

City of St. Joseph, Missouri, HOME-ARP Allocation Plan

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Describe the consultation process including methods used and dates of consultation:

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).

List of organizations consulted:

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	CoC meetings, Survey questionnaire	<p>Eligible Populations: People experiencing homelessness, at risk of homelessness and other qualifying populations.</p>

	services for people who are homeless and at risk of homelessness		<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 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.</p>
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	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</p>

	homeless people		<p>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 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</p>

			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.
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 household items small appliances linens blankets. We see homeless starting over parents, seniors and the disabled members of our community.	Survey questionnaire	<p>Eligible Populations: All</p> <p>Eligible Activities: All of the activities should receive some finding.</p> <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>

<p>Housing Authority of the City of St. Joseph</p>	<p>Local Housing Authority – manage HUD vouchers, VASH vouchers, and PHA for low-income families</p>	<p>1:1 interview, Survey questionnaire</p>	<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>
<p>Interserv (CoC member)</p>	<p>Nonprofit providing housing assistance and services to people experiencing or at risk of homelessness</p>	<p>CoC meetings, Survey questionnaire</p>	<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 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</p>

			<p>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>
Legal Aid of Western Missouri (CoC member)		1:1 interview	<p>Eligible Populations: People at risk of homelessness and at the greatest risk of housing instability.</p> <p>Eligible Activities: All activities are needed, especially tenant based rental assistance. There is not enough rental assistance in St. Joseph— Legal Aid had high hopes for The State Assistance for Housing Relief (SAFHR) Program, but few (roughly 1 in 40) tenants have successfully received rental assistance funds through that program.</p> <p>Supportive Services: All supportive services are needed. There is a great need for more tenant-landlord liaison services, financial assistance (costs and/or short-term/medium-term for rent), and credit repair services.</p> <p>Other comments: Most cases involve households who have managed to find housing, in a living situation that is not great—there are significant habitability issues with broken windows and mold, but it is the only housing available to the household due to bad credit or previous evictions. Plenty of cases where people have gotten behind on rent and are now trying to prevent eviction. Households may have initially been willing to put up with cockroaches, mice, etc. because they had a roof over their head but now, they are fed up and they try to get the landlord to make repairs which triggers the landlord trying to prompt the eviction process. Legal Aid receives daily calls regarding roofs caving in, having no running hot and the landlord is refusing to make repairs.</p>

			<p>Landlords buy property at tax foreclosure sales that are complete dumps, they originally think they will flip it but then never do. These places were purchased for \$1,000 and were red tagged or yellow tagged and not deemed habitable and then they rent them at exorbitant rates (i.e., \$1,000 for a 2BR shed). A lot of times these properties are sold to households with kids or extended families staying in the same property. Legal Aid often sees households that want to move but they do not have disposable income. Clients say if only they had \$800, they could put down a deposit and rent but they are currently living hand to mouth, and they only have \$100 leftover after rent costs. On top of that, landlords often do voluntarily give households their security deposits back after 30-60 days and the landlords stop return tenants' phone calls.</p> <p>The city needs more affordable housing, but if St. Joseph is going to create more affordable housing and leave it in the hands of private landlords, the city is going to run into the same problem eventually. If some of the affordable housing was managed or monitored by a government agency, it might be more judiciously run.</p> <p>Missouri has super harsh judgments where after an eviction, you're disqualified from public housing benefits for roughly three years. Missouri laws are very landlord friendly; landlord tenant laws are set up to disfavor the tenant. It is very simple for the landlord to get an eviction judgment for good or bad reason.</p>
Independent outreach worker, interpreter, journalist	Staff of St. Joseph School District, First Steps (nonprofit for young families) and privately-owned media outlet	1:1 interview	<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.</p>

			<p>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</p>

			of broader qualifying populations, would do more than just supportive services.
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 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</p>

			<p>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	Survey questionnaire	<p>Eligible Populations: All</p> <p>Eligible Activities: All toward affordable housing</p>

	safe and decent homes for low-moderate income citizens		<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 set 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 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</p>

			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</p>

			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 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,</p>

			food, mental health services, outpatient health services, short- and medium-term financial assistance for rent, transportation.
United Way (CoC member)		CoC meetings and 1:1 interview	<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 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>
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,</p>

			<p>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-sufficient. I work with this population in our community daily, and unmet basic needs are the root of the problem.</p>

Summarize feedback received and results of upfront consultation with these entities:

The City received substantial feedback from consultants during the process, including before drafting, as part of the community's gaps analysis, in specific one-on-one interviews, at CoC meetings, and through two separate surveys (one before drafting the Allocation Plan and one in reaction to the proposed Allocation Plan).

In general, consultants felt that all of the qualifying populations should be served with HOME-ARP funds. While not all consultants expressed an interest in preferring one of the qualifying populations over any of the other three, some consultants did feel that people experiencing homelessness should be prioritized for affordable housing.

