



**ST. CHARLES URBAN COUNTY
CITY OF O'FALLON
HOME-ARP DRAFT ALLOCATION PLAN**

October 31, 2022

DRAFT

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Participating Jurisdiction: St. Charles County, MO/City of O’Fallon, MO

Date: November 03, 2022

1. Introduction

In September 2021, the U.S. Department of Housing and Urban Development (HUD) announced the allocation of \$13 million in HOME Investment Partnerships - American Rescue Plan Act (HOME-ARP) funding to the St. Louis County HOME Consortium. This allocation is divided among the five Consortium Participating Jurisdictions (PJs) based on pre-determined HUD formulas.

Of this \$13 million, the City of O’Fallon will receive \$338,622. The St. Charles Urban County (cities of Augusta, Cottleville, Dardenne Prairie, Lake Saint Louis, St. Charles, St. Paul, St. Peters, Weldon Spring, Wentzville, and unincorporated St. Charles County) will receive \$1,467,362. The combined total of these two allocations is **\$1,805,984**. To meet the needs of the area's HOME-ARP designated qualifying populations, the City of O’Fallon and the St. Charles Urban County agreed to work collaboratively. This collaboration will ensure that the allocation serves the residents of the St. Charles Urban County and the City of O’Fallon. HOME-ARP funds must provide homelessness assistance and supportive services through several eligible activities. These eligible activities include:

- Acquisition and development of non-congregate shelter
- Tenant based rental programs
- Housing - related supportive services
- Acquisition and development of affordable rental housing
- Administration and planning
- Non-profit operating and capacity building

The HOME-ARP Allocation Plan must also identify and benefit Qualifying Populations (QPs). QPs include:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

To receive funding, the St. Charles Urban County and the City of O’Fallon must develop and submit a HOME-ARP Allocation Plan to HUD. This Allocation Plan describes the distribution of HOME-ARP funds, identifies any preferences for eligible activities, and included the involvement of stakeholders and the St. Charles Urban County and O’Fallon communities.

2. Consultation

The St. Charles Urban County and the City of O’Fallon consulted with public and private entities as part of the development of the HOME-ARP Allocation Plan. Stakeholders included those who work with families or individuals experiencing and/or at-risk of homelessness, fleeing domestic violence, and other vulnerable qualifying populations with a relevant knowledge of the needs, service gaps, and potential activities that would best benefit qualified populations.

2.1. Consultation process

During plan development, the St. Charles Urban County and the City of O’Fallon sought input from key stakeholders regarding the potential use of HOME-ARP funds, the program’s eligible activities, and the proposed budget. Stakeholders identified gaps in services and housing needs in their feedback. St. Charles County synthesized all participant feedback into a table. The St. Charles Urban County and the City of O’Fallon will continue to collaborate with stakeholders to develop and effectuate strategies that will help end chronic homelessness.

2.2 Agencies/Organizations Consulted

Organizations consulted: Continuum of Care (COC) Agencies, Homeless Service Providers (HSP), Domestic Violence Service Providers (DVSP), veteran groups (VG), Public Housing Agencies (PHA), and agencies devoted to Fair Housing (FH), Civil rights (CV), Disabilities (DS), Shelter Services (SS)

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

Agency/Org	Type of Agency/Org	Consultation Method
Tri-County COC Executive Board	COC governing board agencies	Community meetings, survey
Tri-County COC	COC agencies: HSP, DVSP, VG, FH, CV, DS	Community meetings, survey
St. Charles County Housing Team	Housing services agencies and public and private housing stakeholders (HSP, DVSP, VG, FH, CV, DS, SS)	Community meetings, survey
Community Assistance Board (CAB)	COC governing board and agencies awarded CAB funds	Community meeting, Survey, email request
Community Assistance Board (CAB) All agencies	Nonprofit organization (HSP, DVSP, VG, FH, CV, DS, SS)	Survey, email request, meeting
Salvation Army, Youth in Need, Our Ladies Inn	Shelter services agencies	Survey, email request
Community Council, Sts Joachim and Ann Care Service (SJA), NECAC, LINC, HABITAT, Campus Health	Health & homeless services agencies (providing services to all HSP, DVSP, VG, FH, CV, DS, SS)	Survey, email request

City of St Charles and St. Charles County PHAs	Regional Housing Authority (PHA)	Survey, email request
City of St Charles, Community Council, SJA, HABITAT, St Charles county	Agencies and Government departments HSP, VSP, VG, FH, CV, DS, SS)	Online meetings to discuss affordable housing and shelter needs.

Table 1: Agencies/Organizations Consulted

2.3 Feedback/Comments/Recommendations

Stakeholders submitted very detailed feedback, comments, and recommendations, with an overwhelming majority pointing to the lack of affordable housing as the primary area of concern for the St. Charles Urban County and City of O’Fallon community. Other identified priority needs included rental assistance, a variety of supportive services, and non-profit organizational capacity building. The general survey was circulated throughout the St. Charles County and O’Fallon communities and provided information on how to prioritize the HUD- identified priority needs.

2.3.1 Responses of agencies

A. Responses on Unmet housing and Service needs

Sts. Joachim and Ann Care Service (SJA): Serves all qualifying populations

Unmet housing needs are **affordable housing**- many can only afford \$400-\$450 monthly and that kind of housing is unheard of in our area. They are often in need of **case management, substance abuse services, and mental health assistance**. We can provide them the case management, but the substance abuse services are difficult to access if there is no insurance and no money. **Mental health services** (psychiatrists) are nearly impossible to locate in our area- getting an appointment at agencies who have these services is not easy and is often months out. Even when using drop in services individuals wait months for appointments. Even if substance abuse and mental health services were readily available no progress can be made if they remain on the streets or in temporary shelter- they are always going to be worried about what is going to happen next.

Community Council/Coordinated Entry (CC/CE): Serves all qualifying populations

- There is a huge unmet need for **affordable housing** for all identified populations, which limits our local agencies in their ability to rehouse these vulnerable populations when they are homeless or at risk of homelessness.
- There is a significant unmet need for **emergency shelter** for those who are literally homeless. There is only one shelter in the tri-county area for women and children, and there are no shelters for homeless men. COVID funding has allowed us to provide some non-congregate sheltering in motels, but we anticipate that we will expend these funds by the end of 2022. Additional motel funding will be needed to bridge the shelter gap to maintain current COC performance; Need for pet-friendly and low barrier shelter options

- There is a significant need for **transportation resources** for all qualifying populations. Access to funding to assist with getting to shelter, as well as critical job, legal, and medical appointments remain a high need.
- Many persons being rehoused also need more **intensive case management** to maintain their housing.
- Access to cell phones/cell phone minutes **to maintain communication** with service providers.

NECAC: Serves all qualifying populations

The current challenge is the **lack of affordable housing and owners/landlords willing to accept assisted clients**. By raising the rents, deposits and applications fees, it makes it nearly impossible for our clients.

Developmental Disabilities Resource Board (DDRB): Serves families with persons with developmental disabilities

- Affordable rental units
- Affordable rental units that are handicap accessible
- No shelters for men
- Limited shelter availability for women not fleeing domestic violence

Alive: Serves people fleeing from domestic violence

Transitional and permanent housing is always a shortage for this population – due to financial hardships and lack of resources in a community

Compass Health: Serves all qualifying populations and veterans¹

In a Housing Knowledge and Needs Survey conducted in June 2022, Compass Health Network staff indicated the following:

Is it challenging to find safe, decent, and affordable housing in the communities in which you serve? 95.96% - Responded Yes

Why do you think it's challenging? Top 3 responses:

76.90% - Rent is too expensive

68.96% - There aren't enough rental properties

53.79% - Landlords/property managers don't want to work with those we serve (stigma)

One respondent specifically stated "The ratio of debt to income is out of scope for most of our consumers in St. Charles County"

¹ "Compass Health Network in the past twelve months has created a committee to specifically evaluate the needs of veterans and active military (including families) that engage within our system of care. This group of professionals is looking into ways to better engage veterans and active military, providing access to comprehensive health care services and supports to meet their unique needs. While not specific is targeted to housing needs, housing is addressed with all service delivery, as having access to safe and affordable housing is a key component to any individual's success in both treatment and recovery".

Do you have consumers who are facing housing stability issues?

84.86% - Responded Yes

How many consumers are you working with that you would consider as homeless?

52.29% - Responded they have between 1 and 5 who are homeless

13.03% - Responded they have between 5 and 10

12.50% - Responded they have more than 10

How often are you discussing housing with your consumers?

32.45% - Responded Weekly

25.71% - Responded At Every Meeting

19.33% - Responded Monthly

Do you know what Coordinated Entry is?

76.37% - Responded No

Of those that responded Yes to the above question, a follow up question was asked: Do you know how to contact Coordinated Entry?

79.28% - Responded No

Many of the respondents of this survey requested more information, education, and assistance with the identification of potential resources to assist clients with housing related issues (available landlords, accessing coordinated entry). There continues to be a great deal of interest in having assistance in the navigation of community resources for the individual's facing homelessness in our care and community.

