



Proposed HOME-ARP Allocation Plan

(draft subject to refinement)

Prepared by

Crystal & Company (www.crystco.com)
for the
City of Independence, MO

February 10, 2023

City of Independence HOME-ARP Allocation Plan (Draft)

Note: Items noted in red to be filled in when information becomes available.

Preface

The American Rescue Plan was signed into law on March 11, 2021 to provide federal funding to address the ongoing impact of the COVID Pandemic on the national economy, public health, state and local governments businesses and citizens.

To address these needs Congress allocated ARP funding to be administered by the U.S. Department of Housing & Urban Development as part of the department's Home Investment Partnership Program (HOME-ARP), to address qualifying populations to include homeless individuals and families, persons at risk of homelessness, and other vulnerable populations at risk of homelessness. Specifically:

- Homeless (as defined by section 103(a) of the McKinney-Vento Homeless Assistance Act;
- Fleeing or attempting to flee domestic violence, dating violence sexual assault, stalking, or human trafficking as defined by the Secretary;
- Other populations where providing supportive services or assistance that prevents homelessness or would serve those with the greatest risk of housing instability; and,
- Veterans and families that include a veteran that meet one of the proceeding criteria.

Allowable activities using HOME-ARP funds to address the aforementioned needs include: development and support of affordable housing; tenant-based rental assistance (TBRA); supportive services; and, the acquisition or redevelopment of non-congregate shelter units.

HUD notified the City of Independence that, pending an approved HOME-ARP Allocation Plan, it is allocated \$1,684,853 in HOME-ARP funding. After receiving consultation, input from stakeholders, and statistical research, the City developed this draft HOME-ARP Allocation Plan describing planned activities to address the qualified target group clientele noted above.

Consultation

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

The initial consultation process included telephone interviews with the entities noted below during the months of September and October of 2022 in addition to an initial Public Meeting with these and other relevant entities on October 19, 2022 to elicit input on needs and relevant issues associated with the HOME-ARP clientele. Once the draft HOME-ARP Allocation Plan was prepared, it was subjected to the public review and comment process occurring from February 10, 2023 through March 13, 2023 as well as in the final, mandatory Citizen Participation meeting executed on February 16, 2023. The Independence Plan also secured City Council review and approval in March of 2023 prior to submission to HUD.

List The Organizations Consulted

Organizations initially consulted by phone in September and October of 2022, solicited for attendance at the two Citizen Input meetings on October 19, 2022 and February 16, 2023 and sent copies of the draft HOME-ARP Allocation Plan on February 10, 2023 seeking input/comment.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Independence Housing Authority	PHA	Tel. Interview and/or Citizen Participation Meeting	Need for assistance with client security deposits and application fees to secure adequate housing.
Greater Kansas City Homeless Coalition	Reg'l Continuum of Care	Tel. Interview	First priority on funding use for Non-Congregate Care shelter facilities, then for supportive services and finally, rental housing production.
Hope House	Area Domestic Violence Non-Profit	Tel. Interview and/or Citizen Participation Meeting	Rental supports to keep folks in their dwellings coupled with the key supportive services and bridge housing endeavors for transitional dwelling support.
Hillcrest Transitional Housing	Area Non-Profit Homeless Provider	Tel. Interview and/or Citizen Participation Meeting	Preservation and development of bridge (transitional) housing, case management assistance and other support services for homeless persons and those at-risk and short-term rental supports and possible aid to hike FMRs if/as needed.
Mother's Refuge	Area Pregnant Parenting Young Moms Non-Profit (sometimes Dom. Violence)	Tel. Interview and/or Citizen Participation Meeting	Identified gaps in services for this clientele and affordable housing. Definite interest in non-congregate care shelter support and a variety of supportive services, among others. A concern that HUD rules allow for clients breaking prudent rules oriented to the clientele may be eliminated from securing HUD aid.
Community Services League/United Way Of Greater Kansas City	Area Non-Profit – Homeless Prevention	Tel. Interview and/or Citizen Participation Meeting	Homeless prevention a priority for those folks right on the line. Thus, the first key need is targeted, short-term rental supports to keep folks in their dwellings coupled with the key supportive services; and secondly bridge housing endeavors to re-constitute homeless persons in transitional dwellings that might involve TBRA

			plus targeted supportive services. Investigate resources to hike fair market rent levels.
Salvation Army EA	Non-Profit Homeless Provider	Tel. Interview and/or Citizen Participation Meeting	Rental deposit support, transportation support via vouchers or direct services and employment/training aid.
Kansas City United Way (Vets support)	Area Non-Profit	Tel. Interview and/or Citizen Participation Meeting	See information above derived from the Community Service League (CSL).
Disabilities Advocate – ARC Of The Ozarks	Area Non-Profit	Tel. Interview and/or Citizen Participation Meeting	Emphasis on need for transportation services but also other supportive services, n/p rentals, TBRA and rental deposit assistance.
Metro Lutheran Ministries	Area Non-Profit - religious	Tel. Interview and/or Citizen Participation Meeting	Allocations for supportive services (case mgm't, transportation, job & life skills, empl & training, rental deposits, etc), TBRA and permanent rental development.
Truman Heritage Habitat For Humanity	Area Non-Profit	Tel. Interview and/or Citizen Participation Meeting	Desire for sustaining impacts from limited funds. Preference for rental housing (transition to ownership if possible), shelter development and targeted support services.
Salvation Army Crossroads	Kansas City, MO Local Government	Tel. Interview and/or Citizen Participation Meeting	Need for rental housing production, shelter development and targeted supportive services (utility assistance, short rental aids, credit assistance, etc).
Drum Farm Organization For Children	Area Non-Profit	Tel. Interview and/or Citizen Participation Meeting	Priority needs for transportation vouchers (Uber, Lyft, etc), transitional rental housing in the form of duplexes, targeted TBRA, etc.

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

The feedback from the consultation conducted with the entities noted above via telephone interviews and the Public Meeting conducted are presented below.

HUD Home-American Rescue Program (ARP) & Plan

Citizen Participation Meeting Minutes

Wednesday, October 19, 2022, at 11:00 a.m.

Citizens Present

Amber Bauer – Greater Kansas City Coalition to End Homelessness

Patricia Hernandez – Greater Kansas City Coalition to End Homelessness

Roland Walker – Oikos Development Corporation

Online Participants

Christina Leakey – Truman Habitat for Humanity

Evalyn Duffy – Community Service League

Kelsi Green – Mother’s Refuge

Heather Figley – Independence Public Housing Authority

Stephanie Boyer – ReStart

Sarah Wimberly – Independence Ministerial Alliance

Rich Crystal – Crystal & Co (Consultant for the City of Independence)

Staff Present

Adrienne Fight – Community Development Program Administrator

Miranda Rice – Assistant to the Director

Tom Scannell – Director, Community Development Department

A hybrid meeting for public comment was held at City Hall, Conference Rm D, as well as via Microsoft Teams at 11:00 a.m. on October 19, 2022. The meeting was called to order.