Similarly, some consultants felt that some of the funding should be used toward all four of the eligible activities, affordable housing, tenant-based rental assistance, non-congregate shelter, and supportive services. At the same time, most of the consultants identified the primary needs for the City of St. Joseph: affordable rental housing.

Many stakeholders shared that there are housing vouchers and rental assistance available, but there is a dearth of affordable housing units throughout the City. Several CoC providers noted that finding safe, quality units to house individuals with vouchers was one of their greatest challenges. They also raised the fact that many landlords are unwilling to rent to people from the qualifying populations, especially people currently experiencing homelessness. The greatest need identified by consultants, by far, was more affordable rental housing. As a coalition of organizations, the CoC 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 types of affordable housing options to explore in the region, including tiny home villages and renovations or rehabilitations of existing structures. The City's Housing Authority, who is very aware of affordable options available in the City, also shared that the greatest gap is the insufficient housing stock in the city. Similar to the CoC, they shared that the City needs to create housing stock that has owners and landlords willing to rent to the HOME-ARP qualifying populations.

Another main issue that came up from the consultation process was the plethora of sub-standard housing and the hesitancy of landlords to rent to people experiencing homelessness. The Salvation Army summed it up readily, by sharing:

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.

In addition to affordable housing, consultants noted that shelter is an ongoing issue in the community, but the greatest challenge has been finding shelter operations funding, not shelter units. While there is a great need for emergency shelter that will take anyone experiencing homelessness, the challenge that

the community has faced over and over again is the lack of funding and organizational commitment to *operate* an emergency shelter. The Housing Authority shared that there is a common concern in the community that “we keep providing resources for shelter and it continues not to work.” Stakeholders initially understood that \$800,000 in ARPA funding had been dedicated to building and operating an emergency shelter in the City of St. Joseph. The recipient organization of the ARPA funding, however, determined that a better use of the ARPA resources would be to put them toward affordable rental units, which do not require the operating funds required for a shelter. With the new information, the CoC is concerned about the lack of general population emergency shelter.

All consultants were asked about the types of supportive services that were needed in the community. There was a broad range of services that consultants would prioritize, but many wanted to see HOME-ARP funds going toward supportive services. In general, consultants recognized that there would be insufficient HOME-ARP resources to fund all the supportive services. The services most often mentioned for funding through HOME-ARP were mental health services, substance use treatment, transportation, and case management.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

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

- Public comment period start date: March 22, 2022
- Posting Draft Allocation Plan date: April 15, 2022
- Public comment period end date: May 17, 2022
- Public hearing date: May 3, 2022

Narrative description of public participation process:

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 a presentation 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.

Because the City had provided an opportunity to offer public comment prior to drafting the Allocation Plan and developed the plan based on that public comment, much of the public comment at the public hearing was strongly in support of the draft plan. The City asked attendees what they liked about the draft Allocation Plan, what they didn't like, and what they wanted to see that was missing or under-represented (a summary of that feedback is described below). The City integrated the feedback from the survey and from the public hearing when revising the final Allocation Plan to submit to HUD.

Describe any efforts to broaden public participation:

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.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

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.

Public comment to the **draft Allocation Plan**:

We posted the draft Allocation Plan and announced the opportunity for public comment on April 15, 2022. We made available an online survey, provided opportunity to complete a hard copy form for public comment, or to send thoughts through email. We held the virtual public hearing 18 days after posting the draft plan, on May 3, 2022. The City received 58 public comments to the draft Allocation Plan (in addition to over 250 comments before the draft Allocation Plan was drafted) through our online forum, hard copy, or in email. We had only eight people attend the in-person May 3rd public hearing to provide comment.

At the public hearing, in order to give all attendees ample opportunity to share thoughts and concerns about the draft Allocation Plan, the City presented the HOME-ARP initiative, feedback received during the first public comment period, and an overview of the proposed Allocation Plan. The public then was asked to respond to the following questions:

- *What do you like about the draft Allocation Plan?*
- *What don't you like about the draft Allocation Plan?*
- *What would you like to see instead?*
- *What else would you like to share with us?*

The feedback from the **public hearing** was as follows:

During the public hearing, attendees were provided the opportunity to present their testimony and respond to the series of questions. The following is a summary of the feedback received during the public hearing:

- Participants agreed that utilizing HOME-ARP funding to increase affordable rental housing in St. Joseph was a good use of federal dollars.
- There was a clear consensus at the public hearing from the participants that the draft Allocation Plan putting the majority of HOME-ARP resources toward affordable rental housing, with some funding for supportive services, was the right plan.
- Some participants expressed concern about the length of time the community would have to spend the funding allocated toward supportive services. When they learned that the funding was allocated to be used over multiple years, they were excited about the possibilities of creating pilot programs for supportive services that, if successful, could be replicated and expanded over time.