B. Responses on Challenges

SJA:

There is a mix below of things we see at a community level and things we see at a client level

- **lack of affordable housing**
- **lack of temporary shelter** for those in critical need- EWR does a good job of this in Winter.
- **not enough case managers**
- **no incentive for landlords or property owners** to work with the people we serve- the affordable housing we do have is taken first by people who do not come with evictions or low credit and are considered safer for the landlords to take a chance on. After COVID and the number of landlords that did not get paid rent for months they are even more reluctant to work with us.
- **misinformation and lack of community understanding about homelessness** – causes and how to handle when you encounter someone who is homeless
- **crisis mentality**- very few people become homeless without warning- there is no instant gratification for this type of problem and the community wants that because it is uncomfortable to see people on the streets. DV situations are an exception to this statement as that can and often does happen without warning
- **not enough administrative help to support the programs**

- **lack of transportation**
- **past evictions**
- **past criminal activity**
- **lack of income**
- **untreated medical issues**
- **lack of identifying information (ss card, ID, birth certificate)**
- **mental health/substance abuse-** although this does happen the stereotype is that everyone on the streets has this issue and that is not the case

CC/CE:

- Identifying affordable housing units and landlords who will rent to persons with a poor rental history
- Assisting persons with limited communication and transportation options to navigate communication and access barriers to rehousing & employment

NECAC

SCCHAP doesn't have funding for **deposits or application fees**, so we have to refer clients to other organizations. **The client's rental history and background** is a barrier. There is also the **"not in my backyard" mentality**. Some of the homeless/at-risk clients have **mental health issues and drug addiction** which we aren't equipped to handle.

DDRB

Need for an increase in funding per individual/family that is commensurate to the increase in **housing costs**. Current assistance on average now equals approximately 1 ½ months of rental assistance. Our experience is up to three months of rental and/or utility assistance provides the stability to be self-sufficient.

ALIVE

Challenges we encounter are many – first being transportation, long term shelter, and housing, financial assistance to stabilize a household

Compass Health: Many of our staff members are facing challenges in trying to assist customers with legal issues that vary across the board in both severity and level of assistance required. This can include items such as felony charges, evictions and eviction notices, child custody cases, collection agencies for unpaid bills (including medical care at local hospital systems). Depending on the level of legal issues the customer is facing, this can prohibit many from obtaining safe and affordable housing. Furthermore, within our community some of the affordable housing – if available – is not close to the essential services and employment opportunities for customers. This creates an additional set of barriers as many of these individuals lack financial means to pay for private transportation, leaving them on a metaphorical "island" if their housing is not close to town.

C. Responses on Service gaps

SJA

- **affordable housing/permanent supportive housing-** this is so dependent on landlords being willing to accept the fair market rates and in our area that is difficult
- **substance abuse services**

- **Psychiatric services**
- **affordable childcare**
- **lack of desire to fund for staff support and administrative positions that support the programs**

CC/CE

- **Health/mental health assessments for elderly persons who experience a housing crisis**, to determine if issues are due to dementia or aging, and to assess the appropriate level of supports needed to be successfully rehoused.
- 194 (approximately 1/3) of persons identified as literally homeless have a VISPDAT score of 8 or greater, indicating that they need a permanent supportive housing intervention, which would involve both a housing subsidy and services
- 218 persons (38%) of persons identified as literally homeless also have a disability impacting their ability to stay housed.

NECAC

Some of our clients have **caseworkers who have heavy workloads** so their services are spread thin. Some clients have no services. There is a large **lack of transportation**.

DDRБ

Education in money management

ALIVE

We provide short term shelter/safety while waiting to place in a traditional brick and mortar shelter – larger families present challenges, physically challenged who need special accommodations, ESL challenges, all are populations we serve

Compass Health

Service gaps are in the knowledge and understanding of what is potentially available to assist individuals and families. While resources can be limited in the community, there are available services to assist our most vulnerable neighbors – but these individuals and families need assistance in navigating the maze of community resources. As aforementioned, many of these individuals are unaware of the coordinated entry process, or how to even access that system. There is a tremendous gap between health services and housing resources and an incredible need to bridge that gap and connect the two to create a more holistic approach to addressing the needs of those we seek to serve. These individuals are many times overlooked and often the “invisible members” of our communities. It is imperative that our community make investments in the system of care that exists to ensure no individual or family slips through the crack, regardless of the availability of housing stock and other services.

D. Responses on potential projects that need funding

SJA

- **Acquisition/Rehab Affordable Housing units:** We are in the process of raising funds to purchase housing in the Tri-County area. We have reached \$1 million dollars and will likely be purchasing units before the end of 2022. We will continue our capital campaign

to acquire affordable housing into 2023 and continue to purchase housing as we receive funds. We already own and manage 6 homes, are the partner with a senior complex in Wentzville who received LITCH funding and are searching for other developers to be partners within our area for a family complex. Our experience with this population and wrap around services are a compliment to this housing endeavor. We may only get ten units, but we have to start somewhere.

Any interest in applying for any of the eligible activities listed below if funding is available:

Yes, we would be interested in applying for funds to purchase affordable housing units.

Any interest in applying for non-profit capacity building or non-profit operating assistance funding if funding is available?

Yes, we would be interested- this is an area that need to be paid attention to because an agency like ours could use funding to pay a case manager to work with these families/individuals and we could also use the funds to ensure the administration of the agency is able to remain solid.

CC/CE

- **Coordinated Entry Support:** CE & HMIS staffing
- **Acquisition/Rehab of a motel for non-congregate shelter and affordable rental unit:** Emergency motel
- **Transportation funding**

Any interest in applying for any of the eligible activities listed below if funding is available:

Yes

Any interest in applying for non-profit capacity building or non-profit operating assistance funding if funding is available? Yes – would like to continue efforts to strengthen **HMIS and data reporting** to the community as well as **CE staffing** and **COC workshops in low barrier housing best practices.**

NECAC

- **Navigator” or “Landlord Liaison” Program:** We would like to have a “Navigator” or “Landlord Liaison” in assisting clients in finding units and educating landlords about the Housing Choice Voucher Program. This person would be able to devote all of their time to connecting clients with landlords and also continue working with partner agencies in the Lincoln, Warren and St. Charles area to create a working system for everyone.

Any interest in applying for any of the eligible activities listed below if funding is available:

Yes

Any interest in applying for non-profit capacity building or non-profit operating assistance funding if funding is available? Yes

ALIVE

- **Transportation/Financial Assistance Programs:** Transportation and financial assistance for clients to help them become independent from their abuser

Any interest in applying for any of the eligible activities listed below if funding is available:

Yes, supportive services

Any interest in applying for non-profit capacity building or non-profit operating assistance funding if funding is available? Yes

DDRB

- **Homeless Prevention for Persons with Disabilities:** The DDRB currently provides homelessness prevention funds for individuals/families who have at least one person with developmental disabilities in the household. Due to COVID-19 and inflation, we are encountering individuals who are already homeless. This population is at higher risk for abuse and exploitation especially when un-housed. Shelter service or funds to provide temporary housing for a limited time would assist in the safety and stability of persons with developmental disabilities who are homeless. DDRB provides case management and service coordination to assist with locating available supports and services for an individual to increase independence.
- The DDRB has provided homelessness prevention funds that assist with rent, deposit, utilities, and moving expenses with local county tax dollars. COVID-19 and inflation has decreased the number of people the DDRB can annually serve. Additional funding for the prevention program would improve the challenge of stabilizing those who need up to three months of assistance to return to self-sustainability.

Any interest in applying for any of the eligible activities listed below if funding is available:

The DDRB is restricted by state statute to allocate funds only to those who have qualifying developmental disabilities.

Any interest in applying for non-profit capacity building or non-profit operating assistance funding if funding is available? The DDRB is not a non-profit organization. The DDRB is a public taxing entity.

Both operating assistance and capacity building funding would be beneficial to our system, especially if we could pair this effort with TBRA and support services, our system could enhance our overall housing resources that are available to our customers and community residents alike. The following provides just a few examples of how funding could be used to better support housing efforts within our community, supported by the comprehensive health care system that is operated by Compass Health Network with St. Charles County.

Compass Health

Project #1: Provide funds for technical assistance, staff time and costs associated to develop/create a Community Housing Development Organization (CHDO) and support it through its first year of operation. The CHDO would spearhead housing development for individuals with special needs (including but not limited to individuals and families with mental illness and/or disabilities, individuals and families who are experiencing literal and/or chronic homelessness, fleeing domestic violence, and youth aging out of foster care). The CHDO would collaborate with Compass Health's comprehensive clinical services (primary, behavioral, preventive, and dental services), providing access to high-quality clinical care and supports, while better connecting/linking those in need of supportive housing to healthcare by reducing barriers to services, eliminating silos, and more fully incorporating Housing First into operational practices.

Project #2: TBRA – providing funds for rental assistance for individuals for scattered site and funding for master leasing of units at existing housing developments/apartment complexes for transitional housing which our Housing Liaisons could use as a potential resource for referrals they accept from Coordinated Entry for homeless individuals with mental illness/substance use disorders. This would enable support services to be wrapped around them for stabilization then moving them on to permanent housing through Tenant Based Rental Assistance in scattered sites throughout the county. For the period of time individuals are transitionally housed, Compass Health Network could provide linkages to supportive services to help them achieve and sustain housing stability as well as access to healthcare services, employment resources, training opportunities, and other community-based supports to help improve their overall quality of life.

