The State of Missouri

2018-2022 Consolidated Plan

and

2018 Annual Action Plan

Prepared by:

Missouri Department of Economic Development

Missouri Housing Development Commission

Missouri Department of Health and Senior Services

Missouri Department of Social Services

December 2017

STATE OF MISSOURI

2018-2022 CONSOLIDATED PLAN

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Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

In 1995, the Consolidated Plan became the single planning document for all funds received by the State from the U.S. Department of Housing and Urban Development (HUD). These funds represent five major programs administered by the State of Missouri by four separate agencies:

- Community Development Block Grant (CDBG) - Department of Economic Development
- HOME Investment Partnerships Program - Missouri Housing Development Commission (MHDC)
- Emergency Solutions Grant (ESG) - Department of Social Services/MHDC
- Housing Opportunities for Persons With AIDS (HOPWA) - Department of Health & Senior Services
- National Housing Trust Fund (HTF) - (MHDC)
- Balance of State (BoS) Continuum of Care (CoC) - MHDC

The Department of Economic Development is the designated lead agency for the Missouri Consolidated Plan and Action Plan.

The State uses a five-year planning period. The 2018 - 2022 Consolidated Plan will become effective April 1, 2018. In addition to the Consolidated Plan, the State prepares an Annual Action Plan. For 2018, the Action Plan will also become effective April 1, 2018.

The State's housing, community development, and economic development needs are outlined in the Consolidated Plan; the intended uses that are described in the Action Plan are designed to address those needs. The Consolidated Plan also contains information relevant to lead-based paint, project monitoring, citizen participation, fair housing, and performance measures.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The State must report performance measures for all programs included in the Consolidated Plan. The standard objectives for all of these programs are 1) decent, affordable housing, 2) suitable living environment, and 3) economic opportunities. These are met via the outcomes of availability/accessibility, affordability, and sustainability.

The outcomes that the State seeks to address with these programs are: availability/accessibility of decent housing, affordability of decent housing, availability/accessibility of suitable living environment,

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affordability of decent living environment, sustainability of suitable living environment, and availability/accessibility of economic opportunity. These will be addressed by program as follows:

- Affordability of decent housing will be addressed via HOME, HTF, HOPWA and ESG.
- Availability/accessibility of suitable living environment will be addressed via CDBG.
- Affordability of suitable living environment will be addressed via CDBG.
- Sustainability of suitable living environment will be addressed via ESG and CDBG.
- Availability of economic opportunity will be addressed via CDBG.
- In addition, availability/accessibility of decent housing will be addressed via the State Continuum of Care.

3. Evaluation of past performance

Non-housing community development needs/goals identified in the Consolidated Plan, and for which CDBG funds are targeted, include economic development, public improvements/infrastructure, and public facilities. The State continues to allocate CDBG funds to these needs/goals in accordance with the Consolidated Plan. These continue to be priority needs for the State.

The strategic plan, program year, and actual numbers reported using HOME funds include all units produced by MHDC as stated above. The Balance of State Continuum of Care funds provide housing assistance for permanent supportive housing for individuals and families experiencing homelessness. It also provides funding for HMIS systems and Continuum of Care planning. The State of Missouri utilizes Emergency Solutions Grant funds to provide services to sheltered, unsheltered, and households at-risk of homelessness. The services provided include outreach services to unsheltered households, essential services to sheltered households in emergency shelters, and financial assistance and housing search and stabilization services to households experiencing homelessness or at imminent risk of becoming homeless.

As reported in prior year Consolidated Annual Performance and Evaluation Report (CAPER), the State is well on its way to meeting its goals and objectives for these programs. The 2016 CAPER can be accessed at:

https://ded.mo.gov/sites/default/files/CDBGAnnualReportCombine_060717.pdf

4. Summary of citizen participation process and consultation process

The state of Missouri prepares a thorough citizen participation plan that encourages citizens to participate in the development of the five-year consolidated plan and annual action plans. The citizen participation plan was developed in accordance with the requirements listed in 24 CFR Part 91.115 (Citizen Participation Plan for States). The plan provides citizens (including minorities, the disabled and non-English speaking persons), units of local government, and other interested parties a reasonable opportunity to comment on the plan and encourages them to do so.

