

NOTICE OF PUBLIC COMMENT PERIOD AND PUBLIC HEARING

HOME-ARP ALLOCATION PLAN

Missouri Housing Development Commission (MHDC) is seeking comment on the required allocation plan outlining the use of federal HOME Investment Partnerships Program-American Rescue Plan (HOME-ARP) funds provided by the U.S. Department of Housing and Urban Development (HUD) for qualified populations.

Listed below are multiple opportunities to provide comment on the HOME-ARP Allocation Plan for the State of Missouri. We encourage you to share the following information.

Public Comment Period

The HOME-ARP Allocation Plan will be made available starting on July 8th, 2022 on MHDC's website, at the following link: <http://www.mhdc.com/>. Written comments can be submitted to Julie Smith at julie.smith@mhdc.com. Comments will be accepted through July 22nd, 2022.

Public Hearings

Tuesday, July 12th, 2022 at 1:30 PM – 3:00 PM

Stoney Creek Hotel – Columbia Room

2601 South Providence Road, Columbia, MO 65203

Thursday, July 21st, 2022 at 1:00 PM – 2:30 PM

Please click on the following link to register and join this virtual public hearing:

<https://attendee.gotowebinar.com/register/8194989339883149328>

The Public Hearings will be facilitated by Dr. Anne Williamson of Community Analytics, LLC, a Kansas City-based consulting firm.

Questions about the public comment period or hearings? Contact Julie Smith, Manager of HUD Programs for MHDC at julie.smith@mhdc.com.

For technical support regarding virtual public hearing participation, contact Julie Smith at julie.smith@mhdc.com.

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: Missouri Housing Development Commission

Date: 7/1/2022

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and 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, at a minimum. 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.

Summarize the consultation process:

Missouri Housing Development Commission (MHDC) provided and conducted several consultation opportunities with stakeholders and organizations that serve the qualifying populations of the HOME-ARP program. On December 6, 2021, MHDC met 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. There was also 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 and the comments received were representative of communities across the state.

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. 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. Agencies consulted are included in the attached Consultation Chart.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.

Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
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Public Participation

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.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

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

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 - 7/8/2022 end date - 7/22/2022***
- ***Public hearing: 7/12/2022***

The public comment period started on July 8, 2022 and ended on July 22, 2022. 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.

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 as well.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

(To be completed after public comment period/public hearings).

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

(To be completed after public comment period/public hearings).

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

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

The number and demographic composition of extremely low income households (ELI) in Missouri has been used to describe the size and demographic composition of qualifying populations within the state’s boundaries. Other qualifying populations such as homeless (using both the HUD and McKinney-Vento definitions) and those at risk of homelessness are likely to be a subset of the ELI population. Thus, the ELI group encompasses all who are likely to be eligible for assistance under HOME-ARP.

Those at greatest risk of homelessness are severely cost burdened, paying more than 50% of gross monthly income for housing, including utilities. A table is included below with data for ELI owner and renter households for all demographic groups combined and by race and ethnicity. In addition, a table is provided that shows data for ELI owner and renter households based on female-headed and disability status.

This portion of the analysis also includes a table with data reflecting the number of housing units affordable and available for ELI households.

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

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.)

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.

In summary, 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.

Available and Affordable Rental Housing

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.

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.

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.

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 the 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.

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.

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 PRA. 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.

Survey responses and listening session results underscore the fact that there are gaps in Missouri's service delivery systems. 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:

Not applicable. MHDC does not intend to use the "other populations" definition for the HOME-ARP program.

Identify priority needs for qualifying populations:

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.

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:

MHDC 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 MHDC's Qualified Action Plan and Rental Production NOFA, which accepts applications on an annual basis. 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. MHDC 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

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. The following table may be used to meet this requirement.

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.

MHDC 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:

MHDC 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 supported by 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.

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:

MHDC 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.

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:

- 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).
- PJs are not required to describe specific projects to which the preferences will apply.

MHDC provides statewide assistance and does not intend to prioritize any qualifying population or subpopulation. HOME-ARP funds will be allocated to programs and projects based on the eligibility of the project related to HOME-ARP program requirements, feasibility of the project, and benefit received by households within the qualifying populations.

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:

MHDC 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:

MHDC provides statewide assistance and does not intend to prioritize any qualifying populations or subpopulation.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- *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*

