 2022 for agencies interested in providing HOPWA services to clients. The RFA/RFQ will be widely released and available to interested parties such as grassroots faith-based and other community-based organizations.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>The State of Nevada will use HTF funds exclusively for the construction of rental housing to meet the priority housing needs as identified by the State’s Consolidated plan. In accordance with HTF regulations, up to 10% of the State’s HTF allocation will be used for administration.</p> <p>NHD has elected not to allow HTF funds to be used for homeownership activities given the extremely low-income targeting requirements of the program.</p> <p>NHD will not permit the refinancing of existing debt with HTF.</p>

State of Nevada Non-Entitlement

<p>Describe threshold factors and grant size limits.</p>	<p>Threshold factors are mainly based on the amount of funding the State has for the project and how many projects are successful in obtaining Low Income Housing Tax Credits.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The State will measure its progress, consistent with the State's goals established in the Consolidated Plan. These "Housing Priorities" include the increased availability of rental housing for ELI and VLI households and improving housing accessibility and safety. It is currently anticipated that an additional 25 units will be added annually.</p>

State of Nevada Non-Entitlement

AP-35 Projects – (Optional)

Introduction:

NHD is currently in the middle of the competitive application process for AAHTF, HOME, and ESG for the rural communities and the HTF competitive application process statewide. NHD should have funding determinations by June 2022. HOME funds that have already been allocated to the PJs throughout the State will support new construction and rehabilitation of multifamily rental projects, homeowner down payment assistance and homeowner rehabilitation within the respective jurisdictions.

The projects below have been selected for the 2022 CDBG Program Year.

Projects

State of Nevada Non-Entitlement

#	Project Name
1	Public Works Desatoya Dr
2	Ron Woods-Family Resiliency Program
3	Grants Administration Project
4	Bell Ave Waterline Project
5	Parker/Stevens Ave Sewer Project
6	Fernley Depot Amenity Building/ADA Compliant Restroom
7	Fernley Main Street Beautification/Placemaking
8	Court St. Sidewalk ADA Compliance Project
9	Wastewater Treatment Headwall Project
10	Wells Main Street Retail Center
11	Woodhills Trail Feasibility Study
12	Douglas Food Closet Vehicle Purchase
13	Montello Exploratory Wells
14	Tuscarora Preliminary Engineering Report
15	Pioche Airport Road Phase 2
16	Rural Critical Home Repair Program
17	Baker GID Preliminary Engineering Report

Table 58 – Project Information

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

The funding priorities for HOME and HTF are to support new construction and rehabilitation of multifamily rental properties that support low-income households, special needs population and veterans. One obstacle in the rural communities is the rising costs of construction costs and availability of resources and manpower in the rural and geographically isolated communities.

HOME: As stated prior to this section, the HOME funds administered directly to non-entitled areas of the state prioritize funding new construction and rehabilitation of multifamily rental projects

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throughout rural areas of the State which also receive LIHTCs and a down payment assistance program. Prioritizing funding for multifamily projects that also receive LIHTC's increases the impact of the funding and often results in producing higher quality affordable housing with larger amounts of affordable units thus contributing the increase and maintenance of the affordable housing stock in Nevada.

HTF: Prioritizes funding projects reserving units for households earning 30% AMI or lower. These funds are crucial to meet the needs of Nevada's most vulnerable populations.

ESG: As stated above, the ESG funds prioritize programs in the rural areas of the State. Due to Nevada's geography the programs located in the rural areas of the State face extremely unique challenges which vary county to county. The distance between county and city services contributes to these issues. Rapid re-housing is a category that is prioritized as the largest number of people on the community que regularly fall under the rapid re-housing category.

State of Nevada Non-Entitlement

AP-38 Project Summary

Project Summary Information

HOME: The allocation for the Participating Jurisdictions in the State is

Clark County HOME Consortium-\$759,738

city of Henderson-\$182,769

city of Las Vegas-\$371,138

Washoe County HOME Consortium-\$268,156

Non-entitled area of the State-\$1,118,199

All PJs and NHD prioritizes funding for multifamily new construction and rehabilitation of rental properties. NHD will be able to expand on other projects receiving funding when the competitive application process is over and funding in the rural areas is determined.

HTF: NHD prioritizes funding the multifamily new construction and rehabilitation of rental properties receiving LIHTC. Details on the specific projects will be available after the competitive application process closes and the distribution is determined.

ESG: NHD prioritizes rapid re-housing programs, rural programs and NHD funds all ESG eligible categories. More details regarding the specific distribution will be available after the competitive application process.

NHD is currently in the middle of the competitive application process for AAHTF, HOME, and ESG for the rural communities and the HTF competitive application process statewide. NHD should have funding determinations by June 2022. HOME funds that have already been allocated to the PJ's throughout the State will support new construction and rehabilitation of multifamily rental projects, homeowner down payment assistance and homeowner rehabilitation within the respective jurisdictions.

The following CDBG projects have been selected for the 2021 Program Year.

1	Project Name	Carson City Public Works Desatoya Drive
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Streets & sidewalks

State of Nevada Non-Entitlement

	Funding	CDBG: \$380,000
	Description	The purpose of this project is for the design and construction of ADA compliant sidewalks and ramps along Desatoya Dr.
	Target Date	06/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 1,600 households, including 1,165 LMI households.
	Location Description	Carson City
	Planned Activities	The purpose of this project is for the design and construction of ADA compliant sidewalks and ramps along Desatoya Dr.
2	Project Name	Ron Woods-Family Resiliency Program
	Goals Supported	Public Service
	Needs Addressed	Non-homeless services
	Funding	CDBG: \$35,000
	Description	The Family Resiliency Project focuses on addressing an unmet need in the community intergenerational trauma. This program will work to be the "hub" to assist in processing how all these services can be linked and supplementing individual needs as a means of preventing future crisis. The long-term result is to build healthier families, which will then translate to a healthier community.
	Target Date	06/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 300 LMI households.
	Location Description	Carson City

State of Nevada Non-Entitlement

	Planned Activities	The Family Resiliency Project focuses on addressing an unmet need in the community intergenerational trauma. This program will work to be the "hub" to assist in processing how all these services can be linked and supplementing individual needs as a means of preventing future crisis. The long-term result is to build healthier families, which will then translate to a healthier community.
3	Project Name	Grant Management Project
	Goals Supported	Community Planning and Capacity Building
	Needs Addressed	Training & technical assistance
	Funding	CDBG\$ 50,907
	Description	The purpose of this project is for the planning and grant management of the Carson City projects
	Target Date	06/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Administration. No direct benefit
	Location Description	Carson City
	Planned Activities	The purpose of this project is for the planning and grant management of the Carson City projects
4	Project Name	Bell Ave Waterline Project
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Water/Sewer
	Funding	CDBG: \$274,350