On October 16, 2017 a public kick-off planning meeting/webinar was held in Jefferson City, 22 people attended the meeting and 33 participated by webinar. The meeting was designed to be a conversation between interested parties and the Consolidated Plan team. A wide range of people attended, including other state and local government entities, non-profits, public housing authorities, and developers.

The Consolidated Plan partners created two online surveys to gauge the public's interest in community development and housing priorities for the 5 years covered in the Consolidated Plan (2018-2022). The first was the Community Input Survey, which included questions on all Consolidated Plan programs, the second survey was created for PHA residents only. Both surveys were available through Survey Monkey beginning on October 23, 2017 and closed on November 10, 2017; a total of 970 responses were submitted for the community input survey and 16 were submitted for the PHA survey.

Public Meetings regarding the draft 2018-2022 Consolidated Plan and the FY2018 Annual Action Plan were held on the following dates and locations: December 6, 2017-Maryville; December 7, 2017-Kirksville; December 11, 2017-Jefferson City, December 12, 2017-Springfield; December 13, 2017-Poplar Bluff. Webinars were held on the following dates: December 11, 2017 and December 21, 2017.

Notification of the surveys and public meetings was provided via press release, and state agency websites. In addition, the consolidated Plan partners utilized their own distribution lists to send out all consultation surveys, meeting/hearing notifications and draft documents. Each distribution list reflects a comprehensive reach across Missouri's community development, housing, and social service communities. The combined distribution lists of the Consolidated Plan partners totaled over 17,200 email addresses.

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Audiences targeted on these lists, and those that attended the public meetings, include, but are not limited to: non-profit / for profit housing developers, PHAS, Community Action Agencies, service providers (homeless, DV, emergency shelter, disabled, CoC's, etc.), fair housing organizations, MBE / WBE developers, property management companies, for-profit and non-profit affordable housing developers, electric cooperatives, domestic violence centers, religious organizations, school districts, lending institutions, health care providers, senior citizen advocates, Regional Planning Commissions, Councils of Government, the Missouri Municipal League, the Missouri Association of Counties, USDA Rural Development, the Governor's Committee to End Homelessness, the Missouri Coalition Against Domestic and Sexual Violence, MONAHRO, the Missouri Commission on Human Rights, the University of

Missouri Extension, the University of Missouri Center for Neighborhoods, the Salvation Army, the United Way, agencies representing the Coordinated Entry Network, Missouri Department of Economic Development, the Missouri Department of Mental Health, the Missouri Department of Agriculture, the Missouri Department of Corrections, the Missouri Department of Social Services, the Missouri Housing Development Commission, and the Missouri Department of Health and Senior Services.

Broadband

The expansion of broadband for rural Missouri has become a high priority. This was also reflected in the Missouri Consolidated Plan Community Input Survey results. In early 2017, a team of statewide leaders from the Missouri Department of Economic Development, Missouri Department of Agriculture, Missouri Farm Bureau and the University of Missouri System came together to discuss strategies to better connect Missouri residents and businesses to high-speed internet. Access to high-speed internet has become a necessity for business and community development efforts and many of our rural communities are currently unserved or underserved. In July of 2017, a Missouri Broadband Stakeholder Meeting was held in Jefferson City, bringing together more than 100 individuals representing local, regional, state and federal government, education, agriculture, healthcare, business groups, broadband providers and many more to discuss Missouri's current broadband issues, needs and opportunities.

Missouri's legislators are also involved in the movement to provide and improve broadband service. A bill is making its way through the legislature that will establish a grant program within the Department of Economic Development to expand broadband internet access to underserved and under-served parts of Missouri. Grants may be awarded to fund the acquisition and installation of middle-mile and last-mile infrastructure that support internet speeds of at least 10 megabits per second download and one megabit per second upload. The bill has received support from several telecom companies and businesses, economic development and agricultural organizations.

