



# **HOME-ARP Allocation Plan**

Prepared by

**Crystal & Company for the  
City of Independence, MO**

**June 5, 2023**

## **City of Independence HOME-ARP Allocation Plan**

### **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 that include the following:

- Homeless;
- At-risk of homelessness;
- Fleeing or attempting to flee domestic violence, dating violence sexual assault, stalking, or human trafficking; and,
- Other populations.

Allowable activities using HOME-ARP funds to address the needs of the aforementioned populations 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 HOME-ARP Allocation Plan describing planned activities to address the qualified target group clientele noted above. All HUD required (in HUD CPD Notice 21-10) fully executed documents are attached in the Appendix of this HOME-ARP Allocation Plan as well as executed public notices and other materials provided to the public for the public hearings conducted.

### **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. Secured input/perspectives of Legal Aid of Western Missouri (Brandon Mason and Michelle Albano) via phone on May 31 and June 1, 2023.

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Independence Housing Authority</b>	PHA	Tel. Interview and/or Citizen Participation Meeting	Need for assistance with client security deposits and application fees to secure adequate housing.
<b>Greater Kansas City Homeless Coalition</b>	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.
<b>Hope House</b>	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.
<b>Hillcrest Transitional Housing</b>	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.
<b>Western Missouri Legal Aid</b>	Area Non-Profit Legal Aid Provider	Tel. Interview	Property tax hikes for low income homeowners especially challenging given rapidly increasing hikes motivating foreclosures. Changes in rental occupancy also challenging given landlord price hikes. Independence does not have 'Right to Counsel' law (like other areas) motivating more urgent need for legal resources for lower income persons at-risk. Emergency Rental Assistance Resources (ERAP) resources expended motivating needs in Independence for comparable

			types of resources. Need for resources to pay for 'reasonable accommodations' late fees.
<b>Mother's Refuge</b>	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.
<b>Community Services League/United Way Of Greater Kansas City</b>	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.
<b>Salvation Army EA</b>	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.
<b>Kansas City United Way (Vets support)</b>	Area Non-Profit	Tel. Interview and/or Citizen Participation Meeting	See information above derived from the Community Service League (CSL).
<b>Disabilities Advocate – ARC Of The Ozarks</b>	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.
<b>Metro Lutheran Ministries</b>	Area Non-Profit - religious	Tel. Interview and/or Citizen Participation Meeting	Allocations for supportive services (case mgn't, transportation, job & life skills, empl & training, rental deposits, etc), TBRA and permanent rental development.
<b>Truman Heritage Habitat For Humanity</b>	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.
<b>Salvation Army Crossroads</b>	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).
<b>Drum Farm Organization For Children</b>	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

Evelyn 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 Leahey
  - 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 used 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 an 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 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 affects the number of available subsidized units in the community as well.
- Christina Leahey
  - 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 organizations 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. Note that two public hearings were held on 10/19/2022 and 2/16/2023. Both public notices for such meetings are enclosed in the Appendix of this plan and were posted on 10/4/2022 for the 10/19/2022 public meeting and on 1/31/2023 for the 2/16/2023 public meeting. Information provided to the

public for these two public meetings are also included in the Plan Appendix. For the 2/16/2023 public meeting, a copy of the Draft HOME-ARP HOME Allocation Plan was made available in hard copy and digitally (on the city website). HUD has a copy of this draft Plan so it has not been included in the Plan Appendix. The HUD HOME-ARP Plan template below only allows one public meeting and notice to be inserted into it but realize two are relevant as noted above and are included in the Plan Appendix.

- ***Date(s) of public notices:*** 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:*** 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:

City Hall  
111 E Maple Ave (2nd floor)

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

Midwest Genealogy Center  
3440 S Lee's Summit Road  
Independence, MO 64055

North Independence  
317 W 24 Hwy  
Independence, MO 64050

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 follow.

**HUD Home-American Rescue Program (ARP) & Plan  
Citizen Participation Meeting Minutes**

Thursday, February 16, 2023, at 11:00 a.m.

**Citizens Present**

Cristina Leakey – Truman Habitat for Humanity

**Online Participants**

Roland Walker – Oikos Development Corporation

Rachel Lane - Salvation Army, Emergency Assistance

Bridget Candles – Independence City Council

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

Ilene Shehan – Hope House

**Staff Present**

Adrienne Fight – Community Development Program Administrator

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 February 16<sup>th</sup>, 2023. The meeting was called to order.

## **OVERVIEW OF HOME-ARP Program**

Rich Crystal explained...

- City of Independence will receive about 1.68 million in HOME-ARP resources.
  - Resources intended to assist homeless and those at risk of homelessness.
  - Other populations intended for HOME-ARP: special needs clientele.
  - Other uses for HOME-ARP: Tenant-based Rental Assistance, Developing Affordable Housing, Development of Shelters, Congregate and Non-Congregate Shelters
- Purpose of meeting is to secure input associated with the City of Independence HOME-ARP Allocation plan and program.

## **HOME ARP ALLOCATION PLAN**

- Needs Assessment conducted by the Continuum of Care was utilized heavily to develop HOME-ARP Allocation Plan
- Strong comparisons were analyzed between current homeless population (sheltered and unsheltered – PIT count about 115) and at-risk of homelessness population (about 3500)
- Administrator of the Jackson County ERAP (Emergency Rental Assistance Program) reported 65% of resources were allocated in the Independence area.
- At-risk of homelessness population identified as a focus in the City's approach to the HOME-ARP allocation plan.
- 65% of HOME-ARP funds dedicated to short term rental support. 35% of HOME-ARP funds dedicated to general supportive services.
- Draft of HOME-ARP has been made available publicly on various platforms.
- HOME-ARP Allocation Plan will go to City Council in March 2023
- Public Comment period will run from February 10<sup>th</sup> to March 13<sup>th</sup>, 2023.
- Plan will be submitted to HUD on March 31<sup>st</sup>, 2023.

## **REQUEST FOR HOME-ARP ALLOCATION PLAN INPUT FROM CITIZENS**

- Christina Leakey
  - Has there been any research on how much of the 65% of ERAP Funds that were spent here in Independence regarding the targeted populations that the HOME-ARP Allocation plan will look to serve.
  - Because of the income restrictions tied to the HOME-ARP program, it may take more work to find eligible clients to utilize these funds.
  - Another factor to pay attention to is the availability of units for low-mod tenants to rent. Scarcity of available affordable units has become a problem.
  - For tenants that apply for rental assistance through this program, will there be requirements or standards for the units themselves in order for the tenant to receive the support?

## **ADJOURN**

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

No written comments received on the HOME-ARP Allocation Plan during the public comment period extending from 2/9/2023 to 3/13/2023. The items mentioned in the citizen participation meeting have generally been reviewed and factored into the Allocation Plan.

**NOTE:** To reiterate, please refer to the Appendix of this Plan for copies of the public notices duly executed and posted by the city for the Plan public hearings as well as the information provided to the public associated with such public hearings.