- Participants were happy to hear that separate ARPA funding was allocated toward building a non-congregate shelter in St. Joseph, so supported the fact that HOME-ARP was in addition to the money already allocated to non-congregate shelter and that HOME-ARP didn't need to be used for non-congregate shelter. [Note that the change in ARPA priorities occurred after the hearing.]
- No one at the public hearing suggested that HOME-ARP funds should be used toward tenant-based rental assistance. In fact, many participants said that there is rental assistance available, the bigger challenge in St. Joseph is finding available and affordable rental housing.
- Participants were interested to know if HOME-ARP could be used for landlord incentives or landlord mitigation. When presented the list of supportive services that could be funded through HOME-ARP, the group strongly identified needs around childcare and transportation.
- The group discussed at length an interest in creating pilot programs for childcare and transportation related to helping people stabilize housing.
- Participants liked the idea of having supportive services be more open and see what organizations are interested in proposing, but there was consensus in the room that lack of childcare and adequate transportation were big gaps and they were interested in seeing some of the resources go to those specific services.
- Participants were interested in finding out what the state is proposing to do with their HOME-ARP funds and coordinating to maximize and leverage the City resources to compliment what the state is planning. There was mention that the City likely is ahead of the state in terms of planning.
- There was some interest in doing additional work focusing on improving relationships between landlords and tenants. Participants were hopeful because one of the CoC members recently brought on a staff person who will focus on providing more support to tenants, as well as landlords. The group was excited to see how that pans out before determining what more is needed in the community.

When asked what they wanted to see differently, most attendees did not have specific recommendations. Most of the commentary was expressing support for what the City had proposed and brainstorming about pilot programs that the City could support around innovations in supportive services.

- While at least one participant raised the need for mental health services, a conversation ensued that acknowledged that the challenges around people experiencing mental health wasn't that the services are not available, but the difficulty getting people experiencing homelessness to avail themselves of those services.
- Around supportive services, some participants shared that they would like to see programs with the most flexibility: "What are some possible things to do with supportive services, to help ensure people who are recently housed can stay housed." They didn't think that the supportive services offered had to only be associated with new housing.
- In addition to the above, most of the remaining time at the public hearing was participants brainstorming about potential pilot programs around childcare and transportation as a focus of HOME-ARP funded supportive services.

The feedback from the **public comment survey** on the actual draft Allocation Plan was as follows:

In addition to the public hearing, the City provided an online and hard copy survey that provided an opportunity for the public to comment on the draft Allocation Plan. The public was asked a series of questions to solicit feedback about the draft. The survey also gave them an opportunity to offer any other additional comments.

- Over 55% of respondents were representatives of the broader public, while 9% were people with lived experience of homelessness, 33% represented nonprofit providers, and 2% were policymakers. The majority of people had already reviewed the draft Allocation Plan before responding to the survey (60%) or were reviewing at the same time they were completing the survey (36%).
- When asked if they agreed with the City's proposal not to create a preference for any of the qualifying populations, 70% of respondents either supported or strongly supported not creating a preference. Only 20% opposed or strongly opposed the City's decision, while 8% neither supported or opposed.
- When asked if they agreed with the City's decision in the draft Allocation Plan to dedicate \$1 million toward affordable rental housing and \$250,000 toward supportive services, 65% of respondents either supported or strongly supported the draft Allocation Plan. Eighteen percent opposed or strongly opposed the decision, with another 16% of respondents having no opinion.
- The City followed with a question that allowed multiple selections. When asked what they would prefer to have seen from the City in the draft Allocation Plan, only a small majority of respondents chose to answer this question (16% of respondents):
 - 0% of respondents wanted to see more HOME-ARP funds used for production or preservation of affordable housing;
 - 12,5% of respondents wanted to see less HOME-ARP funds used for production or preservation of affordable housing;
 - 50% of respondents wanted more HOME-ARP funding for supportive services;
 - 0% of respondents wanted to see HOME-ARP funds used for tenant-based rental assistance; and
 - 50 % of respondents wanted to see HOME-ARP funding to go toward non-congregate shelter.
- When asked if they were satisfied with the draft Allocation Plan, 43% of respondents were either satisfied or very satisfied, 32% were neither satisfied or not satisfied, and 25% were either dissatisfied or very dissatisfied.
- Additional comments included general comments such as:
 - "Help them get on their feet but don't let them abuse the system. So many want things handed to them with no work involved. If doing housing, start your own housing don't give more money to owners charging outrageous rent prices. Do a low-income apartment type with services for finding jobs or better jobs."
 - "If you allocate the money to all the agencies currently providing services, nothing will change. Something innovative needs to be done to create housing for the homeless."
 - "I was unsure of the allocation intent since I cannot tell how the \$1 million will be spent: Will it be a boondoggle for slumlords and developers or will it provide local jobs to homeless who are willing to work to fix up houses and apartments and supervised by say Habitat and a qualified foreman? I favor the latter. Also, I would appreciate if the city would spend part of the remaining \$50,000 to institute a registration program for all homeless including those on the street and to triage and license without cost those who wish to collect money on street corners. Triage would improve safety in the city and the

certification would help me know that the person standing at the off-ramp at I 29 and Frederick was safe and legitimately in need. A few years ago, I watched such a person at a distance and after a little while, a van pulled up across the street and the man went to it and got in. So now I don't know whether the person is in need or a scammer out for easy bucks. This registration program would also track some mentally ill and street people who have caused trouble at businesses along Frederick between 25th and 26th streets and elsewhere. Lastly, we raised funds to build a new animal shelter--why isn't a people shelter even more important. There are even some large vacant buildings that could be adapted or converted--maybe with part of the \$1 million. But any housing plan must go along with the supportive services including like skills and inspections that guarantee success."