Resilience

Another priority in Missouri is developing the Missouri Disaster Recovery Framework. Missouri established a recovery support function model to address the state's long term recovery needs following the devastating effects of flooding which began on April 28, 2017. The Missouri Disaster Recovery Framework is a collaborative effort introduced by Missouri Governor Eric Greitens, to enhance the long-term recovery capabilities of Missouri communities. The Disaster Recovery Framework began during the Presidentially Declared Disaster 4317, which started to capture the newly established Recovery Support Functions, as well as the existing recovery processes on going in the state.

The development and implementation of a framework that focuses on the recovery end of the disaster continuum will accomplish an efficient and well-rounded approach to the State's disaster recovery efforts. This framework lays the foundation for a collaborative recovery approach and is patterned after the National Disaster Recovery Framework (NDRF). The NDRF "establishes a common platform and forum for how the whole community builds, sustains, and coordinates delivery of recovery capabilities.

Resilient and sustainable recovery encompasses more than the restoration of a community's physical structures to pre-disaster conditions.

This approach, known as the Whole Community concept of planning, requires that all aspects of a community including state, and local governments, volunteer, faith-, and community-based organizations; other non-governmental organizations; the private sector; and the public work together. The teamwork enables communities to develop collective, mutually supporting local capabilities to withstand the potential initial impacts of these incidents, respond quickly, and recover in a way that sustains or improves the community's overall well-being.

In Missouri there are six Recovery Support Functions (SRFs). They include: Health and Social Services RSF, Economic RSF, Community RSF, Natural and Cultural Resources RSF, Housing RSF, and Infrastructure RSF. Agencies and organizations involved in the Tier 1 RSFs are as follows:

Health and Social Services – U.S. Department of Health and Human Services, MO Department of Health and Senior Services, MO Department of Elementary and Secondary Education, MO Department of Mental Health, MO Department of Natural Resources, and the MO Department of Social Services.

Economic – U.S. Small Business Administration, MO Department of Economic Development, MO Department of Agriculture, MO Department of Insurance, Financial Institutions and Professional Registration, MO Department of Labor and Industrial Relations, MO Office of Administration, Missouri Association of Councils of Government, Missouri Chamber of Commerce, University of Missouri Extension, and the Missouri Economic Development Council.

Community – U.S. Department of Homeland Security/Federal Emergency Management Agency, MO Department of Economic Development, MO State Emergency Management Agency, and the Missouri Association of Councils of Government.

Natural and Cultural Resources – U.S. Department of the Interior, MO Department of Natural Resources, MO Department of Agriculture, MO Department of Conservation, and the MO Secretary of State – Archives and Library.

Housing – U.S. Department of Housing and Urban Development, MO Housing development Commission, MO Department of Economic Development and the MO Department of Insurance, Financial Institutions and Professional Registration.

Infrastructure – U.S. Army Corps of Engineers, MO Department of Transportation, MO Department of Natural Resources, MO Department of Economic Development, Missouri Development Finance Board, and the Missouri Public Service Commission

5. Summary of public comments

Generally, questions raised during the public meetings were answered by the Consolidated Plan partners that were in attendance. Please see link to meeting transcripts. During the December 6, 2017 public meeting in Maryville, a comment was received in regards to the CDBG Program's Rural Economic Opportunities Infrastructure project category and the Job Training project category, as outlined in Appendix A. it was noted that there were two discrepancies concerning job creation and job retention in the project description. The comments were reviewed and those discrepancies were corrected. Please see link to written comments and responses.

A participant at the December 11, 2017 public meeting in Jefferson City, representing the Missouri Coalition Against Domestic and Sexual Violence, later submitted written comments. Please see link to written comments and responses.

A participant at the December 12, 2017 public meeting, representing the Ozark Action, Inc. Community Action Agency, submitted written comments. Please see link to written comments and responses.

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6. Summary of comments or views not accepted and the reasons for not accepting them

There were some comments received through the Citizen Participation and Consultation Survey that focused on state government responsibilities. The state did not respond to the survey questions; rather comment response was focused on specific questions regarding the Consolidated Plan and its programs.