## **Needs Assessment and Gaps Analysis**

### **Introduction**

The following section will describe the shelter and supportive services situation for qualified populations 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 and recent Jackson County Emergency Rental Assistance (ERAP) data, etc.

### **Qualifying HOME-ARP Populations: Overview Of Demographic Analyses & Unmet Housing Needs**

Households and or individuals who meet one of the four population categories noted herein are eligible to receive HOME-ARP resources. In this section, demographic analyses and unmet housing needs are provided for each of the four specific qualifying HOME-ARP populations per CPD Notice 22-10. At the end of this section, the HOME-ARP Plan follows the pre-determined HUD format generated for such plans.

I) **Homeless**, as defined in 24 CFR 91.5 *Homeless (1), (2), or (3)*:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence.
- (2) An individual or family who will imminently lose their primary nighttime residence.
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition.

Information for homeless persons defined herein is derived from the latest Point-In-Time (PIT) count for the regional Kansas City/Independence/Lee's Summit/Jackson County MO-604 CoC and the 2022 Housing Inventory Count.

**KANSAS CTY/INDEPENDENCE/LEE'S SUMMIT/JACKSON COUNTY CoC (604M)  
REGIONAL HOMELESS NEEDS INVENTORY AND GAP ANALYSIS**

	<b>CURRENT INVENTORY 1/</b>				
	Family		Adults Only		Veterans
	# Of Beds	# Of Units	# Of Beds	# Of Units	# Of Beds
Emergency Shelter	436	121	603	n/a	0
Transitional Housing	470	172	519	n/a	136
Safe Haven	0	0	25	n/a	25
Total Inventory	906	293	1,147	n/a	161
<b>HOMELESS POPULATION</b>					
	# Persons in Family Households	Family Households (count)	Adults Only	Total	Veterans
Sheltered Homeless	358	110	578	753	n/a
Unsheltered Homeless	6	2	824	826	n/a
Total Homeless	364	112	1,402	1,579	n/a
<b>GAP ANALYSIS</b>					
	Family		Adults Only		Veterans
	# of Beds	# of Units	# of Beds	# of Units	# of Beds
Current Gap	0	0	255	n/a	n/a
Current Surplus	542	181	0	n/a	n/a

Sources: HUD Exchange, Housing Inventory Count, 2022 and PIT Count 2022.

1/ Permanent supportive housing and rapid re-housing vouchers are not reported because HUD does not consider these persons housed under these programs to be homeless.

### Unmet Housing Needs

The PIT data for 2022 indicates 1,579 homeless persons in the regional Kansas City area. The aforementioned gap analysis indicates that there is a shortage of 255 adult-only however this data should be considered with care as other sources revealed there are many homeless persons in the area who are unable to find shelter. While there appears to be a 181-unit surplus of family units, this figure must also be interpreted with care. Homeless families may avoid being identified as homeless because of fear of having their children placed in foster care, and there may be other issues making it difficult to obtain an accurate count. Thus, there may be an undercount of homeless family households. Further, other sources revealed that many service providers encounter families who are living in cars or other places not intended for human habitation. Thus, it is unlikely that the regional Kansas City area has a surplus of family units, yet these are the numbers generated from the approved regional data.

### Demographic Analyses

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 adults and children who meet the definition of chronically homeless was 305, of whom 40 were sheltered and 265 not.
- Also note the regional special needs population estimates below.

**Other Homeless Groups Whose Needs Require Services With Shelter**

Group	Sheltered	Unsheltered	Total
Severely Mentally Ill	47	240	287
Chronic Substance Abuse	18	157	175
Veterans	106	50	156
HIV/AIDS	20	13	33
Victims Of Domestic Violence	43	51	94
Unaccompanied Youth	73	30	103
Parenting Youth	14	0	14
Children Of Parenting Youth	23	0	23

Sources: KC Regional PIT Count, 2022, HUD Exchange.

**II) At risk of Homelessness, as defined in 24 CFR 91.5, defined as....**

(1) An individual or family who: (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD; (ii) 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, (iii) Meets one of the following conditions:

- ✓ Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- ✓ Is living in the home of another because of economic hardship;
- ✓ 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;
- ✓ 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;
- ✓ 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;
- ✓ 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,

- ✓ 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.

In addition, A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or (3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

### Unmet Housing Needs

For households and/or persons ‘at-risk of homelessness’ per the HUD definitions noted herein, municipal estimates for the City of Independence have been generated drawn from the latest HUD CHAS data (2019), recent Emergency Rental Assistance Program (ERAP) from Jackson County and the latest 2022-’26 Independence Consolidated Plan information. It is estimated that Independence requires upwards of 8,210 affordable dwelling units to assist households earning less than 30% AMI regardless of housing tenure. The incidence of housing cost burden is the predominant factor motivating ‘housing problems’ among Independence residents derived from HUD CHAS data. Since the incidence of housing cost burden factors in those households receiving affordable housing subsidies of one sort or another, at least 8,210 dwellings are needed to address local unmet affordable housing needs for residents earning less than 30% AMI and ‘at-risk’ of homelessness for a variety of reasons per the HUD definitions.

<b>CITY OF INDEPENDENCE ESTIMATED UNMET HOUSING NEEDS FROM FOR PERSONS/HOUSEHOLDS 'AT-RISK OF HOMELESSNESS</b>			
	<b>Number</b>	<b>% Of Total</b>	
<b>Households Earning Less Than 30% AMI</b>	8,210	100%	
<b>Households Earning Less Than 30% AMI With Problems 1/</b>	8,210	100%	
<b>Est. Recent ERAP Usage In The City 2/</b>	4,643	n/a	

Sources: Latest HUD CHAS data (2015-'19), Jackson County ERAP data usage per the Community Services League.

1/ Includes total households with problems. Problems may include at least one of the followig items: unit lacking in kitchen facilities, unit lacking in plumbing facilities, incidence of overcrowding and/or cost burdened households (paying greater than 30% of their income for housing.

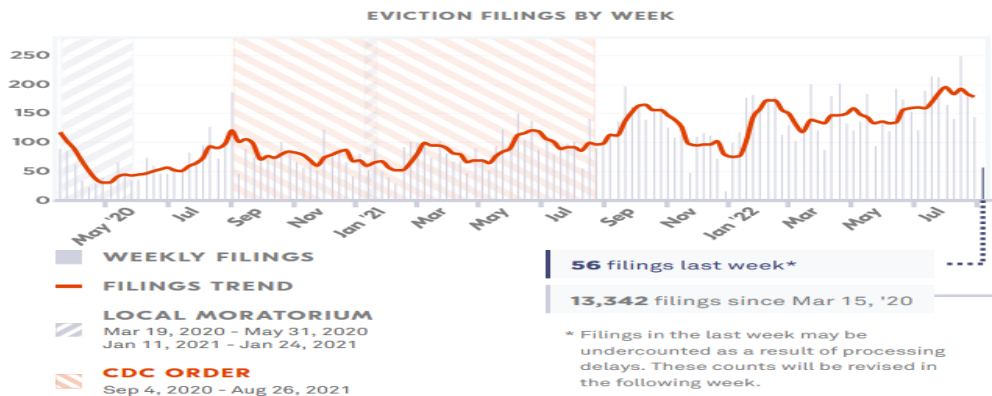
2/ Est. to be included in the 8,210plus households ‘with problems’.

