

State of Missouri HOME-ARP Allocation Plan

Revised September 2023

Prepared by the Missouri Housing Development Commission



I. Consultation

Summarize the consultation process:

Missouri Housing Development Commission (MHDC) provided and conducted several consultation opportunities with all HUD required organizations and stakeholders that serve the qualifying populations of the HOME-ARP program. On December 6, 2021, MHDC met virtually with the Missouri Interagency Council on Homelessness to receive feedback and discuss unmet needs of qualifying populations, in addition to gaps in funding or services. The Missouri Interagency Council on Homelessness membership consists of state departments, non-profit and fair housing agencies, eight Missouri Continuum of Care (CoC), and formerly homeless citizens. There was also a presentation and discussion of the initial results of the data analysis completed to inform the needs and gaps analysis in this plan, which utilized data from recent Point In Time Counts and Housing Inventory Charts from all Missouri Continua.

Virtual listening sessions were held on March 29, 2022 and March 31, 2022. During the listening sessions, MHDC provided an overview of the HOME-ARP program, definitions of the qualifying populations of the program, and eligible activities. MHDC asked questions of the participants to prompt feedback on the highest priorities for serving qualifying populations, as well as, unmet housing and services needs within the respective communities of the participants. A total of 66 individuals participated in the listening sessions, including representatives from the state's Fair Housing and Civil Rights organization *Empower Missouri*, the city governments of St. Louis, St. Joseph, and Springfield, and a wide variety of other organizations and agencies whose comments were representative of communities across the state. Multiple invitations to participate in the listening sessions were sent by email to a broad group of stakeholders, which included multiple organizations, including all Missouri Public Housing Agencies, all Missouri Community Action Agencies, organizations funded or previously funded through MHDC programs, Missouri Interagency Council on Homelessness email distribution list, and MHDC's interested parties email distribution list. The participation in the two listening sessions included feedback from organizations that provide direct services to all of the Qualifying Populations, as well as stakeholders that serve as advocacy organizations for the Qualifying Populations.

In addition, an online survey was sent out to stakeholders and encouraged to be shared. The survey was made available for 20 days and yielded a successful outcome with meaningful feedback. A total of 92 responses were received. The responses provided feedback on the needs and gaps of qualifying populations, as well as, the funding needs and gaps related to HOME-ARP eligible uses. Multiple invitations to participate in the survey were sent by email to a broad group of stakeholders, which included multiple organizations, including all Missouri Public Housing Agencies, all Missouri Community Action Agencies, organizations funded or previously funded through MHDC programs, Missouri Interagency Council on Homelessness email distribution list, and MHDC's interested parties email distribution list. The completion of the survey included responses from organizations that provide direct services all the Qualifying Populations, as well as stakeholders that serve as advocacy organizations for the Qualifying Populations. Stakeholders that were unable to participate in the listening sessions were encouraged to complete the online survey.

Further, MHDC welcomed individual consultation from stakeholders as well as targeted consultation in the form of conference calls and emails. These methods were conducted in several manners to ensure the ease of meaningful participation by persons with disabilities. Outreach and invitations for consultation on the development of the State of Missouri's HOME-ARP Allocation Plan included agencies or organizations that provide direct services to all Qualifying Populations, Continuum of Care lead agencies statewide, public housing agencies statewide, organizations that address civil rights and fair housing, and organizations that address the needs of persons with disabilities. The agencies and organizations that responded to the outreach and invitations through active consultation are included in the following Consultation Chart.

List the organizations consulted, and summarize the feedback received from these entities:

Agency/ Organization Consulted	Type of Agency/ Organization	Qualifying Population Served	Method of Consultation	Result
38th Judicial Circuit	County Circuit Courts Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Persons with disabilities, Unaccompanied Youth)	Survey Response: 03/30/2022	Need for supportive services
AVENUES for Northeast Missouri, Inc.	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided
Avenues Help	Victim Service Provider Staff participation: 1	Domestic Violence/Sexual Assault Trafficking	Listening Session: 03/29/2022	Participated in listening session, no specific comment provided
Burrell Behavioral Health	Community Mental Health Center Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/30/2022	Provided survey response of priorities, no specific comment provided

Callaway Cares	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Seniors, Unaccompanied Youth)	Listening Session: 03/29/2022	Need for rehabilitation of abandoned homes, need for affordable housing is greater than the availability in community
Callaway Cares and One Voice for Many Homeless	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Seniors, Unaccompanied Youth)	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided
Catholic Charities	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/29/2022	Participated in listening session, no specific comment provided
Catholic Charities	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors)	Survey Response: 03/29/2022	Need for supportive services, specifically mental health and substance abuse resources
Central Missouri Community Action	Community Action Agency Staff participation: 2	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations	Survey Response: 03/16/2022 & 03/23/2022	Need for transportation services
City of Kansas City, Missouri	Entitlement City Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided

City of Springfield, Missouri	Entitlement City Staff participation: 3	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/29/2022 & 03/31/2022	Need for shelter to address homeless population in community
City of Springfield, Missouri	Entitlement City Staff participation: 3	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16/2022	Need for more shelter and affordable housing with funding to ensure the viability of each new facility over the next few years, partnerships between funding sources are needed to complete large scale housing development
City of Springfield, Missouri	Entitlement City Staff participation: 3	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Public Hearing: 07/21/2022	Support for use of funds for non-congregate shelter, needs assessment is well described and the needs support the allocation of funds
City of St. Joseph Health Department	Entitlement City Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/30/2022	Provided survey response of priorities, no specific comment provided
City of St. Joseph, Missouri	Entitlement City Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided

City of St. Louis Dept. of Human Services	Entitlement City Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/24/2022	Provided survey response of priorities, no specific comment provided
Central Missouri Community Action	Community Action Agency Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided
Community Council of St. Charles	Homeless Service Provider, CoC Lead Agency Staff participation: 2	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Persons with disabilities)	Listening Session: 03/29/2022 & 03/31/2022	Community has rental assistance available, but none of the available units are affordable, many jobs available but households are unable to find units that they can afford, experiencing pressure on the housing stock with even high earning households, increase is disabled households within homeless population
Community Council of St. Charles	Homeless Service Provider, CoC Lead Agency Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/25/2022	Capacity building is needed for the homeless service system to better respond to unhoused persons

Community Missions Corporation	Homeless Service Provider Staff participation: 1	Homeless	Listening Session: 03/31/2022	Provided survey response of priorities, no specific comment provided
Community Partnership of the Ozarks	Service Provider Staff participation: 2	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Unaccompanied Youth)	Survey Response: 03/28/2022	A comprehensive plan has been developed for our community related to homelessness and stable housing, need funding to help move the plan forward and make significant progress in addressing the issue
Compass Health, Inc.	Health Care Provider Staff participation: 1	Homeless At-risk of homelessness Other Populations (Persons with disabilities)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided
Compass Health, Inc.	Health Care Provider Staff participation: 2	Homeless At-risk of homelessness Other Populations (Persons with disabilities)	Survey Response: 03/23/2022 & 03/29/2022	Provided survey response of priorities, no specific comment provided
Council of Churches/Safe to Sleep	Homeless Service Provider Staff participation: 1	Homeless	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided
Council on Families in Crisis, Inc.	Victim Service Provider Staff participation: 1	Domestic Violence/Sexual Assault Trafficking	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided
Courtesy Care Plus, LLC	Health Care Provider Staff participation: 1	Other Populations (Persons with disabilities)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided

Doorways Housing	Homeless Service Provider Staff participation: 1	Homeless	Listening Session: 03/29/2022	Need rehabilitation/upgrading of existing affordable housing,
Douglass Community Services, Inc.	Service Provider Staff participation: 1	At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors)	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided
East Missouri Community Action Agency	Community Action Agency Staff participation: 1	Homeless At-risk of homelessness Other Populations (Persons with disabilities, Seniors)	Survey Response: 04/01/2022	Provided survey response of priorities, no specific comment provided
East Missouri Community Action Agency	Community Action Agency Staff participation: 2	Homeless At-risk of homelessness Other Populations (Persons with disabilities, Seniors)	Listening Session: 03/29/2022 & 03/31/2022	More mental health services needed
Economic Security Corporation of Southwest Area	Community Action Agency Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided
Elevate Branson	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities)	Listening Session: 03/31/2022	Job development programs to assist people in increasing their income to be able to afford housing
Elevate Branson	Service Provider Staff participation: 2	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities)	Survey Response: 03/30/2022 & 03/31/2022	Make process to access funding quicker and simpler, eliminate paperwork requirements

Empower Abilities	Disabilities Service Provider (All disabilities) Staff participation: 1	Other Populations (Persons with disabilities)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided
Empower Missouri	Fair Housing & Civil Rights Organization Staff participation: 1	Does not provide direct services	Listening Session: 03/29/2022	Need for affordable housing, long waitlists for housing across Missouri, need for more crisis response teams and mental health services
Empower Missouri	Fair Housing & Civil Rights Organization Staff participation: 1	Does not provide direct services	Survey Response: 03/17/2022	Provided survey response of priorities, no specific comment provided
Empower Missouri	Fair Housing & Civil Rights Organization Staff participation: 1	Does not provide direct services	Public Hearing: 07/21/2022	Need for permanent supportive housing
Empower 2 Move	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/17/2022	Provided survey response of priorities, no specific comment provided
Empower 2 Move	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided

Epworth	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided
Faith Covenant Ministries	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided
Family Guidance Center	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors)	Survey Response: 03/30/2022	Provided survey response of priorities, no specific comment provided
Fayette R-III	School District Staff participation: 1	Homeless At-risk of homelessness Other Populations (Persons with disabilities, Unaccompanied Youth)	Survey Response: 03/16/2022	Need for mental health services and counseling support for homeless students
Finding Grace Ministries	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided
First Chance For Children	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Persons with disabilities, Unaccompanied Youth)	Survey Response: 03/16/2022	Need wrap around services for families, need for shelters with day time services

First Christian Church Food Pantry	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided
First Step Back Home, Inc.	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/28/2022	Need for transitional housing to help assist household in making progress
FosterAdopt Connect	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Unaccompanied Youth)	Survey Response: 03/17/2022	Provided survey response of priorities, no specific comment provided
Gateway Housing First	Service Provider Staff participation: 2	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/13/2022 & 03/17/2022	Need for dedicated units to those that have been unhoused or have other needs that prevent them from utilizing rental assistance and renting with traditional landlords

Gateway Housing First	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Persons with disabilities, Seniors, Unaccompanied Youth)	Public Comment: 07/21/2022	Prioritize funds for the most underserved qualifying populations, use the QAP to establish a set-aside of funds for non-profit and CHDO developers that specialize in PSH, consider non-congregate shelter to be developed as part of a PSH development
Good Samaritan Center	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/29/2022	Participated in listening session, no specific comment provided
Great Circle	Youth/Victim Service Provider Staff participation: 1	Homeless Domestic Violence/Sexual Assault Trafficking Other Populations (Unaccompanied Youth)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided
Habitat for Humanity of St. Charles County	Service Provider Staff participation: 1	Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/29/2022	Provided survey response of priorities, no specific comment provided
Habitat for Humanity-Cape Area	Service Provider Staff participation: 1	Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided
Harmony House	Victim Service Provider Staff participation: 1	Domestic Violence/Sexual Assault Trafficking	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided

Hope House	Victim Service Provider Staff participation: 1	Domestic Violence/Sexual Assault Trafficking	Survey Response: 04/01/2022	Provided survey response of priorities, no specific comment provided
Housing Authority of Springfield	Housing Authority Staff participation: 1	At-risk of homelessness Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/29/2022	Participated in listening session, no specific comment provided
Institute for Community Alliances	HMIS Lead Agency Staff participation: 1	Does not provide direct services	Virtual Meeting: 12/06/2021	Participated in virtual public hearing, no specific comment provided
Jobs Plus	Employment Services Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/29/2022 & 03/31/2022	Participated in listening session, no specific comment provided
Jobs Plus	Employment Services Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 04/05/2022	Need for funding at local level to develop shelter and housing
Jordan Valley Community Health Center	Health Care Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/29/2022	Provided survey response of priorities, no specific comment provided
Journey Home of Johnson County	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/29/2022	Homeless shelter clients are ready for housing but are unable to find affordable and available units

Lily's House	Recovery Housing Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking	Survey Response: 03/29/2022	Provided survey response of priorities, no specific comment provided
Lincoln University Cooperative Extension Human Nutrition and Health	Public University Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided
Love Columbia	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Persons with disabilities, Seniors)	Public Hearing: 07/12/2022	Support for use of funds for development of affordable housing, need for mixed use developments, need for supportive services, specifically mental health services
Lydia's House	Victim Service Provider Staff participation: 1	Domestic Violence/Sexual Assault Trafficking	Survey Response: 04/04/2022	Provided survey response of priorities, no specific comment provided
McCormack Baron Salazar	Developer Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/29/2022	Need for use of funds for housing operating costs and to assist with cash flow, concern with the deep affordability requirements so the use of funds for operating subsidy will help developers, need for service plans to provide wrap-around services to tenants

Mercy Health Systems	Health Care Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided
Missouri Coalition Against Domestic and Sexual Violence	Victim Service Provider Coalition Staff participation: 1	Domestic Violence/Sexual Assault Trafficking	Survey Response: 03/29/2022	Provided survey response of priorities, no specific comment provided
Missouri Department of Mental Health	State Department Staff participation: 2	Homeless At-risk of homelessness Other Populations (Persons with disabilities)	Listening Session: 03/29/2022	Need for more case management services, services and financial assistance that are able to serve multiple populations, funding for IDs and birth certificates/gap funding, need for more second chance housing, more units with utilities included within the rent payment to assist households with major debt history
Missouri Inclusive Housing	Disability Advocacy Organization Staff participation: 1	Other Populations (Persons with disabilities, Seniors)	Listening Session: 03/29/2022 & 03/31/2022	Concern with the number of affordable units transitioning to market rate units after the end of the affordability period, concern with potential for dramatic rise in rental rates and displacing tenants