- "The development of non-congregate sheltering is very much needed. If combined with supportive services, it can take most all the individuals, off the street, preserving life. Without it, will be more deaths, more strain on emergency services, etc. Chronic homelessness is growing, due to source of income discrimination, and stringent background investigations. Non-congregate sheltering can create a 'community' a 'neighborhood' for the homeless and with supportive services, on site, can assist them in moving in the direction of self-sufficiency."
- "In reading the comments from the respondents, it is clear basic causation has not been addressed. I see no acute drug and alcohol facilities consulted in the survey. So I have many questions. Will the city be in the business of running these new housing facilities? What is the plan to address the lack of available jobs that provide a living wage? Is there a plan to address the lack of a shelter? Is there a plan to address the lack of emergency drug and alcohol treatment? Affordable housing is needed but it is a step further down the line than where St. Joe is. What is the plan to draw social workers, mental health providers, nurses, doctors, and other professionals to St. Joe? Where is the complete big picture plan? We do not have the types of jobs we need here to maintain a well-rounded community."

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.

The final draft Allocation Plan received an additional 57 comments. Of those, many felt that the City needed a non-congregate shelter, though some expressed reservations about the non-congregate shelter, given that HOME-ARP funds cannot be used toward operations of a shelter. The City initially did not include funding toward non-congregate shelter because there were plans to leverage ARPA funds toward such shelter. After closing public comment, however, the City learned that the ARPA fund sub-recipient no longer intends to create an emergency shelter but is willing to use the funds to build a tiny village of affordable housing. As such, the City revised its Allocation Plan to include a component for non-congregate shelter.

In addition, 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 gaps in the system can be filled: affordable housing and non-congregate shelter. Currently, the City has limited funding to be used toward affordable housing. At the same time, the community 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 additional individuals without affordable units.

Additionally, the City of St. Joseph currently does not have a low-barrier emergency shelter, congregate or non-congregate. There is a dire need for a place for the general population to be able to get shelter. Initially, there were efforts to leverage ARPA funding toward an emergency shelter for the City. However, ARPA funds will be dedicated toward producing an affordable housing tiny home village. As a result, the City is proposing that the majority of HOME-ARP funding be dedicated to support for a non-congregate shelter and *some* affordable housing, which will go a long way to fill two very important gaps and needs 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,

71% said some of the funding should go toward non-congregate shelter, and 21% of survey respondents thought that none of the HOME-ARP funds should be used toward non-congregate shelter.

Reasons for changing the Allocation Plan to include 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. During the initial consultation and public comment period, community organizations and the public recognized a long-standing need for a non-congregate emergency shelter in St. Joseph. They were torn, however, about how they would be able to support it without additional funding for operations.

The City initially proposed not to fund non-congregate shelter with HOME-ARP resources, primarily because there was a proposal to allocate \$800,000 toward a non-congregate shelter through ARPA. Yet, when the final Allocation Plan was released for public comment, more than half of public commentators felt that more of HOME-ARP resources should be committed to a non-congregate shelter.

Subsequently, the City learned that the APRA funds subrecipient no longer intends to build a non-congregate shelter; instead subrecipient would like to build a tiny home village of affordable housing. Given the change in resources and the public support for a non-congregate shelter, the City revised the draft Allocation Plan, which now includes support for a non-congregate shelter. There continues to be a concern, however, about the ability for the community to identify sufficient funding to support and sustain operational funding for a shelter outside of HOME-ARP resources.

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.”

Because one out of two survey respondents (50%) wanted more of the allocated funding to go toward supportive services in the community. The City did not increase the funding toward supportive services; instead, choosing to include funding dedicated to a non-congregate shelter.

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.

Needs Assessment and Gaps Analysis

OPTIONAL Homeless Needs Inventory and Gap Analysis Table (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	Level of Need	Gaps Analysis
	# of Units	# 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			

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

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

Homeless as defined in 24 CFR 91.5

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 348 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
- 51% households (97 persons) were individuals without children and 49% (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.

At Risk of Homelessness as defined in 24 CFR 91.5

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

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.

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

- 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
- 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

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.

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

- 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

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

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 HGIS 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.

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

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.

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 populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

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 348 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

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

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

considered “homelessness” under may of the other HUD programs, but they do fall under the “other special populations” definition for HOME-ARP purposes.