Project #3: Supportive Services – funding for staff who can focus on providing intensive assistance through provision of homeless prevention services, housing counseling, connections with community resources and social service agencies, transportation assistance, employment support programs, and general navigation of a myriad of potential community-based resources to help individuals and families develop an overall life plan for success that includes stable housing, income and building systems of support that work together to improve the overall quality of life for those at risk of becoming homeless (including those who are literally and chronically homeless).

2.3.2 Community Needs Ranking Survey (HOME-ARP) Results

[St. Charles County, MO - Community Needs Ranking Survey \(HOME-ARP\)](#) was submitted on February 18, 2022 and [the results](#) were obtained March 18, 2022. The survey was announced in Tri-County Continuum of Care (COC meeting) on 18 February 2022 and e-mailed to COC Basecamp, Community Assistance Board mail list, Housing Team mail list, St. Charles Urban County Participating Jurisdictions, and CDBG e-mail list (neighborhood groups, associations, nonprofit, ecumenical, business, and other community organizations and other interested individuals). It is also posted on the County social media sites. It was posted on the City of O’Fallon’s website as well.

The results of the survey reiterated that all five (5) eligible activities are needed in the St Charles Urban County and the City of O’Fallon community. 134 responses were received individually (78 responses from public, 56 responses from individuals representing 33 social service agencies, churches, government departments, school districts that constitute TRI County Continuum of Care (COC)) ([See list of agencies](#))

1. Survey Results for Program Prioritization

The overall 134 responses indicate that the number one priority is Production or Preservation of (Rental) Affordable Housing.

1. Production or Preservation of (Rental) Affordable Housing
2. Supportive Services
3. Rental Assistance
4. Capacity Building of non-profits
5. Purchase and Development of Non-Congregate Shelter

When the responses are evaluated separately for the COC (56 individuals from 33 agencies), the number one priority is Production or Preservation of (Rental) Affordable Housing, and Capacity Building for Non-Profits ranked the second.

1. Production or Preservation of (Rental) Affordable Housing
2. Capacity Building of non-profits
3. Supportive Services
4. Tenant-Based Rental Assistance (TBRA)
5. Purchase and Development of Non-Congregate Shelter

When the responses are evaluated separately for the public, the number one priority is Supportive Services and Production or Preservation of (Rental) Affordable Housing ranked the second.

Supportive Services

- Production or Preservation of (Rental) Affordable Housing
- Capacity Building of non-profits
- Rental Assistance
- Purchase and Development of Non-Congregate Shelter

2. Survey Results for Supportive Services Prioritization

The overall 134 responses indicate that the number one priority is Mental Health services, and the second is Rent/Mortgage/Utility Assistance.

1. Mental Health Services
2. Rent/Mortgage/Utility Assistance
3. Services for Domestic Violence victims
4. Services for people with disabilities
5. Housing Information and Referral Services

The COC indicated that the number one priority is Rent/Mortgage/Utility Assistance followed by Mental Health Services, Housing Information and Referral Services, Transportation and Housing Counseling.

1. Rent/Mortgage/Utility Assistance
2. Mental Health Services
3. Housing Information and Referral
4. Transportation
5. Housing Counseling

The residents indicated that the Mental Health Assistance is the number one Supportive Services need, followed by domestic violence victims, seniors, and persons with disabilities.

1. Mental Health Services
2. Services for Victims of Domestic Violence
3. Senior services
4. Services for persons with disabilities
5. Health Services

Comments received:

Forty-one (41) comments are received. Most of the comments focused on the need for affordable housing and supportive services, with a focus on Mental Health Assistance, Transportation Assistance, Employment Assistance, Daycare Assistance for working families (no major distinction between residents and COC comments). Nineteen (19) comments indicated the need for Affordable Housing. Eighteen (18) comments indicated the need for supportive services. The need for housing for single men, one stop place for all homeless services, financial education, and the need for awareness building around homelessness were all among the needs mentioned individually.

DRAFT

Agency List	Count of Responses
General Public	78
Community Assistance Board Member	1
Keller Williams Realty West	1
Preferred Family Healthcare	1
The New Hope Resource Center	1
(blank)	74
Agencies	56
Francis Howell School District	1
Wentzville R-IV School District	1
City of Wentzville Police Department	1
City of St Paul	1
City of Wentzville	2
Developmental Disabilities Resource Board of Saint Charles County	1
St. Charles County Community Assistance Board	1
Compass Health Network	1
Habitat for Humanity of St Charles County	9
The Grace Period Transitional Housing Program	1
The Robertson Center and The Women's Center (Preferred Family Healthcare)	1
BCI Skills Center	1
Bridgeway's domestic violence and sexual assault program	1
CAB Board (Community Assistance Board)	1
Community Council of St. Charles County	2
Connecting Through Charity	1
Connections to Success	1
DHSS	1
First Step Back Home. Inc.	1
LINC ST CHARLES COUNTY	1
NECAC	4
New Hope Resource Center @ Morning Star Church	1
Our Lady's Inn	3
Society of St. Vincent de Paul	1
ST. CHARLES COUNTY HOUSING ASSISTANCE PROGRAM	1
St. Patrick Center	1
St. Vincent de Paul	2
Sts Joachim and Ann Care Service	8
The Salvation Army	1
Tri-County Advisory Board to Probation and Parole	1
Youth In Need	1
(blank)	2
Grand Total	134

Comments Received (details):

Social Services Agencies	Comments
BCI Skills Center	I think there is a lack of awareness in the community that there are homeless in our community. Getting this message out would be helpful.
Bridgeway's domestic violence and sexual assault program	access to mental health services
Sts. Joachim and Ann Care Service	More affordable housing built.
Sts Joachim and Ann Care Service	Affordable housing is the biggest issue we see - there is very little housing available for people unless they are making well above the median income.
Sts. Joachim and Ann Care Service	With O'Fallon Lakes and Hidden Valley raising their rent, there's going to be an even bigger housing crisis then there already is in this county. We need affordable housing complexes to replace them.
Sts. Joachim and Ann Care Service	There is a great need for transitional and affordable housing in the area. Many of our clients cannot afford housing at the present time. It is a basic need and a necessity for people to move toward self-reliance and stability. Without affordable housing, people are resources for food, health needs, transportation, utilities, etc.
Connecting Through Charity	When people get assistance in finding a place to live and get the help, they need to pay each month they often still need help with getting personal hygiene items, cleaning supplies, furniture, etc. If they have children that's another thing to factor in, so therefore they may need help with getting their children school supplies, clothing, bedding, etc. Often the whole family will need clothing, shoes, etc.
Sts. Joachim and Ann Care Service	Public transportation; affordable childcare for single mothers on limited income; services and assistance programs for people with limited income
	workforce housing for those who make \$18-20 an hour, have lived in this area their entire life but cannot afford to live here because apartment costs are ridiculous. The people who work these jobs serve you at your restaurants, make sure the Amazon packages get out and make your cars in Wentzville, but we can't afford to live here.

<p>Sts. Joachim and Ann Care Service</p>	<p>The community needs housing that is affordable for those who are living on the streets. Without the basics for survival (food, shelter) there is no way for people to move off of the streets, gain employment and become productive members of society.</p> <p>A shelter is great but if we don't have housing that is affordable and or landlords that are willing to give people a second chance or overlook their obstacles then people will sit in shelters for years. Right now, spending money on a large shelter is putting a Band-Aid on an issue that will have to be dealt with very quickly after opening.</p>
<p>New Hope Resource Center @ Morning Star Church</p>	<p>Safe, reliable, affordable housing is the biggest need we see in our county.</p>
<p>First Step Back Home,. Inc.</p>	<p>Money for motel stays for the homeless and working poor.</p> <p>Money to buy mobile homes for homeless and working poor.</p> <p>Money to buy cars for the homeless and working poor.</p> <p>money to buy inspections, insurance, taxes, license fees, for cars etc.</p> <p>Money to buy Mobile Homes for the homeless and working poor.</p> <p>Money for car repair and gas.</p> <p>Money for cell phones, food, clothes, shoes, personal accessories etc.</p> <p>Money for job training and searching.</p> <p>Money for more staff to do all the above.</p>
<p>LINC ST CHARLES COUNTY</p>	<p>Temp housing is a helpful gift to so many, however that is not the solution. To avoid the revolving door of homeless sheltering, we must problem solve the lack of affordable housing first and foremost.</p>
<p>Sts. Joachim and Ann Care Service</p>	<p>Affordable housing is needed. There seems to be a lot of luxury apartments being built in the tri-county area, but none or not many of affordable apartments that our clients look for and need. There is also not much in the area in the way of shelters, so I ranked that high also at #2.</p>
<p>Community Council</p>	<p>Coordinated Entry has expanded, and we need to maintain our ability to respond to housing crises, as there is great return on investment for time spent. We have a severe need for affordable housing; homelessness will increase without it. Non-congregate emergency shelter is also a critical need. Transportation options are needed for those without a car, both to</p>

