

Draft St. Joseph Allocation Plan 4.15.22

1. CONSULTATION

1.A. Summarize the consultation process [narrative]

Response: With assistance from our consulting partner, Homebase, the City of St. Joseph engaged with stakeholders in the community. In addition to work we conducted on an annual needs and gaps analysis, the City interviewed and circulated a questionnaire to key stakeholders, convened a focus group of Continuum of Care members, created a website to inform stakeholders and community members about HOME-ARP and to more easily gather feedback, and released a community-wide survey to receive feedback.

The local Continuum of Care (CoC) led a general needs assessment and gaps analysis for the homeless system of care and created an annual action plan to address priority gaps in the community. The CoC meets monthly and at each meeting receives reports on plan progress. The CoC's Executive Committee also meets monthly and at each meeting reviews the Action Plan and sets monthly goals. Since the City has been awarded HOME-ARP funding, we have consulted with the CoC on how best to use the more than \$1.3 million in HOME-ARP funding. Before filing the draft Allocation Plan, the City and Homebase met with the CoC to obtain feedback as the team finalized the draft Allocation Plan.

In addition to regularly consulting with the CoC, Homebase interviewed more than 10 key stakeholders who work throughout the City of St. Joseph. We expanded the organizations interviewed to include service providers and community-based organizations who do not traditionally work with the homeless system of care, but still serve the qualifying populations. The interviews enabled us to discuss not only the needs and gaps in the homeless system of care, but also to understand the broader needs of all qualifying populations in St. Joseph. The interviewees included organizations working within the homeless system of care, including CoC members, as well as city agencies, faith-based organizations, and community-based organizations.

The City also released a community-wide survey that was circulated through listservs, shared through nonprofit organizations, and promoted on the City's website. The survey allowed the City to differentiate responses from key stakeholders and the broader public. Respondents including people with lived expertise of homelessness, policymakers, members of the public, and people associated with local nonprofit or community-based organizations. An additional 13 nonprofit organizations shared their thoughts about the needs and gaps in St. Joseph and how the City could best use their HOME-ARP funds through the online survey and questionnaire. Their thoughts are shared in the consultant section of this Allocation Plan (below).

1.B. List of organizations consulted and summary of feedback:

Agency Name	Type of Organization	Method of Consultation	Feedback (where multiple persons responded from an agency, their comments have been summarized/combined)
Bartlett Center	Nonprofit organization providing services to low-income young families	1:1 interview	<p>Eligible Populations: There is a great deal of need for people on the brink, who are barely making it, whose lives are extremely fragile. They are just one paycheck away from homelessness. Many of the families they serve face hardships because of lack of childcare.</p> <p>Eligible Activities: Affordable housing and tenant-based rental assistance. Rental costs are skyrocketing.</p> <p>Supportive Services: childcare, mental health services, transportation</p> <p>Other comments: Greatest hope is that the money goes directly to the people who need it. Would like to ensure that some of the smaller nonprofits are getting support.</p>
Catholic Charities of Kansas City-St. Joseph (CoC member)	Nonprofit offering housing and supportive services for people who are homeless and at risk of homelessness	CoC meetings, Survey questionnaire	<p>Eligible Populations: People experiencing homelessness, at risk of homelessness and other qualifying populations.</p> <p>Eligible Activities: All eligible activities should receive some funding except, maybe non-congregate shelter.</p> <p>Supportive Services: Case management, childcare, education services, landlord/tenant liaison, legal services, life skills training, mental health services, outpatient health services, substance use treatment, transportation.</p> <p>Other comments: You need all the four activities to cover the wide range of homeless population that our community has. There is no cookie cutter approach to homelessness in which our clients go through. It is not a one size fits all approach and each situation is different, what works for one family might not work for the other; this is why it is important to have that multi-faucet approach to homelessness. When it comes to services for the city of St. Joseph, there is not one approach that is going to fix all. You have to be able to have that multi-faceted approach with all agencies working together for the clients (homeless population) that we serve. Each family or individual that is facing homelessness or that is homeless has their own</p>

			factors that have contributed to their homelessness. We have to address that with case mgt to fit the clients' needs to help them become stable. It is not a one size fits all approach and takes the community and area agencies working together to address this issue.
Community Action Partnership of Greater St. Joseph (CoC member)	Nonprofit that assists with resources in the community of St. Joseph and the surrounding area for low-income and homeless people	CoC meetings, Survey questionnaire	<p>Eligible Populations: All</p> <p>Eligible Activities: All of the activities should receive some of the funding.</p> <p>Supportive Services: All</p>
Community Missions Corporation (CoC member)	Nonprofit that offers housing and outreach services for homeless and chronically homeless people	CoC meetings, Survey questionnaire	<p>Eligible Populations: All</p> <p>Eligible Activities: All eligible activities should receive some funding.</p> <p>Supportive Services: Case management, life skills training, mental health services, outpatient health services, outreach services, services for special populations, short- and medium-term financial assistance for rent, substance use treatment, transportation, childcare, employment assistance, housing search and counseling, legal services.</p> <p>Other comments: There is an extreme need for housing opportunities We have several voucher programs that would allow us to house homeless individuals but the need of housing is much greater. With this population we have to be able to not only house them but give them support through intensive case management to ensure that they stay on the right path. If we just throw homeless individuals or chronic homeless individuals into a housing situation without the wraparound services nine out of 10 times they will fail and unfortunately lose the voucher in which they received.</p>
Continuum of Care St. Joseph and Andrew/Buchanan/Dekalb Counties	Continuum of Care	Special meeting to discuss HOME-ARP	<p>Eligible Populations: All.</p> <p>Eligible Activities: The CoC members expressed a strong need to increase affordable housing options in the area. They were interested in consideration of project-based affordable housing, which would help overcome the barrier of landlords being unwilling to rent to the qualifying populations. They also think there are many affordable housing options to explore in the region, including tiny home</p>

			<p>villages and renovations or rehabilitations of existing structures. They shared that although the bulk of the HOME-ARP funding should go to produce and/or preserve affordable housing, they thought that a smaller amount of resources should be set aside to fund supportive services, especially given that very few current funding streams are available to pay for supportive services.</p> <p>Supportive Services: While many of the supportive services covered through the HOME-ARP program would be helpful in the City of St. Joseph, they were most interested in seeing funds dedicated to case management, landlord mitigation/incentives, mental health and substance abuse services, and transportation assistance.</p> <p>Other comments: Several providers noted that finding safe, quality units to house individuals with vouchers was one of their greatest challenges. They noted that shelter is an ongoing issue in the community, but the greatest challenge has been finding shelter operations funding, not shelter units.</p>
Cornerstone of Care	Nonprofit helping to connect families to supports	Survey questionnaire	<p>Eligible Populations: People at risk of homelessness and people fleeing domestic violence.</p> <p>Eligible Activities: All of the eligible activities except for non-congregate shelter should receive some of the funding.</p> <p>Supportive Services: Mental health services, short- and medium-term financial assistance for rent, substance use treatment, transportation.</p>
Family Guidance Center (CoC member)	Behavioral Health Care for Individuals and Families	CoC meetings Survey questionnaire	<p>Eligible Populations: People experiencing homelessness and people at risk of homelessness</p> <p>Eligible Activities: All of the funding toward tenant-based rental assistance and housing preservation</p> <p>Supportive Services: Childcare, credit repair, financial assistance, short- and medium-term financial assistance for rent</p>
Grace House	Nonprofit that serves single and multi families in need with clothing, shoes jackets	Survey questionnaire	<p>Eligible Populations: All</p> <p>Eligible Activities: All of the activities should receive some finding.</p>

	household items small appliances linens blankets. We see homeless starting over parents, seniors and the disabled members of our community.		<p>Supportive Services: Employment assistance, food, housing search, landlord/tenant liaison, life skills training, mental health services, outreach services, short- and medium-term financial assistance for rent, substance use treatment</p> <p>Other comments: The old Colgan center should be turned into a rehab service where medical interns can run all at no pay plus doctors from Mosaic could donate a few hours by per week to help the residents. They would sign themselves in to stay till they were clean or sober. No phones no social media just classes work on property no leaving learn a skill trade to have a job when they leave.</p>
Housing Authority of the City of St. Joseph	Local Housing Authority – manage HUD vouchers, VASH vouchers, and PHA for low-income families	1:1 interview, Survey questionnaire	<p>Eligible Populations: All, but especially people experiencing homelessness, at risk of homelessness, or those fleeing domestic violence – really important to continue to meet their needs.</p> <p>Eligible Activities: All of the activities should receive some funding, but greatest need is the insufficient housing stock in the city. Need to create housing stock with owners and landlords willing to rent to this population.</p> <p>Supportive Services: Case management, employment assistance, landlord/tenant liaison life skills training, mental health services, outreach services, transportation. Really need the services that can be targeted at people who obtain access to the housing so that they can maintain the housing over time.</p> <p>Other comments: The greatest fear is that we keep providing resources for shelter and it continues not to work. Would like to see us replicate what is happening well in other communities.</p>
Interserv (CoC member)	Nonprofit providing housing assistance and services to people experiencing or at risk of homelessness	CoC meetings, Survey questionnaire	<p>Eligible Populations: All, but prioritize people experiencing homelessness, who have the greatest current need.</p> <p>Eligible Activities: All activities are needed.</p> <p>Supportive Services: All of the services are needed, but prioritize case management, mental health services, substance use treatment, employment assistance, financial assistance, housing search, landlord/tenant liaison life skills training, outpatient health services, outreach services, services for special populations, short- and medium-term financial assistance for rent, substance use treatment, transportation.</p> <p>Other comments: Currently there are zero sustainable shelters in Buchanan County. It has been piece-meal by local non-profits ever since the Salvation Army decided to</p>

			<p>limit their services for families. It is imperative that we work to provide services and opportunities for all who are experiencing a housing crisis. focusing not only on the physical housing structures, but placing a focus on services that provide physical and mental readiness for housing and housing stability. Getting a home and not having the skills or capacity to maintain the housing situation only leads to short-term housing and compounds the individuals future of housing opportunity and stability. There is currently a lot of funding available for Veterans and DV that is not available to address other homeless populations. We have no individual emergency shelter options. We also have people at risk of homelessness that do not fit in current funding criteria. While all of the services noted need some funding, those in most dire need are mental health and substance abuse treatment and case management. These need to be funded well and immediately to begin to address the homeless issue in the community.</p>
<p>Legal Aid of Western Missouri (CoC member)</p>		<p>1:1 interview</p>	<p>Eligible Populations:</p> <p>Eligible Activities:</p> <p>Supportive Services:</p> <p>Other comments:</p>
<p>Independent outreach worker, interpreter, journalist</p>	<p>Staff of St. Joseph School District, First Steps (nonprofit for young families) and privately-owned media outlet</p>	<p>1:1 interview</p>	<p>Eligible Populations: All – Latinos in St. Joseph have very little access to services. There are no interpreters and few agency or organizational staff use Spanish. People who want health care are told that the doctor is bilingual, but they never get to the doctor because front desk staff don't speak Spanish. For the Latino population, there are people from Central American who are not literate in either English or Spanish when they arrive here. They are trapped because they don't have services, don't speak any language, and are not documented. They live in substandard housing, sometimes with no water, no heat, even no walls. But they don't complain. Much of the Latino population is living doubled up – sometimes three or four families in one home (she has a client who lives in a house with 34 others). These folks are the most vulnerable because all they have to do is make one mistake with another family and they are kicked out of the house. No rights, no protections.</p> <p>Eligible Activities: An affordable rental plan – with affordable housing and rental assistance. Would be especially helpful if there were resources to help people fix the homes where they live or for the landlords to fix the homes. There's also no shelter for families.</p>