Of the 348 students:

- 74% reported being doubled up with family or friends due to hardships (i.e., job loss, death in the family, domestic violence, incarceration of one or both parents, unlivable or unsafe housing conditions, or house fire)
- 20% reported living in shelters or transitional housing (YWCA Shelter, Noyes Home, Salvation Army, Bliss, Pivotal Point)
- 4% reported living in a hotel/motel due to a hardship
- 2% reported being unsheltered (staying in a vehicle, camper, etc.)
- 28% met the definition of “Unaccompanied Youth”— youth who live apart from their parents or legal guardian.

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 (Optional):

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 Head Start 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 Head Start 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

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

- The most recent St. Joseph PIT count (2022) identified 148 people experiencing homelessness, 127 of whom were living in shelters and 21 who were living unsheltered on the streets, in vehicles, or encampments.
 - 14% unsheltered (21) and 86% sheltered (127)
- Adults over 18 years old comprised 77% of St. Joseph's homeless population in the 2022 PIT count.
- Children and young adults comprised 23% of the homeless population as reported in the 2022 PIT count.
- Twenty-seven children under 18 years were identified as living in shelters, while none were living unsheltered at the time of the 2022 PIT count.
- An additional number of young adults (aged between 18 and 24) also experienced homelessness (7 living sheltered, none living unsheltered) during the 2022 PIT count.
- For people touching the homeless system of care through Coordinated Entry (CE), more than 115 households and 213 people were on the waiting list for housing, as of the end of May 2022.
- The majority of people on the CE waiting list at the end of May 2022 were part of families (121 individuals). Sixty-seven of those individuals were children under 18 years of age, representing 31% of the people on the CE waiting list (a much higher percentage than counted during the 2022 PIT).
- The number of people on the waiting list has grown even since January 2022. In January 2022, there were only 166 individuals on the waiting list. At the end of May 2022, the number had increased by 28% in those few short months.
- 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 or women and children only).
- There is no longer a cold weather shelter in the City of St. Joseph.
- The shelter that serves women and children is slated to shut down in July 2022.
- 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 suffers 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.

At Risk of Homelessness as defined in 24 CFR 91.5

- 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 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.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Until recently, the City of St. Joseph has one victim service provider, the YWCA, that offers specialized services and emergency shelter to people fleeing domestic violence, data violence, sexual assault, stalking, or human trafficking.

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

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

- For 2019 and 2020, there were 322 individuals who sought assistance from the YWCA and they were only able to serve 108 of those individuals (34%).
- The barriers to obtaining housing stability for the individuals and families the YWCA serves include: limited affordable housing, limited housing subsidies, challenging landlords, reduced shelter capacity, and lack of resources in surrounding communities.
- In 2020, the state’s domestic violence hotline received over 6,900 calls from individuals in the northwest region, which includes Buchanan County. Only a little over 3,900 were able to receive services.
- In 2016-2018, the YWCA and other local partners, including the City Police Department and the Buchanan County Sheriff’s implemented an evidence-based Lethality Assessment Program (LAP). The LAP program included trained police officers, on scene of a domestic violence call, who assessed a survivor’s risk for serious injury/death using a Lethality Assessment Screen. Officers immediately link “high-danger” victims to the YWCA.
- LAP enables police & DV Programs to coordinate, communicate, & cooperate. Data was used to support funding/creation of YWCA Advocate position that is embedded in the City of St. Joseph’s Police Department Family Crimes Division, which was launched in June 2020. The Advocate served 235 people in the last 12 months.
- The YWCA launched an RRH program in Spring 2020, which allowed them to place people from the shelter into rental units and provide more survivors with shelter and housing, even when they were dealing with reduced capacity (50%) due to COVID-19.
- According to lethality assessment plans from local police departments within the geographic area of the CoC, domestic violence calls DECREASED 13% from 2019 to 2020.
- In 2021, HUD approved a proposal from Interserv for their New Leaf Housing project to provide additional supports to people fleeing domestic violence, data violence, sexual assault, stalking, or human trafficking.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

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 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.

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

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, including absence of a low-barrier, housing-focused emergency shelter
- **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

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.

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

- 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 (<= 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 (<= 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.

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

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 early 2022 there was a cold weather shelter).

As of the time of the 2022 HIC, the City's current emergency shelters had only 55 emergency shelter beds that can accommodate families and only 19 beds to accommodate households without children (not including the beds available for individuals and households fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking). For the 2022 PIT, the Continuum of Care (CoC) identified over 148 individuals who were homeless. That total does not count the number of families couch surfing or living doubled up. In 2021/2022 academic year, the City of St. Joseph Unified School District counted 348 school-age students who were homeless under the broader definition. If the available emergency shelter beds were made available to all the individual students counted as homeless by the school district, less than 16% of those students would have a safe place to go under the City's current shelter system (that's not including the family members of those homeless students, who also likely need shelter beds). If you add in all the single adults and adult couples that are not part of the school district count, it becomes apparent that the City's current shelter system does not have the capacity to meet the need of households with children.