7. Summary

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Questions raised during the public meetings were answered by the Consolidated Plan partners that were in attendance. Please see link to meeting transcripts. Written comments received were addressed with a written response. Please see link to written comments and responses.

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The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MISSOURI	DED-BCS/CDBG
HOPWA Administrator		DHSS/ HOPWA
HOME Administrator	MISSOURI	MHDC/HOME
ESG Administrator		DSS/ ESG
HOPWA-C Administrator		Missouri Department of Social Services
	MISSOURI	MHDC/HTF

Table 1 – Responsible Agencies

Narrative

In 1995, the Consolidated Plan became the single planning document for all funds received by the State from the U.S. Department of Housing and Urban Development (HUD). These funds represent five major programs administered by the State of Missouri by four separate agencies:

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- Emergency Solutions Grant (ESG) - Department of Social Services/MHDC
- Housing Opportunities for Persons With AIDS (HOPWA) - Department of Health & Senior Services
- National Housing Trust Fund (HTF) - MHDC

- Balance of State (BoS) Continuum of Care (CoC) - MHDC

The Department of Economic Development is the designated lead agency for the Missouri Consolidated Plan and Action Plan.

The State uses a five-year planning period, and this Consolidated Plan for FY2018 - FY2022 will become effective in April 2018. In addition to the Consolidated Plan, the State prepares an annual Action Plan. For FY2018, the Action Plan will also become effective in April 2018.

The State's housing, community development, and economic development needs are outlined in the Consolidated Plan; the intended uses that are described in the Action Plan are designed to address those needs. The Consolidated Plan also contains information relevant to lead-based paint, project monitoring, citizen participation, fair housing, and performance measures.

Consolidated Plan Public Contact Information

Marcy Oerly, Missouri State CDBG Program Manager, Missouri Department of Economic Development - Business and Community Services, P.O. Box 118, 301 W. High Street, Jefferson City, MO 65102. Telephone number: 573-751-5964. Email address: marcy.oerly@ded.mo.gov

PR-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

The Consultation section provides a detailed description of how the state of Missouri worked with various partners in developing the Consolidated Plan.

All Public Hearings, webinars, posted plans, and additional consultations included estimated funding amounts for all formula allocations based previous awards. The State made it clear that all proposed activities were based on were estimated amounts, all proposed activities' budgets would be proportionatly increased or decreased to match actual allocation amounts when made available by HUD.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

The State's Consolidated Plan partners – DED, MHDC, DSS and DHSS - do not manage or oversee funds to any of the Public Housing Authorities throughout the state. The state consulted MONAHRO to solicit data and significantly increase PHA input for the 2018-2022 Consolidated Plan. This ongoing collaboration will benefit and improve the state's affordable housing and community development strategies and ultimately help more Missourians find homes in healthy communities. To that end,

MONAHRO worked with MHDC to recruit PHAs for the 2018-2022 Consolidated Plan process; providing data for their particular service communities, utilizing the state's consultation survey to engage with their residents, staff and stakeholders, and providing input for the plan.

MHDC collaborates with and maintains an ongoing relationship with the Governor's Committee to End Homelessness (GCEH) which was established with a mission to promote public and private coordination and collaboration, develop new strategies to evaluate and reallocate resources, remove barriers to accessing services, evaluate unmet needs and provide supportive services and affordable housing needs, implement effective solutions to build economic security and promote and support activities that prevent homelessness. The GCEH is a Governor appointed committee consisting of state departments, non-profit agencies, eight Continua of Care (CoC), and formerly homeless citizens. All agencies participating in the Consolidated Plan Process have a seat on this committee. The GCEH was consulted and participated in the 2018-2022 Consolidated Plan process and survey.

Missouri is home to a network of 19 Community Action Agencies that provide direct, localized services to low income citizens. Missouri Community Action Network, Missouri CAN, is the statewide association that serves those agencies, their allies and supporters. Missouri CAN, along with their members, were consulted regarding the Consolidated Plan process.