Missouri Interagency Council on Homelessness	Interagency Council/Advocacy Organization Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Virtual Meeting: 12/06/2021	Participated in virtual public hearing, no specific comment provided
Missouri Mentoring Partnership	Youth Services Provider Staff participation: 1	Homeless At-risk of homelessness Other Populations (Unaccompanied Youth)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided
Missouri River Regional Library	Library Staff participation: 3	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/17/2022	Need for locations for unhoused persons to access shower
North East Community Action Agency	Community Action Agency Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided
North East Community Action Agency	Community Action Agency Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/15/2022	Provided survey response of priorities, no specific comment provided
Ozark Area Community Action Agency	Community Action Agency Staff participation: 2	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16/2022	Recent increases in rental costs

Our House - Caring for Callaway's Homeless	Homeless Service Provider Staff participation: 1	Homeless	Survey Response: 03/29/2022	Provided survey response of priorities, no specific comment provided
Our Lady's Inn	Victim Service Provider Staff participation: 1	Homeless Domestic Violence/Sexual Assault Trafficking	Survey Response: 03/28/2022	Need for more assistance to help households with housing voucher cover costs such as utilities to help maintain their housing
Ozarks Technical Community College	Public Community College Staff participation: 1	Homeless At-risk of homelessness Other Populations (Unaccompanied Youth)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided
Ozarks Technical Community College	Public Community College Staff participation: 1	Homeless At-risk of homelessness Other Populations (Unaccompanied Youth)	Survey Response: 03/30/2022	Provided survey response of priorities, no specific comment provided
Pettis County Community Partnership, Inc.	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided
Preferred Pets & Pals	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors)	Survey Response: 03/17/2022	Need for assistance for unhoused or those in shelters who own or care for pets or animals
ReDiscover	Homeless Service Provider Staff participation: 1	Homeless At-risk of homelessness Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/29/2022	Provided survey response of priorities, no specific comment provided

reStart, Inc.	Homeless Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors)	Listening Session: 03/29/2022	Participated in listening session, no specific comment provided
Safe House of Southeast Missouri	Victim Service Provider Staff participation: 1	Domestic Violence/Sexual Assault Trafficking	Survey Response: 03/29/2022	Congregate shelter is also needed
Samaritan Outreach Center	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/29/2022	Provided survey response of priorities, no specific comment provided
Second Baptist Church Community Action Ministry	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/17/2022	Provided survey response of priorities, no specific comment provided
Second Christian Church	Religious Institution Staff participation: 1	Other Populations	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided
Springfield First Community Bank	Financial Institution Staff participation: 1	Does not provide direct services	Listening Session: 03/29/2022	Participated in listening session, no specific comment provided
Springfield-Greene County Health Department	Health Care Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors)	Survey Response: 04/01/2022	Provided survey response of priorities, no specific comment provided

St. Mark's United Methodist Church	Religious Institution Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided
St. Patrick Center	Homeless Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided
Sts. Joachim and Ann Care Service	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided
Sts. Joachim and Ann Care Service	Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/29/2022	Provided survey response of priorities, no specific comment provided
Synergy Services	Victim Service Provider, Youth Services Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Unaccompanied Youth)	Listening Session: 03/31/2022	Need for child care assistance, legal services assistance
The Kitchen Inc.	Homeless Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16/2022	Provided survey response of priorities, no specific comment provided

The Rolla Mission	Homeless Service Provider Staff participation: 1	Homeless	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided
The Salvation Army - Columbia	Homeless Service Provider Staff participation: 1	Homeless Other Populations (Veterans, Persons with disabilities)	Survey Response: 03/30/2022	Provided survey response of priorities, no specific comment provided
The Salvation Army - Jefferson City	Homeless Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/17/2022	Potential difficulties with creation of affordable units because of history with difficulty related to tenants
The Salvation Army - Springfield	Homeless Service Provider Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors)	Survey Response: 03/30/2022	
The Salvation Army - St. Louis	Homeless Service Provider Staff participation: 1	Homeless At-risk of homelessness Other Populations (Veterans, Persons with disabilities, Seniors)	Survey Response: 03/30/2022	Need for funding for emergency shelter operations, case management, and housing for those exiting shelter
Transformational Housing	Service Provider Staff participation: 6	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/16, 03/17/, 03/18, 03/19/2022	Need to include persons who are utilizing the housing and services into the process, need for transportation and affordable housing options

True North of Columbia, Inc.	Victim Service Provider Staff participation: 1	Domestic Violence/Sexual Assault Trafficking	Survey Response: 03/28/2022	Provided survey response of priorities, no specific comment provided
University of Central Missouri	Public University Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Unaccompanied Youth)	Listening Session: 03/31/2022	Need services that will catch people before they become literally homeless, financial literacy, substance abuse services, mental health services
Voluntary Action Center	Service Provider Staff participation: 1	Homeless At-risk of homelessness Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 03/28/2022	Need for shelter and resource center in Columbia
Welcome Home Veterans	Veterans Service Provider Staff participation: 1	Homeless At-risk of homelessness Other Populations (Veterans)	Listening Session: 03/29/2022	Participated in listening session, no specific comment provided
West Central Missouri Community Action Agency-St. Clair County PHA	Community Action Agency, Public Housing Authority Staff participation: 1	Homeless At-risk of homelessness Domestic Violence/Sexual Assault Trafficking Other Populations (Veterans, Persons with disabilities, Seniors, Unaccompanied Youth)	Survey Response: 04/04/2022	Provided survey response of priorities, no specific comment provided
YWCA St. Joseph	Victim Service Provider Staff participation: 1	Domestic Violence/Sexual Assault Trafficking	Listening Session: 03/31/2022	Participated in listening session, no specific comment provided

II. Public Participation

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

Public Comment Period: 07/08/2022 – 07/22/2022 and 07/25/2023 - 08/09/2023

Public Hearing Date: 07/12/2022 and 07/21/2022

Two public comment periods were held on July 8, 2022, through July 22, 2022, and July 25, 2023, through August 9, 2023. Two public hearings were conducted, including one in-person hearing centrally located in Columbia, MO on July 12, 2022 and one virtual public hearing on July 21, 2022. The public notices were made available on MHDC and DED's websites and the public hearing date was posted on MHDC's calendar of event on MHDC's website. These public notices were also sent out through MHDC's multiple distribution lists.

Describe any efforts to broaden public participation:

In an effort to broaden public participation, MHDC made available several opportunities for stakeholders and the general public to provide feedback and comment throughout the consultation process. An online survey was made available, as well as virtual listening sessions and public hearings. Information to access the survey, listening sessions, and public hearings was provided through various email blasts to stakeholder groups and distribution lists, as well as posted on MHDC's website. Recipients were encouraged to share the opportunities with their contacts and communities as well.

Additionally, on June 20, 2023, MHDC continued its efforts to gain public participation by sending another round of email blasts and placing phone calls to civil right and fair housing organizations for feedback. No additional feedback was received during this outreach.

Summarize the comments and recommendations received through the public participation:

Public Hearing Comments

Questions about how the HOME-ARP program will be administered made up the majority of discussion at the two public hearings held to encourage public comment on Missouri's HOME-ARP Plan. Many of these questions could be answered at the time they were posed, although some answers must await HUD's approval of the Missouri HOME-ARP Plan.