OVERVIEW OF First HOME-ARP Citizen Participation Meeting

Rich Crystal explained...

- Purpose of meeting is to secure input associated with the City of Independence HOME-ARP plan and program.
- HOME-ARP Funding is oriented to assist homeless person, those at risk of homelessness and other special need type clientele.
 - HOME-ARP Program established March 2021
 - City of Independence will receive about 1.68 million in HOME-ARP Funds (one time allocation)
 - Program funding will need to be expended by September 2023
- Kansas City, KS will receive 3.3 million in HOME-ARP funds
- Kansas City, MO will receive 8.3 million in HOME ARP Funds

REQUEST FOR HOME-ARP ALLOCATION PLAN INPUT FROM CITIZENS

- *PRIORITIES, IDEAS, OR PERSPECTIVES AS THEY RELATE TO POPULATIONS THAT SHOULD BE SERVED BY HOME-ARP FUNDS*
- Amber Bauer:

- Focus on how current rent rates compare to family's net income. Families spending 30%+ in rent will be at risk for homelessness. This population in the community should be taken into consideration.
 - Much of the current data that we have available to us to evaluate housing insecurity is pre-pandemic. Post pandemic data will most like yield greater numbers, and we need to take that into consideration.
- Stephanie Boyer:
 - Lack of affordable housing options across the metro, for families in that 30% AMI range
 - Lack of affordable housing options that do not have a subsidy attached.
 - Housing situation has been exacerbated by the pandemic.
 - Housing Authority waiting list (public housing) is not a viable option due to the number of families currently on it.
 - Difficulty getting sheltered families into public housing, and out of shelters to make room for families falling into homelessness due to current economic climate, because there just are not enough affordable housing options available.
 - More conversation and thought around how we design housing opportunities.
 - More conversation and thought around families with income ranges outside that which would qualify for subsidized housing but are being put at risk for homelessness every day. Need to find a way to "shut off the valve" of families falling into homelessness and needed shelter services.
- Amber Bauer
 - Possibility of a regional approach with these funds? Regional strategic plan?
 - Within the region, Kansas City MO, and Kansas City, KS we are sharing populations. Members of this population are using the same resources and the same agencies across the region.
- Stephanie Boyer
 - Would love to see a regional long-term vision or approach to this funding.
 - This could foster opportunities in the future for public-private partnerships
- Amber Bauer
 - Prevention of homelessness is important, but we also need to look at providing supportive services to these population in the now.
 - Address the needs of those currently dealing with street homelessness
 - Drop-In Centers? Places for street homeless to shower, get their mail, etc.
- *IDEAS AND SUGGESTIONS ON ELIGIBLE PROGRAM PROJECTS*
- Christina Leakey
 - Major issue is getting Section 8 vouchers out on the streets due to a lack of units that would qualify for the program. Could funding be use toward assisting with bringing units up to qualification standards?
 - There is a need for assistance with rental deposits required by landlords in order to allow occupancy of a approved tenant. This need is not typically met by the Housing Authority.
- Amber Bauer

- Another issue as the rent moratorium ends, several landlords are deciding just not to take Section 8/Housing Choice vouchers, because they are realizing due to the lack of supply, they can get market rate for their units. This effect the number or available subsidized units in the community as well.
- Christina Leakey
 - Possibility of using funds to help non-profits acquire units that could/should be section 8. This way a non-profit with a commitment to providing affordable housing and accepting those vouchers would be able to collaborate with the Housing Authority. Two organization with similar goals.
- Stephanie Boyer
 - Getting families over the hurdle of rental deposits or just providing the resources to move, would assist population at risk of homelessness.
 - Would like to see some landlord engagement in the work.

ADJOURN

All of the aforementioned input was analyzed by the City of Independence and the decision was made by city officials to focus 65% of its HOME-ARP allocation and program endeavors for eligible, rental financial assistance costs to prevent homelessness in Independence and the balance of 35% of resources for eligible supportive services.

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:

- **Date(s) of public notice:** 10/04/2022 and 1/31/2023
- **Public comment period:** The public comment period on the draft Independence HOME-ARP Allocation Plan extended from February 10, 2023 through March 13, 2023.
- **Date(s) of public hearing:** 10/19/2022 and 2/16/2023

Describe The Public Participation Process

To reiterate as noted above, the consultation process included telephone interviews with the entities noted earlier during the months of September and October of 2022 in addition to an initial Citizen Input Hearing with these and other relevant entities on October 19, 2022 to elicit input on needs and relevant issues associated with the HOME-ARP clientele. Once the draft HOME-ARP Allocation Plan was prepared, it was subjected to the public review and comment process extending from February 10, 2023 through March 13, 2023 as well as the mandatory final Citizen Public Hearing meeting. The second and final Citizen Input Public Hearing Meeting was conducted on February 16, 2023 to solicit input on the draft Independence HOME-ARP Allocation Plan (also noted earlier in this HUD template). Prior to HUD submission, the draft Independence HOME-ARP Allocation Plan was subjected to Independence City Council review and adoption in March of 2023.

Describe Efforts To Broaden Public Participation:

To reiterate, in addition to consulting with relevant entities/stakeholders during September and October of 2022 described earlier, two Citizen Participation Meetings were held on October 19, 2022 and February 16, 2023 to secure input on relevant needs and approaches to assist the HOME-ARP clientele and secure feedback on the draft HOME-ARP Allocation Plan. Citizen input was also secured during the City Council process to review and approve the HOME-ARP Plan executed in March of 2023 prior to HUD Plan submission. The City of Independence provided final citizen participation notices, the final Citizen Input Meeting Agenda and the draft HOME-ARP Allocation Plan to citizens and stakeholders in English and Spanish. The City will provide this plan on the City of Independence Community Development Department website in both English and Spanish during the public comment period. The City will also provide copies of this plan in 7 locations for the public to access during the public comment period. These locations are:

Independence City Hall
111 E Maple Ave (2nd floor)
Independence MO 64050

Independence Housing Authority
4215 S Hocker Dr
BLDG 5
Independence MO 64055

Palmer Center
218 N Pleasant St
Independence MO 64050

Fairmount Community Center
217 S Cedar Ave,
Independence MO 64053

Mid-Continent Public Library
Midwest Genealogy Center
3440 S Lee's Summit Road
Independence, MO 64055