Changes have occurred in Missouri to meet HUD's requirement for the establishment of a CE system; ensuring that people experiencing a housing crisis are quickly identified, assessed, referred and connected to housing services. The CE Network Initiative (CENI) is a collaboration between MHDC, DSS, DHSS, DOC and DMH. Data from this partnership was used for the Consolidated Plan and staff from the various CENI agencies were consulted. CE is required to be in place for each Missouri Continuum of Care by January, 2018. Funding has been made available for pilot programs to establish CE systems within CoCs and regions within those CoCs and data is being collected to provide information on the coordination between multiple state departments and local stakeholders.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Missouri supports eight CoC: Springfield, St. Joseph, Kansas City, St. Louis City, St. Louis County, Joplin, St. Charles and Balance of State. Each continuum in Missouri holds an appointed seat on the GCEH. Each CoC has established specific goals surrounding ending chronic homelessness for families and individuals, families with children, veterans and their families, and unaccompanied youth. The establishment of CE by the CoCs is creating a process for evaluating and prioritizing assistance to chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. State and Federal homeless assistance dollars require participation in the CoC in which funds will be expended. Funds are expected to be coordinated and prioritized in each CoC.

All Missouri CoCs are implementing a CE System. The CE system will serve as a single point of access for those at-risk of or experiencing homelessness. CE is required to be in place for each Missouri Continuum of Care by January, 2018. Funding has been made available for pilot programs to establish CE systems within CoCs and regions within those CoCs and data is being collected to provide information on the coordination between multiple state departments and local stakeholders. The CE Network Initiative (CENI) is a collaboration between MHDC, DSS, DHSS, DOC and DMH. CENI's pilot project has commenced in two regions in the Missouri BoS: region 8 (Dent, Douglas, Howell, Laclede, Oregon, Ozark, Shannon, Texas and Wright counties) and region 10 (Bates, Benton, Cass, Henry, Johnson, Lafayette, Pettis, Saline and St. Clair counties). CENI's objective is to help provide a more efficient process for those experiencing homelessness, or a housing crisis, to access the homeless service delivery system, to identify cross-sections of service utilizers between the collaborating agencies and to provide data that will enable the state to better understand housing and service needs within Missouri.

Additionally, the GCEH established a Discharge Policy in 2011 that was adopted by all Missouri CoCs and state partners. The discharge policy establishes the following guiding principles: homelessness is unacceptable in Missouri; efforts to secure permanent housing shall be made prior to being discharged from a state or public facility, such as a mental health facility, substance abuse treatment facility, long-term care facility, or jail/prison; if "temporary" shelter placement is unavoidable, the reasons for this should be documented; if after having exhausted efforts to engage the client in a discharge plan, if the client continues to refuse services, the efforts will be noted; and if a client receiving out-patient services becomes homeless, the state or public facility should work actively with available community resources to locate suitable housing.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

ESG funds are distributed based on an annual allocation plan by CoC that is approved by DSS and MHDC Board of Commissioners after CoC input is considered through annual action plans, application process and focus groups. Performance standards should be implemented at the CoC level. The HMIS is selected and policies and procedures for the administration of HMIS are created with input from the CoC. Policies and procedures for the administration of HMIS are established and voted on by the governing body of the CoC.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	MISSOURI HOUSING DEVELOPMENT COMMISSION
	Agency/Group/Organization Type	Housing Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	MHDC provided data and analysis for the Plan. MHDC acts as the lead agency for the states Balance of State CoC; all eight CoCs in the state of Missouri contributed data to the state homelessness study commissioned by MHDC, which is used throughout the Consolidated Plan. MHDC is the lead agency working on the Housing disaster plan for the state. MHDC (in coordination with other agencies) solicited input from a cross-section of organizations and individuals throughout the state including but not limited to the GCEH, non-profit and for-profit housing providers, social service agencies, advocates, PHAs and PHA residents, homeless service providers, Community Action Agencies, and the Missouri Commission on Human Rights.
2	**Agency/Group/Organization**	The Missouri Association for Councils of Government
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development