Two public hearing comments expressed concern about Missouri House Bill 1606, a law passed in the 2022 legislative session. Part of this bill provides performance incentives for local governments that reduce the number of people living on the streets or in encampments. Those commenting on the bill were concerned that this would draw local funds away from Permanent Supportive Housing (PSH). One comment was received with a concern that the new law would mean that local governments would not follow the Housing First model. There were no direct suggestions about use of HOME-ARP funds to

address the concerns about Missouri House Bill 1606 provisions.

One public hearing participant stated, “Your needs assessment is well described, and the needs support your allocation of the HOME-ARP funds.” Another public hearing participant commented, “I would like to thank the MHDC staff for taking the non-congregate sheltering needs of the state’s entitlement communities into account as you developed your HOME-ARP Allocation Plan.”

Written Comments

Only one set of written comments was received during the public comment period for the HOME-ARP Plan. These comments were provided by Gateway Housing First, located in St. Louis, Missouri. Gateway Housing First requested three things in their comments. The three requests/suggestions are provided as direct quotes below:

1. “Prioritize HOME-ARP for the most underserved qualifying populations,” where the commenter indicated that the most underserved are those who require Permanent Supportive Housing (PSH).
2. “Use the QAP to establish a set-aside of HOME-ARP for non-profit and CHDO developers that specialize in Permanent Supportive Housing, to ensure the units produced create lasting housing infrastructure to reduce homelessness among those most underserved, ongoingly.”
3. “MHDC’s non-congregate shelter allocation plan: Consider broadening the plan to allow for non-congregate shelter spaces to be developed as part of a PSH development.

Summarize any comments or recommendations not accepted and state the reasons why:

Gateway Housing First submitted written comments stating that HOME-ARP funds administered by MHDC should be prioritized for permanent supportive housing (PSH). Further, comments from this organization also included a request that HOME-ARP funds should have a set-aside for nonprofit and CHDO developers that specialize in PSH. Finally, this organization suggested that HOME-ARP funds be used to link non-congregate shelter space with PSH. These written comments were carefully considered, and the link between two verbal public hearing comments and the written comments was recognized.

While PSH continues to be a need in Missouri, MHDC actively encourages housing for special needs and other vulnerable populations through its annual Qualified Allocation Plan (QAP). There are selection preferences for serving these populations, as well as for developments that include units with income restrictions at or below 30% AMI (Extremely Low Income/ELI). Thus, the selection preferences already in place encourage PSH.

In addition, MHDC recognizes the critical need for ELI housing units in Missouri. HOME-ARP funds are an important tool in facilitating the development and acquisition/rehabilitation of units with rents that will be affordable for ELI households. While some of these housing units are likely to be PSH, Missouri must also consider the overall need for ELI units to serve all who are income qualified rather than limiting the use of HOME-ARP to PSH units to be responsive to the needs of each individual community in a large urban and rural state.

With regard to the suggestion that HOME-ARP funds be used to link non-congregate shelter space with PSH, there is nothing in the HOME-ARP Plan that would prevent this. However, making a specific priority for non-congregate shelters linked with PSH would reduce the flexibility with which potential grantees could design HOME-ARP-funded housing solutions. Reduced flexibility will hamper innovation among HOME-ARP applicants; therefore, MHDC does not intend to create a priority or preference for non-congregate shelter space linked with PSH when it is responsible for serving a diverse state-wide community base.

III. Needs Assessment and Gaps Analysis

This section provides a needs assessment and gap analysis for households qualifying for assistance through the HOME American Rescue Plan (HOME-ARP) program. The four qualifying populations (QPs) under the HOME-ARP program analyzed below are:

1. Homeless
2. At risk of homelessness
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
4. Other Populations

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

Homeless Qualifying Population

This section presents data and analysis for the homeless QP. For the purpose of HOME-ARP, this includes not only those who are homeless under the HUD definition, but also those who (1) will lose their housing within 14 days of application for homeless assistance; and (2) unaccompanied youth under 25 years of age or families with children and youth who do not otherwise qualify (including unaccompanied youth and families identified as homeless under the McKinney-Vento definition).

Data describing Missouri's Housing Inventory Count (HIC) for 2020 are shown in the table below. The table also includes data on the state's homeless populations based on the 2020 Point-in-Time Count (PIT).¹ It concludes with a gap analysis.

² National Center for Injury Prevention and Control, Centers for Disease Control and Prevention. *The National Intimate Partner and Sexual Violence Survey: 2010-2012 Report*. Atlanta, GA: April 2017. URL: <https://www.cdc.gov/violenceprevention/pdf/NISVS-StateReportBook.pdf>.

Missouri's HIC and PIT Data and Gap Analysis

CURRENT INVENTORY					
	Family		Adults Only		Veterans
	# of Beds	# of Units	# of Beds	# of Units	# of Beds
Emergency Shelter	1,753	490	2,054	NA	140
Transitional Housing	965	375	781	NA	167
Safe Haven	0	0	51	NA	25
Total Inventory	2,718	865	2,886	NA	332

HOMELESS POPULATION				
	Family HH (at least 1 child)	Family Households (count)	Adult HH (no child)	Veterans
Sheltered Homeless	1,969	669	2,910	373
Unsheltered Homeless	142	35	1,506	89
Total Homeless	2,111	704	4,416	462

GAP ANALYSIS					
	Family		Adults Only		Veterans
	# of Beds	# of Units	# of Beds	# of Units	# of Beds
Current Gap	-	-	1,530	NA	130
Current Surplus	607	161	-	NA	-

Data Sources: HUD Point In Time (PIT) 2020; Continuum of Care Housing Inventory Count (HIC) 2020

Housing counts were categorized as emergency shelter, transitional housing, or safe haven housing. HIC data were analyzed with PIT data to produce a gap analysis for the State of Missouri.

Family households—those with at least one child—numbered 2,111 in January 2020. Slightly less than 7% of these households were unsheltered.

There were 4,416 homeless adults in households without children counted in Missouri in January 2020. More than one-third (34%) of these individuals were unsheltered at the time of the count.

Veterans made up slightly more than 10% of Missouri's adult household homeless population and 6% of its unsheltered adult household population.

Gap analysis indicates a surplus of family units for families. ***This result should be interpreted with care.*** There are several reasons why the surplus calculation may not reflect an accurate picture of need among homeless families. First, while PIT counts are based on the best information available, the PIT is subject to volunteers' ability to locate and identify members of the homeless population. This is a challenging undertaking, and it is likely that undercounts occur throughout the United States.

Second, some shelters and units have various types of restrictions that make it impossible for some members of the homeless population to access them. For instance, LGBTQ+ persons are not welcome at some facilities. In addition, some facilities may have other restrictions that limit access, such as a sobriety requirement. Third, shelters and other housing units may not be located in proximity to all who are experiencing homelessness. Further, some areas such as St. Joseph have no shelter; other areas have very limited shelter space. Service providers and other stakeholders throughout the state regularly report a

lack of available shelter beds or housing units for homeless families.