### Demographic Analyses

Noted above and per HUD, 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 homelessness. According to Comprehensive Housing Affordability Strategy (CHAS) 2015-2019

data, there are 8,210 households with incomes at or below 30% Area Median Income (AMI), of which all apparently had 'housing problems' per the latest HUD CHAS data. These demographic/need estimates are reinforced by the estimated 4,643 renter households assisted in Independence under the Jackson County ERAP program per the Community Services League (CSL) and the increasing trend of evictions evident in Jackson County of late.

The national advent of extensive inflationary conditions coupled with the overall lack of an affordable housing supply exacerbate the problems for those 'at-risk' of homelessness in Independence. Note the unfortunate upward trend evident in Jackson County, Missouri for evictions since the termination of the COVID rental moratorium in mid- 2021.



- III) **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**, as defined by HUD. 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. This population 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. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

### Unmet Housing Needs

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, 94 identified as adult survivors of domestic violence of which 51 were unsheltered and the balance of 43 were sheltered. 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. They estimated a need for affordable dwellings of late. In addition to affordable housing needs, stakeholders noted a need for non-congregate care shelter support and a variety of supportive services, etc.

### Demographic Analyses

In addition to the demographic information noted above, Kansas City is a major corridor through which trafficked individuals are transported. Information generated by the National Human Trafficking Hotline show 1,103 signals from Missouri on its Hotline in 2021 and there were 355 signals from victims and survivors of human trafficking. The vast majority of these victims were/are females and were/are exploited for sexual purposes. Generating accurate estimates in this venue are a reach.

IV) **Other Populations** where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

- ✓ Other Families Requiring Services or Housing Assistance to Prevent Homelessness is defined as 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 housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.  
ERAP volume
- ✓ At Greatest Risk of Housing Instability is defined as household who meets either of the following: (i) has 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); has 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:
  - Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - Is living in the home of another because of economic hardship;
  - 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;
  - 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;
  - 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;



- 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
- 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
- Note that veterans and families that include a veteran family member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

### Unmet Housing Needs

The minimum unmet housing need estimates for 'Other Populations' eligible under the HOME-ARP program were generated from the latest HUD CHAS estimates (2019) in addition to estimated recent HUD ERAP program beneficiaries within the City of Independence. It is estimated that Independence requires upwards of 5,289 affordable dwelling units to assist the needs of 'Other Populations' in Independence. The incidence of housing cost burden is the predominant factor motivating 'housing problems' among Independence residents derived from HUD CHAS data. The incidence of housing cost burden factors in such households includes folks receiving affordable housing subsidies of one sort or another, the 5,289 plus dwellings represents a net figure of units needed. The table below indicates how estimates were generated based on available data and such estimates are likely low given the volume of past ERAP usage in Independence per the Community Services League.

CITY OF INDEPENDENCE ESTIMATED UNMET HOUSING NEEDS FOR OTHER POPULATIONS		
	Number	% Of Total
Households Earning Less Than 30% AMI	8,210	100%
Households Earning Less Than 30% AMI With Severe Cost Burden (greatest risk of housing instability) 1/	4,430	54%
Households Earning from 31-50% AMI With Problems	4,295	n/a
Those with problems overcrowded at 20% 2/	859	
Minimum Housing Needs Of Other Populations	5,289	n/a
Est. Recent ERAP Usage In The City 3/	4,643	n/a

Sources: Latest HUD CHAS data (2015-'19), Jackson County  
ERAP data usage per the Community Services League.

1/ Includes total households with severe cost burden or paying more than 50% of their income for housing.

2/ Households with problems are defined as lacking in plumbing facilities, incidence of overcrowding and/or cost burdened households (paying greater than 30% of their income for housing. Of this total, the estimated proportion of households overcrowded were estimated at 20%.

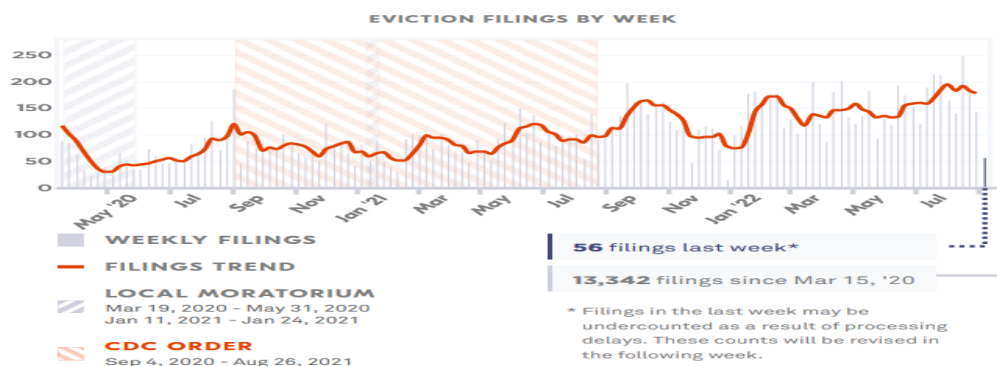
2/ Paying more than 50% of income for housing is severe cost burden.

3/ The estimated number of households previously securing ERAP resources in Independence hikes the minimum estimates shown.

### Demographic Analyses

In addition to the demographic information noted above, to reiterate, the national advent of extensive inflationary conditions coupled with the overall lack of an affordable housing supply exacerbate the problems for those Other Populations 'at-risk' of homelessness in

Independence. Note the unfortunate upward trend evident in Jackson County, Missouri for evictions since the termination of the COVID rental moratorium in mid- 2021.



The national advent of extensive inflationary conditions coupled with the overall lack of an affordable housing supply exacerbate the problems for those 'at-risk' of homelessness in Independence. Note the unfortunate upward trend evident in Jackson County, Missouri for evictions since the termination of the COVID rental moratorium in mid- 2021. Again, our unmet housing needs and related demographic estimates likely understate the needs of 'Other Populations' by virtue of the estimated 4,643 renter households assisted in Independence under the Jackson County ERAP program per the Community Services League.

**NOTE: End of the 'Overview of Needs/Gaps' per HUD review request and the following continues the pre-determined Plan format requested by HUD for grantees.**

**Describe the size and demographic composition of qualifying populations within the City of Independence boundaries. Refer to the information above contained within the “Qualifying HOME-ARP Populations: Overview Of Demographic Analyses & Unmet Housing Needs” Section.** The following information includes some of the information presented earlier as well as supplemental descriptive information and some more detail.