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	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	DED is initiating a statewide Business Retention and Expansion Program with its regional and local economic developers. The initiative tracks industry trends and establishes a survey and feedback system with the businesses that make up the significant portion of the 10 regional economies in the state. The goal is to facilitate the maintenance of jobs in a region as well as facilitate opportunities for job growth. In addition, the Department consults regularly with the state's Regional Planning Commissions concerning the needs of their areas.
3	**Agency/Group/Organization**	MONAHRO
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	MONAHRO was provided the Community Input Survey as well as the PHA Survey specifically geared towards PHA residents. MONAHRO worked as a liaison between the participating PHAs and MHDC to provide data and analysis for all participating PHAs to ensure inclusion into the Plan. All hearing notices and DRAFT documents were provided to MONAHRO and the participating PHAs.
4	**Agency/Group/Organization**	Governor's Committee to End Homelessness
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	GCEH provided the Community Input Survey and Consolidated Plan partners spoke with the GCEH about the consultation opportunities and the timeline for the 2018-2022 Consolidated Plan process. All hearing notices and DRAFT documents were provided to GCEH.

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Identify any Agency Types not consulted and provide rationale for not consulting

Comments were received through the Community Input Survey that focused on state government's general responsibilities. The state did no respond to any of these comments; rather responses were made to specific questions about the Consolidated Plan and its programs.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))

The State encourages local governments to participate in, and comment on, the Consolidated Plan process. Local governments are informed of the Consolidated Plan process in several ways, including via the state's regional planning commissions and councils of local government, the Missouri Association of Counties and the Missouri Municipal League. The Department of Economic Development (DED) also collects data on local needs and assets via a needs assessment process which is required as part of a state CDBG application. The DED also meets regularly with the Regional Planning Commissions and Councils of Local Government to help determine local government needs and priorities.

Narrative (optional):

PR-15 Citizen Participation - 91.115, 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting

The state of Missouri prepares a thorough citizen participation plan that encourages citizens to participate in the development of the five-year consolidated plan and annual action plans. The citizen participation plan was developed in accordance with the requirements listed in 24 CFR Part 91.115 (Citizen Participation Plan for States). The plan provides citizens (including minorities, the disabled and non-English speaking persons), units of local government, and other interested parties a reasonable opportunity to comment on the plan and encourages them to do so.

The Consolidated Plan Partners' increased efforts to broaden citizen participation through the Missouri Consolidated Plan Community Input Surveys, meetings, and public hearings and webinars allowed the partners to prioritize activities and methods of distribution, clarify a variety of items in the draft plan, and provided a vehicle for more open discussion regarding the CDBG, HOME, ESG, HTF, and HOPWA programs.

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Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Public Kick-off Planning Meeting/Webinar: October 16, 2017, Jefferson City, 22 people attended the meeting and 33 participated by webinar.	The meeting was designed to be a conversation between interested parties and the Consolidated Plan team. A wide range of people attended, including other state and local government entities, non-profits, public housing authorities, and developers.	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

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2	Internet Outreach	Non-targeted/broad community	The Consolidated Plan Partners (DED, MHDC, DSS, DHSS) developed a web-based two survey tools. One survey was developed specifically for those interested in Public Housing Authorities and the other survey was developed for state-wide use. The surveys went live on October 23, 2017 and closed on November 10, 2017. Notification of the surveys were provided via press release, state agency websites, e-mail agency list serves directed at interested parties.	Please see link to survey reports that summarizes responses to all questions.	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

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3	Public Meeting	Governor's Committee to End Homeless Meeting	On November 6, 2017, representatives from the Department of Economic Development, the Missouri Housing Development Commission, and the Department of Health and Senior Services discussed the 2018-2022 Consolidated Plan planning process, and the Citizen Participation and Consultation Survey at the Governor's Committee to End Homelessness meeting. There were approximately 30 people in attendance and 5 that participated by conference call.	Comments were general in nature, but those that were more specific included: Who should be participating in the survey? The website where the survey could be found, and what groups/organizations should the survey be forwarded to? The dates and locations of the public hearings for the draft consolidated plan were also discussed.	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

