

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: City of Joplin

Date: 9/19/2022

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:

In accordance with the City of Joplin Citizen Participation Plan, the requirements of HOME-ARP as outlined in CPD-21-10, and in consultation with the participants of the Joplin HOME Consortium, the City of Joplin conducted two advertised public meetings, and hearing to pass resolution by City Council. The formal consultation with the Japster/Newton County Continuum of Care occurred at the first advertised public meeting on the 2nd floor conference room of Joplin

City Hall to allow the public to participate remotely in the virtual meeting of the Homeless Coalition on May 9th, 2022. The second public meeting was on August 11th, 2022 at the advertised meeting of the Joplin HOME Consortium members. Both public meetings were followed by a public comment period of 30 days. Further, regular invitations to inquire on the program and consultation on eligibility and requirements of the program have been offered at the monthly meetings of the Homeless Coalition to develop familiarity of the program prior to any announcement of opportunity to apply for funding, in the interest of providing organizations with limited technical capacity time to familiarize themselves with the program and the ability to apply.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Economic Security Corporation of the Southwest Area	Nonprofit/Lead Applicant of the Coc/ Homelessness provider/Coordinated Entry	CoC public meeting on May 9 th , 2022	Concurred that highest need is for rental units to place vouchers. Waitlist of those applying for assistance is substantially larger than past years and currently have approved assistance without a rental in which the household can be placed.
Lafayette House (LH)	Domestic Violence Shelter	CoC public meeting on May 9 th , 2022	Concurred with the delivery of the Gap Analysis report. Chair of the Homeless Coalition requested direct feedback from the organization and LH expressed need for clients to be placed in safe rentals
Ozark Center	Behavioral health/Counselling/Therapy	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis
Housing Connect	Coordinated Entry Program	CoC public meeting on May 9 th , 2022	Assisted in the Gap Analysis
Next Steps	Homeless Outreach	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis
Veterans Administration	Public Agency	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis

ICA	HMIS administrator for CoC	CoC public meeting on May 9 th , 2022	Assisted in the Gap Analysis
Catholic Charities	Nonprofit homeless services and housing provider	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis/Expressed interest in applying

If additional space is needed, insert image of table here:

ACCESS Family Care	Affordable Helthcare Provider	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis
Children's Haven	Youth Shelter	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis
Jasper County Public Housing	PHA	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis
Vita Nova Village	Non-profit developimg Tiny Home concept for homeless	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis/Expressed interest in applying
Salvation Army	Homelessness Services Provider	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis
Soul's Harvor	Emergency Shelter	CoC public meeting on May 9 th , 2022	Concurred with the Gap Analysis/Expressed interest in applying
Joplin Public Housing Authority	PHA	Direct consultation with the Director	Concurred with the Gap Analysis/Expressed interest in applying
Joplin HOME Consortium	Local Juristictions	Consortium Meeting on August 11 th , 2022	Commented on allocaiton plan prior to Council

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 - 5/10/2022 end date - 6/8/2022***
- ***Public hearing: 9/18/2022***

In total there have been two 30 day public comment periods. The first was following the May 9th public meeting of the Continuum of Care on May 9th and closing on June 8th, and the second was following the meeting on August 11th and ending on September 12th.

Describe any efforts to broaden public participation:

In accordance with City policy all public meetings are held in accessible locations, and if meeting participants are virtual, the City accomidates those without internet access by providing congrence space with appropriate equipment to ensure participations. All agendas are posted with contact to be given notice if accommodation will be required to attend. Public meetings and comment periods are above the required minimum for plan adoption in the City of Joplin Citizen Participation Plan.

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:

Written responses can be summarized as a need to have units available to house qualifying populations. Some organizaitons expressed interest in coordinations with those who would apply. The only responses from individuals from the public not representing a homeless organization were phone contacts made through the newspaper advertisement. The comments varied greatly.

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

All phone call responses from individuals from the public were recommendations to expend the funds on ineligible activities that did not serve homeless populations. Examples include, fund police and fire, repair streetlights in their neighborhood, etc.