State of Nevada Non-Entitlement

	Description	The purpose of the proposed project is to replace 67-year-old cast iron water main pipeline, part of which goes down to four and six inch in diameter in some places, with a new twelve-inch PVC water main on the portion of Bell Ave. Upgrading the current Bell Ave pipeline will create a better looped water system in this part of Ely and improve low water pressure issues on the south end of Bell Ave.
	Target Date	06/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 22 persons, including 18 LMI persons.
	Location Description	City of Ely
	Planned Activities	The purpose of the proposed project is to replace 67-year-old cast iron water main pipeline, part of which goes down to four and six inch in diameter in some places, with a new twelve-inch PVC water main on the portion of Bell Ave. Upgrading the current Bell Ave pipeline will create a better looped water system in this part of Ely and improve low water pressure issues on the south end of Bell Ave.
5	Project Name	Parker/Stevens Ave Sewer Project
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Water/Sewer
	Funding	CDBG: \$373,350
	Description	The purpose of the project is the replacement of the 100 plus year-old vitrified clay sewer main pipeline, along with manholes, from the Central Ely Area; the project will begin on Parker Ave heading south one block to Ruby St, then continue one block east on Ruby St. and finally turn north on Stevens Ave for one block.
	Target Date	06/30/2024

State of Nevada Non-Entitlement

	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 43 persons, including 32 LMI persons.
	Location Description	City of Ely
	Planned Activities	The purpose of the project is the replacement of the 100 plus year-old vitrified clay sewer main pipeline, along with manholes, from the Central Ely Area; the project will begin on Parker Ave heading south one block to Ruby St, then continue one block east on Ruby St. and finally turn north on Stevens Ave for one block.
6	Project Name	Fernley Depot Amenity Building/ADA Compliant Restroom
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Parks/recreations/youth & senior (community) facilities
	Funding	CDBG: \$395,000
	Description	The purpose of this project is to construct an amenity building and ADA complaint restroom at the Fernley Depot. The project would include the completion of site design/plan, construction, grading, utility installation, and landscaping.
	Target Date	06/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 3,590 households, including 1,915 LMI households.
	Location Description	City of Fernley
	Planned Activities	The purpose of this project is to construct an amenity building and ADA complaint restroom at the Fernley Depot. The project would include the completion of site design/plan, construction, grading, utility installation, and landscaping.
7	Project Name	Fernley Main Street Beautification/Placemaking

State of Nevada Non-Entitlement

	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Streets and Sidewalks
	Funding	CDBG: \$100,00
	Description	The purpose of this project is to contract with a landscaping design firm to create an initial overall concept plan this plan will identify and develop individual site plans and final schematic design. This project will also include the purchase of streetscape items such as benches, bicycle racks, planters, and shade structures.
	Target Date	06/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 3,950 households, including 1,915 LMI households.
	Location Description	City of Fernley
	Planned Activities	The purpose of this project is to contract with a landscaping design firm to create an initial overall concept plan this plan will identify and develop individual site plans and final schematic design. This project will also include the purchase of streetscape items such as benches, bicycle racks, planters, and shade structures.
8	Project Name	Court St. Sidewalk ADA Compliance Project
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Street and Sidewalks
	Funding	CDBG: \$405,045
	Description	The purpose of this project is to reconstruct a portion of Court Street to include paving, striping, curb, gutter, sidewalk, and other ancillary improvements associate with the project.
	Target Date	06/30/2024

State of Nevada Non-Entitlement

	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 500 households, including 385 LMI households.
	Location Description	City of Fallon
	Planned Activities	The purpose of this project is to reconstruct a portion of Court Street to include paving, striping, curb, gutter, sidewalk, and other ancillary improvements associate with the project.
9	Project Name	Wells Wastewater Treatment Headwall
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Water/sewer
	Funding	CDBG: \$260,000
	Description	The purpose of this project is to build a specific conveyor system to remove non-biodegradable materials from the Wells ponds.
	Target Date	06/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 1,063 households, including 652 LMI households.
	Location Description	City of Wells
	Planned Activities	The purpose of this project is to build a specific conveyor system to remove non-biodegradable materials from the Wells ponds.
10	Project Name	Wells Main Street Retail Center
	Goals Supported	Community Stabilization/Development
	Needs Addressed	Strategic Acquisition and clearance
	Funding	CDBG: \$150,000

State of Nevada Non-Entitlement

	Description	The purpose of this project is to help acquire a vacant downtown motel and convert it into a retail center for entrepreneurs in Wells.
	Target Date	06/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 1,063 households, including 652 LMI households.
	Location Description	City of Wells
	Planned Activities	The purpose of this project is to help acquire a vacant downtown motel and convert it into a retail center for entrepreneurs in Wells.
11	Project Name	Woodhills Trails Feasibility Study
	Goals Supported	Community Planning and Capacity Building
	Needs Addressed	Environmental/Cleanup
	Funding	CDBG: \$80,000
	Description	The purpose of the project is to hire a consultant to complete a feasibility study for the Woodhills trail design.
	Target Date	06/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 1,063 households, including 652 LMI households.
	Location Description	City of Wells
	Planned Activities	The purpose of the project is to hire a consultant to complete a feasibility study for the Woodhills trail design.
12	Project Name	Douglas Food Closet Vehicle Purchase
	Goals Supported	Public Services
	Needs Addressed	Health & Safety

State of Nevada Non-Entitlement

	Funding	CDBG: \$110,000
	Description	The purpose of this project is for the Douglas Food Closet to purchase to new vehicles; these vehicles will replace the 15-20-year vehicles now is circulation. The vehicles will be used to glean food from over ten locations and host food distribution throughout Douglas County.
	Target Date	06/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 649 households, including 649 LMI households.
	Location Description	Douglas County
	Planned Activities	The purpose of this project is for the Douglas Food Closet to purchase to new vehicles; these vehicles will replace the 15-20-year vehicles now is circulation. The vehicles will be used to glean food from over ten locations and host food distribution throughout Douglas County.
13	Project Name	Montello Exploratory Wells
	Goals Supported	Community Planning and Capacity Building
	Needs Addressed	Water/sewer
	Funding	CDBG: \$85,000
	Description	The purpose of this project is to hire a civil engineer, hydrogeologist, surveyor, and driller to conduct a site investigation of the Montello area for a possible municipal well.
	Target Date	06/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 1,300 households, including 875 LMI households