Mid-Continent Public Library
North Independence
317 W 24 Hwy
Independence, MO 64050

Mid-Continent Public Library
South Independence
13700 E 35th St South
Independence, MO 64055

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

Initial comments/input received (predominantly oral) from the initial public participation process are previously noted in the 'List Of The Organizations Consulted' and the 'Summarization Of Feedback Received And Results Of Upfront Consultation' in this template. Comments received on the draft Independence HOME-ARP Allocation Plan are noted below:

Insert minutes from the 2nd CP Mtg when available and other comment received by city

Summarize Any Comments Or Recommendations Not Accepted And State The Reasons Why

Insert info provided by the city when available as/if relevant

Needs Assessment and Gaps Analysis

Introduction

The following section will describe the shelter and supportive services situation for people experiencing homelessness, people experiencing domestic violence and people receiving housing services within the Jackson County MO Continuum of Care region as data is available from the latest 2022 Point-In-Time (PIT) counts, etc. Information is specifically provided for the City of Independence concerning non-homeless populations most at risk of experiencing homelessness derived from the latest 2019 CHAS data from HUD.

Demographics

Describe the size and demographic composition of qualifying populations within the City of Independence boundaries:

HOME-ARP funds must be used to primarily benefit individuals or families from the following qualifying populations (QPs):

- Homeless – refer to the “People Experiencing Homelessness in The Jackson County MO Continuum Of Care Region Pursuant To 24 CFR 91.5” in this section of the Plan.
- At-Risk of Homelessness – refer to the “People At Most Risk of Experiencing Homelessness in the City Of Independence Pursuant To 24 CFR 91.5” in this section of the Plan.
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking – refer to the “People Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking in The Jackson County MO Continuum Of Care Region” in this section of the Plan.
- Other Populations - refer to the “People At Most Risk of Experiencing Homelessness in the City Of Independence Pursuant To 24 CFR 91.5” in this section of the Plan.
 - #1) Other Families Requiring Services or Housing Assistance to Prevent Homelessness, or
 - #2) At Greatest Risk of Housing Instability

The City of Independence population grew slightly from 116,830 in 2010 to 122,088 presently. There has not been a significant change in the racial or ethnic makeup within the city during this period. A significant proportion of households in the City of Independence in 2019 have housing problems, particularly cost burdens, with 27% of households experiencing cost burdens. Renter

households are particularly impacted by cost burdens, at a rate of 41%. Per the City of Independence Analysis Of Impediments To Fair Housing Choice (AI), the location of renters in distress were in the central and western portions of the locality (from 2015-2019) where a higher incidence of minorities were situated. Homeless and victims of domestic violence are dealt with on a regional basis in the Jackson County CoC. Per the regional GKCCEH Needs Assessment prepared in 2020, only 5.12% of unsheltered homeless and 10.7% of sheltered homeless individuals were situated in Independence. Noted later in this Plan, Independence contains a much more significant volume of persons ‘at-risk’ of homelessness and this has motivated the city’s HOME-ARP programmatic direction and approach for these HUD resources.

People Experiencing Homelessness in The Jackson County MO Continuum Of Care Region Pursuant To 24 CFR 91.5

According to the latest available Jackson County MO 2022 Point-In-Time (PIT) Homeless Count, local data collected indicated that 1,582 people were experiencing homelessness in the region, with 711 of them reported to be unsheltered and the balance of folks (871) in shelters. In 2019 (pre-covid), a total of 1,843 people were experiencing homelessness with 243 unsheltered and the balance sheltered.

For the 2022 PIT Count, 977 or 62% of the population identified as male, 578 or 36.5% identified as female, and 27, or about 1.7% identified as transgender or gender non-conforming, etc. The ethnic breakdown of the PIT Count indicates the majority or 89% identifying as Non-Hispanic and 11% as Hispanic reflecting their overall proportion of the city population. Noted on the following Table, 54% of homeless persons were White, 36% were African American and the balance of 10% distributed among other or persons of multiple races. Unfortunately, African Americans are experiencing homelessness at a rate much greater than their proportion of the City of Independence population of 8.5%.

2022 Point-in-Time Count MO-604-MO Kansas City/Independence/Lee’s Summit/Jackson County CoC

Race (Adults & Children)	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
White	177	260	9	412	858
Black or African American	169	169	6	232	576
Asian)	3	3	0	5	11
American Indian or Alaska Native	8	8	0	15	31
Native Hawaiian or Other Pacific Islander	1	0	1	4	6
Multiple Races	28	29	0	43	100

According to the 2022 PIT Count, key highlights of homeless persons and special populations experiencing such include:

- The number of persons in households without children was 1,188, of which 510 were sheltered and the balance of 678 unsheltered.
- The number of persons in households with at least one adult and one child was 347, of which 341 were sheltered and 6 were not.
- The number of veterans experiencing homelessness is estimated at 149 persons, of which 48 were unsheltered and the balance of 101 were sheltered.
- In the 2021 PIT Count, the number of persons who were counted that identified as adult survivors of domestic violence was 232, of which 168 were in Emergency shelters, 36 in Transitional and 28 were unsheltered. Indicated below, in the 2022 PIT Count, 76

identified as adult survivors of domestic violence of which 48 were unsheltered and the balance of 28 were sheltered. A significant decline from 2021 to 2022.

- It is estimated that 93 unaccompanied homeless youth were evident, of which 68 were in shelters and 25 were unsheltered. Most were between the ages of 18 to 24. These homeless youth tended to be evenly split by gender and were comprised of 51% White and 40% African American.
- The number of adults and children who meet the definition of chronically homeless was 305, of whom 40 were sheltered and 265 not.
- Note the special needs population estimates below.

2022 Point-in-Time Count MO-604-MO Kansas City/Independence/Lee's Summit/Jackson County CoC

Other Homeless Subpopulations

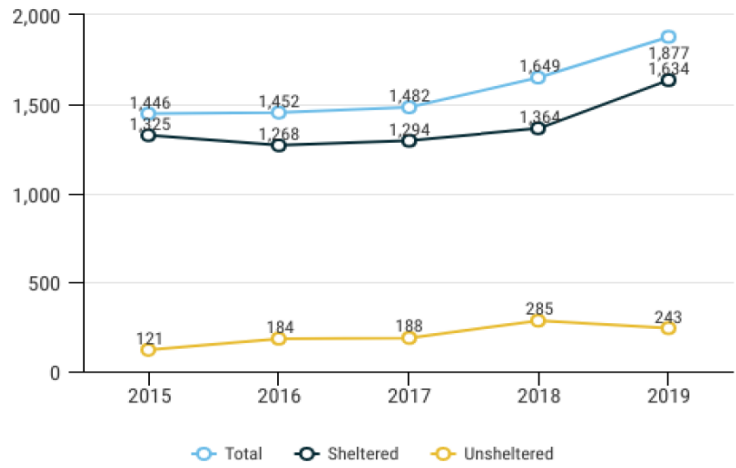
	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Adults with a serious Mental Illness	13	20	0	205	238
Adults with a Substance Use Disorder	2	13	0	132	147
Adults with HIV/AIDS	1	17	0	13	31
Adult Survivors of Domestic Violence	10	18	0	48	76