			<p>Supportive Services: Childcare, employment assistance/job training, financial assistance, mental health services, outreach services (with people who are bilingual), substance use treatment, transportation</p> <p>Other comments: There is no system in St. Joseph to connect people who are non-English speakers to services. Many agencies provide the very minimum for immigrant populations, especially those whose members are not literate. Also need people who can communicate in languages other than English at the shelters. The Latino community isn't there because staff can't communicate with them. They know not to go there because they can't get the assistance that they need. There needs to be some effort put into building trust with the Latino community.</p>
Midland Empire Resources for Independent Living (MERIL)	Disability service organization with housing referral and other supportive services	1:2 interview	<p>Eligible Populations: All, but more to people at risk of homelessness or unstably housed.</p> <p>Eligible Activities: Need more lower-income housing for people with disabilities. There is not enough housing available unless people want to live in sub-standard housing. Need more housing that is ADA compliant. Also need more rental assistance. Don't think that the money should be used toward shelters.</p> <p>Supportive Services: Childcare, food, mental health services, substance use treatment, transportation</p> <p>Other comments: If you are looking at just the homelessness population, would prioritize supportive services. But the broader community of broader qualifying populations, would do more than just supportive services.</p>
Mosaic Life Care (CoC member)	Inpatient mental health unit of larger health system	CoC meetings, Survey questionnaire	<p>Eligible Populations: People experiencing or at risk of homelessness.</p> <p>Eligible Activities: All projects except tenant-based rental assistance should receive some funding.</p> <p>Supportive Services: Case management, life skills training, mental health services, short- and medium-term financial assistance for rent, substance use treatment, transportation.</p> <p>Other comments: The patients I work with often are hospitalized not just for mental health but because they are homeless. We need a homeless shelter in St. Joseph. The Crossing shutting down was a terrible idea. We need one for all women, not just the YWCA who only take the abused. Men have Haven & Juda House so women need</p>

			<p>priority. Also, two more group homes would be amazing as well. Currently there are only two group homes. An additional two would be really helpful for the disabled homeless population. There are many empty homes and that could be converted into a group home.</p>
NAACP	Non-profit agency serving St Joseph	1:3 interview	<p>Eligible Populations: People who are living on the streets, or are rent-deficit and face possible homelessness on a monthly basis. Additionally concerned about people exiting prison and youth who are homeless or couch surfing. These populations are fragile and are a large population in St Joseph.</p> <p>Eligible Activities: The priority is to create and preserve affordable housing, with some services. Would like to see services support housing access.</p> <p>Supportive Services: Key services needed in the community are childcare, outreach, mental health services (including medication access), employment assistance (especially for people coming out of prison), services for seniors, homeless youth, and people with criminal backgrounds, and transportation. People who are homeless or at risk need support to stay in housing.</p> <p>Other comments: We need group housing with staff on site and affordable, good housing. We would like to see them spread out across town, not all in one location. We have a lot of people coming out of prison, including women trying to reunite with their children. We want to make sure that funded projects are effective and accessible to those who most need it.</p>
Northwest Health Services (CoC member)	Health Clinics	Survey questionnaire	<p>Eligible Populations: People experiencing homelessness</p> <p>Eligible Activities: All of the funding should be used to produce or preserve affordable housing.</p> <p>Supportive Services: Case management services</p>
Noyes Home	Nonprofit caring for children	Survey questionnaire	<p>Eligible Populations: People experiencing homelessness</p> <p>Eligible Activities: All of the funding toward non-congregate shelter.</p> <p>Supportive Services: Employment assistance, food, legal services, transportation</p>

			<p>Other comments: The area where the shelter currently lies has a lot of open land ready to be developed. This population in the area fills these shelters quickly and we need ones not just for winter</p>
Progressive Community Services	Nonprofit organization providing housing and services to people with developmental disabilities	1:1 Interview	<p>Eligible Populations: All populations, as people with development disabilities can be found in all the qualifying populations.</p> <p>Eligible Activities: All should receive some funding, except not non-congregate shelter. Would like to see more resources toward producing or renovating affordable housing and rental assistance to help people with rent once those units are available.</p> <p>Supportive Services: Mental health services, substance use services, transportation is a HUGE need – especially to employment, financial assistance. The community doesn't have transportation at all hours, every day of the week, to all locations where people are employed. People need help getting to work when they have jobs during off hours or that are located in places where our current transportation system doesn't go to. Also for people with developmental disabilities, some need for door-to-door service. It is hard for some people to get to the bus – this can be a higher cost and unaffordable for people.</p> <p>Other comments: The community lost several residential housing facilities in the past few years, leaving 100 or more individuals without an affordable unit. Their waiting list for housing has grown considerably. Also, for many of the people they serve, there is a need for one-bedroom units. Would like to see any newly created affordable housing include many one-bedroom units.</p>
St. Joseph Department of Public Health	Local Public Agency	1:1 interview	<p>Eligible Populations: All four qualifying populations need assistance, but priority should be for homeless and at-risk populations</p> <p>Eligible Activities: Rental assistance is important. The United Way has Housing Stability Fund that helps with a lot of needs, it is pretty easy to run and helped so many people. It covers rent for 1-2 months at most, but also helps with back utilities, bus passes, deposits. St. Joseph cannot operate a non-congregate shelter without money, so although there is a need, it's not possible under the HOME-ARP program. Affordable housing and services to keep people successful is a high priority as well.</p> <p>Supportive Services: All services are needed, but especially employment assistance/job training, food, life skills training, housing search and counseling, mental health services, substance use treatment, and transportation.</p>

			<p>Other comments: Supportive services are possible keys to success and stability on their own. Right now, many are not easily accessible. . There is a big difference between nonprofits and service providers knowing what is available and knowing as a member of the public what is available, which might require outreach/case management. This project should have strong accountability built in- tracking services and outcomes.</p>
St. Joseph Habitat for Humanity	Nonprofit that provides affordable safe and decent homes for low-moderate income citizens	Survey questionnaire	<p>Eligible Populations: All</p> <p>Eligible Activities: All toward affordable housing</p> <p>Supportive Services: All eligible services are needed.</p> <p>Other comments: Biggest need is affordable home ownership to stabilize and improve neighborhoods and families Please fund Danny Gach and let him lead his ministry for the homelessness. Please find my social worker Larry Stewart, who knows this population and they trust him. Let Habitat help train some of these people through our HBI program teaching construction trades.</p>
St. Joseph Human Rights Commission	Commission established by ordinance to address human rights in the City of St. Joseph	1:1 interview	<p>Eligible Populations: All qualifying populations, except people fleeing domestic violence as there is already a strong sets of services in place in the community.</p> <p>Eligible Activities: Tenant-based rental assistance and the infrastructure for a non-congregate shelter would be the priority. Think the City should use other City funding to commit to ongoing operations of a shelter that is available for the general population that is publicly-run, not privately funded. Some funding toward affordable housing and supportive services, as well.</p> <p>Supportive Services: Employment assistance and job training, especially a high need in the immigrant community. Engineers and teachers from other countries are coming to St. Joseph and end up working at the pork plant. Also landlord tenant liaison, financial assistance, substance use treatment, and transportation.</p> <p>Would like to see resources to help retrain them. Also would like to see the city set up a central location where organizations can all offer services in one place that people can go to.</p> <p>Other comments: Transportation is a big issue – buses are underutilized and the City has no central transportation except the buses – it takes 2-3 hours to plan ahead</p>

			to get where you need to go. Uber costs too much. Downtown is walkable, but if North, So. E or W of downtown – food deserts. Downtown is where the city started and it blossomed. It’s landlocked with the river. That’s why so many homeless folks are downtown because that’s where all the services are.
St. Joseph Public Library	City services	Survey questionnaire	<p>Eligible Populations: People experiencing homelessness and people fleeing domestic violence.</p> <p>Eligible Activities: Non-congregate shelter and supportive services should both receive some of the funding.</p> <p>Supportive Services: Education services, employment assistance, food, mental health services, substance use treatment.</p>
St. Joseph Youth Alliance	Nonprofit organization that helps youth prepare for the future.	1:1 interview, Survey questionnaire	<p>Eligible Populations: All. Many youth are not considered homeless because they couch surf or are doubled up. We need to support them before they are put in dire circumstances that come with homelessness. But they often are not eligible for services because they don’t meet the HUD definition.</p> <p>Eligible Activities: All of the activities should receive some of the funding. But if they were to prioritize, given limited funding, more housing and more affordable housing – and supportive services. Youth often need help getting set up in an affordable unit, perhaps some initial support with security deposits, etc.</p> <p>Supportive Services: More case management, food, life skills training, mental health services, short-and medium-term financial assistance with rent, substance use treatment, transportation – transportation is necessary for youth who work during hours the transportation system isn’t running. They may work at minimum wage jobs and have to pay for uber to get home from work. Experience with shelter when it was up and running is that case management can get results, so more case management. Youth are also very food insecure. Help with food could be meaningful for youth.</p> <p>Other comments: Consider focusing on youth and young adults with majority of funding. If we can prevent some of these issues with this age group then we can be better off in the long run. Help stop the cycle before it starts. We have the shelter facilities, but no one to operate them, so not so useful having non-congregate shelter without operations – building the building is not sufficient. Please don’t leave youth out of the picture. There really are no places for youth to go in the current homeless</p>

			system of care to get shelter or housing. Greatest need in the community is actual housing. There is not enough affordable housing in the area at all.
Salvation Army (CoC member)	Shelter provider	CoC meetings	<p>Eligible Populations: Focus on single males experiencing homelessness, as there are no shelters or housing for them currently in St. Joseph</p> <p>Eligible Activities: Affordable housing. In St. Joe, there is a housing shortage. People get vouchers pretty fast but can't find anywhere to use them. We can get funding quickly (within 30 days), but it takes upwards of 60 days to find a landlord. It is even harder if they have a terrible rental history or criminal background. As well, St. Joseph's has a lot of really substandard property. It puts the whole community in a vulnerable position when properties are not safe and/or they are abandoned</p> <p>Supportive Services: Mental health services, We have a couple of providers who stay really booked so it's hard to get people in the system. Another big issue is transportation. We have no organizations that freely give out bus passes. We have to scramble to get people to appointments and with COVID no one wants to drive them in their cars. Life skills also are a big need.</p>
Social Welfare Board (CoC member)	Nonprofit that provides health care to the underserved living in poverty	CoC meetings, Survey questionnaire	<p>Eligible Populations: All populations except people fleeing domestic violence</p> <p>Eligible Activities: Each of the activities should receive some of the funding</p> <p>Supportive Services: Case management, housing search and counseling, legal services, services for special populations, substance use treatment</p>
Something Else Cabaret	Performing Arts Organization	Survey questionnaire	<p>Eligible Populations: All of the populations</p> <p>Eligible Activities: All eligible activities should receive some funding</p> <p>Supportive Services: Case management, childcare, education, employment assistance, food, mental health services, outpatient health services, short- and medium-term financial assistance for rent, transportation.</p> <p>Other comments:</p>
United Way (CoC member)		CoC meetings and 1:1 interview	<p>Eligible Populations:</p> <p>Eligible Activities:</p>

			<p>Supportive Services:</p> <p>Other comments:</p>
Young at Heart	Nonprofit organizations that provides services to those 60 years and older and their caregivers	Survey questionnaire, 1:1 interview	<p>Eligible Populations: All</p> <p>Eligible Activities: All eligible activities should receive some funding, especially affordable housing and supportive services.</p> <p>Supportive Services: Case management, financial assistance, housing search, legal services, mental health services, short- and medium-term financial assistance for rent, substance use treatment, employment assistance, life skills training, outpatient health services.</p> <p>Other comments: The greatest needs in the older adult community are for home-based meals, mental health services, and home repairs – both for older adults who own their own homes and for landlords to spend bringing homes up to a higher standard. Many older adults don't have the resources for home repairs and are living in sub-standard housing because of it.</p>
YWCA St. Joseph (CoC member)	Nonprofit organization striving to Eliminate racism and empower women.	CoC meetings, 1:1 interview, Survey questionnaire	<p>Eligible Populations: All</p> <p>Eligible Activities: All activities should receive some funding except for non-congregate shelter (not sufficient without operating funds).</p> <p>Supportive Services: Case management, childcare, employment assistance, mental health services, short- and medium-term financial assistance for rent, substance use treatment, education services, food, legal services.</p> <p>Other comments: Childcare assistance is often overlooked. State pay does not cover the full cost of childcare and low-income families often can't afford to cover the balance. Without access to quality care, low-income families have to either forgo employment opportunities or leave their children in potentially unsafe situations. There is also an unmet need for affordable childcare provided during non-traditional work hours such as evenings, overnights, and weekends People's basic needs are not being met in Saint Joseph Missouri. Until the most basic of needs are met, such as food, shelter, and proper healthcare, homelessness will continue to rise, and money will have been wasted. People do not want a "free ride". They want to be self-</p>

			sufficient. I work with this population in our community daily, and unmet basic needs are the root of the problem.
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DRAFT

2. PUBLIC PARTICIPATION

2.A. What are City of St. Joseph’s “reasonable notice and opportunity to comment” standards for plan amendments in its current citizen participation plan?