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

- Homeless;
- At-risk of homelessness;
- Fleeing or attempting to flee domestic violence, dating violence sexual assault, stalking, or human trafficking; and,
- Other populations.

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 adults and children who meet the definition of chronically homeless was 305, of whom 40 were sheltered and 265 not.
- Also note the regional special needs population estimates that follow.

### Other Homeless Groups Whose Needs Require Services With Shelter

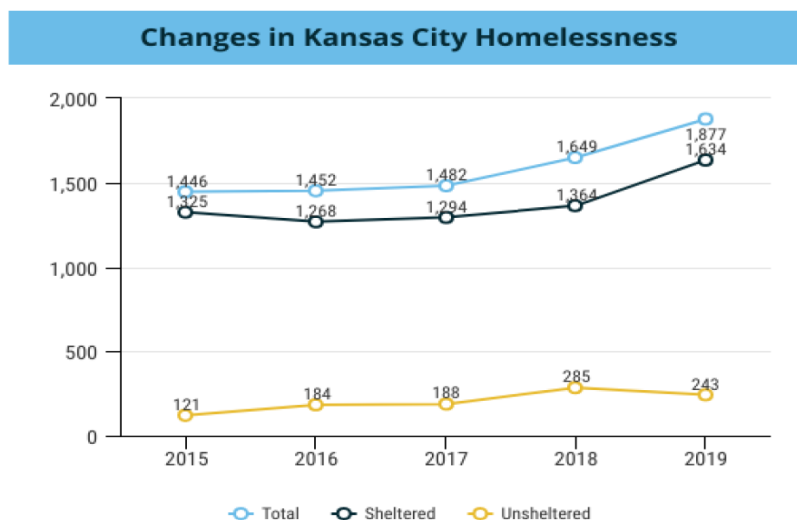
Group	Sheltered	Unsheltered	Total
Severely Mentally Ill	47	240	287
Chronic Substance Abuse	18	157	175
Veterans	106	50	156
HIV/AIDS	20	13	33
Victims Of Domestic Violence	43	51	94
Unaccompanied Youth	73	30	103
Parenting Youth	14	0	14
Children Of Parenting Youth	23	0	23

Sources: KC Regional PIT Count, 2022, HUD Exchange.

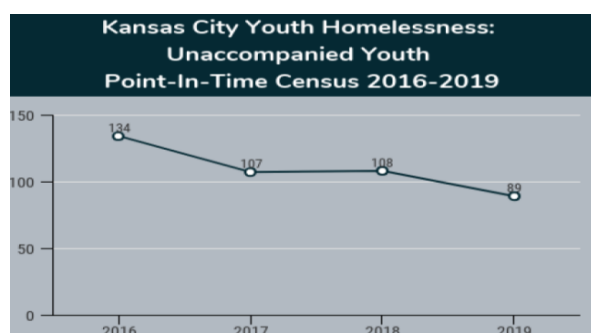
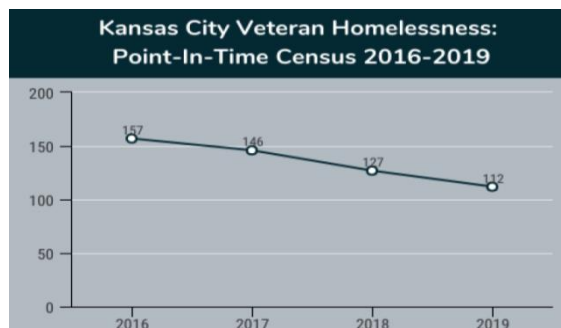
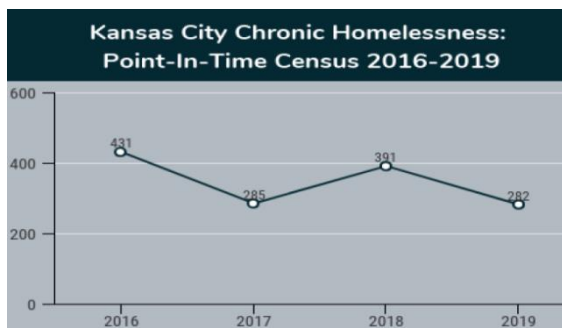
Per the regional GKCCEH Needs Assessment prepared in 2020, the length of homelessness in months for persons before prior to their Coordinated Entry into the homeless system is noted first by the following cohorts with the average length of homeless follow:

- 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.



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



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

Noted earlier, it is estimated that Independence requires upwards of 8,210 affordable dwelling units to assist households earning less than 30% AMI regardless of housing tenure. The incidence of housing cost burden is the predominant factor motivating 'housing problems' among Independence residents derived from HUD CHAS data. Since the incidence of housing cost burden factors in those households receiving affordable housing subsidies of one sort or another, at least 8,210 dwellings are needed to address local unmet affordable housing needs for residents earning less than 30% AMI and 'at-risk' of homelessness for a variety of reasons per the HUD definitions.

CITY OF INDEPENDENCE ESTIMATED UNMET HOUSING NEEDS FROM FOR PERSONS/HOUSEHOLDS 'AT-RISK OF HOMELESSNESS'			
	Number	% Of Total	
Households Earning Less Than 30% AMI	8,210	100%	
Households Earning Less Than 30% AMI With Problems 1/	8,210	100%	
Est. Recent ERAP Usage In The City 2/	4,643	n/a	

Sources: Latest HUD CHAS data (2015-'19), Jackson County ERAP data usage per the Community Services League.

1/ Includes total households with problems. Problems may include at least one of the following items: unit lacking in kitchen facilities, unit lacking in plumbing facilities, incidence of overcrowding and/or cost burdened households (paying greater than 30% of their income for housing).

2/ Est. to be included in the 8,210plus households 'with problems'.

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 homelessness. According to Comprehensive Housing Affordability Strategy (CHAS) 2015-2019 data, there are 8,210 households with incomes at or below 30% Area Median Income (AMI), of which all apparently had 'housing problems' per the latest HUD CHAS data. These demographic/need estimates are reinforced by the estimated 4,643 renter households assisted in Independence under the Jackson County ERAP program per the Community Services League (CSL) and the increasing trend of evictions evident in Jackson County of late.

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. The upward trend in evictions evident in Jackson County, Missouri since the termination of the COVID rental moratorium in mid- 2021 has been identified in this Plan at length.

### **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**

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, 94 identified as adult survivors of domestic violence of which 51 were unsheltered and the balance of 43 were sheltered. 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. They estimated a need for affordable dwellings of late. In addition to affordable housing needs, stakeholders noted a need for non-congregate care shelter support and a variety of supportive services, etc.

In addition to the demographic information noted above, Kansas City is a major corridor through which trafficked individuals are transported. Information generated by the National Human Trafficking Hotline show 1,103 signals from Missouri on its Hotline in 2021 and there were 355 signals from victims and survivors of human trafficking. The vast majority of these victims were/are females and were/are exploited for sexual purposes. Generating accurate estimates in this venue are a reach.