State of Nevada Non-Entitlement

	Location Description	Elko County
	Planned Activities	The purpose of this project is to hire a civil engineer, hydrogeologist, surveyor, and driller to conduct a site investigation of the Montello area for a possible municipal well.
14	Project Name	Tuscarora Preliminary Engineering Report
	Goals Supported	Community Planning and Capacity Building
	Needs Addressed	Water/sewer
	Funding	CDBG: \$65,000
	Description	The purpose of this project is to hire a civil engineer to complete the PER. The PER would lay the groundwork for what areas of Tuscarora water system needs to be addressed, the timeline of when those problems must be resolved, and aid in creating future fiscally responsible projects for the system.
	Target Date	06/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 280 households, including 155 LMI households
	Location Description	Elko County
	Planned Activities	The purpose of this project is to hire a civil engineer to complete the PER. The PER would lay the groundwork for what areas of Tuscarora water system needs to be addressed, the timeline of when those problems must be resolved, and aid in creating future fiscally responsible projects for the system.
15	Project Name	Pioche Airport Road Phase II
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Streets and Sidewalks
	Funding	CDBG: \$800,000

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	Description	The purpose of this project is to complete the Pioche Airport Road project. The first phase of this project was awarded in 2020. The project will be for the curb, gutters, and sidewalks on both sides of the street.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 570 households, including 345 LMI households
	Location Description	Lincoln County
	Planned Activities	The purpose of this project is to complete the Pioche Airport Road project. The first phase of this project was awarded in 2020. The project will be for the curb, gutters, and sidewalks on both sides of the street.
16	Project Name	Rural Critical Home Repair Program
	Goals Supported	Affordable Housing
	Needs Addressed	Provide housing assistance
	Funding	CDBG: \$90,000
	Description	The purpose of this project is to provide critical home repairs to qualifying low-income households. All repairs are provided at zero cost to the homeowners. The most common repairs include HVAC systems, plumbing systems, and accessibility modifications.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 7 households, including 7 LMI households
	Location Description	Nye County

State of Nevada Non-Entitlement

	Planned Activities	The purpose of this project is to provide critical home repairs to qualifying low-income households. All repairs are provided at zero cost to the homeowners. The most common repairs include HVAC systems, plumbing systems, and accessibility modifications.
17	Project Name	Baker GID Preliminary Engineering Report
	Goals Supported	Community Planning and Capacity Building
	Needs Addressed	Water/sewer
	Funding	CDBG: \$75,000
	Description	The purpose of this project is to hire a consultant to complete a PER. The PER will develop a new sewer/water system in an area of future development in Baker. The PER will help determine the cost and design of the new sewer/water system.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit an estimated 30 households, including 30 LMI households
	Location Description	White Pine County
	Planned Activities	The purpose of this project is to hire a consultant to complete a PER. The PER will develop a new sewer/water system in an area of future development in Baker. The PER will help determine the cost and design of the new sewer/water system.

State of Nevada Non-Entitlement

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

This is not an activity that the State of Nevada supports currently.

Available Grant Amounts

This is not an activity that the State of Nevada supports currently

Acceptance process of applications

This is not an activity that the State of Nevada supports currently

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the State allow units of general local government to carry out community revitalization strategies?

Yes.

State’s Process and Criteria for approving local government revitalization strategies

CDBG supports planning and capacity building for community and regional projects to help revitalize their communities and regions. The plans must define strategies and next steps required to accomplish goals of the plan. This process helps communities/regions identify key individuals and/or groups best qualified to implement each activity and goal. The community planning process creates buy-in from residents.

All program funding contributes directly or indirectly to community revitalization efforts (i.e. housing rehabilitation, public facilities/public infrastructure). ESG and HOPWA funds support housing and services for individuals who are vulnerable, thereby contributing to community revitalization by helping ensure safe living environments for all.

HOME and HTF contribute directly or indirectly to government revitalization strategies. These funds can provide new construction and rehabilitation to multifamily rental projects, homeowner rehabilitation and homebuyer assistance.

AP-50 Geographic Distribution – 91.320(f)

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

Geographic Distribution

State of Nevada Non-Entitlement

Target Area	Percentage of Funds
Non-Entitlement Jurisdictions	
Non-Entitlement Plus Carson City	100
Statewide	

Table 3 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

CDGB: The State of Nevada does not have Geographic Distribution of funds, other than to LMI/non-entitlements areas.

HOME: The HOME funds are allocated to all Participating Jurisdictions (PJ's) in the State. The State has decided to allocate the HOME funds based on population to ensure that each Nevadan receives an equitable amount of funding. If the State were to only distribute HOME funds in the non-entitled areas, they would receive approximately several times the amount of funding that other PJs receive. Therefore, the State takes into consideration all the HOME funds coming into the State and distributes the State funds based on a population formula. Ten percent of the award is used for administration of the grant.

The allocation for other Participating Jurisdictions in the State

Clark County HOME Consortium-\$759,738

city of Henderson-\$182,769

city of Las Vegas-\$371,138

Washoe County HOME Consortium-\$268,156

Non-entitled area of the State-\$1,118,199

PI received within each jurisdiction will be allocated back to the respective PJ in the subsequent year's funding agreement. Old PI, EN, and/or recaptured funds remaining from previous funding years originally slotted for certain PJs or non-entitlement areas can be opened up through the normal application process for projects statewide. In the non-entitlement areas, NHD will facilitate a competitive application. In the event that older funds are released for statewide applications, these applications will go through the same competitive application process. HOME funding priority goes to projects that are awarded LIHTCs.

HTF: NHD prioritizes funding the multifamily new construction and rehabilitation of rental properties receiving LIHTC. NHD allows statewide access to these funds as to reach all populations at 30% AMI and lower throughout Nevada. HTF funding priority goes to projects that are awarded LIHTCs.

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ESG: As stated above, the ESG funds prioritize programs in the rural areas of the State. Due to Nevada’s geography the programs located in the rural areas of the State face extremely unique challenges which vary county to county. The distance between county and city services contributes to these issues. Rapid re-housing is a category that is prioritized as the largest number of people in the community que regularly fall under the rapid re-housing category.

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

The State of Nevada’s HOME program funds all Participating Jurisdictions as State recipients. The remaining counties (non-entitlement areas) will be funded directly through applications received by the NHD.