Since the HIC took place in January 2022, there have been changes in the shelter system in St. Joseph. The cold weather shelter is no longer in service in the community. Additionally, at the end of June 2022, the local hotel shelter program that served women and children will close, decreasing the number of family beds available in the community by more than 10% (six beds).

In the community survey released in advance of drafting the HOME-ARP Allocation Plan, as well as in the community engagement, including interviews, focus groups, and community meetings, there was strong support for non-congregate shelter for the City of St Joseph. Comments included:

“There is a need for an emergency shelter (non-congregate) site for the homeless to meet their basic needs.”

“We have many empty structures that aren't being used.”

“The development of non-congregate sheltering is very much needed. If combined with supportive services, it can take most all the individuals, off the street, preserving life. Without it, will be more deaths, more strain on emergency services, etc. Chronic homelessness is growing, due to source of income discrimination, and stringent background investigations. Non congregate sheltering can create a "community" a "neighborhood" for the homeless and with supportive services, on site, can assist them in moving in the direction of self-sufficiency.”

“We have zero year-round shelter beds. This is a critical need.”

“We have no shelter!!! Must I say more. We have a population that can't 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.”

“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.”

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.

Moreover, there are some sub-populations that have nowhere to go (e.g., youth and/or LGBTQ+ individuals as well as those who may have an active substance use disorder or mental health condition). Most shelters do not accept youth or LGBTQ+ individuals.

Funding sources do not exist in the City of St Joseph that provide investment in long-term infrastructure for emergency temporary shelters; to construct, renovate, or rehabilitate a building for use toward a non-congregate shelter (NCS). Even with investment of HOME-ARP into the infrastructure to fill that gap, it is unclear whether there would be resources available that would ensure the operational funds to staff and maintain an NCS in St. Joseph.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

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.

Identify priority needs for qualifying populations:

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

- 1. Increased access to housing**
 - 2. At least one new low-barrier, housing-focused, non-congregate shelter in the City of St. Joseph for all qualifying populations, including single adults**
 - 3. 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.

- **At least one new low-barrier, housing-focused, non-congregate shelter in the City of St. Joseph for all qualifying populations, including single adults**

Currently in the City of St. Joseph, there is no place that provides year-round shelter and services to people experiencing homelessness. There is a small shelter that serves families with children and another that provides shelter to people fleeing domestic violence, sexual assault, dating violence, and human trafficking.

Without a safe place for the general population of people experiencing homelessness to go for shelter, they end up staying in places not meant for human habitation. The winter weather shelter provides support, but only for a limited number of months during the year. The lack of a low-barrier, housing-focused shelter means not only are people sleeping and living in unsafe situations, but it also makes it extremely difficult to locate people to provide them the case management and supportive services they need to obtain and retain stable housing.

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

In addition to housing and shelter, 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.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

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.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The City proposes to focus the majority of the acquired HOME-ARP funding on the Production and Preservation of Affordable Housing and funding the infrastructure to build, rehabilitate, or renovate a non-congregate shelter, with a small amount toward Supportive Services. The opportunity presented by this allocation of HOME-ARP to make the sizable investment to fulfill a long-term solution (affordable housing) and strengthen an important safety net (non-congregate shelter) 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. Since it is unclear at the time of writing this Allocation Plan whether there are any community partners

who would be able to obtain funding to operate a non-congregate shelter, we hope to be flexible in the Allocation Plan to reallocate funding dedicated to a non-congregate shelter and reallocate those funds toward affordable housing, if no organization or agency can provide assurances they have the ability to fund the operations of a shelter. As such, our plan is to stage a local Notice of Funding Opportunity, with a notice of intent that accepts projects for affordable housing and/or non-congregate shelter. If there are no proposals for non-congregate shelter, we would have the flexibility to reallocate the shelter funds and apply them toward affordable rental housing production or preservation.

Once the funding decisions are made about affordable rental housing and non-congregate shelter, the City will issue a second NOFO to address supportive services.

The method and process we intend to use for solicitation and selection of projects for funding is as follows:

- The City will issue the first Notice of Funding Opportunity (NOFO), soliciting applications for funding for producing or preserving affordable housing in St. Joseph and to build, rehabilitate, or renovate a non-congregate shelter.
- We will issue the NOFO and request that applicants inform the City of their intent to apply within 20 days of the NOFO issuance, including information about whether they will be applying for producing/preserving affordable rental housing, non-congregate shelter or both.
- Applicants will be provided an additional 40 days (for a total of 60 days) to submit their full application/s 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.
- The second NOFO, for Supportive Services, will occur after the first round of allocations are awarded. 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. If there is new updated data to help inform the City about which services to prioritize, the NOFO may reflect that new data.

The City will publicly announce the projects that were awarded HOME-ARP funding on its website and through other social media.

Describe whether the PJ will administer eligible activities directly:

There is currently no plan for the City to administer eligible activities directly.