Per the regional GKCCEH Needs Assessment prepared in 2020, the length of homelessness in months for persons before prior to their Coordinated Entry into the homeless system is noted first by the following cohorts with the average length of homeless follow:

- Youth (17-24)...10.5 months (pre CE entry) and total avg. length of homeless is 28.5 months
- Ages 25-60...11.8 months (pre CE entry) and total avg. length of homeless is 23.8 months
- Seniors (ages 61+)...10.8 months (pre CE entry) and total avg. length of homeless is 25.9 months
- Veterans...6.9 months (pre CE entry) and total avg. length of homeless is 16.3 months
- Families With Children...5.7 months (pre CE entry) and total avg. length of homeless is 21.9 months
- Survey Average...11.4 months (pre CE entry) and total avg. length of homeless is 24.3 months

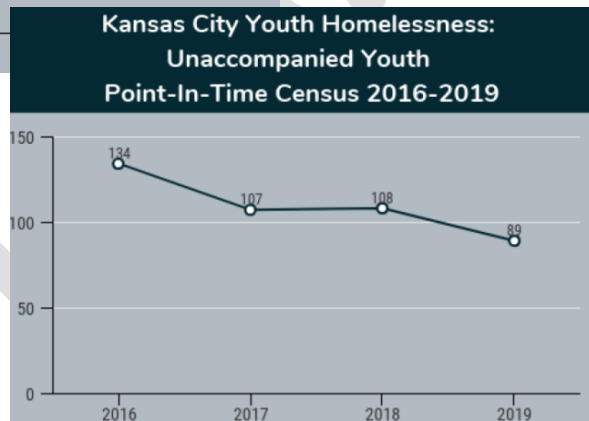
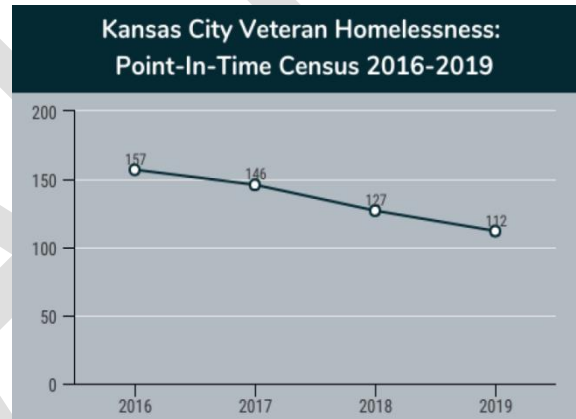
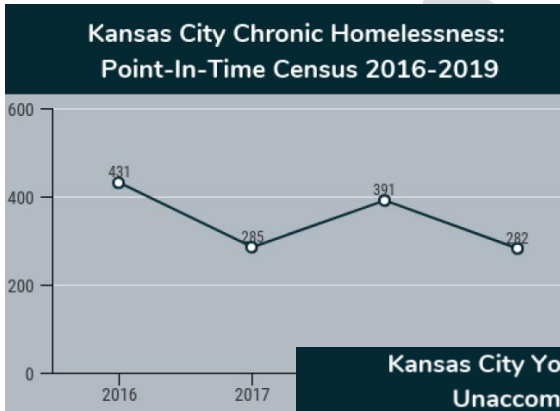
Evidenced on the chart below, the incidence of homelessness in the Kansas City CoC region increased from 2015 to 2019. The decline evident at 1,425 persons from the 2022 PIT are the result of the covid pandemic and likely reporting factors.

Changes in Kansas City Homelessness



Graphic varying homeless persons pre-pandemic from the GKCCEH 2019 Annual Report offer insight into the likely current levels of this clientele.

depictions of categories of



People At Most Risk of Experiencing Homelessness in the City Of Independence Pursuant To 24 CFR 91.5

People who are at most risk of homelessness include individuals and families who have an annual income below 30% of median family income for the area and do not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter.

According to Comprehensive Housing Affordability Strategy (CHAS) 2015-2019 data, there are 5,445 renters with incomes at or below 30% Area Median Income (AMI), and an additional 4,055 renters at or below 50% AMI within the city. Combined, these 9,500 households represent households with incomes that put them most at risk of experiencing homelessness within the community.

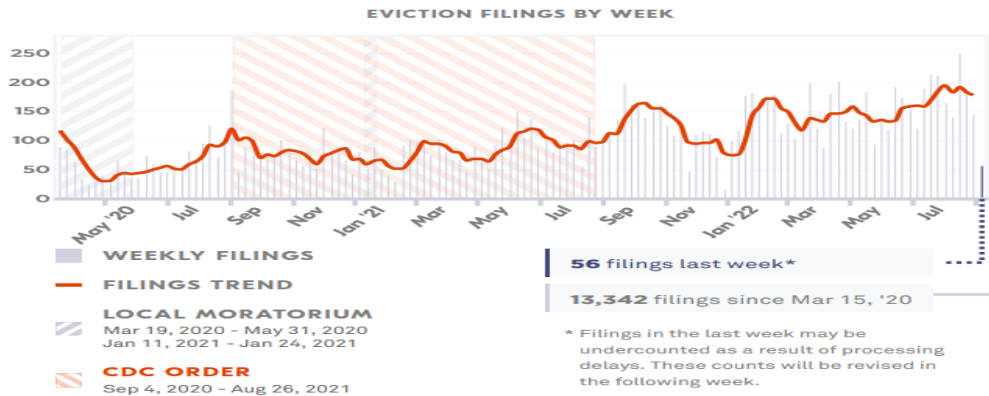
CHAS data also details the living situations of those renters that can put them at further risk of homelessness based on housing problems or rent cost burdens they are experiencing in their current living situation. Cost burden is the ratio of housing costs to household income. HUD defines the four housing problems as: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 30%. HUD further defines the four severe housing problems as: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 50%. For renters, housing cost is defined to include gross rent (contract rent plus utilities).