N/A

- *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.*

N/A

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

N/A

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

N/A

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

N/A

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

N/A

Agency/Organization Consulted	Type of Agency/Organization	Method of Consultation
38th Judicial Circuit	County Circuit Courts	Survey Response
AVENUES for Northeast Missouri, Inc.	Service Provider	Survey Response
Avenues Help	Victim Service Provider	Listening Session
Burrell Behavioral Health	Service Provider	Survey Response
Callaway Cares	Service Provider	Listening Session
Callaway Cares and One Voice for Many Homeless	Service Provider	Survey Response
Central Missouri Community Action	Community Agency	Survey Response
City of Kansas City, Missouri	Entitlement City	Survey Response
City of Springfield	Entitlement City	Listening Session
City of St. Joseph Health Department	Entitlement City	Survey Response
City of St. Joseph, Missouri	Entitlement City	Listening Session
City of St. Louis Dept of Human Services	Entitlement City	Survey Response
Central Missouri Community Action	Community Action Agency	Survey Response
Community Council of St. Charles	Service Provider	Listening Session
Community Council of St. Charles	Service Provider	Survey Response
Community Missions Corporation	Service Provider	Listening Session
Community Partnership of the Ozarks	Service Provider	Survey Response
Compass Health, Inc.	Health Care Provider	Listening Session
Compass Health, Inc.	Health Care Provider	Survey Response
Council of Churches/Safe to Sleep	Service Provider	Survey Response
Council on Families in Crisis, Inc	Service Provider	Survey Response
Courtesy Care Plus, LLC	Health Care Provider	Survey Response
Doorways Housing	Service Provider	Listening Session
Douglass Community Services, Inc.	Service Provider	Survey Response
East Missouri Community Action Agency	Community Action Agency	Survey Response
East Missouri Community Action Agency	Community Action Agency	Listening Session
Economic Security Corporation of Southwest Area	Community Action Agency	Survey Response
Elevate Branson	Service Provider	Listening Session
Elevate Branson	Service Provider	Survey Response
Empower Abilities	Disabilities Service Provider	Listening Session
Empower Missouri	Advocacy Organization	Listening Session
Empower Missouri	Advocacy Organization	Survey Response
Empowher 2 Move	Service Provider	Survey Response
Faith Covenant Ministries	Service Provider	Survey Response
Family Guidance Center	Service Provider	Survey Response
Fayette R-III	School District	Survey Response
Finding Grace Ministries	Service Provider	Survey Response
First Chance For Children	Service Provider	Survey Response
First Christian Church Food Pantry	Service Provider	Survey Response
First Step Back Home, Inc.	Service Provider	Survey Response
FosterAdopt Connect	Service Provider	Survey Response
Gateway Housing First	Service Provider	Survey Response
Good Samaritan Center	Service Provider	Listening Session
Great Circle	Service Provider	Listening Session
Habitat for Humanity of St. Charles County	Service Provider	Survey Response

Habitat for Humanity-Cape Area	Service Provider	Survey Response
Harmony House	Victim Service Provider	Survey Response
Hope House	Victim Service Provider	Survey Response
Housing Authority of Springfield	Housing Authority	Listening Session
Institute for Community Alliances	HMIS Lead Agency	Virtual Meeting
Jobs Plus	Employment Services Provider	Listening Session
Jordan Valley Community Health Center	Health Care Provider	Survey Response
Journey Home of Johnson County	Service Provider	Survey Response
Lily's House	Recovery Housing Provider	Survey Response
Lincoln University Cooperative Extension Human Nutrition and Health	Public University	Survey Response
Lydia's House	Victim Service Provider	Listening Session
McCormack Baron Salazar	Developer	Listening Session
Mercy Health Systems	Health Care Provider	Listening Session
Missouri Coalition Against Domestic and Sexual Violence	Victim Service Provider Coalition	Survey Response
Missouri Department of Mental Health	State Department	Listening Session
Missouri Interagency Council on Homelessness	Interagency Council	Virtual Meeting
Missouri Mentoring Partnership	Youth Services Provider	Survey Response
Missouri River Regional Library	Library	Survey Response
North East Community Action Agency	Community Action Agency	Listening Session
Ozark Area Community Action Agency	Community Action Agency	Survey Response
Our House - Caring for Callaway's Homeless	Service Provider	Survey Response
Our Lady's Inn	Victim Service Provider	Survey Response
Ozark Action	Community Action Agency	Listening Session
Ozarks Technical Community College	Public Community College	Listening Session
Ozarks Technical Community College	Public Community College	Survey Response
Pettis County Community Partnership, Inc.	Service Provider	Survey Response
Preferred Pets & Pals	Service Provider	Survey Response
ReDiscover	Service Provider	Survey Response
reStart, Inc.	Service Provider	Listening Session
Safe House of Southeast Missouri	Victim Service Provider	Survey Response
Salvation Army Center of Hope	Service Provider	Survey Response
Salvation Army Harbor House	Service Provider	Survey Response
Samaritan Outreach Center	Service Provider	Survey Response
Second Baptist Church Community Action Ministry	Service Provider	Survey Response
Second Christian Church	Religious Institution	Survey Response
Springfield First Community Bank	Financial Institution	Listening Session
Springfield-Greene County Health Department	Health Care Provider	Survey Response
St. Mark's United Methodist Church	Religious Institution	Survey Response
St. Patrick Center	Service Provider	Listening Session
Sts. Joachim and Ann Care Service	Service Provider	Listening Session
Sts. Joachim and Ann Care Service	Service Provider	Survey Response
Synergy Services	Victim Service Provider, Youth Services Provider	Listening Session
The Kitchen Inc.	Service Provider	Survey Response
The Rolla Mission	Service Provider	Survey Response
Transformational Housing	Service Provider	Survey Response
True North of Columbia, Inc.	Victim Service Provider	Survey Response
University of Central Missouri	Public University	Listening Session

Voluntary Action Center	Service Provider	Survey Response
Welcome Home Veterans	Veterans Service Provider	Listening Session
West Central Missouri Community Action Agency- St. Clair County PHA	Community Action Agency, Public Housing Authority	Survey Response
YWCA St. Joseph	Victim Service Provider	Listening Session

Needs Assessment and Gap Analysis

The following data was used in the preparation of a needs assessment and gap analysis for households qualifying for assistance through the HOME American Rescue Plan (HOME-ARP) program.

Homeless Data

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.

C U R R E N T I N V E N T O R Y					
	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
H O M E L E S S P O P U L A T I O N					
	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	
G A P A N A L Y S I S					
	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.

¹ HIC and PIT data for 2020 are used in place of 2021 data due to strong concerns about data reliability for data collection during the COVID-19 pandemic.

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.

McKinney-Vento Homeless Data

Households who are defined as homeless under the McKinney-Vento Act are eligible for assistance with HOME-ARP funds. 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