	<p>stabilize and for employment. We are challenged to rehouse persons without availability of housing units within FMR and willing to accept a short- or long-term subsidy. Maintaining persons in their home through a housing crisis is critical, especially with lack of alternative rental housing.</p>
Our Lady's Inn	<p>Case management will be an important component for the homeless population seeking to be housed. They will need to be connected to resources to support them in the endeavor of remaining housed by addressing the issues that caused chronic homelessness to begin with. Addressing the issues of mental health, sobriety, life skills-budgeting and saving, spirituality, relationships, and parenting, etc. Someone to walk beside them and keep them encouraged to move forward as challenges do arise.</p> <p>Affordable housing will provide hope to those who are struggling within the "system". They will have a second chance to as the community provides them with a hand up because the basic necessity of having housing is achieved and they can focus on living within a community with success of having support through their community resources.</p>
St. Vincent de Paul Homeless coordinator	Homeless housing for men
Habitat for Humanity St. Charles County	Financial Education, literally "Home Economics" in the Jr. High & HS ages. This could include budgets, bank accounts, credit cards, some legal, home ownership, etc.
City of Wentzville	Affordable housing for all dealing with low income or medical issues
Developmental Disabilities Resource Board of Saint Charles County	Day care assistance for working parents

Residents:	Comments
	Purchase of property for affordable housing developments.
	A process to Provide assistance to people who are already homeless in our area. A program that allows police to refer homeless to viable services and then arrest for panhandling and using public and private outdoor areas as living quarters if we have repeat offenders who refuse services provided.
	We need to protect the value of our current residents' homes. I have personally seen what subsidized housing can do to a neighborhood. The value of our home was less than what we paid for it. If a person doesn't have a real vested interest in their home, they will not take care of it. With business hiring I don't understand why the homeless can't find a job. Job training and interviewing should be at the top of the list.
	We need to house the homeless and give mental and employment counseling. We also need to take care of our seniors. Many go without meds or/and food to make ends meet. They also need transportation to get to medical help. Secure, safe affordable housing for seniors would really help!
	Transportation options for people unable to drive. Health care for people without insurance.
	Daycare Financial Assistance to working families. Emergency drop off Childcare facility center for families that would need that kind of help on occasion.
	I am no expert on this topic. From my experience with local government and being a resident in many areas of the county, homeless people live near the truck stop around Foristell and congregate at overpasses at major intersections. They form shelters near streams and open spaces. Some chose this lifestyle, but most have severe mental issues that can pose problems for their long-term security and others that cross their path. I'd suspect that people do not have access to find the services ranked above, therefore it seems equipping police officers and non-profit support services to find, approach and help them could be helpful. Food wasn't mentioned in your list. How can we best connect food pantries and transportation to these services?
	Support people in learning how to provide for themselves and not rely on government assistance. This could be done for employment training in order to work their way up to a livable wage by earning it. Possible grants for educational assistance to get training to enter into a higher position of employment. Help for those who truly cannot help themselves, not those who will not, which would require proper vetting on who receives any of these funds.
	This was a difficult survey to take. Clicking on the links for additional information worked well but the documents were so loaded with acronyms that I gave up reading after 2 pages because I had to keep looking back to remind myself of the definitions.....then reread what I just read to make sense of it. This was frustrating because I'm not familiar

	with the jargon/acronyms/programs.
	Some sort of "one stop shopping" for those looking for housing or food.
	There is an overall lack of decent, safe, affordable housing in the county. Lower income people/families and those who are at risk of homelessness cannot just sign their name on a dozen or more waiting lists that will take two years to have a unit come available. Those who find themselves homeless or on the verge of homelessness need an immediate, affordable solution, as well as help in paying the security deposits to get in.
	First Responders education and financial support.
	Fix up current housing/apartments that are fir rent and can be used to assist those in need. Too many properties are run down and are the only affordable options. Not everyone can afford 1,200 a month rent especially for large families.
	I have experienced firsthand what these homeless people are going through. September 2021 my brother was hospitalized with pneumonia. He got pneumonia due to living with a friend in their basement that had a water leak. He contracted covid shortly after being hospitalized. He is disabled, unable to work and homeless due to health cannot live where he was. Trying to get him housing is a 6 month to 2 year wait. The hospital released him without a place to live. A social worker was supposed to come to the hospital and never did. Covid gave him a heart condition and a speech problem. He had trouble communicating. We called the new help number 211 or 311, whatever it is, and they were going to get back to us. Months later nothing. We call them again, and we find out we are supposed to do everything. Finally found housing, will move in later this month, but after rent and utilities he will have \$200 month for food, transportation, medicine etc. He cannot live on that.
	Last thing we need is subsidized housing.....seems to go hand in hand with crime.
	PAY OFF DEBIT with it! stop wasting our monies! Spend within the budget! quit borrowing monies. get back to supporting the Constitution! Its ok for people to have hurt feelings, life is not fair.
	Please take care of our veterans
	Recently was brought to home how few options there are in O’Fallon for Seniors who need to downsize their homes. Getting into a Senior housing apartment often means being in a waiting list for a year or longer. Folks are often having to go into expensive independent or assisted living facilities when all they really need is a smaller apartment in one level.
	Make affordable housing that's actually affordable for low income or disabled people instead of giving builders tax credits and charging 1000+ rent that we can't afford

	<p>Affordable purchase of homes and rental small villas for persons under 55 or over 55.</p> <p>Also, transportation issues</p> <p>More mental health providers</p>
	<p>Affordable housing for mentally ill, but not fully dependent, Can hold a job, but only low paying, and can't afford healthcare and increasing rent costs.</p>

DRAFT

2.4 Public Participation

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: November 3, 2022 – December 5, 2022

Public hearing: November 18, 2022 (COC November 18 meeting)

The St. Charles Urban County and the City of O’Fallon held two public hearings for the consultation with citizens, municipal officials, non-profit agencies, public housing agencies, private developers, governmental agencies, and members of the Continuum of Care in preparation for the HOME-ARP Allocation Plan.

The first public hearing was held on May 25, 2022 with a comment period ending June 10th. St. Charles Urban County and the City of O’Fallon staff discussed the development of the HOME-ARP Allocation Plan, funding sources, eligible activities, and qualifying populations in relation to other funding resources. A list of eligible HOME-ARP activities was presented.

The second public hearing was held on Friday, Nov 18, 2022. During the public hearing, St. Charles Urban County and the City of O’Fallon staff discussed the development of the HOME-ARP Allocation Plan, community needs, eligible activities related to HOME-ARP, and the proposed budget and provided the public with the opportunity to comment on the proposed budget and activities.

Public notices for the HOME-ARP Allocation Plan:

St. Charles Business Journal:

Tuesday, May 10, 2022.

Tuesday, November 3, 2022.

Public comment periods:

During plan development: May 25, 2022 -June 10, 2022.

Draft plan Review: November 3, 2022 -December 5, 2022.

[St. Charles County, MO - Community Needs Ranking Survey \(HOME-ARP\)](#) was submitted on February 18, 2022 and the results were obtained until March 18, 2022.

In addition to survey, the community was informed about the ARP funding in the following meetings:

Housing team meeting (April 1, 2022)

Community Assistance Board Meeting (April 11, 2022)

COC Meetings (02.18.2022; 06.17.2022)

COC Executive Meetings (02.15.2022; 05.10.22;06.14.2022)

Other meetings with selected stakeholders:

Meeting with O’Fallon and City of St. Charles 10.15.21

Meeting with HABITAT, SJA, Community Council (02.11.2021)

Describe any efforts to broaden public participation:

To broaden public participation, the St. Charles Urban County and the City of O’Fallon actively maintain communication with local nonprofit organizations, businesses, residents and housing developers. Both entities engage in the following actions to improve citizen participation:

Actions to improve participation

- Conduct public meetings and ensure that meetings are held at a convenient location for residents of the County and/or virtually (Community Assistance Board Meeting April 11, 2022; Housing Team Meeting April 1, 2022).
- Use electronic and print media to solicit public participation through various media outlets including, but not limited to, the St. Charles Business Journal, Community Assistance Board contact, CDBG mail list that. This includes sending mass emails to County and Municipal employees, nonprofit organizations, and local businesses; advertising on the County’s social media; posting advertisements in the County’s electronic newsletter; and posting information on the St. Charles County Community Development Department and CDBG program website. The City of O’Fallon posts information to its Grants & Assistance webpage, its cable channel, shares information via the weekly e-newsletter and social media pages. O’Fallon also posts copies of the public notice O’Fallon City Hall, the O’Fallon Justice Center, the Renaud Center and the O’Fallon Senior Center. O’Fallon also issues press releases and posts information the St. Charles County Business Record.
- Inform public that the translation of the public notices and related materials for limited English proficiency clientele is available upon request.
- Review and respond to all citizen comments and incorporate such comments in the Action Plan, as applicable.
- Analyze the impact of Action Plan program activities on neighborhood residents, particularly low and moderate-income persons.
- Accepts any comments or views of residents received in writing, or orally at a public hearing, during the preparation of the HOME-ARP allocation plan.

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

Some of the needs highlighted during the Needs Assessment:

- Lack of affordable housing
- Limited stock of available rental housing
- Need more funding for supportive services and case management
- Limited resources
- High Rental Rates
- Lack of access to supportive services

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

All comments were accepted.