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4	Public Hearing	Non-targeted/broad community	On December 6, 2017 a public meeting regarding the draft 2018-2022 Consolidated Plan and the FY2018 Annual Action Plan was held from 9:00 a.m. - 11:00 a.m. in Maryville, MO. Two people from the public were in attendance.	Questions raised during the meeting were answered by the Consolidated Plan partners that were in attendance. Please see link to meeting transcripts. A comment was received in regards to the CDBG Program's Rural Economic Opportunities Infrastructure project category and the Job Training project category, as outlined in Appendix A. it was noted that there were two discrepancies concerning job creation and job retention in the	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
				project description. The comments were reviewed and those discrepancies were corrected. Please see response in link: ?????		
5	Public Hearing	Non-targeted/broad community	On December 7, 2017 a public meeting regarding the draft 2018-2022 Consolidated Plan and the FY2018 Annual Action Plan was held from 9:00 a.m. - 11:00 a.m. in Kirksville, MO. Three people from the public were in attendance.	Questions raised during the meeting were answered by the Consolidated Plan partners that were in attendance. Please see link to meeting transcripts.	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Hearing	Non-targeted/broad community	On December 11, 2017 a public meeting regarding the draft 2018-2022 Consolidated Plan and the FY2018 Annual Action Plan was held from 9:00 a.m. - 11:00 a.m. in Jefferson City, MO. Three people from the public were in attendance.	Questions raised during the meeting were answered by the Consolidated Plan partners that were in attendance. Please see link to meeting transcripts. A participant at the meeting, representing the Missouri Coalition Against Domestic and Sexual Violence, later submitted written comments. Please see link to written comments and responses.	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Internet Outreach	Non-targeted/broad community	On December 11, 2017 a public meeting, via webinar, regarding the draft 2018-2022 Consolidated Plan and the FY2018 Annual Action Plan was held from 1:00 p.m. - 3:00 p.m. Five people from the public participated in the webinar.	No comments were received.	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Public Hearing	Non-targeted/broad community	On December 12, 2017 a public meeting regarding the draft 2018-2022 Consolidated Plan and the FY2018 Annual Action Plan was held from 9:00 a.m. - 11:00 a.m. in Springfield, MO. One person from the public was in attendance.	Questions raised during the meeting were answered by the Consolidated Plan partners that were in attendance. Please see link to meeting transcripts. A participant at the meeting, representing the Ozark Action, Inc. Community Action Agency, submitted written comments. Please see link to written comments and responses.	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Public Hearing	Non-targeted/broad community	On December 13, 2017 a public meeting regarding the draft 2018-2022 Consolidated Plan and the FY2018 Annual Action Plan was held from 9:00 a.m. - 11:00 a.m. in Poplar Bluff, MO. No one from the public was in attendance.	No comments were received.	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Internet Outreach	Non-targeted/broad community	On December 21, 2017 a public meeting, via webinar, regarding the draft 2018-2022 Consolidated Plan and the FY2018 Annual Action Plan was held from 10:00 a.m. - 12:00 p.m. No one from the public participated in the webinar.	No comments were received.	N/A	https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Table 4 – Citizen Participation Outreach

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Needs Assessment

NA-05 Overview

Needs Assessment Overview

In 2015, the Public Policy Research Center, UMSL, published the MHDC Housing Needs Assessment Report for the state of Missouri. The report identified an affordability challenge for many Missouri households. According to the report, 25% the State's population earned $25,000 or less per year and 31% of the State's households were rent burdened. Renter households, in particular, low income renters, bore the majority of that burden. Geographically, that burden was consistent throughout the State with the largest increase in number of households rent burdened occurring in suburban regions around Kansas City, St. Joseph, and Jefferson counties. African Americans and Hispanics experienced the highest rate of rent burden, and households with a disabled family member were more likely to be rent burdened than other subpopulations. Interviews noted repeatedly that the cost of housing presented the most significant barrier to affordable housing in Missouri. NILHC's Out of Reach 2017 concluded that many Missouri renters, both urban and rural, pay more of their income towards housing than is considered reasonable. Almost 41% of renter households in KC were rent burdened, 52% of renter households in Moberly were rent burdened, 46% of St. Louis renters were rent burdened, and in Sedalia, Missouri 52% of renters were rent burdened and 27% severely burdened. The 2015 statewide Needs Assessment looked at changes in rent over time with 53% of units in 2000 charging $500 or less for rent, compared with only 20% of units renting for $500 or less per month in 2012. The steady loss of affordable rental housing and the growing number of low and extremely low income renters are two issues that will challenge the State with respect to the allocation of resources over the next five years.