Response: The City of St. Joseph’s Citizen Participation Plan (CPP) provides clear steps for amendments. The CPP encourages citizen participation in general. The process for amendments outlined in the CPP requires the City to publish a notice in the local St Joseph News-Press. It also requires that the amendments be distributed to St Joseph Public Libraries and Rolling Hills Library and making it available online at www.stjosephmo.gov.

The CPP also commits the City to consider any comments or views of citizens received in writing or orally at public hearings, if any, when preparing amendments, including the Allocation Plan. To obtain citizen feedback, the CPP requires that the City provide 30 days to comment on the draft Allocation Plan before submitting a final one to HUD. As is required under the HOME-ARP notification, the CPP requires the City to provide a summary of citizen comments or views, and a summary of any comments or views that are not accepted and the reasons why.

In addition to following the CPP, the City of St. Joseph went beyond the requirements and solicited public comment in advance of posting the draft Allocation Plan. During that time, the City gathered public feedback about how best to use the HOME-ARP funding and incorporated public feedback in the decision on how to use the HOME-ARP funding in the draft Allocation Plan. The City then posted the draft Allocation Plan that included public recommendations and solicited another round of public feedback and held a public hearing, as described below.

2.B. Describe the public participation process

2.B.i. Public comment period start date: March 22, 2022

2.B.ii Posting Draft Allocation Plan date: April 15, 2022

2.B.iii. Public comment period end date: May 17, 2022

2.B.iv. Public hearing date: May 3, 2022

2.B.v. Narrative description of public participation process:

Response: The City of St. Joseph established a separate webpage focused on the HOME-ARP funding opportunity. Posted on the webpage is information about the HOME-ARP funding opportunity and materials about the process that were prepared by HUD, as well as materials the City developed.

The website launched on Tuesday March 22, 2022, to include the public voice in the development of the draft Allocation Plan. The City shared the webpage through social media, announced its availability to local media, and circulated the link through our local network of partner organizations and agencies, asking them to advertise the website widely.

Prior to posting the Allocation Plan draft, the City developed a questionnaire to solicit comment from the public. The questionnaire was made available on the City’s HOME-ARP webpage to complete online (through Survey Monkey), as well as in hard copy that could be mailed to the City or brought in-person to the City. The questionnaire provided information about the amount of HOME-ARP funding allocated to the City and background information on the qualifying populations and eligible activities that HOME-ARP is intended to fund. With the background information and context provided, we asked the public to share their opinions about who would best be served by HOME-ARP funds (from amongst the qualifying populations) and which eligible activities were most needed in the community.

Subsequently, on **April 15, 2022**, the City officially released the draft Allocation Plan. We posted the Plan prominently on the City's website and promoted it on our social media, with local media, as well as promoted it with our local network of partner organizations and agencies. We also published a notice in the local St Joseph News-Press and distributed the draft Allocation Plan to libraries, as required by our Citizen Participation Plan.

On **April 15th**, the City also provided a new opportunity to solicit public comment in response to the draft Allocation Plan. Like the initial questionnaire, the public could provide their comments online (through Survey Monkey), by a hard copy, or through a dedicated email for a thirty-day period through **May 17, 2022** per the City of St. Joseph's Citizen Participation Plan.

More than two weeks later, the City held a **public hearing** on Tuesday May 3, 2022. The two-hour meeting included presentations by the City and its consultant, Homebase. We provided background information about HOME-ARP funding, qualifying populations, eligible activities, and the needs assessment and gaps analysis. We presented the draft Allocation Plan and gave ample opportunity for people to provide comments verbally, share their thoughts and provide comments to a dedicated email or through the online public comment survey.

2.B.v. Describe any efforts to broaden public participation:

Response: While the HOME-ARP funding is slated to address homelessness, the City promoted the webpage, opportunity for public comment, and the public hearing far beyond the homeless system of care. We asked all City agencies to promote the webpage, questionnaire and public hearing announcement with their constituents, partner organizations, on their social media, and with their local media contacts. We did similar outreach to announce the posting and public comment for the draft Allocation Plan. This included the local Continuum of Care sending it out to their full listserv with a breadth of community stakeholders.

In the past, the City usually receives approximately no more than 100 responses to surveys and questionnaires when seeking input on the local homeless system of care. When we asked for public comment *in advance* of drafting the Allocation Plan, we received over 100 responses in the first two days. By the time the draft Allocation Plan was posted on April 15, 2022, we had received more than 250 general public comments.

2.B.vi. Summarize the comments and recommendations received through the public participation process:

Response:

Public comment during **the planning** for the draft Allocation Plan:

During the planning and drafting stage, the City of St. Joseph sought public comment through a questionnaire. By the time we closed the site to public comment in advance of posting the draft Allocation Plan (on April 15, 2022), we had received 251 individual responses. A summary of the responses to the questionnaire are below:

We asked respondents what group of people they most closely represented: people experiencing homelessness (7%), policymakers (<1%), nonprofit or community-based organizations (23%), or the general public (69%).

We explained that the City of St. Joseph was slated to receive \$1,337,926 in federal HOME-ARP resources. We shared with them the qualifying populations and asked which, if any, of the qualifying populations the City should prioritize. The responses are ranked below in order of most votes (people could choose more than one option):

- The City should prioritize each of the qualifying populations (56%)
- The City should prioritize people experiencing homelessness (32%)
- The City should prioritize people fleeing domestic violence (24%)
- The City should prioritize people at risk of homelessness (22%)
- The City should prioritize other populations at greatest risk of housing instability (17%)

We also sought their input on the four primary eligible activities, asking them to share which of the activities the City of St. Joseph should spend the HOME-ARP funding on. The responses are ranked below in order of most votes:

- 82% of respondents thought producing or preserving affordable housing should receive some funding, while 6% said it should receive no funding and 11% said it should receive all the funding.
- 81% thought tenant-based rental assistance should receive some funding, while 17% said it should receive no funding and 3% said it should receive all the funding.
- 71% thought non-congregate shelter should receive some funding, while 21% said it should receive no funding and 8% said it should receive all the funding.
- 87% thought supportive services should receive some funding, while 9% said it should receive no funding and 5% said it should receive all the funding.

2.B.vii. Summarize any comments or recommendations not accepted and state the reasons why:

The City of St. Joseph solicited feedback in advance of drafting and posting the Allocation Plan. As noted above, we received over 250 comments. We relied on those comments to craft the draft Allocation Plan.

Feedback from public participants and consultants included a number of comments/recommendations that were considered and not included in the proposed draft Allocation Plan. Below is a summary of those comments and the stated reasons why the recommendations are not included in the draft Allocation Plan.

Recommendations to fund all eligible activities for all qualifying populations: A number of public participants who initially shared their thoughts while the City was developing the draft Allocation Plan indicated that they believed that the City should use its funding across all of the eligible activities and for all of the qualifying populations. More than half of respondents felt that all populations deserved help. Many commenters felt that covering all the qualifying populations would help ensure that the City was able to help the most people need. Examples of comments include:

“They all need help. There are resources available in our community, but the need is too great for those resources to help everyone.”

“The truth is all of these populations are highly vulnerable. Unfortunately, until our City has the means to help with wrap around services, we will continue to serve the same people over and over again. If we focus on all these populations, we will be able to help a variety of people instead of just the same people over and over again.”

“There are so many struggling people on the streets of Saint Joseph like myself and my boyfriend and there are not enough resources to help them come up and out of poverty or make it easy for them to find or fund stable secure housing in this city.”

“All are important and people in our community that are in need should be considered for the assistance that can be provided with these funds.”

Reasons for not funding all eligible activities as some requested in the Allocation Plan:

Existing funding sources are sorely insufficient to fund production or preservation of affordable housing; therefore, utilizing HOME-ARP funding for this eligible activity fills the highest priority need that only HOME-ARP funding can. Spreading the money equally across all eligible activities would not dedicate sufficient HOME-ARP funds to be utilized as effectively to accomplish a meaningful difference.

With only \$1,377,993 million, the City wants to maximize the funding to ensure that the most significant unmet gap in the system can be filled. Currently, the City not only has limited funding to be used toward affordable housing, it also has sub-standard housing and many vacant buildings. Furthermore, in the past two years, a number of residential facilities have shut down, leaving over 100 individuals without affordable units. Dedicating HOME-ARP funds forward affordable housing can go a long way to fill an important gap and need in St. Joseph.

Recommendations to fund tenant-based rental assistance: Very few of the consultant stakeholders that we interviewed or solicited input from identified Tenant-Based Rental Assistance (TBRA) as needed in the City of St. Joseph. Only 3% of public survey respondents believed that TBRA should get all of the HOME-ARP funding. However, more than 80% of survey respondents shared that some of the funding should go toward rental assistance. Other commenters noted that there are already local programs that provide rental assistance. Comments from respondents in support of funding rental assistance included:

“Some people are able to find a place to live but struggle with making ends meet and therefore might need some assistance. Security deposits are often the main barrier to renting.”

“I have seen several tenants that have had to deal with crappy housing, all because they believe it is all they can get. Landlords sometimes take advantage of the clients.”

“Rental assistance should be available due to high rent and low wages.”

“Households with low incomes are often unable to meet all of their basic needs. Providing tenant-based rental assistance allows them to better help themselves.”

Reasons for not including tenant-based rental assistance recommendations in the Allocation Plan:

Numerous existing and upcoming funding sources within the community are eligible and sufficient to fund Tenant-Based Rental Assistance; therefore, utilizing HOME-ARP funding for this eligible activity is not the most effective use of HOME-ARP funding and would not fill a gap within the City of St Joseph.

There are likely to continue to be resources for TBRA as well. The City of St. Joseph and partners received an influx of federal resources to provide rental assistance under other parts of the ARP and the CARES Acts. The Housing Authority has Mainstream Vouchers. In addition, there are regular annual Continuum of Care

Program and Emergency Solutions Grant Program funds, as well as HOME and HCV funds, that support TBRA.

Homeless system of care providers who are intimately familiar with the ongoing gaps and needs in the community did not identify TBRA as a significant need or priority for the HOME-ARP funds for the City of St. Joseph. For the public, TBRA was ranked as the lowest priority of the four primary eligible activities with only 3% of respondents recommending all HOME-ARP funding be used for TBRA.

Moreover, the City will be pursuing request for proposals that consider affordable housing from organizations or collaborations that can bundle the housing units with services, managed by a local organization. One of the biggest challenges in St. Joseph is identifying landlords willing to rent to the qualifying populations. If proposals are put forward to create affordable housing units with landlords and/or property managers who are accustomed to working with the qualifying populations, the HOME-ARP funds will be leveraged to remove some of the same barriers that can be addressed with TBRA.

The HOME-ARP funding is unique in its flexibility in terms of who it can serve and in terms of what it can be used on. Therefore, prioritizing it for a use that is already sufficiently covered with other one-time and renewable funding streams would not be prudent.

Recommendations to fund non-congregate shelter: Many consultant stakeholders whom we interviewed or heard from felt that it was difficult to support the idea of HOME-ARP funds used for non-congregate shelter when the funds cannot be used to operate the shelter. Public survey respondents also had mixed opinions about using HOME-ARP funds for infrastructure without funding for operations. While there were 8% of respondents who believed all the funding should go to non-congregate shelter, 21% of survey respondents thought that none of the HOME-ARP funds should be used toward non-congregate shelter. The range of comments included:

Expressions of Support:

“A shelter would help the homeless.”

“We have no shelter!!! Must I say more. We have a population that cant be housed due to multiple evictions, drug addiction, untreated mental health.”

“We need shelter for those homeless living in places not meant for habitation until they can be housed. If we plan and do things the right way, shelter will be needed on a much less intensive basis.”

Expressions of Concern:

“This would only be good if there is funding to maintain it later.”

“Seems this would be temporary & require a lot of maintenance, upkeep & continued, on-going funding.”

“Why purchase and build without a plan to sustain?”

“Without ongoing operating funds, I don't think this would be beneficial.”

Reasons for not including non-congregate shelter recommendations in the Allocation Plan:

While the City has not had a sustained, general population, year-round shelter for several years, and shelter is a key gap in this area, the challenge in sustaining shelter locally has been rooted in the cost of operating and overseeing shelter, not in finding space to house it. Even more, the City has already committed \$800,000 of APRA funds to a local non-profit for creation of a non-congregate shelter.