Demographics for persons who are part of the homeless population under the HUD definition are shown in the table below.

HUD Homeless Persons by Gender, Race and Ethnicity, 2020

	Year (2020)	% Total
Total Persons Experiencing Homelessness (HUD definition)	6,527	
<i>Total Persons Experiencing Homelessness by Gender</i>		
Female	2,952	45.3%
Male	3,540	54.3%
Transgender	23	0.4%
<i>Total Persons Experiencing Homelessness by Race</i>		
American Indian	87	1.3%
Asian	35	0.5%
Black	2,489	38.1%
Multiple races	372	5.7%
Pacific Islander	22	0.3%
White	3,522	54.0%
<i>Total Persons Experiencing Homelessness by Ethnicity</i>		
Hispanic/Latino	326	5.0%
Non-Hispanic/Non-Latino	6,201	95.0%

While the majority of persons experiencing homelessness as defined by HUD are male (54.3%), a sizeable minority are female (45.3%). Further, while the number of reported transgender homeless persons is quite low (0.4%), this result must be interpreted with care due to challenges in identifying and reporting accurate results for the transgender community.

Statewide, White persons make up the largest group of homeless persons (54.0%). The next largest group is Black (38.1%). Given that Whites make up 82.6% of the state's population and Blacks make up only 11.8%, it is clear that Blacks disproportionately experience homelessness in Missouri. Multiple race individuals make up 5.7% and American Indians make up 1.3% of the HUD homeless population in Missouri.

The next table displays data for persons experiencing homelessness as defined by HUD and who are unaccompanied youth, children of youth, and parenting youth.

Total Persons Experiencing Homelessness as Unaccompanied Youth, Children of Youth, and Parenting Youth

Youth < 18 years	194
Youth 18-24 years	470
Children of Youth	157
Parenting Youth	117
Total	938

Although unaccompanied youth, the children of youth, and parenting youth make up 14.3% of the total number of persons experiencing HUD homelessness in Missouri, this group is especially vulnerable and is likely to require specialized outreach and social services to establish effective interventions.

McKinney-Vento Homeless Data

Households who are defined as homeless under the McKinney-Vento Act are eligible for assistance with HOME-ARP funds and may be part of one or more HOME-ARP qualifying populations (Homeless, At Risk of Homelessness, Fleeing Domestic Violence, and Other Qualifying Population). Thus, this Plan includes analysis of the number of McKinney-Vento students in Missouri. The table below is based on the 2019-2020 school year, the most recent year for which statewide data are available.

Missouri McKinney-Vento Homeless Students, 2019-2020

Total Homeless Students Enrolled	Shelters	Doubled Up	Unsheltered	Hotels/Motels
34,942	2,072	29,965	812	2,093

Source: Missouri Department of Elementary & Secondary Education, December 2021

Demographic data for the McKinney-Vento homeless population in Missouri are not available.

At Risk of Homelessness Qualifying Population

The largest segment of the group that is at risk of homelessness is made up of households with an annual income below 30 percent of median family income for the area. Missouri classifies these households as Extremely Low Income (ELI) households. The next table shows data for ELI owner and renter households for all demographic groups combined.

Extremely Low Income Households

Extremely Low Income Households	ELI Owners	% of ELI Owners	ELI Renters	% of ELI Renters
Households	112,445	6.9%	200,945	25%

Source: CHAS, 2015-2019

According to CHAS data, 112,455 Missouri owner households are at risk of homelessness, by HUD's definition of having an annual household income below 30% AMI. ELI owner households make up about 6.9% of the total owner households in Missouri. There is a greater amount of ELI renter households at risk of homelessness. CHAS data shows 200,945 renter households are ELI. This data expresses 25% of all Missouri renter households are at risk of homelessness.

Additionally, CHAS data shows that about 18% of renter households and about 42% of owner households have at least 1 of 4 household problems. CHAS defines household problems as: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 30%. Having at least 1 of 4 household problems may also put a household at greater risk for becoming homeless.

ELI Affordable and Available Units and Gap Analysis

A critical but often overlooked aspect of affordable rental housing analysis is availability. In other words,

affordable units may exist, but they may already be occupied. Therefore, they are not available to other income-qualified households.

The available and affordable approach has been used as part of the gap analysis for this Plan. The table below provides data for housing units available and affordable to ELI households. The table shown below provides a gap analysis for ELI renter households and units that are both affordable and available to ELI renters.

ELI Households Available and Affordable Rental Units

Rental Households With 30% AMI or Less	183,311
Total Units Affordable at 30% AMI or less	123,722
(Deficit) of Affordable Units at 30% AMI or Less	(59,589)
Units Affordable & Available at 30% AMI or Less	60,545
(Deficit) of Affordable & Available Units at 30% AMI or Less	(122,766)

Source: American Community Survey, 2015-2019 5-Year Estimates

An analysis of affordability alone indicates a gap of 59,589 units for ELI households. However, once unit availability is incorporated into the analysis, the gap is 122,766. In other words, there are 122,766 fewer units that are available and affordable at the ELI level than there are ELI renter households in Missouri.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Domestic Violence

This section presents data and analysis identifying populations fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, and stalking based on national and state-level reporting produced by the National Center for Injury Prevention and Control, a unit of the Centers for Disease Control and Prevention (CDC).² Data for reports of domestic violence in Missouri were gathered from the Missouri State Highway Patrol Statistical Analysis Center.³ Data and analysis related to human trafficking were obtained from World Population Review⁴ and the National Human Trafficking Hotline.⁵

The National Center for Injury Prevention and Control defines intimate partner violence as contact sexual violence, physical violence, and/or stalking by an intimate partner. This definition approximates the definition used by the HOME-ARP program. The table below shows the estimated number of persons who experience intimate partner violence in Missouri on an annual basis by gender.

² National Center for Injury Prevention and Control, Centers for Disease Control and Prevention. *The National Intimate Partner and Sexual Violence Survey: 2010-2012 Report*. Atlanta, GA: April 2017. URL: <https://www.cdc.gov/violenceprevention/pdf/NISVS-StateReportBook.pdf>.

³ Missouri State Highway Patrol Statistical Analysis Center. URL: https://www.mshp.dps.missouri.gov/MSHPWeb/SAC/crime_data_domestic_violence_960grid.html.

⁴ World Population Review. URL: <https://worldpopulationreview.com/state-rankings/human-trafficking-statistics-by-state>.

⁵ National Human Trafficking Hotline, State of Missouri. URL: <https://humantraffickinghotline.org/state/missouri>.

Missouri Estimated Annual Number of Persons Experiencing Intimate Partner Violence

Gender	Number
Female	160,000
Male	175,000
Total	335,000

Source: National Center for Injury Prevention and Control, 2010-2012 Survey

The National Center for Injury Prevention and Control does not publish demographic data for intimate partner violence for the state of Missouri due to a lack of statistical significance among demographic groups. However, national results indicate that the Multiracial, American Indian/Alaskan Native, and Black demographic groups have the highest lifetime rates of victimization among women. The highest lifetime rates among men are also found in these groups. The table below provides details.