3. Need Assessment and Gap analysis

3.1 Affordable Rental Housing in St. Charles County

According to 2020 census, there are 154,851 occupied households. Approximately 18% is renter-occupied, according to American Community Estimates (ACS 2016-2020). This study will use CHAS 2014-2018 data, and ACS 2016-2020 estimates since they are the latest data available to examine qualifying population demographics. The population and housing statistics are as follows

Population (Census 2020): 405,262 (2010: 360,485)

Occupied Housing Units (2020 Census): 154,851 (Vacant: 6293)

Occupied Housing Units: 149,472 (2010:134,274)

Renter Occupied units (estimate based on ACS): (18%) **27,568** (2010:26,055)

Total housing units: 156,396 (Vacant: 6924)

Occupied: 149,472 ACS 2020; **138,958** ACS 2015

Owner occupied: 121,904² (%82) ACS 2020

Renter Occupied: 27,568 (%18) ACS 2020

Owner occupied: 110,058 (%79) ACS 2015

Renter Occupied: 28,900 (%21) ACS 2015

Facts about the affordable rental market in St. Charles County:

1. **Affordable rental units are not meeting the pace of population increase:** According to ACS 2016-2020 and 2011-2015 comparable estimates, the supply of rental units doesn't indicate a substantial change between 2015 and 2020 (there is an observed decrease by almost 4000 units³ for rental units with housing costs less than \$800).

The supply of affordable rental units (units with gross rent less than \$1000) does indicate a substantial decrease; a decrease of 31%, 5059 units.

Per St. Charles County, there is no subsidized housing construction since 2016 (There is only one subsidized housing construction took place since 2016 as a second phase of an earlier project). There were 79,310 occupied units paying rent in 2010 and 98,590 occupied units paying rent in 2018. The median monthly rent in 2010 was \$819 per month and increased to \$1,069 in 2020.

2. **Available Housing Choice (formerly called Section 8) vouchers are far from meeting the need and the number of landlords willing to accept vouchers are limited and decreasing:** The number of available regular vouchers is 740, of which 635 are utilized. There are 79 Mainstream vouchers, of which 60 are utilized. There are currently **4,292** households under

² CHAS 2014-2018, Owner Occupied; 116,280; Renter Occupied: 28,365. Please note that any kind of ACS data cannot be comparable unless there are 5 years intervals. CHAS data provide details on housing based on income levels but the latest available is 2018 data

³ ACS estimates might not be reliable for unit estimates due to high margins of error. The numbers should be used with caution. These numbers are reliable 90% confidence level with a margin error of 0.5%.

50% AMI on the **waiting list**.

On average, Housing Choice vouchers pay St Charles County landlords **\$582** per month towards rent. The average voucher holder contributes **\$258** towards rent in St Charles County.

For two-bedroom units, the average rent is \$777, with \$343 as the low and \$1100 as the high. The average tenant portion for two-bedroom unit is \$258, with \$0 as the low-end contribution and \$949 as the high. The average two-bedroom HAP is \$518, with \$0 as the low-end and \$1061 as the high.

The amount a voucher pays on behalf of a low-income tenant in St Charles County, Missouri for a two-bedroom apartment is between **\$343** and **\$1,100**.

Since 2018, the number of landlords accepting vouchers has dropped from thirty-three to thirteen.

3. **Rental units affordable to LMI households are very limited:** There are **1,180 (4%)** occupied rental units with monthly housing costs less than \$500/month in St. Charles County (St Charles County Housing Voucher Program; ACS 2016-2020). ACS 2011-2015 estimates indicate that rental units under \$500/month accounted for 6% of all rental housing in 2015, a decrease of 612 units with a margin error of 0.5%.

According to 2020 ACS estimates, 80% of area rental units have rents at or above **\$800/month**. There are **5,490** units (20% of all units) with rent (and costs) less than \$800 (Only 4% of all rental units are under \$500 and 16% of rental units are between \$500-800). ACS 2011-2015 estimates indicate that rental units under \$800/month accounted for 31% of all rental housing (9,046 units), a decrease of 3695 units since 2015.

There are 9,926 units (40% of all units) with rent \$500-999/month (ACS 2020) down from 1615 unit (56% of all rental units) in 2015.

The NLIHC⁴ estimates that the **median income for a renter** in St Charles County is **\$49,780**. The Area's Fair Market Rent (FMR) for a two-bedroom apartment is **\$938** and to afford this level of rent and utilities without paying more than 30% of income on housing, one would need to work at a minimum of 70 hours per week or maintain at least 1.75 full-time jobs in St. Charles County. The **affordable rent** for minimum wage is **\$536** in St. Charles County (<https://reports.nlihc.org/oor/missouri>).

The number of the units with gross rent less than \$550/month is 1491; and the number of households with income less than \$50,000 is 13,955.

⁴ The National Low Income Housing Coalition's "Out of Reach" 2021 Annual Report calculates the amount of money a household must earn to afford a rental unit based on the number of bedrooms in a rental unit at the Fair Market Rent (FMR), consistent with HUD's affordability standard of paying no more than 30% of income for housing costs.

3.2 Homeless Needs Inventory and Gap Analysis Tables

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	35	15	11	8	0								
Transitional Housing	17	7	3	#	#								
Permanent Supportive Housing	5	2	42	40	31								
Other Permanent Housing						63	17	6	1				
Sheltered Homeless						24	17	9	43				
Unsheltered Homeless						188	115	6	13				
Current Gap										315	95	295	250

Table 2: Housing inventory and Gap Analysis for Homeless

Data Sources: 1. St. Charles 2022 Point in Time Count (PIT); 2. St. Charles Continuum of Care Housing Inventory Count (HIC); 3. Consultation with Community Council

Non-homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of	# of	# of
Total Rental Units	28,365		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	382*		
Rental Units Affordable to HH at 50% AMI (Other Populations)	798*		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk Homelessness)		2,900**	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,445**	
Current Gaps			3,215 ⁵

Table 3: Housing inventory and Gap Analysis for Non-Homeless

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS); National Low Income Housing Coalition Out of Reach Report 2021: St. Charles County

⁵ (**4,395 – *1180 = 3215) Please note that 1,180, sum of 382 and 798) is an estimate from ACS 2016-2020; it roughly corresponds to number of units with monthly housing costs under \$500 which is affordable to households with income under %40AMI when ACS AMI for Renter Households, \$49,400, is used for calculations)

3.3 The size and demographic composition of qualifying populations

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

HUD requires HOME-ARP funds be used to primarily benefit specific qualifying populations. Qualifying populations include, but are not limited to, the following:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

2014-2018 CHAS Data⁶ estimates that 27.7% of all households in St. Charles County are low income (out of 144,645 households there are **40,130 low-income households** earning **under 80%AMI**). 48.3% of low-income populations (**19,395 households**) are **very low (VLI)** (income less than 50% AMI); **or extremely low income (ELI)** (income less than 30% AMI); These figures inform the qualifying populations determination in St. Charles County area.

Renters account for 38% of all LMI households (**15,070 households**). Of these LMI households, 56.9% are VLI or ELI (**8,575 households**). These 8,575 households will be given special consideration when identifying the qualifying populations' affordable rental housing needs. There are **19,395 HOME-ARP supportive service-eligible households, of which** 72% (13,970 households) are housing-cost burdened.

Income Distribution Overview	Owner	Renter	Total	Owner (%)	Renter (%)	Total (%)
Household Income <= 30% HAMFI	4,475	4,120	8,595	17.9%	27.3%	21.4%
Household Income >30% to <=50% HAMFI	6,345	4,455	10,800	25.3%	29.6%	26.9%
Low and Very Low-Income Households	10,820	8,575	19,395	43.2%	56.9%	48.3%
Household Income >50% to <=80% HAMFI	14,240	6,495	20,735	56.8%	43.1%	51.7%
LMI Households	25,060	15,070	40,130	100.0%	100.0%	100.0%
Total households	116,280	28,365	144,645			

Income Distribution Overview	Owner (%)	Renter (%)	Total (%)	Owner (%)	Renter (%)	Total (%)
Household Income <= 30% HAMFI	52.1%	47.9%	100.0%	3.8%	14.5%	5.9%
Household Income >30% to <=50% HAMFI	58.8%	41.3%	100.0%	5.5%	15.7%	7.5%
Low and Very Low-Income Households	55.8%	44.2%	100.0%	9.3%	30.2%	13.4%
Household Income >50% to <=80% HAMFI	68.7%	31.3%	100.0%	12.2%	22.9%	14.3%
LMI Households	62.4%	37.6%	100.0%	21.6%	53.1%	27.7%
Total households	80.4%	19.6%	100.0%	100.0%	100.0%	100.0%

Table 4: Income Distribution

Data Sources: St. Charles County; Missouri Year Selected: CHAS 2014-2018

⁶ Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low-income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds. For more background on the CHAS data, including data documentation and a list of updates and corrections to previously released data, click here: [Background](#). 2014-2018 data and 2013-2017 geospatial data as available by HUD has been used in this report.