### **Unmet Housing And Services Needs**

**Describe the unmet housing and service needs of qualifying populations, including limited to:**

- Homeless;
- At-risk of homelessness;
- Fleeing or attempting to flee domestic violence, dating violence sexual assault, stalking, or human trafficking; and,
- Other populations.

### **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**

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.

The minimum unmet housing need estimates for 'Other Populations' eligible under the HOME-ARP program were generated from the latest HUD CHAS estimates (2019) in addition to estimated recent HUD ERAP program beneficiaries within the City of Independence. It is estimated that Independence requires upwards of 5,289 affordable dwelling units to assist the needs of 'Other Populations' in Independence. The incidence of housing cost burden is the predominant factor motivating 'housing problems' among Independence residents derived from HUD CHAS data. The incidence of housing cost burden factors in such households includes folks receiving affordable housing subsidies of one sort or another, the 5,289 plus dwellings represents a net figure of units needed. The table below indicates how estimates were generated based on available data and such estimates are likely low given the volume of past ERAP usage in Independence per the Community Services League.

CITY OF INDEPENDENCE ESTIMATED UNMET HOUSING NEEDS FOR OTHER POPULATIONS		
	Number	% Of Total
Households Earning Less Than 30% AMI	8,210	100%
Households Earning Less Than 30% AMI With Severe Cost Burden (greatest risk of housing instability) 1/	4,430	54%
Households Earning from 31-50% AMI With Problems	4,295	n/a
Those with problems overcrowded at 20% 2/	859	n/a
Minimum Housing Needs Of Other Populations	5,289	n/a
Est. Recent ERAP Usage In The City 3/	4,643	n/a

Sources: Latest HUD CHAS data (2015-'19), Jackson County ERAP data usage per the Community Services League.

1/ Includes total households with severe cost burden or paying more than 50% of their income for housing.

2/ Households with problems are defined as lacking in plumbing facilities, incidence of overcrowding and/or cost burdened households (paying greater than 30% of their income for housing. Of this total, the estimated proportion of households overcrowded were estimated at 20%.

2/ Paying more than 50% of income for housing is severe cost burden.

3/ The estimated number of households previously securing ERAP resources in Independence hikes the minimum estimates shown.

In addition to the demographic information noted above, to reiterate, the national advent of extensive inflationary conditions coupled with the overall lack of an affordable housing supply exacerbate the problems for those Other Populations 'at-risk' of homelessness in Independence. Note the unfortunate upward trend evident in Jackson County, Missouri for evictions since the termination of the COVID rental moratorium in mid- 2021.

The national advent of extensive inflationary conditions coupled with the overall lack of an affordable housing supply exacerbate the problems for those 'at-risk' of homelessness in Independence. Note the unfortunate upward trend evident in Jackson County, Missouri for evictions since the termination of the COVID rental moratorium in mid- 2021. Again, our unmet housing needs and related demographic estimates likely understate the needs of 'Other Populations' by virtue of the estimated 4,643 renter households assisted in Independence under the Jackson County ERAP program per the Community Services League.

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**

To reiterate again, 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, 94 identified as adult survivors of domestic violence of which 51 were unsheltered and the balance of 43 were sheltered. 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. They estimated a need for affordable dwellings of late. In addition to affordable housing needs, stakeholders noted a need for non-congregate care shelter support and a variety of supportive services, etc.



In addition to the demographic information noted above, Kansas City is a major corridor through which trafficked individuals are transported. Information generated by the National Human Trafficking Hotline show 1,103 signals from Missouri on its Hotline in 2021 and there were 355 signals from victims and survivors of human trafficking. The vast majority of these victims were/are females and were/are exploited for sexual purposes. Generating accurate estimates in this venue are a reach.

### **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**

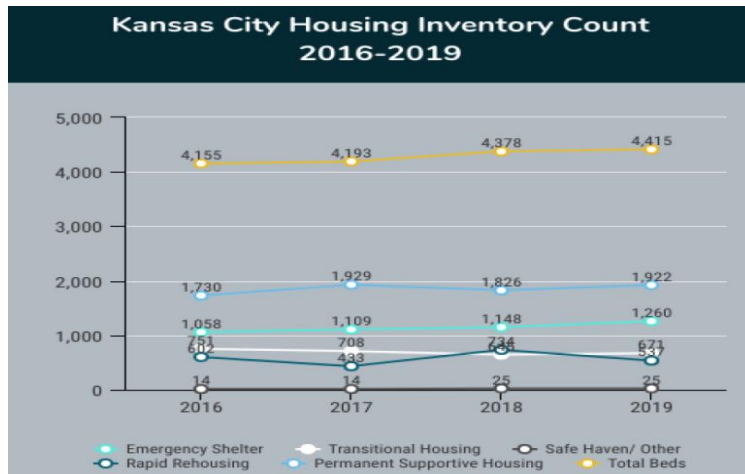
There is an array of homeless service providers in the Jackson County MO CoC Region that assists qualifying populations. The following information indicates the shelter and permanent housing units within the Kansas City Continuum of Care area:

- 561 permanent supportive housing units
- 344 Rapid Rehousing units
- 70 emergency shelter units
- 125 transitional shelter units
- 1,333 emergency shelter beds
- 707 transitional housing and safe haven beds
- 752 Rapid Rehousing beds

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. Refer to the earlier narrative evidencing the volume of permanent supportive housing for varying clientele in the region (with reasonably high levels of occupancy per the 2020 GKCCEH HIC info).

### 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

There is an array of homeless service providers in the Jackson County MO CoC Region that assists qualifying populations. The following information indicates the shelter and permanent housing units within the Kansas City Continuum of Care area:

- 561 permanent supportive housing units
- 344 Rapid Rehousing units
- 70 emergency shelter units
- 125 transitional shelter units

- 1,333 emergency shelter beds
- 707 transitional housing and safe haven beds
- 752 Rapid Rehousing beds

Drawn from the 2020 GKCCEH HIC, there were at least 3,500 emergency shelters/ 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 appears that needs for adults only were quite evident. To reiterate, derived from the 2020 GKCCEH inventory, note the 2020 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**

It is estimated that Independence requires upwards of 8,210 affordable dwelling units to assist households earning less than 30% AMI regardless of housing tenure. The incidence of housing cost burden is the predominant factor motivating 'housing problems' among Independence residents derived from HUD CHAS data. Since the incidence of housing cost burden factors in those households receiving affordable housing subsidies of one sort or another, at least 8,210 dwellings are needed to address local unmet affordable housing needs for residents earning less than 30% AMI and 'at-risk' of homelessness for a variety of reasons per the HUD definitions.