NHD does not target areas for the HOME program, as the amount of funding received by NHD for rural areas generally requires the partnership of a developer who is involved in the tax credit program. NHD does have two set-asides in its tax credit program to ensure that the rural areas can access the funds. This generally results in two or three construction or rehabilitation projects. All residents in the non-entitled area do have access to a HOME funded down payment assistance program.

Nevada’s Account for Affordable Housing Trust Funds (AAHTF) will also be used in these jurisdictions for weatherization and rental assistance.

CDBG: The CDBG program has recommended a housing rehabilitation project for funding. Eleven (11) owner-occupied homes would be rehabilitated to help ensure the life of the home and increase accessibility to and inside the home.

HTF: National Housing Trust Funds will be allocated statewide based on applications submitted. HTF will mirror the HOME program and NHD will not target specific areas of the state for funding. NHD will require that each eligible recipient certify that housing assisted with HTF funds will comply with HTF requirements.

One Year Goals for the Number of Households to be Supported	
Homeless	190
Non-Homeless	0
Special-Needs	0
Total	190

Table 4 - One Year Goals for Affordable Housing by Support Requirement

State of Nevada Non-Entitlement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	
The Production of New Units	10
Rehab of Existing Units	10
Acquisition of Existing Units	12
Total	32

Table 5 - One Year Goals for Affordable Housing by Support Type

Discussion:

NHD resources have remained steady with the Trust Fund allocation, it is still its intention to keep funding and leveraging funding with other programs to ensure that NHD is utilizing the HOME and HTF funds to the greatest extent possible.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

This section pertains to grantees who also oversee public housing authority activities. These activities are administered by Nevada Rural Housing Authority (NRHA), Reno Housing Authority (RHA) and the Southern Nevada Regional Housing Authority (SNRHA). Each Authority is responsible for submitting an Annual Action Plan. Please refer to the following links for additional information regarding actions that will occur at Public Housing Authorities in the State of Nevada.

NRHA: <http://nvrural.org/about-us/resources/>

The Housing Authority of the City of Reno: <http://www.renoha.org>

Southern Nevada HA: <http://www.snrha.org/agency-plans.htm>

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

NHD will continue to provide State funds to Nevada Rural Housing Authority (NRHA) to subsidize the Section 8 Housing Choice Voucher program; and provide assistance to senior and disabled populations on the wait list. Additional funds have been allocated to NRHA for a security deposit program that is provided to Housing Choice Voucher tenants needing financial assistance to obtain housing.

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State funds that are passed through to local jurisdictions may be used in the same manner in northern and southern Nevada, but it is the decision of the local Consortiums to support local housing authorities with their allocation of funds.

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

In rural Nevada the Nevada Rural Housing Authority oversees the “Home at Last” program for 1st-time homebuyers and provides up to 4% of the loan amount for down payment assistance. In addition, the Housing Authority oversees the Mortgage Credit Certificate program which provides a dollar-for-dollar federal income tax credit equal to 20% or 50% of the interest paid on a mortgage loan. The tax credit is provided to the homebuyer every year; and annual savings is estimated to average \$2,000 per year. Finally, the Housing Authority works with eligible Housing Choice Voucher recipients to set aside funding to become 1st-time homebuyers.

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

The PHA is not troubled.

Discussion:

No additional discussion.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

The NHD ESG Program Manager works very closely with the local Continuum of Care to ensure funds are targeted to the most vulnerable homeless and at-risk of homelessness clients. In rural Nevada the ESG Program and the Rural Nevada Continuum of Care (RNCOC) developed joint Written Standards and Performance Standards/Outcome Measures which will help with local efforts to end homelessness for the chronically homeless, homeless veterans and their families, and homeless families with children. Some of the ESG sub-recipients are also recipients of HUD Homeless funding through the RNCOC, and programs are managed in a way to ensure that homeless clients are placed in the most appropriate program which will best meet their needs.

NHD will also provide AAHTF to the local Veteran's Resource Center (VRC) to assist veterans and their families with rental assistance until appropriate documents are obtained and they can access SSVF funding. As the VRC is working with the veteran they will also contact the Veteran's Administration to see if the veteran can access a VASH housing voucher. If advised that the veteran is a potential client for a VASH voucher, the VRC will engage Nevada Rural Housing Authority to obtain assistance with the housing eligibility requirements of the VASH voucher program. If the VASH Voucher program does not work out, the Housing Authority will then utilize AAHTF funds allocated by NHD to provide

Tenant-Based Rental Assistance subsidies until such time that a Housing Choice Voucher becomes available.

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

Although the state is not a jurisdiction. NHD is working closely with the RNCOC to ensure the sharing of mutual goals. Shelters and rapid re-housing programs are in high demand and are thus priorities for ESG funding. NHD grant managers also participated in developing the RNCOC strategic plan in which NHD is taking on several responsibilities to alleviate workload from the agencies in the RNCOC. An example of this is that NHD along with one other agencies in the RNCOC will be facilitating the RNCOC monitoring, a task that previously was the sole responsibility of the agencies within the RNCOC.

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

NHD does provide ESG funds for outreach to homeless providers. NHD requires agencies to engage homeless persons within a community so that they have access to available resources through Homeless Connect activities, veteran outreach functions, and by engaging households who have children in the programs at local schools. A number of communities have created a coalition of agencies, including social services agencies, hospitals, police, fire, and mental health providers, who are meeting monthly or quarterly in order to identify the most frequent users of community emergency services. Additionally, they collaborate in shared case management to meet the most urgent needs of the individuals identified. Clients are then engaged and are provided access to available housing and services. Many ESG sub-recipients also receive other HUD Homeless funding and act as lead agencies for this process.

A number of rural ESG sub-recipients are also the local Coordinated Entry Lead Agency and are working with community providers to access available programs and services for homeless clients. As part of the coordinated entry process, agencies complete an assessment in the Homeless Management Information System (HMIS) database which will provide information on the client's vulnerability. As part of the process clients are referred to Nevada Rural Housing Authority to see if they are eligible to receive a limited number of Tenant-Based Rental Assistance vouchers funded with AAHTF. If accepted, the client will receive up to 24 months of rental subsidy and will be "fast-tracked" into the Housing Choice Voucher program once a voucher is available. The Housing Authority has made the homeless population a priority to receive assistance in their HCV program as part of the coordinated entry process.