Recommendations to fund supportive services: The City of St. Joseph is proposing to use some of the HOME-ARP funding toward supportive services. The public participants who weighed in in advance of the draft Allocation Plan identified a need for supportive services in the City. The most common supportive services public participants and consulting organizations seek for qualifying populations were ongoing case management, mental health services, and transportation. Comments included thoughts such as:

“Supportive services help with those steps to help people get independent.

“Overall, these supportive services would be key into making any of these other options viable.”

“Once affordable housing is provided, information on how to be successful is necessary.”

“Can be used broadly to assist individuals in a variety of situations.”

Supportive services funding was included in the Allocation Plan

As stated above, the City of St. Joseph is dedicating a portion of the HOME-ARP funds toward supportive services, particularly focused on addressing the case management, mental health, and transportation issues that have been identified as creating significant housing stability barriers for people in the community.

3. NEEDS ASSESSMENT AND GAPS ANALYSIS

Optional Table: Housing Needs Inventory and Gaps Analysis (source via PIT, HIC, and consultation notes)

Homeless													
	Current Inventory (2022)					Homeless Population (2021)				Gaps Analysis			
	Family		Adults only		Vets	Family HH (at least 1 child)	Adults HH (w/o child)	Vets	Victims of DV	Family		Adults only	
	# Beds	# Units	# Beds	# Units	# Beds					# Beds	# Units	# Beds	# Units
Emergency Shelter	54	19	59	59	0								
Transitional Housing	61	21	26	26	0								
PSH	93	26	107	107	34								
Other Permanent Housing													
Sheltered Homeless						18	56	3	28				
Unsheltered Homeless						1	28	2	8				
Current Gap													

Optional Table: Housing Needs Inventory and Gaps Analysis (source via CHAS for St Joseph city, Missouri)

Non-Homeless			
	Current Inventory		Gaps Analysis
	# of Units	Level of Need # of Households	# of Households
Total Rental Units	11,575		
Rental Units Affordable to HH at 30% AMI (at risk of homelessness)	958		
Rental Units Affordable to HH at 50% AMI (other populations)			
0-30% AMI Renter HH w/ 1 or more severe housing problems (at risk of homelessness)		1,970	
30-50% AMI Renter HH w/ 1 or more severe housing problems (other populations)		1,385	
Current Gap			

3.A. Describe the size and demographic composition of qualifying populations within City of St. Joseph’s boundaries:

Response:

General population of the City of St. Joseph: The City of St. Joseph is located in Missouri in Buchanan County. According to the U.S. Census Bureau (ACS), the population in 2020 was 72,473. Seventy one percent of the population in 2020 were over 18 years old.

For 2015-2019, 13% of the City of St. Joseph residents under age 65 years had a disability and 15% were uninsured. In St. Joseph, 17% of residents lived below the federal poverty level (compared to only 13% in Buchanan County and 12% in the state of Missouri). The median value of an owner-occupied home was \$117,800 and the median gross rent in the community from 2015-2019 was \$785/ month.¹

People experiencing homelessness: The most recent St. Joseph PIT count (2021) identified 150 people experiencing homelessness, 118 of whom were living in shelters and 32 who were living unsheltered on the streets, in vehicles, or encampments. Adults over 18 years old comprised 70% of St. Joseph’s homeless population. Thirty-nine children under 18 years were identified as living in shelters, while 2 were living unsheltered. An additional number of young adults (aged between 18 and 24) also experienced homelessness (2 living sheltered, 2 living unsheltered). Children and young adults comprised 30% of the homeless population. At the same time, the number of children identified as experiencing homelessness in the St. Joseph Unified School District was 567 for the 2021/2022 academic year. Many of those children and youth do not meet the definition of homelessness for purposes of the PIT count but fall under the “other special populations” definition for HOME-ARP purposes.

In the City of St. Joseph 84.7% of residents identify as white, 5.6% of the general population identify as Black or African American, 1.5% identify as Asian, less than 1% identify as American Indian and Alaska Natives or Native Hawaiian, and people identifying as two or more races comprise 4.9% of the population.

An analysis of St. Joseph’s last official PIT count (2021) reveals distinctions in how different racial groups are represented among the homeless population compared to the general population. St. Joseph counted 150 people experiencing homelessness in January 2021. White individuals comprised only 75% of the homeless population (compared to 84.7% of the general population). At the same time, Black or African American individuals comprised 15% of the homeless population (compared to 5.6% of the general population) and people identifying as multiple races comprised 8% of the homeless population (compared to 4.9% of the general population). While white individuals are underrepresented in the homeless population, *Black or African Americans were almost 3 times more likely to be homeless than the general population.*

¹ [United States Census Bureau. Quick Facts](#), for United States, Missouri, Buchanan County, and the City of St. Joseph. U.S. Census Bureau.

At the last official PIT count (2021), 16% of St. Joseph homeless residents self-reported having a severe mental illness (SMI), while 25% reported experiencing a substance use disorder (SUD), and 24% identified as adult survivors of domestic violence.

According to March 2022 St. Joseph data as reflected in the Homeless Management Information System (HMIS):

- 113 households (consisting of 192 people) had been assessed for vulnerability and were listed on the CoC's by-name list as needing housing
- 78% 88 households (97 persons) were individuals without children and 22% (25 families with 95 people, 44 adults and 51 children) were families.
- 75 persons were chronically homeless and 7 were veterans.
- In March 2022, 6 households left homelessness (5 were placed in housing through coordinated entry and 1 obtained housing on their own).

The City of St. Joseph was able to obtain aggregate data from the HMIS vendor that looked at the period between August 1, 2018 and July 31, 2021. During that time, 2,009 unique individuals accessed homeless services. The majority of those individuals (1,109) came from households that included children or only children. Over 600 of all individuals in HMIS were children (60.6%). Seven percent (148) were young adults. Less than one percent identified as unaccompanied youth (4 people).

For that same time period, HMIS data shows that 988 (49%) of the individuals identified as female, with 1,010 (50%) identifying as male, there was no one in HMIS who identified as transgender. For the racial composition of people tracked in HMIS, 1,490 (74%) of those in HMIS identified as White, 328 (16%) identified as Black, 146 (7%) identified as multiple races, while all other races comprised 2.2% or less of the population in HMIS. Only 79 people (4%) of the total HMIS population, identified as Hispanic or Latino.

People at risk of homelessness:

For people at risk of homelessness, it is useful to understand the underlying circumstances of people living in the Greater St. Joseph area.

- The most recent data disclosing median gross rent indicates that the median gross rent in St. Joseph is \$785 per month.² For people to be able to afford that rent and contribute 30% or less of their household income toward housing, they would need to earn at least \$2,620 per household per month (or \$31,440 annual income) which requires more than \$15.00/hour wage. The minimum wage in Missouri for 2022 is \$11.15/hour.³ Minimum wage would have to increase by 35% for households earning minimum wage to afford local median rent.
- The rates of poverty in the area are higher than both state and national averages. More than 17% of individuals in the City of St. Joseph live below the federal poverty level

² [United States Census Bureau. Quick Facts](#), for the City of St. Joseph. U.S. Census Bureau.

³ [Missouri Minimum Wage 2022](#), Federal Department of Labor, 2022.

(FPL) (more than Buchanan County at 13%, the state of Missouri at 12% and the national average, at 11%).⁴

- More than 23% of all children under 18 years old in the City of St. Joseph live below the federal poverty level (3,803 out of 16,360). Similarly, 22% of Buchanan County children live below the FPL (4,197 out of 19,315 children under 18 years of age).⁵
- One of the most vital safety nets in the City of St. Joseph is the 211 Help Me Hotline.⁶ From 2019 to 2020, the percentage of callers needing housing or shelter assistance grew by 50% relative to need between 2019 and 2020.
- In Greater St. Joseph, income does not meet basic needs of many households. The rate of unemployment and local low paying jobs make it challenging for people with disabilities and older adults with fixed incomes to remain stably housed.⁷
- Low educational attainment throughout the area impacts access to income and creates employment barriers. Many households have a difficult time access educational programs that would help them obtain their high school diploma or GED or attend vocational school. Transportation is also a barrier to education both children and adults.⁸
- The lack of affordable and accessible quality childcare and early childhood programs also impact the Greater St. Joseph region. For employees and people seeking work outside of traditional work hours have the added challenge of lack of extended hour or overnight care for their children.⁹
- The area also lacks an abundance of available jobs. In Greater St. Joseph, many of the jobs that are available are either part-time or are full-time, but only offer low wages. Employment assistance for St. Joseph residents is limited to a number of employment agencies all located in only one part of the City.¹⁰
- For people with criminal backgrounds or with past eviction histories seeking employment or housing, there are even more limited options.¹¹
- The Greater St. Joseph area lacks affordable rental properties. The City of St Joseph's renter population whose income is 30-50% AMI are the greatest at risk population of being homeless due to substandard conditions of existing housing.
- There are few rental assistance programs that provide rental deposits, home repair assistance, utility assistance, or eviction defense/eviction expungement. Even for families who are able to obtain rental assistance, it is difficult to find property managers or landlords who accept housing vouchers.¹²

⁴ [United States Census Bureau, Quick Facts](#), for United States, Missouri, Buchanan County, and the City of St. Joseph. U.S. Census Bureau.

⁵ [Poverty Status in the Past 12 Months of Related Children under 18 Years by Family Type by Age of Related Children under 18 Years](#), City of St. Joseph, Missouri, Buchanan County, Missouri, U.S. Census Bureau, 2020 ACS 5-Year Estimated Tables.

⁶ [AFL-CIO 211 Help Me Hotline](#). Note that this data does NOT include AFL-CIO Northwest Community Services information, but 211 calls that are addressed by other 211 offices.

⁷ [2020 Community Needs Assessment](#), Community Action Partnership of Greater St. Joseph, September 2020.

⁸ [2020 Community Needs Assessment](#), Community Action Partnership of Greater St. Joseph, September 2020.

⁹ [2020 Community Needs Assessment](#), Community Action Partnership of Greater St. Joseph, September 2020.

¹⁰ [2020 Community Needs Assessment](#), Community Action Partnership of Greater St. Joseph, September 2020.

¹¹ [2020 Community Needs Assessment](#), Community Action Partnership of Greater St. Joseph, September 2020.

¹² [2020 Community Needs Assessment](#), Community Action Partnership of Greater St. Joseph, September 2020.

- Many households live in the Greater St. Joseph area are over income for SNAP benefits (formerly known as food stamps), but are still unable to afford the rising food costs. In many parts of Buchanan County (where the City of St. Joseph is located), there are food deserts, limited food pantry options, and transportation challenges that make it hard to access affordable food options.¹³
- A high percentage of individuals in the City of St. Joseph do not have health insurance (15% or one out of 6 individuals). Missouri was one of the states late to adopt Medicaid expansion and has been criticized for moving slow on implementation. While a ballot measure in 2021 directed the legislature to expand coverage, a circuit court case allowed the process to be put on hold.¹⁴ It was not until October 2021 that the federal government approved Medicaid essential services to over 270,000 households who were previously ineligible.¹⁵
- There are very limited treatment options in the area for people with mental health and substance use issues, particularly for people without health coverage.¹⁶

People fleeing domestic violence and human trafficking: Extrapolated from the CoC PIT count, there were 38 survivors of domestic violence at the time of the 2021 point-in-time count. In 2021, the local shelter dedicated to survivors of domestic violence received 1,143 unduplicated hotline calls requesting assistance and served 1,136 people throughout all their departments. The shelter provided a place for 247 persons and covered 8,410 nights of shelter. The racial composition of people who accessed domestic violence shelter services in 2021 were 78% white, 18% black, 2% Native American or Alaska Native, with all other races at or less than 1%. Like the general HMIS population, less than 14% identified as Hispanic/Latino.

According to the City of St. Joseph Police Department's website, the Police Department dispatched calls for service for the following domestic related incidents in 2018 and 2020:

- In 2018, 58% of their aggravated assault cases (280 for the year) were related to domestic violence (up from 47% the previous year)
- In 2020, the family crimes unit, which investigates child abuse and neglect, child custody interference, child fatalities, domestic assault, missing persons, protection order violations, sexual assault, and stalking and harassment, was assigned 1,000 of the total cases in the department for the year, comprising 31.6% of the assigned cases of the division.
- Calls for service to the Department in 2020 totaled 93,088, down from 106,547 in 2019.

As a result of the high need, a DV Advocate was embedded in the SJPD Family Crimes Division as of June 2020 and served 235 persons in the first 12 months of service.

¹³ [2020 Community Needs Assessment](#), Community Action Partnership of Greater St. Joseph, September 2020.