<b>CITY OF INDEPENDENCE ESTIMATED UNMET HOUSING NEEDS FROM FOR PERSONS/HOUSEHOLDS 'AT-RISK OF HOMELESSNESS</b>			
	<b>Number</b>	<b>% Of Total</b>	
<b>Households Earning Less Than 30% AMI</b>	8,210	100%	
<b>Households Earning Less Than 30% AMI With Problems 1/</b>	8,210	100%	
<b>Est. Recent ERAP Usage In The City 2/</b>	4,643	n/a	

Sources: Latest HUD CHAS data (2015-'19), Jackson County ERAP data usage per the Community Services League.

1/ Includes total households with problems. Problems may include at least one of the followig items: unit lacking in kitchen facilities, unit lacking in plumbing facilities, incidence of overcrowding and/or cost burdened households (paying greater than 30% of their income for housing.

2/ Est. to be included in the 8,210plus households 'with problems'.

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 homelessness. According

to Comprehensive Housing Affordability Strategy (CHAS) 2015-2019 data, there are 8,210 households with incomes at or below 30% Area Median Income (AMI), of which all apparently had 'housing problems' per the latest HUD CHAS data. These demographic/need estimates are reinforced by the estimated 4,643 renter households assisted in Independence under the Jackson County ERAP program per the Community Services League (CSL) and the increasing trend of evictions evident in Jackson County of late.

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. The upward trend in evictions evident in Jackson County, Missouri since the termination of the COVID rental moratorium in mid- 2021 has been identified in this Plan at length.

### **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 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 of 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 16 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
- Etc.

## **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 its 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 sub-recipient to both administer, manage and implement its 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**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
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%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,684,853</b>		
<b>*Up to 15% of the total grant.</b>			

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 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 administering 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.
- ✓ In Independence, those at-risk of homelessness earning less than 30%AMI regardless of tenure with 'problems' are estimated at 8,210 per HUD 2019 CHAS data.
- ✓ In Independence, those other populations earning from 31 to 50% AMI regardless of tenure with 'problems' are estimated at 4,295 per HUD 2019 CHAS data and a possible additional 859 households are severely overcrowded.
- ✓ Also 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, over-crowding 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% (estimate of 4,643) 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. Information from Western Missouri Legal Aid in June of 2023 has indicated Jackson County ERAP resources have been committed.
- ✓ 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.
- ✓ 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.

**CITY OF INDEPENDENCE, MO HOME-ARP**  
**ALLOCATION PLAN**

**APPENDIX**

**(Fully executed documents stipulated in HUD CPD Notice 21-10 followed by copies of the public notices duly executed and posted by the city for the Plan public hearings as well as the information provided to the public associated with such public hearings.)**

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision
<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>		
<b>* 3. Date Received:</b> 03/22/2023		<b>4. Applicant Identifier:</b> <input type="text"/>
<b>5a. Federal Entity Identifier:</b> <input type="text"/>		<b>5b. Federal Award Identifier:</b> M21-MP290207
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> City of Independence		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 44-600190		<b>* c. UEI:</b> U5W1BFU54PJ3
<b>d. Address:</b>		
<b>* Street1:</b> 111 E Maple Ave		
<b>Street2:</b> <input type="text"/>		
<b>* City:</b> Independence		
<b>County/Parish:</b> <input type="text"/>		
<b>* State:</b> MO: Missouri		
<b>Province:</b> <input type="text"/>		
<b>* Country:</b> USA: UNITED STATES		
<b>* Zip / Postal Code:</b> 64050-3066		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Community Development		<b>Division Name:</b> Neighborhood Services
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Mr.	<b>* First Name:</b> Tom	
<b>Middle Name:</b> <input type="text"/>		
<b>* Last Name:</b> Scannell		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> Community Development Department Director		
<b>Organizational Affiliation:</b> City of Independence		
<b>* Telephone Number:</b> 816-325-7830		<b>Fax Number:</b> <input type="text"/>
<b>* Email:</b> tscannell@indepmo.org		

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

### \* 12. Funding Opportunity Number:

M21-MP290207

\* Title:

HOME-ARP HOME Investment Partnership Program - American Rescue Plan

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Administration, Rental Assistance, and Supportive Services

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,684,853.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="1,684,853.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:



## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

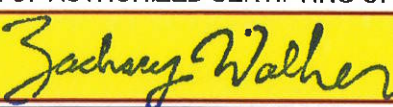
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93- 205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Independence	DATE SUBMITTED 3/22/23

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. § 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	<div data-bbox="885 1354 1502 1386" style="border: 1px solid black; padding: 2px;">City Manager</div>
APPLICANT ORGANIZATION	DATE SUBMITTED
<div data-bbox="89 1491 860 1533" style="border: 1px solid black; padding: 2px;">City of Independence</div>	<div data-bbox="885 1491 1502 1533" style="border: 1px solid black; padding: 2px;">3/22/23</div>

## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

Zachary Walker  
Signature of Authorized Official

3/22/23  
Date

City Manager  
Title



# THE EXAMINER

## AFFIDAVIT OF PUBLICATION

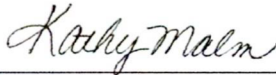
AFFIDAVIT OF PUBLICATION: #476570

STATE OF MISSOURI, COUNTY OF JACKSON, SS:

Kathy Malm

I, Kathy Malm, of lawful age, being duly sworn upon oath, deposes and says that I am the Authorized Agent of Examiner, a publication that is a "legal newspaper" as that phrase is defined for the city of Independence, for the County of Jackson, in the state of Missouri, that this affidavit is Page 1 of 1 with the full text of the sworn-to notice set forth on the pages that follow, and that the attachment hereto contains the correct copy of what was published in said legal newspaper in consecutive issues on the following dates:

4 Oct 2022

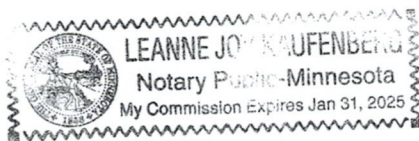


Authorized Agent



Notary, State of MN, County of Redwood  
Commission expires January 31, 2025

Printer's Fee: \$55.00



### Public Notice HOME Investment Partnership Program – American Rescue Plan (HOME-ARP) Planning and Participation Public Meeting

The City of Independence will conduct an in person and virtual public meeting for citizen input for the HOME-ARP funds. Wednesday, October 19, 2022, at 11:00 a.m., City Hall, 111 E. Maple Avenue, Conference Room D (Ground floor)

Virtual over Microsoft Teams:

Join via computer, tablet, or smartphone: [indep.us/home-arp](https://indep.us/home-arp)  
Meeting ID: 253196167839 Pass-code: BHeU6u

Join by telephone: 1-660-631-8082 – 45399851#

Projects or programs must benefit low to moderate income residents and must address at least one of the City's Consolidated Plan goals and priority objectives which are summarized on the city website at: <https://www.ci.independence.mo.us/ComDev/NHPrograms>

If you are unable to attend, comments can be submitted by calling Adrienne Fight at 816-325-7398, or by email at [cdbg@indepmo.org](mailto:cdbg@indepmo.org).