Addressing the emergency shelter and transitional housing needs of homeless persons

NHD continues to provide allocations to rural emergency and domestic violence shelters since communities have indicated that there is still a need for these types of programs. In communities that do not have access to shelters, ESG and AAHTF pay for motel vouchers so that homeless individuals and families have access to a safe and secure place to stay. Shelters provide case management to clients residing in the shelter, or who are accessing services offered by the provider, and will issue referrals to transitional and permanent housing programs. NHD will allocate no more than 60% of its annual allocation to emergency shelter and essential services activities, as mandated by program regulations. It is anticipated that 300 homeless persons will have access to emergency and domestic violence shelters supported through the NHD's ESG program.

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

The Rural Nevada Continuum of Care has developed a Coordinated Entry process that requires lead agencies to utilize the VI-SPDAT assessment tool to determine the most vulnerable residents. Applicants who are “harder to serve” will score higher on the VI-SPDAT and will receive priority access to available housing and mainstream resources. Agencies with staff trained in SOAR practices will assist clients in applying for Social Security Disability.

Agencies are encouraged to reduce lengths of homelessness episodes, and new and returned entries into homelessness. Recipients of ESG and CoC funds shall also be required to increase jobs, income and self-sufficiency of program participants, and shall be measured annually to ensure that these objectives are met.

The State ESG Program has also encouraged agencies to increase the number of veterans provided access to permanent housing, and to increase the number of families with access to rapid rehousing and homeless prevention assistance.

Funding for case management to ensure the long-term stability of program participants will be provided with ESG.

Finally, Coordinated Entry Lead Agencies will facilitate access for homeless individuals and families to available affordable housing units. Databases such as the one located at NVHousingSearch.org offer free access to a rental database that matches units with the needs of the clients. Case managers are able to access a portal for social services agencies that provides information about landlords who

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have asked to be connected to agencies working with special needs groups such as veterans, the frail and elderly, the physically disabled and more.

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.

Service providers in local communities are working closely with each other to ensure low-income individuals and families avoid becoming homeless. Communities have implemented informal and formal Memorandums of Understanding with local jails, health care facilities, mental health providers, Division of Child and Family Services (DCFS), Child Protective Services, (CPS) schools, and other facilities and programs so that providers are engaged when a homeless or at-risk of homeless person or family has been identified.

Community Coalition meetings are held throughout the year as the forum to develop protocols to ensure the homeless and low-income households have access to programs and services, including housing if available. Participants include local hospital staff, Sheriff's deputies, Fire Department Emergency management Systems staff, emergency shelter staff, behavioral health, family resource centers, and public guardians. The coalitions work together to identify the most vulnerable residents that are repeatedly using emergency services without a long-term plan.

Homeless liaisons at local school districts are also working closely with providers to help families gain access to housing and supportive services. Community meetings have identified the need for at-risk of homelessness assistance. Agencies will utilize funding sources such as ESG and AAHTF to insure individual and families at most risk of homelessness are assisted.

Discussion

NHD encouraged communities to prioritize rapid re-housing activities.

AP-70 HOPWA Goals – 91.320(k)(4)

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	26
Tenant-based rental assistance	32

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One-year goals for the number of households to be provided housing through the use of HOPWA for:	
Helping eligible households secure safe and affordable housing, either standalone or in conjunction with Tenant-based rental assistance.	25
Total	93

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

The State’s strategy to remove barriers to affordable housing are shown in the Table AP-75.1, below.

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.

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Table AP-75.1			
Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
Promote homeownership and rental opportunities in high opportunity areas	<p>Moderate to high levels of segregation</p> <p>Access to low poverty areas</p> <p>Insufficient affordable housing in a range of unit sizes</p> <p>Black, Pacific Islander, American Indian, and Hispanic households have disproportionate rates of housing problems</p> <p>Discriminatory patterns in Lending</p>	<p>Segregation</p> <p>R/ECAPs</p> <p>Disproportionate Housing Need</p>	<p>Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG, HOME, and HTF funds. Over the next five (5) years:</p> <p>40 rental units added Annual</p> <p>Annual Goal: 10 rental units added</p> <p>50 rental units rehabilitated</p> <p>Annual Goal: 10 rental units rehabilitated</p> <p>60 households receive homeowner down payment assistance (DPA)</p> <p>Annual Goal: 12 households receive DPA</p> <p>Homeowner rehabilitation programs will no longer be funded through HOME funds but with AAHTF.</p> <p>Track activities annually in the State's PER.</p>
Promote community and service provider knowledge of ADA laws	Insufficient accessible affordable housing	Disability and Access	Increase outreach and education for housing providers in the state, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability

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Table AP-75.1			
Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
			advocate organizations. Record activities annually.
Enhance community services in R/ECAPs	Access to low poverty areas Access to job proximity Access to school proficiency	Disparities in Access to Opportunity	Encourage increased public services and public investment in poverty areas in the State. Record activities annually.
Increase outreach and education for housing providers in the state	Moderate to high levels of segregation Access to low poverty areas and concentrations of poverty Moderate to high levels of segregation Discriminatory patterns in Lending	Fair Housing Enforcement and Outreach	<p>Continue to raise awareness and educate buyers through enhanced home purchase and credit education, through seminars, webinars and other outreach efforts. Record activities annually.</p> <p>Enhance outreach and education to units of local government, as well as housing consumers, as it relates to affirmatively furthering fair housing and the duty to affirmatively further fair housing. Record activities annually.</p> <p>Conduct outreach and education of prospective housing consumers on how to acquire and keep good credit, in partnership with local civic organizations (i.e., churches, schools, etc.) Record activities annually.</p> <p>Continue to partner with the Silver State Fair Housing Council, conduct outreach and education with managers of new and existing rental housing complexes. Record activities annually.</p>

Introduction:

Other actions of the four HUD formula programs in Nevada are specific to each program. See narrative for discussion on each program's actions.

Actions planned to address obstacles to meeting underserved needs

Agencies continue to have challenges keeping homeless and at-risk of homelessness clients engaged in their journey to long-term independence and stability. Funding for case managers is strained due to efforts to address homeless and chronically homelessness issues in rural areas and finding staff with the skills to work with this population is challenging in smaller communities.

Although improved, case managers working with homeless clients continue to have difficulties with engaging clients in the process of becoming stabilized and self-sufficient. Program participants are challenged to find employment with a “living wage” that allows a household to meet its basic needs.