Within Independence, per the most recent HUD CHAS data (2019), there are approximately 5,455 renter households in Independence earning less than 30% of the area median, of which 3,985 or 73% had at least one of four problems related to housing distress (incidence of being cost burdened, being overcrowded and/or residing in substandard dwelling units). Approximately 2,965 or 74% of these renter households are severely cost burdened (paying more than 50% of their income for housing). These households hold the greatest risk of homelessness in Independence and represent a very significant level at 16% of the community renter population. An additional 570 renter households earning from 31 to 50% of the area median who are severely cost burdened, bringing the total of renters at significant risk of homelessness in Independence to **3,535 or 19% of all renters**. See excerpts from the relevant HUD CHAS tables below.

Displaying data for Independence city, Missouri
Year Selected: 2015-2019 ACS

Income Distribution Overview	Owner	Renter	Total
Household Income <= 30% HAMFI	2,765	5,445	8,210
Household Income >30% to <=50% HAMFI	3,840	4,055	7,895
Household Income >50% to <=80% HAMFI	6,675	4,375	11,050
Household Income >80% to <=100% HAMFI	4,070	2,180	6,250
Household Income >100% HAMFI	11,820	2,870	14,690
Total	29,170	18,920	48,085
Housing Problems Overview ¹	Owner	Renter	Total
Household has at least 1 of 4 Housing Problems	5,755	8,295	14,050
Household has none of 4 Housing Problems OR cost burden not available, no other problems	23,415	10,625	34,040
Total	29,170	18,920	48,085

Unfortunately, the national advent of extensive inflationary conditions coupled with the overall lack of an affordable housing supply exacerbate the problems for these 3,535 renter households and undoubtedly indicate an undercount for folks in need. Note the unfortunate upward trend evident in Jackson County, Missouri for evictions since the termination of the COVID rental moratorium in mid- 2021.



The Independence Housing Authority serves the city and other regions within Jackson County. The Independence Housing Authority operates 1,468 units of Section 8 rental assistance and 505 units of public housing support. The thousands of clients benefitting from these resources are at risk of becoming homeless without them.

People Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking in The Jackson County MO Continuum Of Care Region

Mentioned earlier, in the 2021 PIT Count, the number of persons who were counted that identified as adult survivors of domestic violence was 232, of which 168 were in Emergency shelters, 36 in Transitional and 28 were unsheltered. In the 2022 PIT Count, 76 identified as adult survivors of domestic violence of which 48 were unsheltered and the balance of 28 were sheltered. A significant decline from 2021 to 2022. Discussions with Hope House and Mother's Refuge, two non-profits with shelters/services situated in Independence serving victims of domestic violence, indicated client needs included rental supports to keep folks in their dwellings coupled with the key supportive services and bridge housing endeavors for transitional dwelling support. In addition to affordable housing needs, stakeholders noted a need for non-congregate care shelter support and a variety of supportive services, etc.

Unmet Housing And Services Needs

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

- Sheltered and unsheltered homeless populations defined in 24 CFR 91.5;
- Those currently housed populations at risk of homelessness defined in 24 CFR 91.5;
- Other families requiring services or housing assistance or to prevent homelessness;
- Those at greatest risk of housing instability or in unstable housing situations; and,
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking.

Sheltered and unsheltered homeless populations defined in 24 CFR 91.5

While there were 711 unsheltered persons and 871 sheltered persons experiencing homelessness on a given night in 2022 as identified by the Point-in-Time Count, there are more people who experience homelessness throughout the year than during any one night. Anecdotal feedback solicited through consultation from homeless providers suggests that homelessness

may well have risen since 2022 given the onset of excessive inflationary conditions, the overall lack of affordable housing and significantly rising rental levels.

Unmet City Of Independence Affordable Housing Needs To Prevent Homelessness

In the City of Independence, there is an increasingly worsening shortage of rental housing that are both affordable, in good condition and available to the extremely- and low- income households (with incomes at or below 50% AMI) and severely cost burdened paying more than 50% of their income on housing. Noted earlier, 2019 CHAS data for Independence indicated 3,535 households or 19% of the city's renter households fell into this category thus placing them at serious risk of homelessness.

According to consultation with local providers, the following challenges are evident to serve the HOME-ARP targeted clientele in Independence and the Jackson County CoC region:

- ✓ Housing Service providers are struggling to meet the additional care needs of their clients;
- ✓ Housing program administrators are struggling to locate landlords willing to rent to low-income households, including those with housing subsidies or vouchers. Unused vouchers impact the effectiveness of housing vouchers in our community.
- ✓ Housing service providers are reporting an increase in landlords not renewing leases due to household inability to pay for rent increases.
- ✓ There is a significant unmet need between the number of households that could receive assistance for rent and the number of vouchers and units publicly available to support those households.
- ✓ The need for affordable housing outpaces the availability of vouchers and units.

Independence contains a much more significant volume of persons 'at-risk' of homelessness and this has motivated the city's HOME-ARP programmatic approach for such HUD resources.

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

Noted earlier, in the 2021 PIT Count, the number of persons who were counted that identified as adult survivors of domestic violence was 232, of which 168 were in Emergency shelters, 36 in Transitional and 28 were unsheltered. In the 2022 PIT Count, 76 identified as adult survivors of domestic violence of which 48 were unsheltered and the balance of 28 were sheltered. A significant decline from 2021 to 2022. To reiterate, discussions with Hope House and Mother's Refuge, two non-profits with shelters/services situated in Independence serving victims of domestic violence, indicated client needs included rental supports to keep folks in their dwellings coupled with the key supportive services and bridge housing endeavors for transitional dwelling support. In addition to affordable housing needs, stakeholders noted a need for non-congregate care shelter support and a variety of supportive services, etc.

Available Resources

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.

Jackson County MO CoC Region
Resources and Supportive Services for People Experiencing Homelessness

There is an array of homeless service providers in the Jackson County MO CoC Region that assists qualifying populations. The following optional Table offers some insights into the inventory, homeless population and general gaps of such on any given night in the region indicated in the 2022 PIT. In 2022, it would appear that adult households without children warrant the greatest regional need re: emergency shelters, transitional housing and Safe Havens.