¹⁴ [The Status of Medicaid Expansion in Missouri and Implications for Coverage and Cost](#), Kaiser Family Foundation, June 2021.

¹⁵ [Missouri Medicaid Expansion Brings Quality Essential Health Coverage to More than 275,000 Missourians](#), HHS.gov (October 2021).

¹⁶ [2020 Community Needs Assessment](#), Community Action Partnership of Greater St. Joseph, September 2020.

Domestic violence is one of the leading causes of homelessness for women and their children. Although safe housing can provide a pathway to freedom, there are many barriers that prevent survivors from obtaining or maintaining safe and affordable housing. The majority of survivors experience financial abuse, meaning that they have not had access to the family finances, have been prohibited from working, or have had their credit scores destroyed by an abusive partner. Victims may also face discrimination in accessing or maintaining housing based on the violent or criminal actions of perpetrators. Additionally, victims are limited in the locations and types of housing they can access because of their unique safety and confidentiality needs, and many housing or homelessness assistance programs have barriers that inadvertently exclude victims of violence.

Human trafficking is also an issue in Missouri. National research indicates that many of the risk factors and vulnerabilities of human trafficking reflect circumstances faced by HOME-ARP qualifying populations, including caretaker substance use, involvement with the child welfare and/or foster care system, juvenile justice involvement, mental health concerns, runaway or homeless youth, underemployment or unemployment, and unstable housing, among many others. Two of the top five risks/vulnerabilities for human trafficking are homelessness and unstable housing.

The majority of statistics about human trafficking are state level data. In 2016, the National Human Trafficking Hotline (NHTH) logged 509 contacts (through telephone, texts, online chats, emails and webforms) in Missouri concerning human trafficking. Of those, 77 contacts were from victims or survivors of human trafficking. From among the total contacts, 141 cases of human trafficking were reported.

Only four years later, in 2020, the number of NHTH contacts had increased by more than 47% in Missouri. NHTH logged over 750 contacts concerning human trafficking. Of those, the percent of contacts from victims or survivors of trafficking was up almost 140% (with 185 contacts from victims or survivors). The number of actual reported cases logged at NHTH had increased over the four-year period by over 100% (with 267 cases of human trafficking reported in 2020).¹⁷

Of the 267 Missouri cases reported in 2020, 86% involved sex trafficking. 38% (101 of 267) of the cases involved minors. By gender, 88% of the cases (234 of 267) involved female victims or survivors, while 10% involved male victims or survivors. In 2019, the Polaris Project¹⁸ reported Missouri statewide data about human trafficking. They identified 426 victims and 117 traffickers during the calendar year.

Recent St. Joseph information is that there were two local human trafficking sting operations, with 6 arrests and 11 victims (one repeat). Information suggests that locally most of the victims were trafficked by someone they knew and trusted who used force, fraud, or coercion.

Other special populations:

¹⁷ [Missouri Spotlight, 2016-2020 National Human Trafficking Hotline Statistics.](#)

¹⁸ [Missouri Spotlight, 2019 National Human Trafficking Hotline Statistics.](#)

CHAS data indicate that between 2014 and 2018 (the most recent available data), there were 28,665 households in St Joseph city, Missouri. Of those households, roughly 26% had at least 1 of 4 housing problems. Households that had at least 1 of 4 *severe housing problems* comprised roughly 14% of the households. 11% percent of households were cost burdened (paying more than 50% of their income toward housing).

Children and youth are a population that faces homelessness, yet they are not always eligible for homelessness services for the CoC and other funding streams. Local community partners shared that approximately 567 school-aged students in the 2021/2022 academic year were facing homelessness under the McKinney-Vento Act in the St. Joseph school district. That group includes students and their families who are couch surfing, doubled up, or in other unstable housing situations that are not considered “homelessness” under may of the other HUD programs, but they do fall under the “other special populations” definition for HOME-ARP purposes.

3.B. Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Other families requiring services or housing assistance or to prevent homelessness; and
- Those at greatest risk of housing instability or in unstable housing situations.

Response:

Sheltered and unsheltered homeless populations

- The most recent St. Joseph PIT count (2021) identified 150 people experiencing homelessness, 118 of whom were living in shelters and 32 who were living unsheltered on the streets, in vehicles, or encampments.
 - 21% unsheltered (32) and 79% sheltered (118)
- Adults over 18 years old comprised 70% of St. Joseph’s homeless population.
- Children and young adults comprised 30% of the homeless population.
- Thirty-nine children under 18 years were identified as living in shelters, while 2 were living unsheltered.
- An additional number of young adults (aged between 18 and 24) also experienced homelessness (2 living sheltered, 2 living unsheltered).
- There is not one year-round emergency shelter that provides shelter for any individual or family seeking services. The few emergency shelters that do exist serve special populations only (e.g., people fleeing domestic violence).
- Permanent housing opportunities for people transitioning from the homeless system of care (from a shelter, RRH, or PSH) are difficult to find, especially units where landlords or property managers are willing to accept vouchers.

The unsheltered and sheltered homeless population in St. Joseph also suffer from mental health issues and/or substance abuse problems, which can hinder them from obtaining and retaining employment. They also tend to isolate themselves from the public, making it more challenging for provider outreach to make contact and assist individuals with case management.

People experiencing homelessness who rely on public transportation in St. Joseph have found transit difficult to navigate, with complicated bus routes and limited stops and time offerings. Buses are currently underutilized and there is no alternative centralized transportation system in the City. For people experiencing homelessness (and others), who need to connect with services, attend school/work/ trainings, or even check available housing listings, the inability to get around the City serves as barrier to accessing critical services that would help facilitate housing stability and permanency, and improve quality of life overall. Moreover, the hours of transportation are limited to traditional work hours, leaving people who work second or third shifts unable to use transportation to get to and from jobs. Most of the transportation lines focus toward downtown, so additional challenges exist for people who need public transportation to access jobs or services outside of the downtown area.

People experiencing homelessness in St. Joseph also report a lack of available jobs they can fairly compete for, with employment opportunities often going to individuals with more experience/skills. Jobs that are available are often part-time, below living wage, and evening/graveyard shifts. Having to juggle multiple low-wage jobs to make ends meet and cover basic costs, make the availability for extended hour or overnight childcare options all the more essential. In addition, employment agencies were reported to be clustered in one area of the City that is not central to “downtown,” where shelters are located, making it less accessible for people experiencing homelessness to obtain employment.

Additionally, many new immigrant populations live in St. Joseph, coming to the U.S as doctors, teachers, or engineers. Without direct experience and education in the U.S. and few employment opportunities or retraining, stakeholders shared that a large number of those individuals work at the local meat processing plant, not using their education, training, or skills.

Those currently housed populations at risk of homelessness

- In St. Joseph, 17% of residents lived below the federal poverty level (compared to only 13% in Buchanan County and 12% in the state of Missouri). The median value of an owner-occupied home was \$117,800 and the median gross rent in the community from 2015-2019 was \$785/ month.
- Persons/families who are at 30% or below AMI are more likely to be affected by severe housing problems, are forced to live in places with substandard conditions, and are more susceptible to falling into experiencing homelessness. According to 2014-2018 CHAS data, there are 4,030 households that have incomes between 0 and 30% of the area median income (AMI)— indicating that a substantial portion of the population could be considered at-risk of homelessness based on income alone.
- For people to be able to afford local rent and contribute 30% or less of their household income toward housing, they would need to earn at least \$2,620 per household/month. Earning an annual income of \$31,440 necessitates earning more than \$15.00/hour wage. Currently, the minimum wage in Missouri for 2022 is \$11.15/hour.¹⁹ Minimum wage

¹⁹ [Missouri Minimum Wage 2022](#), Federal Department of Labor, 2022.

would have to increase by 35% for households earning minimum wage to afford local median rent.

- Many formerly homeless and rapid re-housing assistance recipients live from paycheck to paycheck and often need more than twelve months of supportive services and financial assistance to secure decent safe housing that can remain affordable to them. Rent and utility assistance continue to be needed by low-income residents of St. Joseph.
- The lack of health insurance can be a key determinant of health status and housing instability along with inconsistent access to health care, which often results in illness, longer hospitalizations, and increased vulnerability to mental health conditions. In the most recent U.S. Census report for City of St. Joseph, more than 15% of the total population reported having no health insurance.²⁰
- The City of St Joseph has approximately 5,935 residents with disabilities – experiencing difficulties with hearing, vision, cognitive, ambulatory, self-care, and independent living. The City of St. Joseph also has an aging population of 1,632 residents who are over the age of 65 who have issues with mobility, hearing, vision, self-care and independent living, making it harder to maintain affordable housing. Low-income, elderly, and residents with a disability need more affordable, suitable housing to choose from. There are many elderly individuals and individuals with a disability who have fixed incomes that are not able to make ends meet. Many older adults do not have the resources for home repairs and are forced to live in sub-standard housing.
- The limitations of the local transportation system and impact the ability for people at risk of homelessness to retain employment and stable housing. For people at risk of homelessness, stable employment may be located outside the transportation systems reach and/or buses do not run during their evening or weekend working shifts. For families working late night shifts, they are often forced to resort to taking Ubers back home which are increasingly cost prohibitive for households that are already cost burdened and only earning minimum wage.
- St. Joseph has a concentration of homes with housing problems in Census Tract 3 and 21– tracts located in the older parts of the city. At the same time, there is more housing available to low-income families in the older parts of the city. In the central area of St Joseph, the housing stock appears to be older and with limited income, low- and moderate-income households are forced to live in sub-standard housing conditions.
- Census Bureau data indicate that 79% of owner-occupied housing and 71% of renter-occupied housing was built before 1979, signifying a great need for rehabilitation of the aging housing stock that have code violations and/or lead based paint hazards. Of the 1,537 homes with lead-based paint in St. Joseph, an estimated 50-75% are occupied by low- and moderate-income households.

Other families requiring services or housing assistance to prevent homelessness

- Housing costs can be a significant factor in housing instability and risk of homelessness. The more a household spends on their housing, the less income is left for other necessities. Eighty-one percent of the 2,123 low-income renter households who allocate

²⁰ [United States Census Bureau, Quick Facts](#), for United States, Missouri, Buchanan County, and the City of St. Joseph. U.S. Census Bureau.

more than half their income to housing costs, have incomes below 30% of AMI. Having such limited flexibility with how income can be spent, means making tough decisions on what does and ultimately does not get paid month to month. Missed payments are easy to accumulate and can significantly damage credits histories, further perpetuating a vicious cycle of housing loss and substandard housing options that is challenging to break free from. Once housing is lost, it is increasingly difficult for a family to get back on track.

- For families that do qualify for housing assistance, there are limited properties and landlords who are willing to accept housing vouchers in St. Joseph.
- Tenants who do not know their full tenant rights may be taken advantage of by landlords. They may not understand the eviction process and their rights during the process. Furthermore, some Central American families in St. Joseph are not literate in Spanish or English and are undocumented, leaving them more vulnerable and susceptible to living in substandard housing without advocating for themselves, out of fear that they will not have tenant protections and will be kicked out of the house and potentially reported.
- Households with insufficient financial literacy may not be able to plan for unexpected expenses. Community reports note that extreme temperatures place a burden on low- and moderate-income households as they experience higher utility costs and financial burden when unexpected repairs or replacement of equipment are needed.
- A lack of financial literacy may also lead to confusion in paying bills and a lack of understanding regarding the importance of a good credit history and the impact of missed payments on their credit history. Such confusion can lead to mismanagement of budgets, which can further exacerbate housing instability.
- Non-English speakers have difficulty navigating the public service systems that are in place to address housing instability. Latino people in St. Joseph have very little access to services. There are limited interpretive services available, a lack of program material available in native languages, and limited numbers of agency or organizational staff who speak Spanish. In addition, there may be reluctance to have an interpreter that may know the person in crisis, which further hinders open and easy access to needed public assistance.
- There is a community need for affordable childcare and youth programs for low- to moderate-income families, and specifically for childcare options that provide flexibility that extend to covering non-traditional working hours, so families have the mobility to accept and retain jobs that have less flexible working hours. Without access to quality care, low-income families have to either forego employment opportunities or leave their children in potentially unsafe situations.
- Relatively lower educational attainment can make it more challenging to secure living wage employment. In St. Joseph, adults are slightly less likely to have a high school education than compared to the national average, and St. Joseph residents are less likely to have a four-year college education. There is a need for job skills training and assistance in applying for and attending diploma/GED programs, vocational school, certificate programs and higher education.
- Workforce reductions and layoffs make income streams inconsistent, which can lead to further housing instability. The uncertainties of how to meet financial obligations and a loss of benefits that come with unemployment, can put a strain on families as members grapple with how to make ends meet in the interim and whether they can afford to remain in their community or will be forced to move and seek employment elsewhere.