If accommodations will be required due to a disability, limited English proficiency, or other special need, contact Adrienne Fight at 816-325-7398 or by email at [cdbg@indepmo.org](mailto:cdbg@indepmo.org). Si se requiere ayuda por falta de hablar el idioma inglés o por alguna otra razón en especial, póngase en contacto con Adrienne Fight al 816-325-7398 o al correo electrónico [cdbg@indepmo.org](mailto:cdbg@indepmo.org).

Published in the Examiner, Oct 4, 2022

476570



**CITY OF INDEPENDENCE  
HUD HOME-AMERICAN RESCUE PROGRAM (ARP) & PLAN  
CITIZEN PARTICIPATION MEETING**

**OCTOBER 19, 2022 at 11:00am**

**On Site Location: City Hall Conference Rm D**

**Microsoft Teams Connection Link: [indep.us/home-arp](https://indep.us/home-arp)**

**Meeting ID: 253196167839 Passcode: BHeU6u**

**Join by telephone: 1-660-631-8082 – 45399851#**

**I. INTRODUCTION OF PARTICIPANTS**

- 1) Facilitator, Rich Crystal, Crystal & Company ([www.crystco.com](http://www.crystco.com)) and City Staff attending
- 2) On-Site Participants
- 3) Remote Participants

**II. BACKGROUND & PURPOSE OF MEETING**

- 1) Background – Independence has secured \$1,684,853 from HUD in HOME-ARP funds that must be used in approx. 7 years to assist homeless folks, those at-risk of such and associated special needs clientele like victims of domestic violence and runaway youth, etc. HOME-ARP funds may be used for tenant based rental support (TBRA), rental housing and/or non-congregate care housing/shelter development, support services and some technical assistance support for non-profits.
- 2) Purpose Of Meeting – To secure input on the needs of the aforementioned targeted clientele in Independence and preferences associated with the prospective use of HOME-ARP resources to assist them.

**III. DISCUSSION OF CLIENTS IN INDEPENDENCE**

- 1) Homeless Persons (sheltered or not)
- 2) Persons 'At-risk' Of Homelessness (persons earning less than 30% of the AMI and expending more than 50% of their income for housing per HUD rules. In 2018, the estimate was 3,175 households in Independence and more now given inflation levels.
- 3) Other special needs persons and households
- 4) Client assistance preferences by type, location, etc.





**IV. DISCUSSION OF PREFERENCES FOR USES OF HOME-ARP RESOURCES**

- 1) Rental/shelter development
- 2) Rental Assistance
- 3) Supportive Services
- 4) Non-Profit support

**V. FOLLOW-UP COMING** – The City will generate its draft HOME-ARP Allocation Plan per HUD rules in the late Winter/Spring of '23 and seek your comments and input via a public comment process and final Citizen Participation Meeting.

**VI. ADJOURNMENT**

## **BACKGROUND OF THE HUD HOME-ARP PROGRAM**

- The City of Independence has been appropriated \$1,684,853 (less allowable city administrative uses) in HOME-ARP funds in FY 2021 and such resources must be expended on or before **September 30, 2030**.
- For Independence, a plan for the expenditure of such funding is anticipated to be submitted to HUD by April 30, 2023.
- The name of said plan will be the City of Independence HOME-ARP Allocation Plan.
- The City of Kansas City, Kansas will secure \$3.19 million of HOME-ARP resources.
- The City of Kansas City, Missouri will secure \$8.39 million of HOME-ARP resources.



## CLIENTELE OF THE HOME-ARP RESOURCES

To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit the qualifying individuals and families noted below.

Homeless, as defined in 24 CFR 91.5 – Homeless people may include those residing in places not designed as regular sleeping places, persons in emergency shelters of one sort or another and persons at imminent risk (14 days) of losing their residence and becoming homeless, and unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless.

'At-Risk' of Homelessness, as defined in 24 CFR 91.5 - Persons at-risk of homelessness are defined as an annual income below 30 percent of median family income for the area, as determined by HUD and/or 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 earlier in the definition of homeless. In addition, other criteria are germane that include very significant factors putting individuals and families 'at-risk' as well as certain children or youth.

Certain Special Needs Persons or Households – This category includes those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD.

Certain Other 'At-Risk' Populations - Other Populations where providing supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as folks 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 housed, and who need additional housing assistance or supportive services to avoid a return to homelessness. In addition, persons earning less than 30% of the area median and severely cost burdened (paying more than 50% of their income for housing) and persons earning less than 50% of the area median and serious imminent risk of becoming homeless per 24CFR91.5.

The city may establish preferences in the HOME-ARP Allocation Plan for qualifying populations to prioritize applicants for HOME-ARP projects or activities based on the city's needs and priorities. In addition, the city may use the coordinated entry or coordinated entry process (CE) of the Kansas City continuum of care (CoC) for referrals for projects and activities via a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals within a defined area.

---



## PROSPECTIVE ALLOWABLE USES OF HOME ARP FUNDS

Eligible uses of HOME-ARP funds are briefly displayed below. Note there is much more detail in HUD CCPD Notice 21-10 commencing on pages 20 to 67. If you seek more detail on individual rules by project type at this point, let me know and I will provide you with attachments for such.

- 1) Tenant Based Rental Assistance (TBRA) Program Uses – Rental assistance provided similar to Section 8 rental support.
- 2) Development Of Affordable Rental Housing Program Uses – Resources possible for the development and operation of rental housing oriented to eligible clients. Up to 70% of the city's total funding allocation must be occupied by individuals in one or more of the defined qualified populations and income eligibility is not a qualifying factor. The other 30% of the units are for individuals that meet the definition of low-income at 80% AMI and HUD rental limits apply. Among other things, long-term use restrictions apply.
- 3) Supportive Services Program Uses – Supportive services aimed at assisting eligible clients in a variety of ways. Short term rental support and a myriad of support services.
- 4) Non-Congregate Care Housing Program Uses – Typically comprised of old motel facilities, etc, resources would likely be oriented to develop/operate shelter facilities for the HOME-ARP targeted clientele. Among other things, long-term use restrictions apply. No FMR rules and income limits, if used, are very low.
- 5) Non-profit Operating and Capacity Building Assistance – Independence may use up to 5 percent of its HOME-ARP allocation to pay operating expenses of CHDOs and other nonprofit organizations that will carry out activities with HOME-ARP funds. Independence may also use up to an additional 5 percent of its allocation to pay eligible costs related to developing the capacity of eligible nonprofit organizations to successfully carry out HOME-ARP eligible activities. The city may award operating expense assistance or capacity building assistance to a nonprofit organization if it reasonably expects to provide HOME-ARP funds to the organization for any of the eligible HOME-ARP activities within 24 months of the award.