**Kansas City/Independence/Lee's Summit/Jackson County CoC (604M)
2022 PIT Homeless Population & Needs**

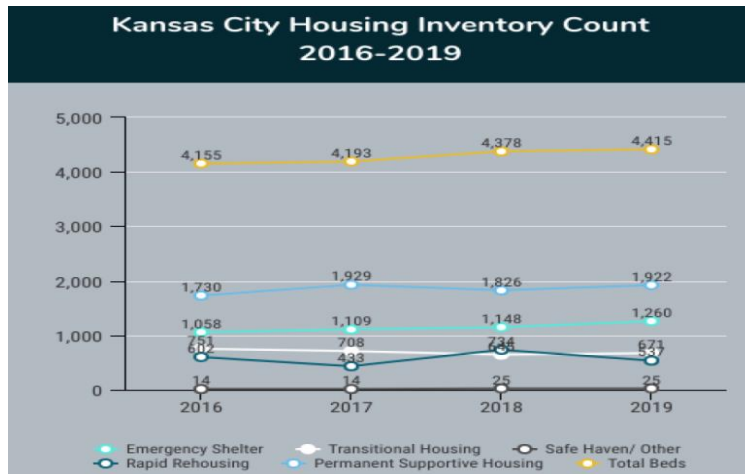
	A	B	C	D	E	F
Item	Sheltered Persons In Current Inventory		Homeless Population			Victims Of Dom. Violence
	Family	Adults Only	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	
Emergency Shelter	160	220				
Transitional Housing	181	278				
Safe Haven	0	16				
Sheltered Homeless			341	514	101	28
Unsheltered Homeless			6	704	48	48
Total	341	498	347	1,218	149	76

Sources: Kansas City/Independence/Lee's Summit/Jackson County (604M) 2022 CoC PIT.

Derived from the 2020 GKCCEH inventory (latest available HIC), note the very approximate regional volume of dwellings by type and PIT/beds below with brief comments on general utilization rates.

- Emergency Shelters – 2,647 (PIT)/2,349 beds....such facilities vary by clientele, an aggregate utilization rate is 80% or so.
- Transitional Housing – 785 (PIT)/773 beds... such facilities vary by clientele, an aggregate utilization rate is 80% or so...
- Rapid Re-Housing Facilities – 434 (PIT)/348 beds... such facilities vary by clientele, but generally are booked.
- Permanent Supportive Housing – 1,477 (PIT)/1,999 beds... such facilities vary by clientele, an aggregate utilization rate is 85%+ or so.
- Other Public Housing & Supportive Housing – 45 (PIT)/45 beds.. limited inventory fully booked

More detailed information from the GKCCEH 2019 Annual Report offers insight into recent trends in the supportive housing inventory available to homeless persons in the region.



Resources for People Seeking Affordable Housing

The Independence Housing Authority (PHA) currently funds tenant based rental assistance and public housing support to clients in the city, however the need for assistance exceeds demand and the amount of funding available to provide the service. Mentioned earlier, the Independence PHA provides 1,468 units of Section 8 TBRA and 505 units of public housing for clients in need in the region. Currently, there are over 3,600 households on the Independence PHA waiting list and it is not expected to open anytime in the near future. Both tax credit rental projects and other subsidized rentals in Independence are fully booked. Discussed earlier there are also about 1,477 (PIT)/1,999 beds of permanent supportive housing for varying clientele in the region that with reasonably high levels of occupancy per the 2020 GKCCEH HIC.

Resources and Supportive Services for People Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking in the Jackson County MO CoC Region

Within Independence, resources and services for people fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking include HOPE House and Mother's Refuge. Noted earlier, their discussions indicated clients need rental supports to keep folks in their dwellings coupled with the key supportive services and bridge housing endeavors for transitional dwelling support. In addition to affordable housing needs, stakeholders noted a need for non-congregate care shelter support and a variety of supportive services, etc.

Shelter Inventory

Drawn from the 2020 GKCCEH HIC (latest available), there at least 3,500 emergency shelter/transitional housing in the region with utilization rates that vary by clientele and approach 80% on aggregate. Drawn from the latest 2022 GKCCEH PIT count, it appeared needs for adults only were quite evident. To reiterate, derived from the 2020 GKCCEH inventory (latest available HIC), note the very approximate regional volume of dwellings by type and PIT/beds below with brief comments on general utilization rates.

- Emergency Shelters – 2,647 (PIT)/2,349 beds....such facilities vary by clientele, an aggregate utilization rate is 80% or so.

- Transitional Housing – 785 (PIT)/773 beds... such facilities vary by clientele, an aggregate utilization rate is 80% or so...
- Rapid Re-Housing Facilities – 434 (PIT)/348 beds... such facilities vary by clientele, but generally are booked.
- Permanent Supportive Housing – 1,477 (PIT)/1,999 beds... such facilities vary by clientele, an aggregate utilization rate is 85%+ or so.
- Other Public Housing & Supportive Housing – 45 (PIT)/45 beds.. limited inventory fully booked

Affordable Housing Inventory & Persons At Serious Risk Of Homelessness In The City Of Independence

To reiterate, approximately 2,965 or 74% of these renter households are severely cost burdened (paying more than 50% of their income for housing). These households hold the greatest risk of homelessness in Independence and represent a very significant level at 16% of the community renter population. An additional 570 renter households earning from 31 to 50% of the area median who are severely cost burdened, bringing the total of renters at significant risk of homelessness in Independence to **3,535 or 19% of all renters**. Note that special HUD CHAS runs incorporate housing affordability estimates and cost burden by income.

Independence Area Non-Homeless Populations	Gap
Non-Homeless Renter Households Earning From 0 - 30% AMI Paying Over 50% of Their Income For Housing These are Severe Housing Problems 1/ (At-Risk Of Homelessness)	2,965
Non-Homeless Renter Households Earning From 31 - 50% AMI Paying Over 50% of Their Income For Housing These are Severe Housing Problems 1/ (Other Populations At Greatest Risk of Housing Instability)	570
Total Renter Households Earning Less Than 50% AMI With Severe Cost Burden & Possible Other Problems	3,535

Source: HUD CHAS Data, 2019.

1/ - Severe cost burden is defined as households more than 50% of their income for housing.

These 3,536 households all needed an available affordable housing option in 2019 (the latest available CHAS data) and it is reasonable to say that these numbers represent an undercount of need given the adverse consequences of the current inflationary spiral to low income households and persons in 2020 and beyond. The aforementioned information represents an undercount of HOME-ARP qualified populations earning less than 30% and 50% AMI who are either at-risk of homelessness or face housing instability per HUD CPD Notice 21-10.

Supportive Service System

Consultation identified gaps in supportive services for persons experiencing homelessness, persons at greatest risk of income instability and homelessness, and special populations such as veterans and victims of domestic violence. Refer to information/feedback in the 'Consultation' Section of this Plan.