Finally, agencies have agreed to implement “Housing First” or “Low Barrier” programs. However, case managers feel pressure to meet State and CoC performance measures and are struggling to find enough resources such as permanent housing subsidies that will ensure the long-term success of program participants. Limited funding means that clients need to be exited quickly, yet the limited availability of permanent housing subsidies means clients are in jeopardy of exiting without sufficient resources to ensure long term housing stability.

To help address these issues, the State will continue to partner with the local Continuums of Care to help with the training and development of case managers on how to engage their clients. This will continue to be a topic that will be discussed during technical meetings which take place every other month.

Social Services agencies that are also ESG recipients have developed workforce programs and are working closely with Northern Nevada Development Authority, a coalition of community and business leaders that promotes education and marketing, to identify workforce and educational needs across northern Nevada. Workforce case managers will work with individuals to identify the barriers keeping them from stable employment. The case manager will also connect participants to educational opportunities to help develop work skills. In addition, participants will receive assistance with the creation of resumes, and soft skill training such as interviews, how to dress, and other employment etiquette.

These same ESG recipients are also Community Action Agencies that conduct monthly meetings to identify households that are facing poverty and homelessness. Members discuss the availability of resources and opportunities for indigent residents in an open forum format. Partnerships have been developed with emergency shelter providers, Salvation Army, JOIN, Job Connect, Voc-Rehab, Veterans Resource Centers, Aging and Disability Resource centers, and local food banks.

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The shortage of permanent housing subsidies is a more challenging issue to resolve, especially in rural Nevada. Fortunately, the Nevada Rural Housing Authority has members who participate in the Rural Continuum of Care and are very engaged in directing funds to homeless providers. They have agreed to prioritize the homeless to receive Housing Choice Vouchers (HCV) that are not only referred to them via Coordinated Entry Lead Agencies, but who are also on the HCV wait list. They will also receive additional State Account for Affordable Housing Trust Funds (AAHTF) for tenant-based rental assistance programs for the homeless, although it is likely that those resources will not be sufficient to cover all of the housing needs of rural participants.

Actions planned to foster and maintain affordable housing

The principal features for achieving the objectives of this strategy include:

Increasing the supply of standard, affordable rental housing through the rehabilitation of existing housing and the construction of new units;

Promoting home ownership opportunities through the acquisition and rehabilitation of housing, the construction of new single-family homes, and the provision of below market rate mortgage financing;

Preserving existing home ownership through the renovation of owner-occupied single-family homes;

Providing rental assistance to alleviate rental cost burden experienced by very low and low-income households;

Providing affordable housing opportunities designed to meet the needs of the elderly, people with disabilities, large families, and other special needs groups;

Addressing the needs of homeless individuals and homeless families through the provision of services and assistance to shelter operators;

Providing opportunities for nonprofit community organizations to develop and execute projects which benefit lower-income residents.

Actions planned to reduce lead-based paint hazards

HOME: NHD will continue to ensure that all housing projects funded with HOME funds will comply with the Federal guidelines regarding notification and abatement requirements.

CDBG: The Governor's Office of Economic Development: Rural Community Development/CDBG ensures that homes built prior to 1978 that are rehabilitated with CDBG funds are tested for lead-based paint hazard by the Rural Nevada Development Corporation (RNDC) staff. Any chipped, peeling, or flaking paint is tested with an XRF analyzer. If lead-based paint is present, the contractor is tasked with setting up proper containment areas during construction and with proper clean up. Any hazardous lead paint areas must be encapsulated. In some instances, the components, such as

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door and window frames, are replaced. Other times the peeling paint is scraped and peeled away, and a special paint is used to seal the area. One hundred percent of the homes rehabilitated with CDBG funds are LMI households.

HTF: NHD ensures that all units built prior to 1978 are tested. If HTF are used for new construction, lead-based hazards should be mitigated.

HOPWA: Grantee will be attending any trainings offered around lead-based paint hazards in 2022 and offered to project sponsors also.

Actions planned to reduce the number of poverty-level families

Nevada's anti-poverty strategy is based on helping families to move to economic self-sufficiency. Providing low-income households with assistance through various programs allows them to live in safe, decent, and affordable housing. This helps to provide a base for them to maintain employment, provides a nurturing environment to raise children, and helps them become a part of the community where they work.

The State of Nevada Department of Health and Human Services (HHS) is tasked with the responsibility of addressing poverty issues throughout the State of Nevada and oversees a number of programs that build capacity of social services networks in order to respond to the needs of Nevada's residents.

One key funding source in the battle to end poverty is the federal Community Services Block Grant (CSBG) Program. Approximately \$970,000 in CSBG funding provides Community Action Agencies (CAA's) in 15 rural counties with the ability to move lower-income, poverty-level, and homeless households into self-sufficiency. In 2016 CAA's will utilize this funding to:

Operate intake systems that assess individual and family needs and identify state and local services that can assist families to remove barriers to self-sufficiency.

Develop a network of relations with state agencies, local government agencies, non-profits, faith-based organizations, and local businesses to coordinate and deliver services to individuals and families.

Work on strengthening and expanding partnerships from year to year, as they add new services, increase proficiency in servicing clients, and participate in community coalitions.

Provide case management services to persons who are committed to attaining improved economic self-sufficiency. In most instances, case management involves coordinated services with multiple partner agencies.

Continue adopting a more client centered and driven service delivery model, including the development of self-sufficiency plans based on goals identified by program participants; and

Development of job fairs, which have resulted in a number of jobs offers to participants.

Other continued efforts to move low-income, poverty-level, and homeless households into self-sufficiency include improvements to transportation services that provide access to job training, employment opportunities, and counseling services. In addition, HHS administers funding for family resource centers, which are located throughout the state in most of the larger communities and provide a variety of support services to families who have lower incomes. The family resource centers, in conjunction with local social service offices, are generally the initial point of contact for many individuals and families who are seeking assistance.

Finally, NHD continues to fund projects that support housing and supportive programs. There are several nonprofit organizations in rural Nevada that have and continue to develop services and facilities to move very low-income and homeless persons to self-sufficiency. These efforts, along with programs provided by the RNCOC and other partner agencies, will have a direct impact on the number of families living in poverty.

Actions planned to develop institutional structure

The State of Nevada is committed to continuing its participation and coordination with federal, state, county, local agencies, and the private and nonprofit sectors in order to serve the needs of low-income individuals and families across Nevada. The Governor's Office of Economic Development, the Housing Division, and the Department of Health and Human Services collaborate with various entities to continually improve coordination.