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.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	54	2	125	4	15								
Transitional Housing	45	3	45	2	25								
Permanent Supportive Housing	51	5	85	3	98								
Other Permanent Housing						#	76	#	#				
Sheltered Homeless						24	98	38	#				
Unsheltered Homeless						0	36	4	#				
Current Gap										25	1	0	0

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	8800		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	250		
Rental Units Affordable to HH at 50% AMI (Other Populations)	430		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		920	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		700	
Current Gaps			750

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

According to the 2021 Joplin Comprehensive Housing Study there are 815 homeowner and 2180 renters whose household incomes are less than \$20,000 and are housing cost burdened. This seems to be consistent with numbers provided by the Homeless Coalition, for the total numbers of household requesting assistance on the inactive, housed and first time entered HMIS counts for the previous year is 1,495. The average household size of the City of Joplin is 2.3 making the number of persons at risk of homelessness approximately 3,400. Therefore the population at risk of homelessness is approximately between 2180 and 3300 persons. Additionally the homeless count at the most recent PIT was 210 sheltered and 35 unsheltered.

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:***

Safe Haven facilities were identified as absent within the CoC. While some behavioral health services are provide through partners such as Ozark Center, a 24 hour service tailored to those who are in need of mental health services as well as shelter currently is not in operation in the area.

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:

The total ESG funds awarded for PY 2020 was approximately \$660,000.00. Of those funds approximately \$130,000.00 are allocated for rapid rehousing, \$315,000.00 allocated to Shelter Care Plus, \$90,000.00 for permanant supportive housing and \$50,000.00 for Chronically Homeless programs. Further TBRA and homelessness prevention funds are applied for and received from MHDC as well as supportive services funds to fully fund Coordinated Entry. HMIS and Coordinated Entry funds is provided through the City of Joplin CDBG Entitlement Program.

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

Currently many of the shelters do not report their housing inventory to HMIS reporting, mental health services are prided by partners but services are limited. Mental health training is also needed for street outreach teams in the CoC.

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:

The highest identifiable risk is housing cost burden.

Identify priority needs for qualifying populations:

The rental market is currently extremely competitive. All qualifying populations would benefit from greater supply. This is creating further pressures on those experiencing homelessness. Currently, a number of organizations in the Homeless Coalition have provided assistance for housing with no unit for the recipient to be placed.

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:

The PIT and HIC is much of the readily available data for gap analysis, however, HMIS performance measure can further elaborate what is otherwise a limited dataset. Return to homelessness remains relatively low in the CoC however, length of homelessness and days on the active list until placed in permanent housing has been growing.

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 City of Joplin will administer the allocation of HOME-ARP funds and manage HOME-ARP activities through Sub-Recipient agreements, similar to the existing HOME program. The City will issue Notice of Funding Opportunity and provide 30 for preliminary applications to be submitted. Preliminary applications will be required to determine project eligibility, prioritization based on needs determined within this allocations plan, and preliminary feasibility for all construction project for the 15 year period as required in CPD-21-10. A Rank and Review Committee consisting of organizations serving qualifying populations who do not apply for funds, similar to the CoC process for allocating funds, will be used to prioritize funding and awards granted on activities serving highest need and awarded based on funds available

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:

No portion of the administrative funding was distributed prior to HUD's approval of the City's HOME-ARP Allocation Plan.

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	\$ 173,601.70		
Acquisition and Development of Non-Congregate Shelters	\$ 694,406.80		
Tenant Based Rental Assistance (TBRA)	\$ 173,601.70		
Development of Affordable Rental Housing	\$ 347,203.40		
Non-Profit Operating	\$ 86,800.85	5 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 260,402.55	15 %	15%
Total HOME ARP Allocation	\$ 1,736,017.00		

Additional narrative, if applicable:

Preliminary allocations are determined by first by needs identified in the gap analysis, and the funding thresholds identified in the Citizen Participation Plan that will allow funds to be deobligated and moved to construction project as a minor amendment, to ensure timely delivery of sub-recipient agreements to City Council.

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:

Enter narrative response here.

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:

6

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:

Enter narrative response here.

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.

HOME-ARP sub-recipient agreements will require non-congregant shelter and rentals to participate in the Coordinated Entry Program referral system and prioritize homeless and those

Fleeing, Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined in CPD-21-10 and in accordance with the Jasper/Newton County Continuum of Care vulnerability assessment tool. No further preference will be given to subpopulations.

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:

Enter narrative response here.

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 supportive services allocation of the plan is intended to service the other populations as defined in CPD-21-10. Supportive services funding is intended to enhance the Coordinated Entry Process, referrals and connection of existing services, housing counseling and case management.

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***
HOME-ARP will not be used in refinancing.
- ***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.***
HOME-ARP will not be used in refinancing
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
HOME-ARP will not be used in refinancing

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
HOME-ARP will not be used in refinancing
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
HOME-ARP will not be used in refinancing
- ***Other requirements in the PJ's guidelines, if applicable:***
HOME-ARP will not be used in refinancing