Identify The Characteristics Of Housing Associated With Instability And An Increased Risk Of Homelessness If The City Will Include Such Conditions In Its Definition Of "Other Populations" Per The HOME-ARP Notice

Much of the Independence HOME-ARP Program will be oriented to the "other populations" component of the HOME-ARP qualified and eligible clientele. All "other populations" will be

eligible for assistance and any preferences will be determined on an individual case-by-case basis. All program beneficiaries assisted as “other populations” shall meet one of the two required definitions in CPD Notice 21-10 (on pages 7 and 8) noted below:

- 1) Other Families Requiring Services or Housing Assistance to Prevent Homelessness; and/or
- 2) At Greatest Risk of Housing Instability

Identify Priority Needs For Qualifying Populations

In its 2022-2026 Consolidated Plan, the City of Independence identified high priority needs. The HOME-ARP funds will address unmet needs for qualifying populations by addressing several of the high priorities in the plan that include but are not limited to those noted below:

1. Emergency/Transitional Shelter Support & Services;
2. Services and Housing for People Experiencing Homelessness and At-Risk of Homelessness;
3. Services and Housing for Special Needs Populations including Victims of Domestic Violence;
4. Provision Of Subsistence Housing & Utility Support; and,
5. Provision of targeted public services for low- and moderate- income persons in need.

While all of the priority needs may be addressed by the use of HOME-ARP resources, emphasis has been placed on households at imminent risk if becoming homeless described in as ‘other populations’ pursuant to HUD COD Notice 21-10 as follows: (1) other families requiring services or housing assistance to prevent homelessness; and, (2) at greatest risk of housing instability.

Explain How The Level Of Need And Gaps In The Shelter And Housing Inventory And Service Delivery Systems Based On The Data Presented In This Plan Were Determined

The needs assessment primarily reviewed data from the latest available 2022 Point in Time (PIT) Count, the most recent Housing Inventory County (HIC), American Community Survey (ACS), the Jackson County MO CoC Regional Homelessness Management Information System (HMIS), and demand levels and the latest available (2019) Comprehensive Housing Affordability Strategy (CHAS) to provide quantitative data and serve as a basis for the identification of unmet needs. In addition, feedback was received from about 15 agencies that identified their support for and a documented community need for affordable housing for low-income renters, supportive services for special populations, tenant based rental assistance, and the development of new non-congregate shelter units. This feedback provided significant qualitative data from which to support the development of the priority needs, and the resulting identification of system and service delivery gaps in the city and region.

Additional quantitative needs and gap information was also derived from the following sources:

- Independence PHA Waiting Lists
- The City Of Independence FY 2022-2026 Consolidated Plan
- The City Of Independence FY 2022-2026 Analysis Of Impediments To Fair Housing Choice (AI)
- Discussions With The Managers/Administrator of The Jackson County Emergency Rental Assistance Program (ERAP) as well as the State of Missouri ERAP program.
- Research Associated With Independence Interest, Demand and Usage of ERAP programs.
- Jackson County eviction data.
- Selected Data From policymap.com

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

Upon approval of the City of Independence HOME-ARP Allocation Plan, the city will go out for public bid for a subrecipient to manage, administer and implement it's entire HOME-ARP program described in its adopted Allocation Plan through its procurement process in 2023. Incorporating HUD CDP Notice 21-10, the RFP will describe the city HOME-ARP program plan to be undertaken and the relevant expertise needed to manage and implement it. City will select a sub-recipient based on that sub-recipient demonstrating adequate experience in administrating short term rental assistance, capacity, and ability to provide other supportive services.

Describe Whether The City Will Administer Eligible Activities Directly

Noted earlier, Independence will retain a subrecipient to both administer, manage and implement it's entire HOME-ARP program. Again, the city will select a sub-recipient based on that sub-recipient demonstrating adequate experience in administrating short term rental assistance, capacity, and ability to provide other supportive services. The city shall not authorize the commencement of HUD HOME-ARP program operations until its HOME Allocation Plan is approved by HUD. The city will monitor its HOME-ARP Program on an ongoing basis for general compliance with HUD program rules and regulations, program performance and Allocation Plan objectives as well as financial management. The subrecipient ultimately selected shall take the lead in all of the items noted above as well as with HUD program documentation and reporting, liaison and HOME-ARP program implementation and management.

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:

Refer to the information noted above.

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

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,432,125		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 0	0%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning*	\$ 252,728	15%	15%
Total HOME ARP Allocation	\$ 1,684,853		
*Up to 15% of the total grant.			

To reiterate, the maximum 'Administration and Planning' charges above may be \$252,728 but those fees may well be less and 'Supportive Services' hiked.

Describe How The City Will Distribute HOME-ARP Funds In Accordance With Its Priority Needs Identified In Its Needs Assessment And Gap Analysis

Based on discussions with relevant regional and local stakeholders as well as the analysis of of homeless needs/gaps and those at risk of such, the city has elected to commit all of its available HOME-ARP resources for supportive services; of which approximately 65% will be used for Financial Assistance Costs noted in HUD Notice CPD-21-10 (see page 51) oriented to homeless prevention support via rental aids and the balance for other eligible supportive services costs motivated by the needs of qualified populations. Noted earlier, per the regional GKCCEH Needs Assessment prepared in 2020, only 5.12% of unsheltered homeless and 10.7% of sheltered homeless individuals were situated in Independence. Independence contains a more significant volume of persons 'at-risk' of homelessness and this has motivated the city's HOME-ARP programmatic approach for its HUD resources. City will select a sub-recipient based on that sub-recipient demonstrating adequate experience in administrating short term rental assistance, capacity, and ability to provide other supportive services. The city shall not authorize the commencement of HUD HOME-ARP program operations until this HOME Allocation Plan is approved by HUD per federal guidance.

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 rationale to fund supportive services, of which approximately 65% would be used for Financial Assistance Costs and the balance for other supportive services, is derived from the following shelter and housing inventory in the community, service delivery system as well as identified gaps in the jurisdiction realizing that all clients assisted shall be Independence residents:

- ✓ Per the regional GKCCEH Needs Assessment prepared in 2020, only 5.12% of unsheltered homeless and 10.7% of sheltered homeless individuals were situated in Independence. Independence contains a more significant volume of persons 'at-risk' of

homelessness and this has motivated the city's HOME-ARP programmatic approach for its HUD resources.