U.S. Lifetime Intimate Partner Violence Experience by Gender, Race & Ethnicity

Race/Ethnicity	Women	Men
Non-Hispanic		
Black	45.1%	40.1%
White	37.3%	30.3%
Asian or Pacific Islander	18.3%	13.7%
American Indian/Alaskan Native	47.5%	40.5%
Multiracial	56.6%	42.3%
Hispanic	34.4%	30.0%

Source: National Center for Injury Prevention and Control, 2010-2012 Survey

While national data for the demographics of those experiencing domestic violence is not necessarily representative of the demographics for the State of Missouri, it is indicative of patterns that must be considered when planning for the use of HOME-ARP funds in serving this qualifying population.

Further, the Missouri State Highway Patrol Statistical Center indicates that 40,340 domestic violence incidents were reported in 2014, the most recent year for which data are available. When comparing the Missouri State Highway Patrol's reported number of domestic violence incidents with the National Center for Injury Prevention and Control's Survey results, it is clear that most instances of domestic violence are not reported to the highway patrol. This is an indicator of the need for special care in conducting outreach and identifying members of this qualifying population for services under HOME-ARP.

Human Trafficking

Missouri has the third highest rate of reported human trafficking cases in the United States; only Mississippi and Nevada have higher rates. Missouri's rate is 4.31 persons per 100,000 population. The U.S. Census Bureau estimates Missouri's 2022 population to be 6.2 million persons. Applying the reported cases of human trafficking rate to the state's population results in an estimated 267 cases in 2022.

The National Human Trafficking Hotline provides data on human trafficking cases nationally and somewhat more limited data at the state level. The Hotline's published data indicates that there were

10,583 reported cases of human trafficking in 2020. Women make up the majority (79.8%) of those who are victims of human trafficking. Men are 11.9% of this group, while the remainder (8.3%) are gender minorities. Data for race and ethnicity for trafficked persons are not available at this time.

Estimating the number of persons in this HOME-ARP qualifying population is especially difficult due to the fact that many people do not report intimate partner violence, and it is also difficult to identify all who are victims of human trafficking. Further, the most authoritative source for statewide and national data that provides information about specific demographic groups is based on a 2010-2012 survey (although the survey results were not published until 2017). Further, the Missouri State Highway Patrol data are for 2014. Human trafficking data do not provide demographics, and it is also likely that the number of persons experiencing human trafficking are under counted. Despite the limitations in the best available data for determining the size of the population qualifying for HOME-ARP assistance in the fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking designation, the data presented provide guidance in planning for housing and services addressing the needs of this qualifying population.

Other Qualifying Populations

Data at the state level for criteria (1) of the Other Populations section, “Other Families Requiring Services or Housing Assistance to Prevent Homelessness”, defined in CPD-21-10, are not available, and thus, size and demographic data for this population cannot be clearly enumerated. However, data for those who meet criteria (2) of the Other Populations section, “At Greatest Risk of Housing Instability,” with an annual income less than or equal to 30% of the area median income and experiencing severe housing cost burden (e.g., paying more than 50% of gross monthly income for housing) are identifiable, and shown in the ELI Households table below.

The next table shows data for ELI owner and renter households for all demographic groups combined and by race and ethnicity with severe cost burden.

Extremely Low Income Households with Race & Ethnicity with Severe Cost Burden

Demographic Group	ELI Owners	Severe Cost Burden	% Severe Cost Burden	ELI Renters	Severe Cost Burden	% Severe Cost Burden
All Groups	111,729	56,409	50.5%	183,288	111,214	60.7%
White, Non-Hispanic	92,898	45,905	49.4%	112,687	65,000	57.7%
Black, Non-Hispanic	11,020	6,440	58.4%	51,766	34,615	66.9%
Asian, Non-Hispanic	1,115	717	64.3%	4,173	2,572	61.6%
Other, Non-Hispanic	3,339	1,372	41.1%	7,570	4,637	61.3%
Hispanic	3,357	1,975	58.8%	7,092	4,390	61.9%

Source: American Community Survey, 2016-2020 5-Year Estimates

Just over one-half (50.5%) of ELI owner households experience severe cost burden, while nearly 61% (60.7%) of ELI renter households experience severe cost burden. Among racial and ethnic groups, Black, Non-Hispanic renter households have the highest rate of severe cost burden (66.9%). Asian, Other Race,

and Hispanic renter households have severe cost burden rates ranging from 61.3% (Other Race, Non-Hispanic) to 61.9% (Hispanic), while White Non-Hispanic renter households have a severe cost burden rate of 57.7%.

In addition, a table is provided below that shows data for ELI owner and renter households based on female-headed and disability status with severe cost burden.

Female-Headed and Persons with Disability ELI Households with Severe Cost Burden

Demographic Group	ELI Owners	Severe Cost Burden	% Severe Cost Burden	ELI Renters	Severe Cost Burden	% Severe Cost Burden
Female-Headed Households	64,315	31,067	48.3%	117,520	71,435	60.8%
Persons with Disability Households	51,953	25,077	48.3%	80,550	45,238	56.2%

Source: American Community Survey, 2016-2020 5-Year Estimates

Among female-headed owner households in the ELI group, 48.3% experience severe cost burden. Nearly 61% (60.8%) of female-headed ELI renter households experience severe cost burden.

In ELI owner households where at least one member has a disability, 48.3% experience severe housing cost burden. Among ELI renter households with at least one member with a disability, 56.2% experience severe cost burden.

Data for additional households who meet criteria (2), “At Greatest Risk of Housing Instability,” are not available at the state level. Thus, this Plan focuses on ELI households who are at the greatest risk of housing instability under the Other Populations category.

The majority of ELI renter households experience severe housing cost burden. In addition, a significant proportion of ELI owner households also experience severe cost burden. Severe cost burden is an indicator that households may be at risk of homelessness or housing instability, since very little is left for other life necessities after paying for housing and utilities each month. A car repair, illness or injury, or other urgent need may push these households into homelessness or housing instability.

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

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

The response to this question is based on both quantitative and qualitative analysis. Qualitative data were collected through a survey of stakeholder organizations throughout the state and through virtual listening sessions. There were 92 responses to the HOME-ARP survey. Listening sessions were held virtually to maximize participation and took place on March 29 and March 31, 2022. Each bulleted point in the

question is addressed below.

Homeless Qualifying Population: Sheltered and Unsheltered Homeless Populations

Data analysis shows a gap of 1,530 adult shelter beds and 130 veterans' shelter beds. This indicates unmet housing need among unsheltered homeless adults. The actual number of unsheltered homeless adults is likely to be larger due to the challenges of collecting PIT data. In addition, adult and shelter beds are not available in many areas within the state. Thus, there is a mismatch between availability and geographic location in some instances. Combined, these factors indicate a need for more shelter for unsheltered homeless adults, including veterans.

Further, while the data show a surplus of 607 family shelter beds and 161 family units, information provided by stakeholders leads to the conclusion that there is a deficit of family shelter beds in many areas of Missouri. The geographic mismatch of family shelter beds and units for homeless families means that there a need for family shelter beds and units remains.