- Within immigrant communities in St. Joseph, residents with specialized degrees and skills are ending up working at factory jobs such as the meat processing plant. Employment assistance, retraining, and language services can facilitate matching this labor force with job openings that leverage their advanced degrees and technical skills.
- A significant portion of the Latino population in St. Joseph is living doubled up – sometimes three or four families in one home. Anecdotally, it was reported that a community partner has a client who lives in a house with 34 other household members.
- Special populations that do not have the knowledge or ready access to public resources require additional services to ensure housing stability. Persons living with disabilities, persons living with HIV/AIDS, at-risk youth, LGBTQIA+ individuals, and youth/adults leaving the juvenile/criminal legal system may frequently require supportive services to make living independently a viable option in addition to finding the inclusive and affordable housing opportunities they need in the community.

Those at greatest risk of housing instability or in unstable housing situations

- While increasing the amount of safe, decent, and affordable housing is a top priority for the City of St. Joseph, limited public resources and incomes that fall short of being able to provide subsistence and permanency for households continue to trap residents in a cycle of poverty and exacerbate housing disparities.
- Due to unique circumstances, youth, older adults, persons with disabilities, large households, persons with substance abuse problems, persons with mental health challenges, households experiencing homelessness, survivors of intimate partner violence, persons with convictions, and persons with HIV/AIDS, and immigrant households of color are more likely to have low- or moderate-incomes.
- From discussions with groups that serve populations with special needs with regard to housing and St. Joseph’s Consolidated Plan, the City knows that:
 - There is a concentration of abandoned and condemned housing units where numbers of minority and low-income households reside.
 - Individuals with mental and developmental disabilities often lose housing opportunities they are eligible for and were successful in applying to prior to a personal interview, due to stigma and landlords’ negative perceptions of tenants with mental and developmental challenges.
 - Some landlords are reluctant to rent to individuals who have Section 8 assisted housing certificates and vouchers. Some landlords include blanket ban statements on classified rental advertisements such as "no pets -- no housing" and other statements to signify that low-income tenants who are eligible for Section 8 are unwelcome.
 - St Joseph’s affordable housing stock is made up of older homes that are not accessible for individuals with mobility limitations.
 - Access to transportation options is very limited, restricting the areas that people can choose to live and obtain employment.
- According to HUD, households spending more than 30% of their income on housing are referred to as “cost burdened” and owners and renters who pay more than 50% of their income for housing are referred to as “severely cost burdened.” Having such limited disposable income remaining after paying for housing costs leaves households at an increased risk of housing instability and homelessness. For renters, housing costs include

rent paid by the tenant, plus utilities and for owners, housing costs can include mortgage payment, taxes, insurance, and utilities. Housing problems that can serve as key indicators of at-risk households include overcrowding and lack of proper kitchen and plumbing facilities.

- As noted earlier, persons/families who are at 30% or below AMI are more likely to be affected by severe housing problems, are forced to live in places with substandard conditions, and are more susceptible to experience housing instability and fall into homelessness.

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

Response: The City of St. Joseph and the local Continuum of Care providers and other organizations have access to funding sources that are used to assist qualifying populations obtain stable housing, shelter, and/or supportive services.

For **people experiencing homelessness**, the following funding resources in the City of St. Joseph provide services:

- Emergency Solutions Grant (ESG): State ESG funding in the City of St. Joseph supports local Rapid Rehousing (RRH), shelter operations, shelter essential services, and other essential services for people experiencing homelessness.
- Emergency Solutions Grant – Cares Act (ESG-CV): The State ESG-CV funding in St. Joseph supports RRH, shelter conversion/rehabilitation, shelter operations and essential services, emergency hotel assistance, street outreach, and case management.
- Community Development Block Grant (CDBG): CDBG funding in the City supports local social service agencies that assist those who are experiencing homelessness.
- Community Development Block Grant – Cares Act (CDBG-CV): The City's CDGB-CV funding is used to support social service agencies who have been impacted by the COVID-19 pandemic.
- Continuum of Care (CoC): Rapid rehousing, permanent supportive housing, Coordinated Entry, HMIS
- Emergency Housing Vouchers (EHVs): Administered through the local Public Housing Authority to assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.
- Housing Choice Vouchers (HCVs): Administered through the local Public Housing Authority to assist very low-income families, elderly persons, and disabled person to afford decent, safe, and sanitary housing in the private market.
- Mainstream Vouchers: Administered through the local Public Housing Authority to assist non-elderly disabled persons, including people experiencing homelessness.
- Missouri Housing Trust Fund: Housing Assistance, emergency assistance, operating funds

- United Way Foundation: Housing stability funds, rent and mortgage assistance, utility assistance, transportation assistance. Also supports social service agencies serving people who are homeless or at risk of homelessness.
- St. Joseph United School District: Assistance to school-age children experiencing or at risk of homelessness.
- Housing and Urban Development Veterans Supportive Housing vouchers (HUD-VASH): The HUD-VASH Program combines HUD's Housing Choice Voucher rental assistance for homeless Veterans with case management and clinical services provided by the [Department of Veterans Affairs \(VA\)](#).
- Community Services Block Grant (CSBG): Community support workers.
- Community Services Block Grant-CV (CSBG-CV): Emergency shelter and related services.
- Supportive Services for Veteran Families (SSVF): provides supportive services to low-income Veteran Families experiencing housing issues, including outreach, case management, financial assistance, and assistance obtaining VA and other benefits.
- SAMHSA: Support a housing stability case manager to help homeless people access and maintain housing.

For **people at risk of homelessness**, the following funding resources in the City of St. Joseph provide services:

- Emergency Solutions Grant (ESG): ESG funding supports the local homelessness program.
- Community Development Block Grant (CDBG): CDBG funding in the City supports local social service agencies that assist those who are experiencing homelessness.
- Community Development Block Grant – Cares Act (CDBG-CV): The City's CDGB-CV funding is used to support social service agencies who have been impacted by the COVID-19 pandemic.
- Emergency Housing Vouchers (EHVs): Administered through the local Public Housing Authority to assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.
- Mainstream Vouchers: Administered through the local Public Housing Authority to assist non-elderly disabled persons, including people at risk of homelessness.
- Housing Choice Vouchers (HCVs): Administered through the local Public Housing Authority to assist very low-income families, elderly persons, and disabled persons to afford decent, safe, and sanitary housing in the private market.
- Missouri Housing Trust Fund: Housing Assistance, emergency assistance, operating funds
- United Way Foundation: Housing stability funds rent and mortgage assistance, utility assistance, and transportation assistance. United Way supports social service agencies serving people who are homeless or at risk of homelessness.

- Supportive Services for Veteran Families (SSVF): provides supportive services to low-income Veteran Families experiencing housing issues, including outreach, case management, financial assistance, and assistance obtaining VA and other benefits.
- Community Action Program (CAP): Weatherization utility payment support, childcare and Headstart programming
- American Rescue Plan - City of St. Joseph: \$2 million to preserve old housing.
- HOME Program: The City uses its HOME funds to construct new single-family homes that enable low-and moderate-income individuals to become homeowners.
- Community Action Program (CAP): Weatherization, utility arrears, childcare and Headstart programming
- Catholic Charities: Rental Assistance for people who are formerly homeless or at risk of homelessness; employment assistance; housing stability services.
- Community Services Block Grant (CSBG): Community support workers.
- SAMHSA: Support a housing stability case manager to help people at risk of homelessness access and maintain housing.
- LIHEAP: Utility arrearages

For **people fleeing domestic violence or human trafficking**, the following funding resources in the City of St. Joseph provide services:

- Emergency Solutions Grant (ESG): State ESG funds emergency shelter operations and essential services for people fleeing domestic violence
- Emergency Solutions Grant – Cares Act (ESG-CV): State ESG supports a Safe Places program and emergency shelter operations and essential services for people fleeing domestic violence.
- Continuum of Care (CoC): Rapid rehousing for people fleeing domestic violence.
- Violence Against Women Act (VAWA): Funded through the Department of Justice, provides services to people fleeing domestic violence.
- Missouri Housing Trust Fund: Housing Assistance and operating funds
- St. Joseph United School District: Assistance to households with school-age children experiencing or at risk of homelessness, including households experiencing domestic violence.
- Office of Violence Against Women/Dept of Justice: Funding to support transitional housing for survivors of domestic violence.
- State Department of Social Services (including Federal FVPSA, State TANF, VOCA, and other state general resources): Supports services and shelter for survivors of domestic violence.

For **other special populations**, the following funding resources in the City of St. Joseph provide services:

- Community Development Block Grant (CDBG): The City uses CDBG funds to support local social service agencies that provide services for youth programs, advocacy programs for developmentally delayed, services for children who are victims of sexual/physical abuse, supplemental food program for the elderly, dental services for

extremely low income individuals, mental health counseling for low income individuals, services for those suffering from substance addiction, transitional housing for homeless families, and a referral service provider.

- Community Development Block Grant – Cares Act (CDBG-CV): These funds were allocated to Entitlement Communities to prepare, prevent and respond to the Covid-19 crisis. After public consultation the City chose to use the funds to assist with small businesses to retain employees and public service agencies who were impacted by the pandemic. Agencies were able to utilize funds for needs identified that there was no other funding source available for the need.
- Missouri Housing Trust Fund: Housing Assistance, emergency assistance, operating funds
- Supportive Services for Veteran Families (SSVF) provides supportive services to low-income Veteran Families experiencing housing issues, including outreach, case management, financial assistance, and assistance obtaining VA and other benefits.
- St. Joseph United School District: Assistance to school-age children experiencing or at risk of homelessness.
- United Way: Housing stability funds rent and mortgage assistance, utility assistance, and transportation assistance. United Way supports social service agencies serving vulnerable populations.
- HOME Program: \$369,514 in 2021 HOME funds for new construction, the provides the opportunity for low- and moderate-income individuals to become homeowners
- Community Action Program (CAP): Weatherization
- American Rescue Plan - City of St. Joseph: \$2 million to preserve old housing.
- Community Services Block Grant (CSBG): Community support workers.
- LIHEAP: Utility arrearages

3.D. Identify any gaps within the current shelter and housing inventory, as well as the service delivery system:

Response: There are a number of gaps within the current shelter and housing inventory, as well as the service delivery system. In 2020 and 2021, the local CoC conducted a needs assessment and gaps analysis. The Assessment identified three major gaps and opportunities for action in the homeless system of care that could improve the local response to homelessness. The gaps included:

- Insufficient Housing and Housing Resources
- Limited Access to Supportive Services
- Unstable Crisis Services

- **Insufficient Housing and Housing Resources**

Affordable Housing: The lack of affordable housing in the City of St. Joseph has a number of layers. There are not enough affordable housing units in the area, the costs to rent the units that are available in the area is high compared to local income, and many of the housing units that are

available for qualifying populations is sub-standard, with households overcrowded and/or cost burdened. Both renter and owner-occupied households are most likely to report problems with high housing costs.

The most severe problems affect the lowest income households. In 2020-2021, more than 2,100 low-income renter households paid more than half their income on housing; 81% of them had income below 30% AMI. Households with income below 30% of AMI are more likely to obtain housing with at least 1 of the severe housing problems (cost burden, overcrowding, lacking kitchen facilities, or lacking complete plumbing). The City's low-income households often face a choice between deficient housing and cost burden. Some local households do not have the choice – they have both cost burden and deficient housing.

The median gross rent in St. Joseph in 2020 was \$785. However, 17% of the local population (approximately 12,320 individuals) lives below the federal poverty level (currently \$23,030 for a three-person family). At the federal poverty level, a family of three would only be able to afford \$576 per month in rent to spend 30% of less of their income on housing. That is \$200 more a month than the area's median gross rent.

At the same time, many of St. Joseph's affordable units are dilapidated, unsafe, and substandard options. Stakeholders throughout the community shared that replacement of dilapidated housing with quality housing is a necessity in St. Joseph.