The Governor's Office of Economic Development, Department of Business and Industry, and the Department of Health & Human Services all have individual institutional structures. Within each Office or Department, there are divisions that administer HUD programs. The Community Development Block Grant is in the Rural Community Development Division/CDBG of the Governor's Office of Economic Development. The HOME, ESG, HTF, and NSP programs are in the Nevada Housing Division of the Department of Business and Industry. The HOPWA program is in the Office of HIV, housed within the Division of Public and Behavioral Health of the Department of Health and Human Services, and under Community Health Services. Each Division has its institutional structure, as well.

HUD funds pass through to local governments and other entities that are eligible to receive HUD program funding. These entities, when funded, are part of the institutional structure for each program. The scope of the institutional structure is from the state level to those at the community level where projects are implemented and/or managed.

Actions to be taken in 2022 to enhance coordination and promote further development of that institutional structure include:

Continue supporting the creation of cross-jurisdiction economic development regions;

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Contract and/or collaborate with Silver State Fair Housing on outreach and training to NHD and CDBG grantees;

Annual training and technical assistance to non-entitlement communities in rural Nevada

Support efforts such as Strengthening Economies Together (SET) that strengthen collaboration in CDBG non-entitlement areas;

Participate in quarterly meetings with other funders to maximize limited resources (CDBG, USDA, EPA, other collaborative funders);

Continue (HOME) to work with the staff of the Low-Income Housing Tax Credit program to ensure that the HOME funds are used to leverage this program;

Continue staff support of the Rural Nevada Continuum of Care and through correspondence with the Northern Nevada CoC (RAH) and the Southern Nevada CoC.

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

Throughout the State of Nevada there exists an effective coordination effort between public and private housing and social services agencies. For example, in rural Nevada, members of the Rural Nevada Continuum of Care (RNCoC) include:

Staff from Nevada Rural Housing Authority, which oversees the Housing Choice Voucher and HUD VASH Voucher programs;

County social services agencies, a few who are also recipients of HUD Supportive Housing and Shelter + Care funds;

Staff from the State's Office of Mental Health which oversees a Shelter + Care program for mentally ill homeless;

Low-income housing and homeless developers; and

Staff from NHD. In northern and southern Nevada many of the same types of agencies participate in the local Continuum of Care initiatives.

In 2022, it is anticipated that efforts to continue coordination between public and private housing providers and social services agencies will include the following actions:

The Governor's Interagency Council on Homelessness will continue with implementation of its Strategic Planning Goals and Objectives. Working groups will include state, local and non-profit agencies from throughout Nevada, and the mission of the Council will be to address homeless needs throughout Nevada;

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The continuation of the State of Nevada's Division of Public and Behavioral Health's CABHI (Cooperative Agreements to Benefit Homeless Individuals for States) grant, which includes the implementation of the statewide plan to ensure sustained partnerships across public health and housing systems that will result in short- and long-term strategies to support individuals who experience chronic homelessness; and

Statewide Continuum of Care meetings will continue to be held throughout the year. Topics of discussion will include implementation of a statewide strategic plan to end homelessness; implementation of statewide performance measures for CoC and ESG programs; statewide discharge planning; implementation of a statewide Homeless Management Information System Lead agency; and other issues that affect homelessness at a statewide level.

Discussion:

All divisions work to increase collaboration between agencies and private entities in order to improve the quality of life for all Nevadans.

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Program Specific Requirements

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

Introduction:

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.

The years covered, for CDBG, that include this Annual Action Plan are: 2019, 2020, 2021.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(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
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2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

100.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

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

Nevada Housing Division does not have any other forms of investment being used beyond those identified in Section 92.205.

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:

HOME Program funds used for homebuyer assistance will be subject to recapture provisions in accordance with 24 CFR Part 92. Provisions are established as follows:

Upon sale of the property or transfer of title, the HOME investment should be recaptured from the net proceeds. Only in the case where net proceeds (sales price minus loan repayment and closing costs) are insufficient to recapture the full HOME investment plus enable the homeowner to recover the amount of the homeowner's down payment, principal payments, and any capital improvement investment, the HOME investment amount that must be recaptured may be reduced. The HOME investment amount may be reduced pro rata based on the time the homeowner has owned and occupied the unit measured against the required affordability period; except that the State's recapture provisions may not allow the homeowner to recover more than the amount of homeowner's down payment, principal payments, and any capital improvement investment. In order to ensure compliance with the recapture provisions, restrictions may be incorporated into each project Deed of Trust and Promissory Note and must be included into the signed written agreement. The restrictions are as follows:

The State (or state recipient) reserves the right of first refusal;

The property must be used as the purchaser's principal residence;

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No subleases are allowed;

HOME funds must be repaid upon sale of the property; and

In the event of foreclosure, all deed restrictions may be cancelled. A State recipient may also choose to recapture a portion of the equity as a local program option. However, recipients that select to recapture a portion of the equity must develop acceptable program guidelines and their Annual Plan will state recapture/resale provisions.

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:

HOME Program funds used for homebuyer assistance will be subject to recapture provisions in accordance with 24 CFR Part 92. Provisions are established as follows:

Upon sale of the property or transfer of title, the HOME investment should be recaptured from the net proceeds. Only in the case where net proceeds (sales price minus loan repayment and closing costs) are insufficient to recapture the full HOME investment plus enable the homeowner to recover the amount of the homeowner's down payment, principal payments, and any capital improvement investment, the HOME investment amount that must be recaptured may be reduced. The HOME investment amount may be reduced pro rata based on the time the homeowner has owned and occupied the unit measured against the required affordability period; except that the State's recapture provisions may not allow the homeowner to recover more than the amount of homeowner's down payment, principal payments, and any capital improvement investment. In order to ensure compliance with the recapture provisions, restrictions may be incorporated into each project Deed of Trust and Promissory Note and must be included in the signed written agreement. The restrictions are as follows:

The State (or state recipient) reserves the right of first refusal;

The property must be used as the purchaser's principal residence;

No subleases are allowed;

HOME funds must be repaid upon sale of the property; and

In the event of foreclosure, all deed restrictions may be cancelled. A State recipient may also choose to recapture a portion of the equity as a local program option. However, recipients that select to recapture a portion of the equity must develop acceptable program guidelines and their Annual Plan will state recapture/resale provisions.

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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:

Nevada Housing Division does not have plans to refinance existing debt secured by multi-family housing that is rehabilitated with HOME funds.