In terms of services for sheltered and unsheltered homeless populations, survey data and listening session results indicate a strong need for supportive services and other assistance such as transportation, mental health care, legal care, and other services.

At Risk of Homelessness Qualifying Population: Currently Housed Populations at Risk of Homelessness

Any ELI household that is currently housed but experiencing severe cost burden is at risk of homelessness. Nearly 61% (111,214 households) of Missouri's ELI renters are severely cost burdened, paying more than 50% of gross monthly income for housing, including utilities. Given that there is very little money left for other life necessities after paying for housing, these households are continuously at risk of homelessness.

Further, some ELI homeowners may be in need of foreclosure prevention services due to the economic distress caused by the COVID-19 pandemic. There may also be ELI households in need of assistance for adapting their dwelling unit for disability access, particularly among the elderly population.

Service needs among those who are currently housed but at risk of homelessness are likely to include help with housing searches, assistance in obtaining better-paying employment, transportation, and legal assistance in the case of eviction prevention or intervention.

Other Families Requiring Services or Housing Assistance

In addition to ELI households requiring services or housing assistance in Missouri, there are other families who may not have been ELI households at the beginning of the COVID-19 pandemic, but who have fallen behind in rent or mortgage payments due to job loss or other economic distress caused by the pandemic. These households are unlikely to show up in the most recently available American Community Survey data as ELI. Thus, it is necessary to prepare for the needs of families requiring services and/or housing assistance who are not represented in the data analysis.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking Qualifying Population

The Missouri State Highway Patrol Statistical Center indicates that 40,340 domestic violence incidents

were reported in 2014, the most recent year for which data are available. When comparing the Missouri State Highway Patrol's reported number of domestic violence incidents with the National Center for Injury Prevention and Control's Survey results, it is clear that most instances of domestic violence are not reported to the highway patrol. This is an indicator of the need for special care in conducting outreach and identifying members of this qualifying population for services under HOME-ARP.

Other Qualifying Population: Greatest Risk of Housing Instability or in Unstable Housing Situations

ELI households with severe cost burden are at the greatest risk of housing instability or being in unstable housing situations. This applies to adult-only households as well as families with children. Families with students who are designated as homeless under the McKinney-Vento Act are also part of the group with the greatest risk of housing instability or are living in unstable housing situations. Further, unaccompanied homeless youth often engage in "couch surfing" as a means of remaining sheltered. The actual number of young adults experiencing this type of housing instability is unlikely to be captured by available data.

Those at greatest risk of housing instability or who are living in unstable housing situations are likely to be in need of both housing they can afford and services to help them transition to a stable housing situation. Some may require permanent supportive housing on a long-term basis.

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:

This response is organized in the order in which resources to assist qualifying populations are identified in the question.

Shelter Units

Current resources available to assist qualifying populations are inadequate to meet the level of need present within the state. Congregate and non-congregate shelter units are presented in tabular form earlier in this Plan. There is a deficit in adult shelter beds, including shelter beds for veterans, in Missouri. Further, while the statewide analysis shows a small surplus of family shelter beds and units, qualitative information collected through a statewide survey and listening sessions indicates that there are several areas in the state with no family shelters available, and in some cases, no adult shelters available.

The deficit in adult shelter beds, including shelter beds for veterans, combined with a geographic mismatch between adult and family shelter beds outside Missouri's major cities, means that there is a need to provide shelter beds in a number of communities. Access to shelter in rural areas will mean not only shelter beds, but also transportation services for homeless adults and families.

Supportive Services

Survey responses and listening session results indicate that there is an insufficient level of supportive services available throughout the state to address the needs of the HOME-ARP qualifying population. While Missouri's two largest cities (Kansas City and St. Louis) have more capacity to provide supportive services than smaller communities and rural areas, even those cities do not have enough supportive services capacity to serve all who qualify for assistance.

Further, many areas of the state have limited supportive services available; some areas have no supportive services at all. Addressing the need for supportive services throughout the state will require adding nonprofit capacity, including groups that will provide access to services in the form of transportation or other assistance. Missouri's rural areas and smaller communities have lengthy waiting lists for social services, if assistance is available at all.

Tenant-Based Rental Assistance

Tenant-based rental assistance (TBRA) most often comes through the federal Housing Choice Voucher program. There are lengthy waiting lists for vouchers throughout the state. Thus, there is a need for additional TBRA to address the needs of those who qualify for assistance under HOME-ARP.

Affordable and Permanent-Supportive Rental Housing

The ELI affordable and available rental housing analysis presented earlier in this Plan shows a deficit of more than 122,000 units for this group. While Missouri's implementation of its *Five-Year Strategic Plan for Affordable Housing for the State of Missouri* has stimulated progress in the production of ELI units through the federal Low Income Housing Tax Credit (LIHTC) and the Missouri Low Income Housing Tax Credit (MOLIHTC) since 2020, the process of increasing the state's supply of affordable and available ELI rental units has only just begun.

Other resources used to create affordable housing opportunities already include HOME and will include HOME-ARP in the future. Making units affordable at the ELI level typically requires several subsidy layers; the federal Low Income Housing Tax Credit alone is not sufficient for financial feasibility of developments that include ELI units.

Permanent supportive rental housing is developed using the federal LIHTC and MOLIHTC, HOME, and Section 811. As with ELI units, the production of permanent-supportive rental housing units has increased through the implementation of Missouri's *Strategic Plan for Affordable Housing*. However, many more supportive housing units will be required throughout the state to meet the needs of those who require this type of housing to ensure housing stability.

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

As presented earlier in this Plan, there is a gap in shelter space for adults, including veterans, in Missouri. This gap is calculated as 1,530, although it is likely that this figure is higher due to PIT data limitations. Further, while analysis of PIT and HIC data indicate a surplus of 607 family shelter beds and 161 family units, information collected through a statewide survey and listening sessions indicates that there are areas of the state with a severe lack of family shelter space or units. Gaps in the current shelter system must be interpreted based on both numbers and the presence of geographic mismatches between the populations in need of shelter and the location of shelters. Further, some shelters do not accept members of certain groups, such as LGBTQ+ or those who may struggle with sobriety. Overall, there is a need for more shelter space in Missouri, and this shelter space must be geographically targeted to populations in need.

Analysis of the current housing inventory reveals a large deficit (more than 122,000) in affordable and available rental housing units for ELI households. ELI households include any household with income from

0% to 30% of the area median. Thus, those who are currently homeless or at risk of homelessness are part of the ELI population. In addition, there were nearly 35,000 students identified as homeless under the McKinney-Vento Act in the 2019-2020 school year. These students and their families are also likely to be in ELI households. Moreover, more than 800 of the McKinney-Vento students in Missouri during the 2019-2020 school year were identified as unsheltered. This indicates a critical need for affordable rental housing and for family shelter space.

The major gaps within the current service delivery system include mental health services, transportation and legal services. These gaps were determined by analysis of stakeholder surveys, focus groups, listening sessions, and the 2021 Missouri Homelessness Study. While the two largest cities in the state (Kansas City and St. Louis) have relatively large service delivery systems, stakeholders frequently indicate that the systems are not adequate for the level of need in those cities. Further, smaller communities and rural areas in the state have limited service delivery capacity, and in rural areas, there is often no service delivery capacity. Connecting qualifying populations in smaller communities and rural areas with social services will require transportation and other forms of assistance that connect individuals and families with the service delivery system.