The following impediments were identified as factors that contribute to housing shortages in St. Joseph:

- Lack of housing access due to high housing costs and the availability of housing: The median price of homes sold in St. Joseph in March 2022 was \$275,000.²¹ There are few multi-family structures in the community; more than three quarters of units in St. Joseph are single units.²² Eighty seven percent of all units are occupied and only one third of all units are available for rent (66% of units in St. Joseph are owner-occupied, which is higher than the national average of 64%).²³
- Availability of affordable, accessible units in a range of sizes: More than 50% of St. Joseph's housing stock was built before 1969.²⁴ One third of the housing units were built in 1939 or earlier.²⁵ The median year built for St. Joseph housing was 1958.²⁶ Four percent of housing units lack complete plumbing, complete kitchens, and/or telephone service.²⁷ Additionally, there is insufficient housing for single individuals or couples in the St. Joseph metro area. Data for February/March 2022 showed only 3-4% of all homes on the market in the area that were for sale were one-bedroom units.²⁸

²¹ Rocket Homes: <https://www.rockethomes.com/real-estate-trends/mo/saint-joseph>

²² Census Reporter, St. Joseph Missouri-Kansas Metro Area.

²³ Census Reporter, St. Joseph Missouri-Kansas Metro Area.

²⁴ [St. Joseph, MO housing statistics](#), Infoplease.

²⁵ [St. Joseph, MO housing statistics](#), Infoplease.

²⁶ [St. Joseph Demographics](#), Point2Homes.

²⁷ [St. Joseph, MO housing statistics](#), Infoplease.

²⁸ Rocket Homes: <https://www.rockethomes.com/real-estate-trends/mo/saint-joseph>

- According to 2020 Community Needs Assessment from the St. Joseph Community Action Program (CAP), 23% of households in Buchanan County (7,817) are housing cost-burdened (housing costs exceed 30% of income). More than half of those households are rental households (4,357). Thirty-six percent of Buchanan County rental households are cost-burdened, while 21% of owner-occupied households with mortgages are cost-burdened.²⁹
- According to 2014-2018 CHAS data for Buchanan County, there are an estimated 4,030 extremely low-income households ($\leq 30\%$ HAMFI) in St. Joseph. Of those, more than 70% are renter households (2,835). 2014-2018 Consolidated Planning/CHAS data for Buchanan County illustrates that 8,310 households in Buchanan County experience at least 1 of 4 housing problems: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened (paying more than 30% of their income on housing). More than half of those households (4,470) experience severe housing problems, meaning that they are severely cost-burdened (paying more than 50% of their income on housing).
- According to 2014-2018 CHAS data for St. Joseph, Missouri, there are an estimated 3,690 extremely low-income households ($\leq 30\%$ HAMFI) in St. Joseph. Of those, more than 75% are renter households (2,765). 2014-2018 Consolidated Planning/CHAS data for St. Joseph indicates that 6,730 households are cost-burdened, paying 30% or more of their household income toward rent. Of those households, close to half are severely cost-burdened (3,130 households are paying more than 50% of their household income toward housing). Moreover, 7,460 households in St. Joseph experience at least 1 of 4 housing problems (per list noted above). Of those, more than half (4,005) experience at least 1 of 4 severe housing problems, meaning that they are severely cost-burdened (incomplete kitchen facilities, incomplete plumbing, 1.5 people per room, and/or paying more than 50% of their income on housing).

Housing Services: For many people who fall in the qualifying populations, maintaining stable housing requires additional and frequent support. Case management services can support people to obtain and retain housing. HUD recently published recommendations for an appropriate caseload ratio, taking into consideration that each organization will need to assess the expectations placed on staff and the level of service availability to come up with their own ratios. HUD recommends that a case load ratio of 1:10 when providing Intensive Case Management can lead to “positive client outcomes and staff retention.”

In St. Joseph, based on information provided to the CoC’s Gaps Committee, many newly housed individuals are receiving home visits only once per month after relocating. In some cases, due to funding limitations, staff that were serving people experiencing homelessness before they accessed housing were unable to continue services once the individuals obtained housing. Staff that were able to continue serving people once they were housed shared the challenges they have reaching people and scheduling appointments. Local housing programs reported staffing ratios as low as 16 hours *per year*, although some had high ratios, including a 1 staff to 13 household ratio for rapid rehousing resources at YWCA.

²⁹ [2020 Community Needs Assessment](#), Community Action Partnership of Greater St. Joseph, September 2020.

For people recently transitioning from homelessness to housing, “critical time intervention” calls for frequent case management and more wrap-around services. As people become more stable, case management and wrap around services can slowly taper off, but not completely. For some high acuity tenants, intensive case management may need to occur throughout their tenancy, in order to ensure they can successfully retain housing and well-being.

- **Limited Access to Supportive Services**

St. Joseph CoC and local providers have invested significant resources toward helping people find a place to live and reduce barriers to housing. Quick access to housing, however, is only one aspect of the Housing First approach. In order to be effective, not only do people need a place to live, but they need supportive services to go hand-in-hand with an apartment or house. There are few supportive service staff to help people transition effectively from homelessness to housing or to help people experiencing housing insecurity to stabilize. St. Joseph providers indicated that current provider staff do not have the bandwidth to provide follow-up visits as frequently as might be necessary for newly housed or precariously housed residents.

There are more people in need of supportive services in the qualifying populations than there are service providers, particularly case management, mental health services, and substance use treatment, all important supports that are needed to ensure people are able to obtain and maintain stable housing.

The current needs and gaps exist primarily due to inadequate funds that are limiting the ability of the City and partner agencies to provide adequate services for stability and self-sufficiency to all residents in need. Additionally, food insecurity resulting from the pandemic has created a need for additional food services and has highlighted the growing disparity among the areas in need of equitable access to affordable nutritious food. Equitable access to all housing and services will be an important consideration in planning for the future.

Another challenge in the community is clients who often resist help or lifestyle changes necessary to retain housing due to mental health issues. The need for mental health services across the qualifying populations has grown considerably over the past few years. For example, comparative data for 2019 and 2020 from the St. Joseph Police Department tracked police incidents. While the number of calls involving people experiencing homelessness went down considerably in August 2020 compared to August 2019 (a 22% decrease), the number of incidents involving what the police term, “emotionally disturbed persons” rose from 1 out of 20 (5%) in 2019 to almost 1 out of 4 (24%) in 2020. Yet, there are limited providers who supports people with mental health issues in St. Joseph.

Another common supportive service that all qualifying populations are in need of is transportation. The community survey, consultations, focus groups, and staff interactions with citizens have constantly reinforced that many of people struggle to get to work, to medical appointments, and even to the store. The limitations of the public transportation system was identified as a primary reason for transportation challenges in the City of St. Joseph. Availability, type, frequency, reliability, and accessibility of public transportation was identified by most stakeholders as a challenge for qualifying populations. Additional reasons for the transportation

gaps include the cost of owning a vehicle (payments, insurance, gas), credit capacity to purchase a vehicle, the high per-trip cost of services like Uber, and the lack of available jobs and services within walking and biking distance of affordable neighborhoods. The issue of transportation access to jobs and services is reported as a significant factor in several other issues, such as medical services. medical care, appointments, and prescriptions can be difficult to manage without ready access via transportation.

- **Unstable Crisis Services**

Crisis services in St. Joseph have been unstable for a number of years. Since 2016, the community has had several of its emergency shelters close or change the populations they serve, a day center that provided outreach, case management and benefits access to people in the community was opened (2016) and then closed (2019), and a night shelter was opened (2019) then became a 24/7 shelter (2019) then was taken over by a new organization (2020) and then was closed (2021). During COVID, crisis resources shifted again, with a different organization taking over shelter operations and agreed to operate the shelter only through 2022. At the same time, with the lack of available shelters, local funding was used to hire an additional outreach worker (2019/2020), but after the funding allocation cycle ended, that position was eliminated.

Agencies and organizations working within the homeless system of care, as well as people experiencing homelessness, shared that one of the biggest challenges in the current system is the there is no general emergency shelter for households without children in the City (there are family and DV shelters, and in 2021/22 there was cold weather shelter). Unfortunately, the issue is not the lack of a building or site for a shelter. As shared above, there have been multiple shelters in the past few years. The issue is that there are not sufficient resources to support an organization to operate a low-barrier, housing focused shelter consistently. While a majority of the public and stakeholders noted the lack of shelter, the limitations place on the HOME-ARP funding – that the resources cannot be used to support operation of a shelter – limit the ability of this funding to meet this need. Funding sources do not exist in the City of St. Joseph that provide investment in long-term operations for emergency shelters.

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

Response: Housing instability can be linked to higher poverty rates, changes in income, job loss, changes in family composition, family conflict, and physical or mental health conditions. Households that are living paycheck-to-paycheck or in doubled and tripled up situations are more likely to be affected by challenges that arise such as illness, a broken appliance, a flat tire that prevents a person from getting to work one day and could cause significant instability for the household. The lowest-income households and families with children need resources that allow them to remain stably housed, though the specifics will depend on the needs of the individual households and families. For example, some households may need access to affordable childcare and transportation to allow a parent or caregiver to attend school or to go to work as the primary barrier is economic. Other households may have a member with an untreated chronic physical or mental health condition and therefore need access to affordable healthcare as well as financial

assistance while becoming stable with regard to health. Children who are unstably housed statistically face higher rates of illness and are less likely to have access to healthcare.

According to CHAS data, there are 3,690 households in households with incomes between 0 and 30% of the area median income (AMI), indicating that a substantial portion of the population could be considered vulnerable to homelessness based on income alone. Nearly all persons experiencing homelessness have incomes between 0 and 30% AMI.

This HOME-ARP gaps analysis process has identified that local immigrant populations, youth, people exiting prison, older adults, and families with young children are at specific risk of experiencing housing instability, but may not meet the definitions of homelessness or at risk of homelessness. These populations often live doubled or tripled up, or just move frequently to maintain housing.

Moreover, for many individuals and families in the qualifying populations, it is challenging to maintain housing stability. Local system performance measures indicate that people experiencing homelessness need supportive services in order to maintain stable housing over time. For example, for families with children that do not have the supports they need, housing instability can result in missed school days, lack of adequate nutrition, and insufficient access to health care and other services.

3.F. Identify priority needs for qualifying populations:

Response: The priority needs for qualifying populations in the City of St. Joseph are as follows:

- 1. Increased access to housing**
- 2. Increased availability and scope of supportive services**
 - Increased access to housing**

The ultimate need in any effort to reduce homelessness and housing instability is to increase access to housing. While there has been great emphasis in this CoC on matching individuals to housing, CoC providers report that it is difficult to find units that are affordable and accessible for people exiting homelessness. Specifically, members of the Gaps Committee indicated that there are increasing numbers of instances where landlords have expressed an unwillingness to continue to rent to people transitioning out of homelessness. Other community members note that locating affordable, safe housing is a challenge for the other priority populations as well. They reported that housing units are unaffordable, or in poor condition.

One effort already underway to respond to this challenge is a local service provider's plans to create a tiny house village with on-site services for people who need extra support to maintain housing. Also, several providers are providing life skills classes to support individuals in understanding their rights and responsibilities as renters. The Public Housing Authority obtained Mainstream Vouchers which can support non-elderly disabled people, including people experiencing homelessness and at risk of homelessness, to obtain housing.

- **Increased availability and scope of supportive services**

In addition to housing, resources are needed to support and increase case management services in St. Joseph. Not only would increased resources bring in more case managers, but they could be used to provide training to all community case managers about trauma-informed care, prevention and diversion, and other best practices.

Supportive services are also needed to improve access to behavioral health resources for qualifying populations, which would entail funding and staff to create additional dedicated behavioral health resources for qualifying populations across the City. In addition, resources could ensure that access to services are better coordinated amongst the local providers for people with mental health and substance use disorders.

With the ability to provide supportive services to households with children who are deemed “homeless” under the McKinney-Vento definition (those households couch surfing or doubled up), HOME-ARP supportive services could support efforts to connect with the local school districts, working directly with school counselors and McKinney-Vento liaisons to provide services to those students and young adults. Partner with school districts’ McKinney-Vento Liaisons and school counselors to ensure all are aware of system resources.

Additional supportive services resources should be prioritized for expanding transportation in the area. Many households in the qualifying populations struggle to get to and from work outside of local public transportation hours. Still others would like to work or go to school in parts of the area where the local bus system does not travel.

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

Response: The City of Saint Joseph continues to work diligently with community partners to address the needs of individuals and families who are homeless, at risk of homelessness, and other vulnerable populations.