3.3.1. Sheltered and Unsheltered Homeless Populations⁷

- There are **302 homeless persons (180 households)** in St. Charles County according to 2022 PIT counts. (72 unsheltered and 230 sheltered). There were 328 homeless persons (182 households) in St. Charles County according to 2021 PIT counts (79 unsheltered and 249 sheltered).
- **Between 2020 and 2022, total number of homeless persons increased by 10%.** There was an increase of 20% in homeless persons after pandemic (2020 to 2021).
- There is a decrease in child/youth homelessness, but a 29% increase in adult homelessness.
- Of the 302 homeless neighbors in the St. Charles County community, **158 persons are female** (120 in emergency shelter, 8 in transitional shelter, 30 unsheltered), **140 persons are male** (91 in emergency shelter, 7 in transitional shelter, 42 unsheltered), **3 persons are transgender, 1 person is gender non-conforming.**
- Eleven (11) individuals were identified as chronically homeless.
- Ethnic composition: Majority Non-Hispanic/Non-Latino. (296 persons, 98%)
- Racial composition: Majority white (213 persons, 70%)
- There are **911 persons** on the **2021 housing prioritization list** in St. Charles County showing **an increase of 11%** since 2020, when there were 824 persons on the housing prioritization list.
- In **2020** MO-503 Coordinated Entry assessed 1021 persons in need. In **2021** this number **increased** by 35% to **1,382** assessed persons in need.
- Between 2020 and 2021, the number of 2-1-1 calls transferred to Coordinated Entry increased from 8,922 to 9,497.
- Majority of clients calling Coordinated Entry live below the poverty line, are single-parent households, white-non-Hispanic Latino and literally homeless.
- Between 2020 and 2022, the emergency shelter need for youth (age group 18-24) decreased by 7%. The emergency shelter need for adult **men increased by 36%, and 18% for adult women.** The need for emergency shelter for children decreased by 7%. Overall, even with the decrease in emergency shelter need, there was a 10% increase in youth homelessness after pandemic (2020 to 2021).

⁷ (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; **and**

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing

Youth Homelessness⁸:

- Of the 302 homeless persons in St. Charles County **116 persons are under the age of 24.**

Of these 116 homeless persons in St. Charles County:

- **93 persons are under the age of 18.**
- **23 persons are under the age of 24.**
- **11 persons unsheltered.**

3.3.2. Individuals and Families at Risk of Homelessness⁹

- There are **4,120 renter households** with incomes at or below **30% AMI**, which is **14.5%** of all St. Charles's renter households.
- There are 1,418 units with affordable monthly housing costs below \$500.
- It is not possible to identify how many of the 4,120 renter households lack sufficient resources and support networks. However, Coordinated Entry assessments estimate roughly **400 households** to be at risk of homelessness.

⁸ (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act, section 637 of the Head Start Act, section 41403 of the Violence Against Women Act of 1994, section 330(h) of the Public Health Service Act, section 3 of the Food and Nutrition Act of 2008, section 17(b) of the Child Nutrition Act of 1966, or section 725 of the McKinney-Vento Homeless Assistance Act;

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

⁹ Individuals and Families at Risk of Homelessness HUD defines those at risk of homelessness as individuals and families

- An individual or family who: (i) Has an annual income below 30% of median family income for the area, as determined by HUD;
- Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "Homeless" definition in this section; and Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

3.3.3. Fleeing or attempting to flee domestic violence or human trafficking¹⁰

The Preferred Family Healthcare Women’s Center is the only entity in St. Charles County offering emergency shelter to victims of domestic violence and their children, effectively mitigating service duplication in St. Charles County. The program offers a 24-hour crisis hotline, group and individual counseling, legal advocacy, and outreach services. The program addresses the safety and housing needs of the clients by delivering a COC to individuals and children who enter the shelter program, beginning when clients call the crisis line and throughout one year following discharge from the shelter program. Each client is offered case management services that will focus on identifying and securing independent, and permanent housing after leaving the program. In addition to the Woman’s center, Turning Point and Alive are the other domestic violence service providers serving the domestic violence victims of St. Charles County with their location being outside the County.

- In 2021, the Women's Center received 776 emergency crisis calls and provided 2,059 bed nights for victims fleeing from intimate partner violence
- In 2021, the Women’s Center served 119 individuals (81 adults and 38 children) providing 224 adult bed nights and 45 children bed nights (48% white, 45% black residents served).
- In 2021, Alive served 178 individuals (160 adults and 18 children) providing 47 adult bed nights and 67 children bed nights (74% white, 14% black residents served).
- In 2021, Turning Point served 32 individuals, providing 3010 bed nights.
- Most of the victims are 30-40 years of age (St. Charles County Domestic Violence Board 2021 Reports).
- According to 2022 PIT counts, there were **58 domestic violence victims** in 2021 (43 sheltered, 13 unsheltered, 1 other permanent housing) (Community Council of St. Charles).

3.3.4 Residents living in housing instability or in unstable housing situations

Other Families Requiring Services/Housing Assistance to Prevent Homelessness:

Households (i.e., individuals and families) who:

have previously been qualified as “homeless” as defined in 24 CFR 91.5;

- are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be house; and
- need additional housing assistance or supportive services to avoid a return to homelessness.

¹⁰ For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life- threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit

According to PIT 2022 counts, there are **230 sheltered homeless persons** in the St. Charles County community.

At Greatest Risk of Housing Instability means a household that has:

- an annual income \leq 30% of area median income and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs); **OR**
- an annual income \leq 50% of area median income and meets one of the seven conditions outlined in the McKinney Vento Homeless Assistance Act in 24 CFR 91.5;

According to HUD’s 2014-2018 CHAS data, there are **5,355 ELI households** experiencing severe housing cost-burden. Of these 5,355 households, **2,845 are renter-occupied**. Of the VLI St. Charles County households, **3,390** experience severe housing cost-burden, of which **1,460** (33% of 4,455¹¹ households) are renter-occupied households. Based on Coordinated Entry assessments, it is estimated that 330 of these households lack sufficient access to resources and support networks.

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income \leq 30% HAMFI	3,165	2,845	4,120
Household Income >30% to \leq 50% HAMFI	3,675	1,460	4,455
	6,840	4,305	8,575
Household Income >50% to \leq 80% HAMFI	2,875	240	6,495
	9,715	4,545	15,070
Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Cost burden > 50%	Total
Household Income \leq 30% HAMFI	6,570	5,355	8,595
Household Income >30% to \leq 50% HAMFI	7,400	3,390	10,800
	13,970	8,745	19,395
Household Income >50% to \leq 80% HAMFI	8,350	1,300	20,735
	22,320	10,045	40,130

Table 5: Housing Cost-Burden by Income Groups

Data Sources: St. Charles County; Missouri Year Selected: CHAS 2014-2018

Housing Gap

All housing service providers highlighted the need for more affordable rental units, specifically indicating that affordable rental production and affordable housing is the primary area of concern.

Community Council estimates 315 units are needed to house all currently homeless families and 290 units are needed to house homeless adults. This is estimated using the by-name (Housing Prioritization) list.

¹¹ St. Charles County has **4,455 renter households** with incomes between **30-50% AMI**, which is **15.7%** of all St. Charles’s renter households.

Affordable rental housing unit gap for qualifying populations is estimated to be 3,125¹²

Affordable Rental Unit Gap	
Renter Households with Income <30% AMI paying more than 50% of income for rent, including utilities (ELI)	2,845
Renter Households with Income 30% to 50% AMI paying more than 50% of income for rent, including utilities (VLI)	1,460
A. Renter Households with Income < 50% AMI paying more than 50% of income for rent, including utilities (ELI and VLI ¹³)	4,305
B. Number of rental units where monthly housing costs are less than \$500 (ACS 2020)	1,180
Total Affordable Rental Unit Need (A-B)	3,125

Table 6: Affordable Rental Unit Gap calculation

3.4 The unmet housing and service needs of qualifying populations

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:*

Although the needs of each qualifying population are unique, there are both common needs and challenges impacting all the identified groups. Common needs include a flexible response system, affordable, available housing, and supportive services that prevent homelessness and housing instability. Common challenges to addressing these needs include:

- lack of affordable housing
- lack of emergency shelter
- not enough case managers (staff need)
- no incentive for landlords or property owners to work with the people
- misinformation and lack of community understanding about homelessness –
- crisis mentality-
- not enough administrative help to support the programs

¹² For persons under 50%AMI, there are 4,305 extremely cost burdened persons and there are 4,395 (2,900 plus 1,495) under 50% AMI households that have severe housing problems¹². As public consultation process indicates, there is an extreme additional need in St. Charles for rental assistance and wrap around or supportive services to assist households who are living in housing instability or that have recently received housing assistance due to COVID-19 impacts. This means that at least 4,300 households are in housing instability, that require some kind of housing intervention. As ACS estimates indicate that there are around 1,418 units with a rent below \$500; 1,118 units housing costs below \$500

¹³ Total number of VLI and ELI renter households: **8,575** (57% of 15,070¹³ all LMI renter households in the County)

Total number of **cost burdened VLI and ELI renter** households: **6,840** (80 % of 8,575)

Total number of **extremely cost burdened** VLI and ELI renter households: **4,305** (62 % of 6,840)

- lack of transportation
- past evictions
- past criminal activity
- lack of income
- untreated medical issues
- lack of identifying information (ss card, ID, birth certificate)
- mental health/substance abuse-
- Access to cell phones/cell phone minutes to maintain communication with service providers.