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

Severe cost burden is an indicator that households may be at an increased risk of homelessness or housing instability. Households that are paying more than 50% of gross monthly income for housing are severely cost burdened and are at greatest risk of needing housing assistance, supportive services, and access to affordable housing in order to attain a stable housing situation.

Identify priority needs for qualifying population:

Identification of priority needs for qualifying populations is based on data analysis related to homelessness combined with analysis of survey responses and listening session results. The inclusion of qualitative information obtained through the survey and listening sessions provides important context for interpreting quantitative data and making judgments about data limitations in assessing actual need and gaps in services among qualifying populations.

Missouri’s informed priority needs include the following starting with the greatest need:

- Acquisition, rehabilitation, or construction of affordable housing rental units targeting households with incomes at or below 30% AMI (ELI households);
- Expansion of social services, particularly in under-served areas of the state;
- Expansion of mental health services for qualifying populations;
- Expansion of transportation and legal services availability, particularly outside of major cities, for qualifying populations;
- Providing nonprofit capacity-building and operating assistance for social service and housing providers

serving qualifying populations;

- Increasing available shelter space;
- Increasing availability of tenant-based rental assistance.

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

Needs and gaps in the shelter and housing inventory were identified through the use of PIT and HIC data, American Community Survey data, and McKinney-Vento homeless data reported by the Missouri Department of Elementary & Secondary Education. Needs and gaps were also identified through a stakeholder organization survey and stakeholder listening sessions. PIT, HIC, and American Community Survey data provided quantitative information about the state's shelter, housing inventory, and service delivery systems, while the survey and listening sessions provided important context for the interpretation of data and identifying priorities.

IV. HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients, and/or contractors and whether the PJ will administer eligible activities directly:

The State of Missouri will solicit applications from developers, service providers, and/or subrecipient organizations to administer eligible activities. Existing methods for soliciting applications for the development of affordable rental housing will be used through Missouri Housing Development Commission's Qualified Action Plan (QAP) and Rental Production NOFA, which accepts applications on an annual basis. The project selection process for MHDC's QAP and Rental Production NOFA will not provide a preference to one or more of the Qualifying Populations for HOME-ARP projects or activities.

A Notice of Funds Available (NOFA) and Allocation Plan will be issued to accept applications from eligible service providers or subrecipients for funding allocated to supportive services, acquisition and development of non-congregate shelters, non-profit operating, and non-profit capacity building.

The State of Missouri will not directly administer HOME-ARP activities.

If any portion of the PJ's HOME-ARP administrative funds were 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:

N/A

Use of HOME-ARP funding:

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$3,176,763		
Acquisition and Development of Non-Congregate Shelters	\$5,445,880		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$27,229,400		
Non-Profit Operating	\$1,361,470	3%	5%
Non-Profit Capacity Building	\$1,361,470	3%	5%
Administration and Planning	\$6,807,350	15%	15%
Total HOME ARP Allocation	\$45,382,334		

Additional narrative, if applicable:

The funding amounts designated for each eligible HOME-ARP activity type are based on data analysis related to homelessness combined with analysis of survey responses and listening session results.

The State of Missouri will allocate 60% of the HOME-ARP allocation to the development of affordable rental housing. 7% of the funds will be allocated to supportive services, which will be available to service providers within existing MHDC properties serving qualifying households. MHDC will make available 12% of the allocation for acquisition and development of non-congregate shelters to leverage entitlement cities utilizing their respective allocation for non-congregate shelter. 3% of the allocation will be made available for non-profit operating related to non-profit organizations providing supportive services to qualifying households in existing MHDC developments. In addition, 3% will be made available for non-profit capacity building for non-profit organizations with interest in becoming a Community Housing Development Organization. If any of these funds are not fully allocated by 12/31/2024, remaining funds will be reallocated to the development of affordable rental housing.

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 State of Missouri reviewed the data within the gap analysis and survey results, and anecdotal experience provided from the stakeholders working with those who experience homelessness or who are at risk of homelessness. While there are significant needs related to each eligible use of the HOME-ARP program, analysis of the current housing inventory revealed a large deficit in affordable rental housing units for ELI households. The survey results provided a clear preference for making the acquisition, rehabilitation, or construction of affordable rental housing the first priority for the use of HOME-ARP funds. In addition, the survey provided clear support for assistance with supportive services and non-profit operating and capacity-building assistance. These priorities were consistently identified and supported through the stakeholder feedback received during the listening sessions, which identified that the lack of affordable housing and inadequate funding for operations and supportive services as the greatest unmet need related to the populations they serve.

V. 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 State of Missouri expects to produce an estimated 111 affordable rental units with HOME-ARP funds.

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

Missouri's highest priority need is the availability of affordable housing rental units targeting households with incomes at or below 30% AMI. The production of these units through the funds allocated for acquisition, rehabilitation, or construction of affordable rental housing will directly address this need. HOME-ARP funds allocated for the development of affordable rental housing will assist in leveraging available state and federal LIHTC programs and other federal subsidy funds, such as the Housing Trust Fund and HOME program, in order to maximize the production of affordable units for ELI populations.

VI. Preferences

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 State of Missouri provides statewide assistance and does not intend to prioritize any qualifying populations or subpopulation.

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

The State of Missouri does not intend to prioritize any qualifying population or subpopulation.

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

The State of Missouri provides statewide assistance and does not intend to prioritize any qualifying populations or subpopulation.

Referral Methods

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:

The State of Missouri does not intend to use the coordinated entry process for referrals to a HOME-ARP project or activity. Requirements of the referral process for each HOME-ARP project and activity will be established as HOME-ARP funding opportunities are made available.

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:

The State of Missouri does not intend to use the coordinated entry process for referrals to a HOME-ARP project or activity.

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

The State of Missouri does not intend to use the coordinated entry process for referrals to a HOME-ARP project or activity.

Limitations in a HOME-ARP Rental Housing of NCS Project

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

The State of Missouri does not intend to limit eligibility for HOME-ARP rental housing or NCS projects to a particular qualifying population or specific subpopulation of a 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 State of Missouri does not intend to limit eligibility for HOME-ARP rental housing or NCS projects to a particular qualifying population or specific subpopulation of a qualifying population.

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:

The State of Missouri does not intend to limit eligibility for HOME-ARP rental housing or NCS projects to a particular qualifying population or specific subpopulation of a qualifying population.

VII. HOME-ARP Refinancing Guidelines

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

The State of Missouri does not intend to use HOME ARP funds to refinance the existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

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 State of Missouri does not intend to use HOME ARP funds to refinance the existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

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

The State of Missouri does not intend to use HOME ARP funds to refinance the existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

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

The State of Missouri does not intend to use HOME ARP funds to refinance the existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

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

The State of Missouri does not intend to use HOME ARP funds to refinance the existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

Other requirements in the PJ's guidance, if applicable.

The State of Missouri does not intend to use HOME ARP funds to refinance the existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.