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

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

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 250,000		
Acquisition and Development of Non-Congregate Shelters	\$ 350,000		
Tenant-based Rental Assistance (TBRA)	\$		
Development of Affordable Rental Housing	\$ 675,000		
Nonprofit Operating	\$	%	5%
Nonprofit Capacity Building	\$	%	5%
Administration & Planning	\$ 62,926	4.7%	15%
Total HOME-ARP Allocation	\$1,337,926		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

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 7 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.

Additionally, the City of St. Joseph needs at least one shelter that is low-barrier and housing-focused that accepts people regardless of their household status, age, gender, race/ethnicity, sexual preference and without conditions of participation. Throughout the consultation process that Homebase conducted on behalf of the City of St. Joseph, most organizations specifically mentioned the lack of a low-barrier, housing-focused shelter in the community. They shared that the existing shelters are limited to special populations; that there is no place for single adults, youth, or adult-only families to shelter in the entire City. They expressed concern, however, that it would be challenging to stand up a new emergency shelter under current conditions where there is no funding to operate such a shelter.

St. Joseph proposes to use HOME-ARP funds to acquire land, construct, and/or rehabilitate an already existing space (such as a motel/hotel, or other building) for one low-barrier, housing-focused non-congregate shelter to respond to a key need that HOME-ARP could address. While multiple shelters have been stood up in the past few years, they closed to lack of operation funding and currently no funding for standing up a shelter has been identified. We recognize that even with HOME-ARP funding, it may be difficult to establish a non-congregate emergency shelter due to the dearth of available resources available locally to commit to operating a shelter. If through the process the City is unable to get assurances that operational funds exist to secure a shelter for the minimum period required under HOME-ARP, the city intends to reallocate the HOME-ARP funds to increase the dollars available for permanent affordable rental housing.

Lastly, 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.

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

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.

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.

HOME-ARP Production Housing Goals

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

The City of St Joseph will provide at least 7 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.

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

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.

Preferences

Commented [BKD1]: Mary Kay, please review this section carefully.

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A method of prioritization is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in

the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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

The City of St. Joseph will establish a preference for residents experiencing homelessness referred through the CoC's Coordinated Entry System (CES) based on that CES' prioritization rubric.

Coordinated Entry uses the VI-SPDAT to standardize assessment. For permanent supportive housing (PSH) units, the CoC's By-Name list is sorted first by those households who meet the definition of chronically homeless and then by their score. Those scoring nine and above on the assessment tool qualify for PSH. For rapid rehousing, the first priority is non-chronically homeless, homeless households who have not been identified as having severe service needs. Then, homeless households who have been residing in a place not meant for human habitation, a Safe Haven, or in an emergency shelter for less than 90 days. The length of time in which households have been homeless is considered when prioritizing households that meet the criteria, but there is not a minimum length or maximum length of homeless time required. The next prioritization is homeless households who are actively seeking or have sustainable income to retain housing when the RRH program ends. The final priority is homeless

households who are coming from Transitional Housing, where prior to residing in the transitional housing they had lived in a place not meant for human habitation, in an emergency shelter, or Safe Haven.

The CoC prioritizes entry to other housing and homelessness assistance programs through the CES using any combination of the following factors to prioritize homeless households:

1. Significant challenges or functional impairments, including physical, mental, developmental, or behavioral health challenges, which require a significant level of support to maintain permanent housing.
2. High utilization of crisis or emergency services to meet basic needs.
3. Extent to which households, especially youth and children, are unsheltered.
4. Vulnerability to illness or death.
5. Risk of continued homelessness.
6. Vulnerability to victimization, including physical assault, trafficking, or sex work

All eligible applicants who are experiencing homelessness will be referred for the new permanent affordable rental housing according to the CES rubric, including individuals who have received RRH and are stable and ready to transition to permanent housing without supportive services, individuals residing in PSH who are ready to transition from PSH to permanent housing without supportive services, and then individuals whose scores on the VI-SPDAT indicate that they do not need supportive services and are able to transition to permanent housing immediately upon a space becoming available.

The City and the CES operator will enter into a contract to assure that all qualifying populations can be referred to HOME-ARP funded housing through the CES. All other HOME-ARP qualifying populations will be selected in chronological order for a HOME-ARP rental project.