Priority needs for qualifying populations are:

- Affordable rental housing, including permanent supportive housing
- Non-congregate shelter
- Supportive services include:
 - Housing navigation, Housing search and counseling assistance
 - Landlord-tenant liaison services
 - Case management
 - Childcare
 - Education services
 - Employment assistance and job training
 - Life skills training
 - Mental health services
 - Outpatient health services
 - Outreach services
 - Substance abuse treatment services
 - Transportation, including vehicle repairs and gas etc.
 - Credit repair
 - Services for special populations, including trauma-informed services
 - Financial assistance to secure stable housing, such as rental application fees, security and utility deposits, and first and last month's rent.
 - Legal services

3.4.1 Homeless Populations

There is a significant unmet need for emergency shelter for those who are literally homeless. There is only one shelter in the Tri-county area for women and children, and there are no shelters for homeless men. COVID funding allowed the Community Council of St. Charles County to provide some emergency non-congregate sheltering in motels, but it is anticipated that these funds will be expended by the end of 2022. Additional motel funding will be needed to bridge the shelter gap to maintain current COC performance.

Over the past year, there has been significant support and commitment from municipal leaders to invest in short-and long-term housing solutions for St. Charles County's homeless neighbors. A St. Charles City mayoral-appointed task force, under COC leadership, engaged City of Refuge from Atlanta, GA as a consultant to help develop a multiservice project incorporating short-and-long term shelter, health and mental health services, substance use treatment, and employment training opportunities. Endorsement

has been secured from the St. Charles City Council, as well as other local elected officials/municipalities, COC leadership, and other stakeholders. Most recently, stakeholders have signed letters of support for St. Charles City to apply for up to \$10M in State American Rescue Plan Act (ARPA) funding for this project. Listening sessions with over 30 church and civic organizations, community groups, and non-profit organizations, helped shape and focus the project, as well as to secure funding commitments for operational support.

The process of resolving unsheltered homelessness is entrenched and complicated. Resolution takes longer and is more involved than that of emergency, crisis shelter solutions. Sts. Joachim and Ann care Service's Street Outreach Team meets with about 300 street homeless individuals annually. There is a percentage of the community's unsheltered homeless population that has been literally homeless for over 10 years. This segment of the community's homeless population is interested in shelter and would more willingly accept support items, like food and new socks.

Recent analysis of homelessness data reveals that the primary risk factors in first time homelessness in St Charles County are having an income below 50% of poverty level and/or being a single parent female. The vast majority are low income, and 58% are female.

3.4.2 Individuals and Families at Risk of Homelessness

Individuals and families at risk of homelessness need housing assistance that varies from eviction assistance, diversion assistance, rent and utility assistance, and other types of supportive services. Such supportive services include:

- Short-term subsidies to defray rent and utility arrearages for families that have received eviction or utility termination notices or are experiencing a hardship that may lead to homelessness.
- Security deposits and first month's rent to permit homeless families to move into their own apartment.
- Case management services geared towards problem solving and rapid resolution for people receiving diversion services.
- Mortgage payments.
- Rapid resolution case management and/or mediation services.

Rents have increased dramatically over the past year, even among previous Low Income Housing Tax Credit (LIHTC) properties, disrupting many formerly stable households. The COC is also now working with area Courts and the Sheriff's office to monitor and prevent evictions. Coordinated Entry staffing was increased to strengthen the assessment process, including improved targeting resources and referrals for persons at imminent risk of homelessness.

Agencies within the Coordinated Entry System secured prevention funding for highest need households. The COC focus on eviction prevention resulted in a 61% reduction in evictions in 2021, and a 76% reduction in evictions overall from 2019-2021. However, there is a growing need and these efforts require continued financial support for the Coordinated Entry System.

3.4.3 Fleeing or attempting to flee domestic violence or human trafficking

There is one emergency shelter (PFH -Woman's center) located in St. Charles County that serves domestic violence victims and their family members. The agency provides housing accommodations and a variety of wrap-around services, such as counseling and advocacy assistance. Domestic violence and human trafficking survivors often lack easy access to short-term shelter, to medical and psychological services, and networks to connect to job opportunities. Without economic independence, many survivors are caught in abusive relationships and the gains they make with traditional social services are not fully realized. Creating better access to short-term shelter, housing, and supportive services will help stabilize this qualifying population.

3.4.4 Residents living in housing instability or in unstable housing situations

Residents who have been previously homeless or who rely on rental assistance often need financial assistance to continue for a longer period than is permitted. Funding for such existing services and housing assistance programs is critical to ensuring housing. Additionally, St. Charles County lacks affordable housing options for residents in need. The community's neighbors living in housing instability need financial literacy assistance, to increase incomes, build savings, and acquire assets. The COC is aware of this need, and CE and COC members proactively coach low-income persons, providing key information regarding how to leverage community supports like food pantries, utility assistance, and employment services to increase income and reduce returns to homelessness. Current returns to homelessness rates are about 10% over two years. The COC's highest returns to homelessness are from persons voluntarily exiting shelter and transitional programs before attaining permanent housing. The shelter providers, COC and CE are all working to better address permanent housing at shelter intake.

3.5 The current resources available to assist qualifying populations

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 St. Charles Urban County receives an annual allocation of approximately \$2 million in federal formula grant funding through the Community Development Block Grant (CDBG), and HOME Investment Partnerships (HOME) Grant and COC grants, and \$4M for Housing Choice Voucher program. The Urban County also provides \$300,000-\$400,000 of Housing and Indigent funding to local non-profit agencies annually.

The City of O'Fallon receives roughly \$500,000 in CDBG and HOME funds annually. The St. Charles Urban County and the City of O'Fallon utilize their CDBG and HOME funds to assist families with obtaining affordable homes, supportive services, rental assistance, transportation assistance, and other services. These services can and often benefit qualifying populations. Although the St. Charles Urban County and the City of O'Fallon use CDBG to fund public services to the greatest extent possible, which can help stabilize individuals and families by providing services like healthcare, childcare, job training, and homeless service, there is a regulatory 15% Public Services cap of the total CDBG allocation. Continuum of Care collaborative projects in the amount of \$492,806 annually provide following services:

- Community Council - funding for HMIS, COC Planning, and Coordinated Entry (in addition to the Homeless Management Information System (HMIS) expansion grant)
- Compass Health - permanent supportive housing grant (19 units)
- Youth in Need - funding to support youth in rapid rehousing (6 units)
- Sts. Joachim and Ann - rapid rehousing funding (5 units)

In St Charles County, there are a total of 4,958 Affordable Housing Units for very low-income households. This includes low-income housing apartments, income-based apartments, and rent subsidized apartments.

There are thirty-three (33) **low-income housing apartment communities** offering **2,213**¹⁴ affordable apartments for rent in St Charles County, Missouri.

St Charles County features **707 income-based apartments**, where tenants typically pay no more than 30% of their income towards rent and utilities.

There are **1,592 rent-subsidized apartments** that do not provide direct rental assistance but remain affordable to low-income households in St Charles County.

Since 2018, there has been **NO** LIHTC subsidized housing production, according to HUD data. In 2018, Aspen Trails 2 (St. Peters, 38 units) opened, and in 2017, Hillman Place 2 (O’Fallon, 56 units), following five other projects in St. Peters, Lake St. Louis, Wentzville, Dardenne Prairie, St. Charles in 2016¹⁵.

The following four projects are listed with no info on the dates: CCRC of O’Fallon, O’Fallon Lakes apartments, Villas at Peruque Hills, Gentemann 3 (Senior).

In St Charles County, the total number of Affordable Housing Units provided for LMI households is **4,598** (total of low-income housing apartments, income-based apartments, rent subsidized apartments). ACS 2020 estimates that **the number of rental units with housing costs under \$800 is 5,490**.

Affordable Units Inventory	
The number of low-income housing apartment community units (33 communities)	2,213
The number of income-based apartments (tenants typically pay no more than 30% of their income towards rent and utilities)	707
The number of rent subsidized apartments (These do not provide direct rental assistance but remain affordable to low-income households in St Charles County)	1,592
Total Affordable Rental Unit	4,512

¹⁴ According to HUD sources LMI units by LITECH seems to be between 2,175 and 2,213. <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::low-income-housing-tax-credit-properties/about>

¹⁵ There is West Clay Senior Living listed as started service in 2020 in one HUD document; it is the second phase. Otherwise it is listed as 2016)

The number of apartment units that accept vouchers (13; there is a drop from 33)	1200-2000
# of LITECH Units	2175-2213
The number of units with monthly costs under \$800 (ACS 2020)	5,490

Table 7: Affordable Units Inventory

Data Source: Estimates from internet search <https://affordablehousingonline.com/housing-search/Missouri/St-Charles-County2>. ACS 2020 3. HUD LITECH Inventory <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::low-income-housing-tax-credit-properties/about> 4. NECAC Consultation on landlords accepting vouchers 5. SJA – Housing Locator List

3.6 Gaps within the current shelter, housing inventory, the service delivery system:

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

Based on the gap analysis tables provided above, the most significant gap is in affordable housing for households at risk of homelessness, for whom there is a 3,125-unit gap. The CHAS data used for this table indicates that there are only enough affordable units for 27% of this population.