- ✓ Derived from HUD CHAS data in 2019, approximately 3,535 renter households earning less than 50% AMI held at least one of four severe housing problems (cost burden, overcrowding and/or inadequate living conditions) and this accounted for approximately 20% of the city's renters. Per the Independence housing study conducted in 2021, rental housing costs have risen extensively of late imposing extreme affordability challenges to very low-income rental households at-risk of homelessness and suffering from the adverse consequences of inflationary conditions not seen since the early 1980s. Completed in early 2022, the Independence Housing Study indicates that 29% of Independence renters are cost burdened and threatened by eviction. The study indicated 45% of households can't afford the \$21/hr needed to afford the \$1,020 FMR for 2 bedroom units. In 2016, one in every 23 renter households in Independence experienced eviction, with a total of 740 evictions that year.
- ✓ The aforementioned conditions are reinforced by the extensive level (\$25 million) of federal Emergency Rental Assistance Resources (ERAP) originated and committed in Jackson County to date for renters in need, of which the administrator estimates 65% was committed to City of Independence residents. Informed sources estimate the remaining balance of funding in Jackson County ERAP resources will be expended by July to September of 2023, thus terminating this program.
- ✓ Per the Independence Housing Study conducted in 2022, it is estimated that the city is currently in need of affordable rental units and some rental units are in dilapidated condition, reinforcing the current and future needs of low income renters and motivating the unwelcome prospect of homelessness by such folks going forward.
- ✓ Unfortunately, the prevailing waiting list for affordable rental housing contains over 3,600 households and not anticipated to open soon. This information is derived from the Independence Housing Authority. Other LIHTC and subsidized rental properties in Independence are typically fully rented on a sustained basis.
- ✓ The regional homeless needs and inventory gap for adults only in the Kansas City/Lee's Summit/Jackson County CoC did not appear as severe as the need for homeless prevention in Independence for renters.
- ✓ Depicted earlier in the report, discussions with stakeholder providers in the Fall of 2022 indicated a wide variety of supportive social service needs among homeless clients and those at risk of such throughout Independence and the metro Kansas City regional CoC boundaries.

HOME-ARP Production Housing Goals

Estimate The Number Of Affordable Rental Housing Units For Qualifying Populations That The City Will Produce Or Support With Its HOME-ARP Allocation

Based on the actual experience evident from the Jackson County ERAP program (about \$3,500 assistance/Household), it is estimated that approximately 266 households will be assisted via Independence HOME-ARP rental financial assistance costs. It is estimated that approximately 145 persons will also be assisted via supportive social services of which a part would also secure the aforementioned rental financial assistance.

Describe The Specific Affordable Rental Housing Production Goal That The City Hopes To Achieve And Describe How The Production Goal Will Address The City’s Priority Needs

No rental production goals are anticipated in the proposed Independence HOME-ARP program.

Preferences

Identify Whether The City 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

While all qualified populations per HUD regulations will be eligible under the Independence HOME-ARP program, the type of supportive services allocated by the City of Independence will guide preferences associated with clients to be assisted realizing that all program beneficiaries shall be municipal residents.

Preferences for Financial Services Costs authorized under the HOME-ARP program shall be oriented to city residents determined to be at the greatest risk of housing instability capable of full-time employment within the community per HUD regulations noted below:

- (1) Households that have annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs; and/or
- (2) Households that have annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at [24 CFR 91.5](#):
 - (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 persons reside 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.

All HOME-ARP qualified populations who are municipal residents shall be eligible for other supportive services besides eligible financial costs, with preferences for those securing concurrent rental aid.

If A Preference Was Identified, Explain How The Use Of A Preference Or Method Of Prioritization Will Address The Unmet Need Or Gap In Benefits And Services Received By Individuals And Families In The Qualifying Population Or Subpopulation Of Qualifying Population, Consistent With The City's Needs Assessment And Gap Analysis

The preferences for eligible 'Financial Services Costs' contained within the Independence HOME-ARP Allocation Plan are oriented to the prevention of homelessness by municipal renters comprising eligible 'Other Populations' earning less than 30% and 50% of AMI and experiencing varying forms of housing instability (cost-burden, over-crowding, unstable dwellings and conditions, etc). These resources account for 65% of program funds. The remaining 35% of Independence HOME-ARP program funds will be committed to eligible 'Supportive Services' and made available to all eligible qualifying populations, with a preference for those clients assisted with 'Financial Services'. To reiterate, all eligible, qualifying populations shall be residents of the City of Independence.

Referral Methods

Identify The Referral Methods That The City Intends To Use For Its HOME-ARP Projects And Activities. City's May Use Multiple Referral Methods In Its HOME-ARP Program. (Optional):

Eligible qualified population applicants shall be solicited from a variety of sources and client beneficiaries will all be City of Independence residents. Sources of information and referral for qualified eligible clients will include, but not, be limited to: city and county court eviction/legal data, City of Independence utility data provided by the locality and other Project/Activity Waiting Lists, etc.

If The City 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):

The city may investigate the prospective use of the Coordinated Entry process for the Kansas City regional Continuum of Care as long as in compliance with HUD-CPD Notice 21-10. Regardless of the referral method used, the city shall ensure it subrecipient effectively documents that all client beneficiaries meet the federal definitions of a qualifying population within allowable city preferences and consistent with HUD-CPD Notice 21-10.

If The City Intends To Use The CE Process Established By The CoC, Describe The Method Of Prioritization To Be Used By The CE. (Optional)

If the city elects to ultimately use the CE Process, the method of prioritization will be oriented to the preferences noted earlier within this section of the Plan.

If The City 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)

If the city elects to ultimately use the CE Process and another referral method, the method of prioritization between the two methods will be oriented to those which emphasize the preferences noted earlier within this section of the Plan.

Limitations In A HOME-ARP Rental Housing Or NCS Project

Describe Whether The City Intends To Limit Eligibility For A HOME-ARP Rental Housing Or NCS Project To A Particular Qualifying Population Or Specific Subpopulation Of A Qualifying Population Identified In Section IV.A Of The Notice

The City of Independence is using HOME-ARP funds for supportive services so this item is not relevant to its program since no limitations associated with eligibility for a HOME-ARP rental housing or NCS project are being proposed for qualified populations.

If A City 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 City's Needs Assessment And Gap Analysis

The City of Independence is using HOME-ARP funds for supportive services so this item is not relevant to its program since no limitations associated with eligibility for a HOME-ARP rental housing or NCS project are being proposed for qualified populations.

If A Limitation Was Identified, Describe How The City 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 City's HOME-ARP projects or activities):

The City of Independence is using HOME-ARP funds for supportive services so this item is not relevant to its program since no limitations associated with eligibility for a HOME-ARP rental housing or NCS project are being proposed for qualified populations.

HOME-ARP Refinancing Guidelines

If the City intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the City must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the

conditions under which the City will refinance existing debt for a HOME-ARP rental project, including:

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

The City of Independence is using HOME-ARP funds for supportive services so this item is not relevant to its program.

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

The City of Independence is using HOME-ARP funds for supportive services so this item is not relevant to its program.

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

The City of Independence is using HOME-ARP funds for supportive services so this item is not relevant to its program.

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

The City of Independence is using HOME-ARP funds for supportive services so this item is not relevant to its program.

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

The City of Independence is using HOME-ARP funds for supportive services so this item is not relevant to its program.

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

The City of Independence is using HOME-ARP funds for supportive services so this item is not relevant to its program.