Emergency Solutions Grant (ESG)

Reference 91.320(k)(3)

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

Although State agencies are not required to develop written standards, the Division worked very closely with the Rural Nevada Continuum of Care to develop joint standards that help to align all homeless funded programs. A copy of the document is included in the written version of the State of Nevada' 2022 Annual Action Plan.

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

State ESG sub-recipients are required to participate in the local Continuum of Care Coordinated Entry system. In rural Nevada there are Coordinated Entry Lead Agencies located within the 15 rural counties, and a number of them are also recipients of ESG funding. Clark County is the lead agency for HMIS. NHD does not fund any other providers in southern Nevada, so participation is not necessary.

Lead agencies have agreed to accept the responsibility of screening homeless clients to determine eligibility for various programs and services that may be available either locally or statewide. Agencies utilize the HMIS system to complete the VI-SPDAT tool to ensure that the most vulnerable clients are given priority for receiving assistance.

A comprehensive referral form has been developed with other agencies in the community that provides services to clients. This referral form allows agencies, with permission from the applicant, to share information and assist in setting appointments. This referral process will ensure the applicant has made contact with other agencies before they leave the office. Included in the referral agencies are food pantries, emergency shelters, the McKinney-Vento school representatives, the Housing Authority for access to VASH Vouchers and vouchers funded with AAHTF, and the Dept. of Behavioral Health, which is the recipient of Shelter + Care vouchers for the homeless who suffer from mental illness. If programs are not available, the lead agency is responsible for maintaining a waiting list sorted by the score of the VI-SPDAT. Agencies enter the VI-SPDAT into HMIS for other agencies to review should the applicant present themselves in another community. The client is also provided a

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business card or other form that documents that the assessment has been completed and information entered into HMIS.

If a client is accepted into one of the housing programs the lead agency is responsible for gathering the required documents that may be needed, such as documentation of chronic homelessness, disability, etc. Although the lead agency is not responsible for providing ongoing case management services, many continue to work with the clients to ensure their long-term success.

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

ESG funds are passed through NHD and are allocated to city, county and non-profit organizations in rural Nevada through a competitive application. Due to limited number of providers in rural communities many government agencies retain funds to implement programs directly. In 2021, four (4) county social services agencies in rural Nevada received State ESG funds, along with four non-profit agencies that oversee two emergency shelters and two domestic violence shelters.

Due to the limited amount of funding, preference is given to agencies that are current recipients of ESG funds; can demonstrate successful implementation of their programs; and are actively helping to meet the objectives of NHD, HUD, and the local Continuum of Care. Preference is given to agencies that choose activities to help homeless and chronically homeless individuals and families to obtain and maintain shelter and housing. Past performance is reviewed as part of the rating and ranking process. NHD convenes an independent review panel to review all applications. The panel includes persons qualified to make decisions about programs and services offered to assist homeless and at-risk of homelessness persons. NHD staff presents the allocation information to the RNCOC governing board for approval. Sub-recipients will be chosen, and final allocations will be made, based on recommendations received for the RNCOC. As required by program regulations, NHD shall engage the RNCOC to ensure that ESG-funded activities chosen will address the goals and objectives of the CoC. State ESG funds have also been allocated to the city of Reno. Clark County receives funds as the State HMIS lead.

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.

This requirement does not apply to states, however, NHD requests that sub-recipients engage homeless or formerly homeless individuals when developing their program policies and criteria.

Describe performance standards for evaluating ESG.

The State works closely with local Continuum's of Care to develop performance outcomes for sub-recipients of State ESG funds. In rural Nevada performance outcomes were created jointly and are

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reflected in the “Rural Nevada Continuum of Care and State Emergency Solutions Grant Program Performance Evaluation Tool.” This document reflects goals, measures and expected outcomes for all projects funded through the CoC and State ESG-funded programs. The most recent version of the combined outcome measures are also available at:

<http://housing.nv.gov/uploadedFiles/housingnvgov/content/programs/ESG/2015RNCOandESGPerformanceEvaluation.pdf>

Housing Trust Fund (HTF)

Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to State agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter “N/A”.

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Eligible applicants include non-profit and for profit, sponsors, developers or owners of affordable housing. Priority funding goes to properties that secure LIHTCs.

b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Eligible recipients must submit a completed application including project narrative, experience of developer(s), project budget and timeline including other sources of funding, and population to be served and supportive or other services provided by the owner of the project.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Applicants will be evaluated on the amount and quality and supportive services provided, the efficiency of the development based on a per-unit cost, long-term viability of the project and on

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whether the developer has experience in delivering or operating housing designed to serve ELI households.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

NHD does not have a funding priority based on geographic diversity. HTFs are available statewide.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

NHD requires grantees to expend funds in the required timeframe indicated by HUD.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

While the State prioritizes supporting projects that will have some form of rental subsidy on the project, it is largely assumed that in order to serve households at 30% AMI and below that projects can only be viable if they come with project-based subsidy or some other form of rental assistance.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Currently, the State underwrites to the 30-year period.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Many of these projects are also competing for tax credits and thus are meeting stringent requirements for these needs as found in the States QAP.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

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The State expects that for the foreseeable future that all HTF applications will likely include tax credit funding which creates a significant contribution to the equity of the project. We will continue to favor projects that are able to leverage other funding sources, but it is difficult to find other sources that are able to be applied to projects serving ELI households.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low-Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

The State of Nevada has adopted the 2020 QAP per unit development subsidy for HTF investment.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to

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determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

- a. In addition, the rehabilitation standards must address each of the following:
- b. health and safety;
- c. major systems;
- d. lead-based paint;
- e. accessibility;
- f. disaster mitigation (where relevant);
- g. state and local codes,
- h. ordinances,
- i. and zoning requirements;
- j. Uniform Physical Condition Standards; and
- k. Capital Needs Assessments (if applicable).

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95% of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

11. Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

N/A

12. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's

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refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

N/A

Discussion:

The Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community and economic development needs. Beginning in 1974, the federal CDBG program is one of the longest continuously run programs at HUD. The CDBG program provides annual grants on a formula basis to 1,209 general units of local government and States.

The Rural Community & Economic Development Division of the Governor's Office of Economic Development administers the CDBG Program. The allocation from HUD for the State CDBG Program in Nevada for 2022 is \$3,421,222. Deducting \$168,424 for State Administration and \$34,213 for T.A., allowed \$2,735,798; an additional \$386,359 was recaptured and available to allocate for the 2022 grant cycle. The allocation recommendation meeting was held April 13th, 2022. Program year 2022 is the beginning of the next three-year period for Overall Benefit for LMI (70% minimum).