The Tri-County Continuum of Care (COC) collaborates with non-profit organizations to analyze existing needs to assist in identifying funding gaps and other gaps in services. The Homeless Point in Time Count, organized by the COC, annually assesses the characteristics of the homeless population in the region. Overall, **843 persons (474 households)** are currently on the housing prioritization list (**literally homeless**). **This is a 23% increase over the past year. Most of these households are not in shelter. (72% is in St. Charles County).** The COC lists the **observed trends as follows:**

- **23% increase in literally homeless households from 2021-2022**
- Rehousing rate dropped from **62% to 30%**
- **A large increase in persons who are physically and medically fragile without housing**
- Households that used to be rapidly rehoused are now waiting for units
- Decreasing the number of persons who are chronically homeless, as well as persons with mental health needs.
- Increasing the number of persons with developmental disabilities
- Coordinated Entry assessed **30%** more households in 2021

3.7 Characteristics of housing associated with instability and an increased risk of homelessness

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 previous history of homelessness is the main indicator of households falling into homelessness from a place of housing instability. Homeless assistance is generally the last resort for households in extreme poverty with few resources of their own and limited connections to others who could offer temporary, emergency support.

3.8 Priority needs for qualifying populations:

Identify priority needs for qualifying populations:

HOME-ARP qualifying populations often have overlapping needs. The needs may vary amongst these QPs. The COC lists the overall priorities as:

- 1) **Affordable rental units that will accept vouchers/short term subsidies** – lack of availability has made this a critical issue. Agencies cannot rehouse neighbors, even with subsidies, due to lack of available units.
- 2) Funding to **maintain Coordinated Entry** services.
- 3) Continued support for an **emergency motel voucher & transportation program** when shelters are at capacity; **access to affordable motel units; shelter is especially needed for men, those with physical disabilities and/or special needs (mental health, substance abuse, autism) and medical respite care; non-congregate options are preferred by clients due to trauma.**
- 4) **Increased street outreach services and case management for targeted high-risk households that have been rehoused.**
- 5) More intensive housing navigation, follow-up, and landlord support for housing persons with high vulnerability scores.
- 6) Continued need for **flexible homeless prevention funding** to maintain people in their homes, especially due to limited rehousing options.
- 7) Additional supportive services to include locations to shower; laundry, weather shelters, transportation, cell phones/minutes for clients; mental health, legal services, and job search & job start assistance.

3.8.1 Homeless or At-Risk of Homelessness Populations

The Tri-County COC identifies and prioritizes the needs of the homeless population. The COC’s Strategic Plan outlines goals that address the needs of homeless veterans, people experiencing chronic or near chronic homelessness, homeless families, and youth. The needs of each group generally overlap. Those who are experiencing or are at-risk of homelessness need more affordable housing and shelter options that provide short-term, mid-term, and long-term interventions. Those who are at-risk of homelessness have a demonstrated need for homelessness prevention and stabilizing services, while those who are currently homeless or experiencing chronic homelessness need more case management services.

3.8.2 Domestic Violence Populations

Families or individuals fleeing domestic or dating violence need increased safety measures to minimize the risk of returning to unsafe residential environments. This qualified population has a critical need for temporary shelter, for safe harboring, and supportive services to help them transition to permanent supportive housing. These families and individuals also need legal advocacy, childcare, employment services, and case management. The issues present in DV homeless population grew during the pandemic. There was a marked increase in survivors requiring with mental health and substance use disorder services. An additional barrier is the lack of affordable housing and public transportation within the County.

3.8.3 Residents living in housing instability or in unstable housing situations

Residents living in unaffordable or unsafe homes have many needs and face compounded challenges. These households need support staying housed. While many families may gain stability through rental assistance, other families need more housing options that are safe and affordable. However, most of these households will also need a livable wage and supportive services to create long-term self-sufficiency.

3.9 Methodology

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 gaps in services and programs needed to provide shelter, housing, and services were determined using data from multiple sources. This plan identifies gaps and needs by analyzing quantitative data from the state and federal government (Comprehensive Housing Affordability Strategy, American Community Survey), data gathered from local service providers and institutions (Point in Time Count, Housing Inventory Count, annual CAB reporting). The analysis was supported by the qualitative interviews and surveys from local experts and service providers, as well as the public. These data sources presented the local needs which have been highlighted for the last years through a variety of reports and meetings, including the Housing Summit 2022, Master Plan 2030, and Analysis of Impediments to Fair Housing Report. Taken together, these various data sources provided a holistic view into the local qualified populations and their needs.

4. HOME-ARP Activities

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

The St Charles Urban County and the City of O'Fallon will administer a Request For Proposal (RFP) process for the Collaborative HOME-ARP project once the HOME-ARP Allocation Plan is approved by HUD. The RFP process will be administered by St Louis County, the lead agency for HOME Consortium. The RFP will allow applicants to state their requested funding amount, indicate which HOME-ARP activity (or list of activities) the funds will be used for, and state how their proposal will meet the needs

articulated in this plan.

Describe whether the PJ will administer eligible activities directly:

The St Charles Urban County and the City of O’Fallon will not administer any eligible activities directly. Individual agencies will be eligible to respond to the Request For Proposal.

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

No portion of the PJ’s HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services			
Acquisition and Development of Non-Congregate Shelters			
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental	\$1,805,984.00		
Non-Profit Operating		STCO	5%
Non-Profit Capacity Building		STCO	5%
Total Allocation for projects	\$1,805,984.00		
Administration and Planning	To be determined by STCO	STCO	15%
Total HOME ARP Allocation	To be determined by STCO	100%	100%

Table 8: Use of HOME-ARP Funding

Additional narrative, if applicable:

Table 4 shows the HOME-ARP budget, which indicates the amount of HOME-ARP funding that St Louis County (STLCO) allocated for eligible HOME-ARP activities. The administrative and planning costs within HOME-ARP statutory limits will be determined by St Louis County.

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

St Charles County’s priority need is affordable housing unit production in all studies and reports. Supportive activities, rental assistance and shelter for homeless people are identified as additional needs. St Charles County will primarily allocate its HOME-ARP funds for the development of affordable housing rental housing that is expected to include supportive services for the tenants. The funds that will include the administration and planning of the HOME-ARP funds and will also provide the infrastructure for recipient organizations to administer services, including through capacity building, staffing, and other expenses for effectively delivering the funded services. The Consortium lead, St Louis County, will identify the amount that will be allocated to administration and planning.

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 large gap in affordable housing for qualified populations, coupled with issues such as NIMBYism and willingness to rent to qualified populations led to significant investment in creating affordable housing units that would serve these qualifying populations.

The local service providers' needs such as staffing, capacity, and other funding limitations require investment in supportive services. Rental assistance has always been an avenue to ensure housing stability. Additionally, there are local efforts underway to create non-congregate shelter in St Charles County, requiring extensive funding. Being aware of all these needs, the St Charles Urban County and the City of O'Fallon will use the HOME-ARP funds to initially invest in the efforts to increase the affordable rental units.

4.1 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 St. Charles Urban County and the City of O'Fallon will produce and support an estimated six-eight (6-8) affordable rental units with HOME-ARP funds. Support will include unit operating funds and supportive services for qualifying populations. Because most qualifying populations are also extremely low-income, the HOME- ARP affordable rental units will specifically address the need for rental units affordable to qualifying households.

Using the \$1.8 million it has allocated toward Affordable Rental Housing, the St Charles Urban County and the City of O'Fallon plan to produce and support six (6) new affordable housing units at \$250,000/unit, including other costs. This is in line with [HUD guidance](#) on maximum HOME per-unit costs, where a 2-bedroom elevator unit can cost up to \$250,530.

If this HOME-ARP funding is spent on renovating existing housing, then the Consortium estimates that it could renovate 15 housing units (using inflation-adjusted estimates from [this source](#)).

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

As described in the consultation process, the affordable housing produced with HOME-ARP funding will address the lack of area housing that is affordable, high quality, accessible, and available to low-income households or those seeking public assistance. Building brand new units funded through HOME-ARP would ensure that these attributes are met, while renovations/rehabilitation would more significantly increase the number of quality affordable housing units.

4.2 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 St. Charles Urban County and the City of O'Fallon will not provide preferences to any population or subpopulation.

4.3 Referral Methods

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

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

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

the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;

the CE does not include all HOME-ARP qualifying populations; or,

the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

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

N/A

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

N/A

If the PJ intends to use the coordinated entry (CE) process established by the COC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

N/A

If the PJ intends to use the CE process established by the COC, describe the method of

prioritization to be used by the CE. (Optional):

N/A

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

N/A

4.4 Limitations in a HOME-ARP rental housing or NCS project

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

The St Charles Urban County and the City of O’Fallon will not utilize any limitations for its HOME-ARP-funded projects.

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:

N/A

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

N/A

4.5 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:

The St. Charles Urban County and the City of O’Fallon do not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

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.

HOME funds cannot be used to refinance multiple-family loans made or insured by any other federal program, including but not limited to, the Community Development Block Grant Program.

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

Properties for which refinancing is approved may be located anywhere within the corporate limits of the Consortium members.