The City has leveraged the work of the CoC and its gaps analyses in 2020 and 2021. The CoC’s processes included review of shelter and housing, outcomes, trends in performance, and qualitative input. This input included surveys of people with lived experience of homelessness (designed and analyzed by people with lived experience of homelessness), focus groups of providers, and surveys of the whole CoC membership. The resulting 2021 and 2022 CoC Action Plans identified the CoC’s key priorities for action by the community and a group of community leaders referred to “Planning for the Future” has been working to address the CoC’s highest priorities. While the lack of a functioning, stable shelter for individuals has captured the community’s attention, especially during the pandemic period, the need for increased access to housing units and need for additional supportive services to maintain housing stability has been the primary focus in both Action Plans.

In 2020, the System Performance Measures reflected that returns to homelessness were quite high compared to national performance data, which aligned with providers’ reports that the permanent supportive housing vouchers in the community are serving a revolving door of the same people, because they cannot maintain housing. Providers shared their struggles with

helping people stabilize in housing due to funding limitations and limited supportive services funding. Providers also reported that landlords have become more resistant to taking housing vouchers because of their experience with people using vouchers without sufficient support. People with lived experience reported their greatest need was to access to housing.

The interviews and surveys completed as part of the Allocation Plan obtained input from a broader swath of the community, The primary findings from the interviews conducted echoed and supported the CoC's priorities, from the childcare center director serving low-income youth who stated that she has not been able to find an affordable safe unit for one of the parent she assists, to the NAACP's comment that housing that is affordable and safe and the services to maintain that housing are a key gap in our community.

4. HOME-ARP ACTIVITIES

4.A. Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients, and/or contractors and whether the City of St. Joseph will administer eligible activities directly:

Response: The City proposes to focus the majority of the acquired HOME-ARP funding on the Production and Preservation of Affordable Housing, with a smaller amount on Supportive Services. The opportunity presented by this allocation of HOME-ARP to make the sizable investment to fulfill a long-term solution is vital to strengthening the community's homeless system of care.

The City of St. Joseph will administer the HOME-ARP allocation and oversee all projects to completion. The method and process we intend to use for solicitation and selection of projects for funding is as follow:

- The City will issue a Notice of Funding Opportunity (NOFO), soliciting applications for funding. The NOFO will specify that we are seeking applications specifically for producing or preserving affordable housing in St. Joseph and for Supportive Services for service to the qualifying populations.
- We will issue the NOFO and request that applicants inform the City of their intent to apply within 20 days of the NOFO issuance.
- Applicants will be provided 30 days to submit their full application for funding.
- If applicants have questions or wish to discuss their plans in advance of submission, the City of St. Joseph will make staff available to answer any questions.
- The City will be explicit in the solicitation with any other conditions that the City will require in order to receive funding.
- For Supportive Services, based on feedback received from the initial public participation and stakeholder engagement, as well as additional public comments we expect to receive in regard to the draft Allocation Plan, the City will identify in the solicitation specific Supportive Services that HOME-ARP funding can be used for that will address the gaps identified in the needs assessment and gaps analysis.
- The City will publicly announce the projects that were awarded HOME-ARP funding on its website and through other social media.

4.B. If any portion of the admin funding was distributed to contractor or subrecipient prior to HUD’s approval of the Allocation Plan because the contractor or sub-recipient is responsible for the administration of the entire grant, identify the contractor or subrecipient and describe its role or responsibilities for administering all of the PJ’s Home-ARP program.

Response: No portion of the administrative funding was distributed to a contractor or subrecipient prior to HUD’s approval of the Allocation Plan.

4.C. Use of HOME-ARP Funding:

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

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 250,000		
Acquisition and Development of Non-Congregate Shelters	\$		
Tenant-based Rental Assistance (TBRA)	\$		
Development of Affordable Rental Housing	\$1,021,030		
Nonprofit Operating	\$	%	5%
Nonprofit Capacity Building	\$	%	5%
Administration & Planning	\$ 66,896	5%	15%
Total HOME-ARP Allocation	\$1,337,926		

4.C.ii Additional Narrative:

Response: The City of St. Joseph has limited rental housing. Many of the affordable rental housing units that do exist are old and need updating. According to stakeholder feedback, any landlords or property managers would prefer to rent sub-standard housing to low-income people who are willing to rent, rather than invest in the units to bring them up to code or to update them to be more accessible and eligible to receive housing assistance. Of the units that do come on the market and are available for rent to qualifying populations, there are insufficient numbers of the size needed for people on the verge of homelessness. The city lacks studio units or one-bedroom units.

Throughout the consultation process that Homebase conducted on behalf of the City of St Joseph, most organizations specifically highlighted the need for more affordable, quality housing and the services needed to maintain them.

The City of St. Joseph proposes to use HOME-ARP funds to acquire land for, construct, or rehabilitate existing housing for at least 10 units of affordable housing. With the unprecedented resources offered by HOME-ARP to support infrastructure to increase available affordable housing in the community, the City of St. Joseph believes that community organizations and local developers who are familiar with the challenges and needs of HOME-ARP qualifying populations will be well-placed to propose projects that can receive and utilize HOME-ARP funds. This will help to address the gap caused by private landlords who are unwilling to rent to these populations. It will also give some HOME-ARP eligible households the opportunity to rent housing that is safe and affordable.

In addition, the City will dedicate \$250,000 toward housing-related supportive services that can fill a key gap in the community. The current staffing for supportive services that enable households to retain stable housing are lacking. HOME-ARP funds will be dedicated to supportive services that are focused on providing the assistance households need to obtain housing and avoid evictions and/or returns to homelessness.

4.D. Describe how the characteristics of the shelter and housing inventory and service delivery systems, and the needs identified in the gaps analysis provided a rationale for the plan to fund eligible activities:

Response: The gaps analysis reflected St. Joseph has insufficient housing and housing resources, limited access to supportive services, and unstable crisis services. The community's recent homeless needs assessments and action plans, as well as the interviews and surveys completed as part of the HOME-ARP process reflected the same findings that these three gaps are impeding the community's response to housing instability.

HOME-ARP is a one-time opportunity to respond to these gaps. Of the opportunities to use the funding, paired with other community resources, the best use of the funds is to focus on developing affordable rental housing and the services to help people maintain their housing. The community has several sources of funding of tenant-based rental assistance including HCV, CoC, EHV, ESG, state funding, and Mainstream Vouchers. The community has also allocated other ARPA funding to support construction of a local non-congregate shelter.

Community service providers have time and again bumped up against the challenge that even with the tenant-based rental assistance that is available in St. Joseph, there is a dearth of affordable housing units in the area (sadly, some of the rental assistance available cannot be efficiently used because people with vouchers struggle to find units to use them in). The lack of affordable housing not only impacts people experiencing or at risk of homelessness, but also people fleeing domestic violence and other populations that experience housing instability.

The limited resources the community has had in recent years has made it challenging, if not impossible, to address the lack of affordable housing in St. Joseph. Yet each year through our planning processes, the community recognizes that there is insufficient housing for the people who need it most.

Investing HOME-ARP funds to address this long-standing community issue is vital moving forward. Additional housing units will help meet community needs going forward. The new affordable housing units created with HOME-ARP fund will be places to use the tenant-based rental assistance dollars that are already available in our community.

Moreover, limited access to supportive services has created barriers to housing for many populations. Limited supportive services availability has resulted in people cycling in and out of housing and created further trauma, caused inefficiencies in the system of care, and damaged landlord relationships. The Allocation Plan will focus on providing case management and other supportive services to households who are able to access affordable housing to ensure that tenants are well equipped to retain their housing over the long-term. With more individuals and families in our community able to access stable and affordable housing, the annual funds coming into our community can be leveraged to help the most vulnerable in the qualifying populations.

5. HOME-ARP PRODUCTION HOUSING GOALS

5.A. Estimate the number of affordable rental housing units for qualifying populations that the City of St. Joseph will produce or support with its HOME-ARP allocation:

Response: The City of St Joseph will provide at least 10 units of affordable housing through new construction, renovation, or rehabilitation. The HOME-ARP units will be made available to the qualifying populations that exist in our community.

5.B. Describe the specific affordable rental housing production goal that the City of St. Joseph hopes to achieve and describe how it will address the City of St. Joseph's priority needs:

Response: The goal for the City of St. Joseph is to increase affordable rental housing, specifically smaller units, such as studios and one-bedroom apartments. The HOME-ARP funds will be used to create affordable rental housing with 100% of the units made available to households from the HOME-ARP qualifying populations. The City will maximize the funding from HOME-ARP to support new construction, renovation or rehabilitation, whichever will add the most units as possible into the community. Through the RFP process, we will encourage efficiencies, asking potential partners and developers to leverage other resources that may be available from city, county, state, federal, or private funding streams to best meet the needs of qualifying populations.

Throughout the stakeholder engagement process, stakeholders made it very clear that there is a need for more affordable housing in St. Joseph. People mentioned the lack of units available, the substandard condition of some of the units that are being rented currently, the number of abandoned buildings, and the recent closing of facilities that support qualifying populations.

Stakeholders also identified the insufficient number of small units available for people to rent in the City. Given the limited resources available from HOME-ARP and the need for smaller units, the City will leverage the HOME-ARP funds for smaller units, enabling a greater quantity of new affordable housing to come online in the City.

6. PREFERENCES

6.A. Identify whether the City of St. Joseph intends to give preference to one or more qualifying populations or a sub-population within one or more qualifying populations for any eligible activity or project:

Response: The City of St. Joseph has not given a preference to any of the qualifying populations or sub-populations. However, the Allocation Plan does propose to direct HOME-ARP funding to the Production and Preservation of Affordable Housing and Supportive Services. Both the housing component and the supportive services component are prioritized as intending to serve all of the qualifying populations.

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

Response: There will be no preference for qualifying populations. The solicitation for applications will entertain projects targeted toward any or all of the qualifying populations who may be in need of Affordable Rental Housing and/or Supportive Services. The City of St. Joseph will issue guidance in its NOFO regarding serving all populations. For the sheltered, unsheltered, and at risk of homelessness populations, the City will recommend use of the Coordinated Entry System (CES), which assesses each individual or household to identify any immediate, emergent needs and risk factors, and to evaluate their overall level of vulnerability, including basic and housing-related needs. Based on those assessments, the Coordinated Entry System will make referrals to participating agencies. For those requiring services or housing assistance to prevent homelessness, and those at greatest risk of housing instability or unsuitable housing situations who may fall outside CES, the City will utilize its Information & Referral system run by Northwest Community Services (2-1-1) to provide referrals to participating agencies.

The United Way is an integral partner working to serve vulnerable populations. They have requested HUD amend the planning grant to become the CoC lead and CoC collaborative applicant. They have done a great deal of work to research and identify other qualifying populations, partnering with local organizations that both work within and outside the homeless system of care. United Way is a primary funder of the Information & Referral system. As calls for assistance come into the Information & Referral system and through local partners who serve qualifying populations who are not served by CES (e.g., the school district identifies families experiencing housing instability who are couch surfing or doubled up, therefore ineligible for assistance through CES), referrals for supportive services and non-affordable housing will be made directly to the HOME-ARP projects. The HOME-ARP providers will develop lists from those referrals based on first come, first served. As units become available, the HOME-ARP provider will take two referrals from CES, then one from Information & Referral system list.

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

Response: No preference has been identified.

7. HOME-ARP REFINANCING GUIDELINES

7.A. If the City of St. Joseph intends to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing that is being rehabilitated with HOME-ARP funds, the City of St. Joseph must state its HOME-ARP refinancing guidelines (in accordance with 24 CFR §92.206(h)). The guidelines must describe the conditions under which the City of St. Joseph will refinance existing debt for a HOME-ARP rental project, including:

7.A.i. Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity:

Response: The City of St. Joseph will not be allocating funding to refinancing of existing debt.

7.A.ii. Require a review of management practices to demonstrate disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility for serving qualified populations for the minimum compliance period can be demonstrated.

Response: The City of St. Joseph will not be allocating funding to refinancing of existing debt.

7.A.iii. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

Response: The City of St. Joseph will not be allocating funding to refinancing of existing debt.

7.A.iv. Specify the required compliance period, whether it is the minimum 15 years or longer

Response: The City of St. Joseph will not be allocating funding to refinancing of existing debt.

7.A.v. State that HOME-ARP funds cannot be used to refinance multi-family loans made or insured by any federal program, including CDBG

Response: The City of St. Joseph will not be allocating funding to refinancing of existing debt.

7.A.vi. Other requirements in the PJ's guidelines, if applicable

Response: N/A

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