# THE EXAMINER

AFFIDAVIT OF PUBLICATION

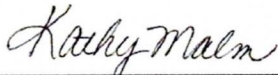
AFFIDAVIT OF PUBLICATION: #800650

STATE OF MISSOURI, COUNTY OF JACKSON, SS:

Kathy Malm

I, Kathy Malm, of lawful age, being duly sworn upon oath, deposes and says that I am the Authorized Agent of Examiner, a publication that is a "legal newspaper" as that phrase is defined for the city of Independence, for the County of Jackson, in the state of Missouri, that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and that the attachment hereto contains the correct copy of what was published in said legal newspaper in consecutive issues on the following dates:

31 Jan 2023



Authorized Agent



Notary, State of MN, County of Redwood  
Commission expires January 31, 2025

Printer's Fee: \$107.80



LEANNE JOY KAUFENBERG  
Notary Public  
State of Minnesota  
My Commission Expires  
January 31, 2025

## PUBLIC NOTICE OF CITY OF INDEPENDENCE, MISSOURI SUBSTANTIAL AMENDMENT TO 2021-22 ANNUAL ACTION PLAN AND SOLICITATION OF 30-DAY PUBLIC REVIEW & COMMENT PERIOD

The City of Independence is seeking public review and comment on the following substantial amendment to the 2021-22 Annual Action plan in the form of the addition of the HOME-ARP Allocation Plan commencing on Friday, February 10, 2023 and extending through Monday, March 13, 2023. Internet links for the draft of the City of Independence HOME-ARP Allocation Plan will be available for 30 days on the city's website at:

<https://www.ci.independence.mo.us/ComDev/CDBG>

Also, commencing on Friday, February 10th 2023, hard copies of the City of Independence HOME-ARP Allocation Plan will also be available at the City of Independence Community Development Department at 111 E. Maple Ave (2nd floor), the Independence Housing Authority at 4215 S Hocker Dr., Bldg 5, Independence MO 64055, The Palmer Center at 218 N Pleasant St, Independence MO 64050, the Fairmount Community Center at 217 S Cedar Ave, Independence MO 64053 and the three Independence Mid-Continent Public library branches at:

Midwest Genealogy Center  
3440 S Lee's Summit Road  
Independence, MO 64055

North Independence  
317 W 24 Hwy  
Independence, MO 64050

South Independence  
13700 E 35th St South  
Independence, MO 64055

Comments regarding the proposed plan can be submitted in writing to [CDBG@indepmo.org](mailto:CDBG@indepmo.org). All written comments must be received by Monday, March 13, 2023.

This substantial amendment concerns the addition of the HOME American Rescue Plan Allocation Plan (HOME-ARP) to the 2021-22 Annual Action plan. Via the US Department of Housing and Urban Development the City of Independence has been allocated approximately \$1,684,853 in

HOME-ARP funds that must be used in approx. 7 years to assist the qualified populations of Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)), at-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1)), fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary, Veterans and families that include a veteran family member that meet one of the preceding criteria, or other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. Published in the Examiner, Jan 31, 2023

800650





**CITY OF INDEPENDENCE  
HUD HOME-AMERICAN RESCUE PROGRAM (ARP) & DRAFT PLAN  
CITIZEN PARTICIPATION MEETING  
FEBRUARY 16, 2023 at 11:00AM - 12:30PM**

**On Site Location: City Hall Conference Rm D  
and**

**Microsoft Teams Link: [http://www.indep.us/home\\_arp\\_meeting2023](http://www.indep.us/home_arp_meeting2023)**

**Meeting ID: 29508890141 Passcode: NvSxTM**

**Join by telephone: 1-660-631-8082 Phone Conference ID: 676397499#**

**I. INTRODUCTION OF PARTICIPANTS**

- 1) Facilitator, Rich Crystal, Crystal & Company ([www.crystco.com](http://www.crystco.com)) and City Staff attending
- 2) On-Site Participants
- 3) Remote Participants

**II. BACKGROUND & PURPOSE OF MEETING**

- 1) Background – Independence has secured \$1,684,853 from HUD in HOME-ARP funds that must be used in approx. 7 years to assist homeless folks, those at-risk of such and associated special needs clientele like victims of domestic violence and runaway youth, etc. HOME-ARP funds may be used for tenant based rental support (TBRA), rental housing and/or non-congregate care housing/shelter development, support services and some technical assistance support for non-profits.
- 2) Purpose Of Meeting – To secure input on the needs of the aforementioned targeted clientele in Independence and input on the draft HOME-ARP Allocation Plan to assist them.

**III. DISCUSSION OF CLIENTS IN INDEPENDENCE MOTIVATING PROGRAM APPROACH**

- 1) Homeless Persons (sheltered or not) - 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.
- 2) Persons 'At-risk' Of Homelessness (persons earning less than 30% of the AMI and expending more than 50% of their income for housing per HUD rules. In



2019, the estimate was 3,535 households in Independence and more now given inflation levels.

- 3) \$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.

#### **IV. DISCUSSION OF PREFERENCES FOR USES OF HOME-ARP RESOURCES**

- 1) Possible uses include: rental/shelter development, TBRA rental assistance, supportive services (that includes financial services costs for rentals and supportive services) and non-profit Support.
- 2) Independence plans on using 65% of HOME-ARP program resources for financial services costs for rental support and the balance of 35% for needed Support services.
- 3) The targeted clientele for rental financial services costs are city residents determined to be at the greatest risk of housing instability capable of full-time employment within the community while supportive services will be oriented to all eligible, qualified populations within Independence.
- 4) The emphasis of the city program is homeless prevention.

#### **V. INDEPENDENCE HOME-ARP PROGRAM EXECUTION**

The city HOME-ARP Program will be administered, managed and implemented in its entirety by a subrecipient under a contract based on the ultimate's subrecipient's extensive local experience administering multi-million short-term rental programs in the region and its documented capacity to provide of a myriad of eligible, relevant and needed supportive services for qualified populations in the community. 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.

#### **VI. DRAFT INDEPENDENCE HOME-ARP ALLOCATION PLAN INPUT**

Comments solicited on city/regional client needs, municipal HOME-ARP programmatic approach and other input secured from attendees. Other comments.

#### **VII. FOLLOW-UP**

- 1) If you don't already have the draft HOME-ARP Allocation Plan, you can secure it at <https://www.ci.independence.mo.us/ComDev/CDBG> .





# INDEPENDENCE

★ COMMUNITY DEVELOPMENT ★

- 2) Please convey any written or oral comments on the draft HOME-ARP Allocation Plan to Adrienne Fight at Independence at 816-325-7398 or [afight@indepmo.org](mailto:afight@indepmo.org) by 03/13/2023.
- 3) The draft HOME-ARP Allocation Plan shall be submitted to the Independence City Council on and submitted to HUD prior to 3/30/2023 for their review/approval.
- 4) The city greatly appreciates your input, expertise, and assistance in generating its HOME-ARP Allocation Plan.

## VIII. ADJOURNMENT