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 subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

While all HOME-ARP qualifying populations have a need for permanent housing, people experiencing homelessness will be preferred. With no general population emergency shelters of any kind in the City of St. Joseph, homeless people are likely to be living in places not meant for human habitation, which is of great concern to the community. In addition, gaps analyses done over the past few years have reflected high returns to homelessness amongst this population. Creation of additional affordable rental housing and/or a non-congregate shelter that preference serving people experiencing homelessness will support overall improvement in the community and individuals' lives. While there is a desire to serve all qualifying populations, stakeholders agree that if any population is most lacking, it is people currently experiencing homelessness. The greatest unmet need and most significant gap in the city is the inability to provide shelter and housing to people currently experiencing homelessness. A preference that prioritizes housing and non-congregate shelter for people experiencing homelessness is a necessity.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Template:

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

The City of St. Joseph will use the local CE process to make direct referrals to HOME-ARP projects from all HOME-ARP qualifying populations using the preferences and prioritization schema in place in the CoC.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE

process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

All qualifying populations will be included in the CE process, with people experiencing homelessness preferred first and prioritized based on current CE policies and all other populations served in chronological order.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

The CoC has established a community-wide list of all known homeless households who are seeking or may need CoC housing and services to resolve their housing crisis. The list generated during the prioritization process, referred to as the "By-Name list" or "Prioritization List," provides an effective way to manage an accountable and transparent prioritization process.

Prioritization for Permanent Supportive Housing

The By-Name list will be sorted first by those households who meet the definition of chronically homeless and then by score. Those scoring nine and above on the assessment tool qualify for PSH.

A semi-monthly meeting will be held to review the By-Name list, match households to PSH programs (after review of published program eligibility criteria), make appropriate referrals, and follow-up on past households.

Households selected for CoC-funded PSH shall be prioritized in the following order:

- A. Order of Priority in CoC Program-funded PSH Beds Dedicated to Households Experiencing Chronic Homelessness and PSH Prioritized for Occupancy by Households Experiencing Chronic Homelessness.
 1. First priority shall be chronically homeless households residing in a place not meant for human habitation, a Safe Haven, or an emergency shelter and the severity of the household's service needs by By-Name List order.
 2. Where there are no chronically homeless households within the CoC's geographic area, such PSH beds will be prioritized based on the Section B below.
- B. Order of Priority in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Households Experiencing Chronic Homelessness
 1. First Priority—Homeless Households with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs, as determined by the VI-SPDAT score. A household that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs.
 2. Second Priority—Homeless Households with a Disability with Severe Service Needs, as determined by the VI-SPDAT score. A Household that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a Safe Haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which

households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

3. Third Priority—Homeless Households with a Disability coming from places not meant for human habitation, Safe Haven, or emergency shelter without severe service needs. A household that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a Safe Haven, or an emergency shelter where the household has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.
 4. Fourth Priority—Homeless Households with a Disability Coming from Transitional Housing. A household that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes households residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.
- C. Target Populations: Recipients of CoC Program-funded PSH shall follow the orders of priority above, as adopted by the CoC, while also considering the goals and any identified target populations served by the project.
- D. CE Prioritization: In addition to the prioritization of CoC-funded permanent supportive housing beds as stated above in Sections A and B, the CoC prioritizes entry to other housing and homelessness assistance programs through the CE system using any combination of the following factors to prioritize homeless households:
1. Significant challenges or functional impairments, including physical, mental, developmental, or behavioral health challenges, which require a significant level of support in order to maintain permanent housing.
 2. High utilization of crisis or emergency services to meet basic needs.
 3. Extent to which households, especially youth and children, are unsheltered.
 4. Vulnerability to illness or death.
 5. Risk of continued homelessness.
 6. Vulnerability to victimization, including physical assault, trafficking, or sex work

In cases where the assessment tool does not produce the entire body of information necessary to determine a household's prioritization, either because of the nature of self-reporting, withheld information, or circumstances outside the scope of assessment questions, the CoC allows case workers and others working with households to provide additional information through case conferencing or another method of case worker input.

In the event that two or more homeless households within the same geographic area are identically prioritized for the next available unit, and each household is also eligible for that unit, the CoC selects the household with most months homeless in the determination of which household receives a referral to the next available unit.

Prevention Services/Rapid Rehousing (RRH) Prioritization

- A. Within the CoC, households selected for CoC-funded RRH, other RRH, or prevention shall be those who are not chronically homeless and then organized by the following:
 - 1. *First priority*-Homeless households who have not been identified as having severe service needs.
 - 2. *Second Priority*-Homeless households who have been residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for less than 90 days. The length of time in which households have been homeless should be considered when prioritizing households that meet the criteria, but there is not a minimum length or maximum length of homeless time required.
 - 3. *Third Priority*-Homeless households who are actively seeking or have sustainable income to retain housing when the RRH program exits.
 - 4. *Fourth Priority*-Homeless households who are coming from Transitional Housing. A household that is eligible for CoC program-funded RRH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes households residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.
- B. Households must pay 30% of their adjusted annual gross income while receiving rapid rehousing assistance.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

The City does not intend to use another referral method for a project or activity in addition to the CE process. We intend to only use the CE process and open that up to all qualifying populations.

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City of St Joseph will not limit eligibility of HOME-ARP project to a particular qualifying population.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City of St. Joseph will not implement a limitation.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

No limitation was identified for the City of St. Joseph's Allocation Plan.

HOME-ARP Refinancing Guidelines

- *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*

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

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

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

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

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

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

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

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

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

- *Other requirements in the PJ's guidelines, if applicable:*

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