The Statewide Homelessness Study 2015 showed that while Missouri's total number of homeless had decreased from the prior year, there are subpopulations that continue to struggle. Student homelessness increased by 78% from 2009 to 2015, the number of homeless families in the Balance of State (BoS) increased, and the number of chronically homeless, both sheltered and unsheltered, has consistently grown.

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NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

American Community Survey (ACS) data from 2016 shows that Missouri has a total of 2,372,190 households, almost 65% of those households are family households with slightly less than 36% representing non-family households. The average household size is 2.49 people. 30% of Missouri households include one or more people under 18 years of age and 29% of households include one or more people over the age of 65 years.

Demographics	Base Year: 2000	Most Recent Year: 2013	% Change
Population	5,595,211	5,982,413	7%
Households	2,197,214	2,358,270	7%
Median Income	$37,934.00	$47,333.00	25%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	283,035	282,570	414,320	252,120	1,126,230
Small Family Households	86,730	85,195	145,785	100,410	620,085
Large Family Households	16,395	17,350	30,655	20,365	90,140
Household contains at least one person 62-74 years of age	40,005	56,220	85,660	52,020	210,125
Household contains at least one person age 75 or older	39,130	61,995	65,205	27,180	74,895
Households with one or more children 6 years old or younger	51,925	45,495	67,060	40,765	122,905

Table 6 - Total Households Table

Data Source: 2009-2013 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	4,000	3,020	2,210	760	9,990	2,515	1,735	1,745	900	6,895
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	1,730	1,235	1,270	655	4,890	285	445	645	255	1,630
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	4,905	3,665	3,130	1,645	13,345	980	1,565	3,245	2,035	7,825
Housing cost burden greater than 50% of income (and none of the above problems)	112,665	33,740	5,295	570	152,270	54,045	37,265	25,660	5,410	122,380
Housing cost burden greater than 30% of income (and none of the above problems)	22,425	64,470	47,475	5,670	140,040	17,260	36,390	69,085	37,445	160,180
Zero/negative Income (and none of the above problems)	14,915	0	0	0	14,915	8,845	0	0	0	8,845

Table 7 – Housing Problems Table

Data Source: 2009-2013 CHAS

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2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	123,300	41,655	11,900	3,630	180,485	57,825	41,010	31,295	8,605	138,735
Having none of four housing problems	48,590	100,855	148,920	73,205	371,570	29,560	99,045	222,205	166,680	517,490
Household has negative income, but none of the other housing problems	14,915	0	0	0	14,915	8,845	0	0	0	8,845

Table 8 – Housing Problems 2

Data Source: 2009-2013 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	51,880	39,065	21,055	112,000	19,390	23,915	38,310	81,615
Large Related	9,240	6,755	3,045	19,040	3,990	5,205	9,550	18,745
Elderly	21,765	20,570	10,175	52,510	31,695	32,520	27,375	91,590
Other	60,345	37,425	19,990	117,760	18,710	13,720	20,745	53,175
Total need by income	143,230	103,815	54,265	301,310	73,785	75,360	95,980	245,125

Table 9 – Cost Burden > 30%

Data Source: 2009-2013 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	45,170	12,715	1,370	59,255	16,105	13,555	9,370	39,030
Large Related	7,565	1,710	95	9,370	3,085	2,365	1,800	7,250
Elderly	14,500	8,660	2,360	25,520	20,745	13,440	8,670	42,855
Other	51,705	12,375	1,885	65,965	15,745	8,475	5,990	30,210
Total need by income	118,940	35,460	5,710	160,110	55,680	37,835	25,830	119,345

Table 10 – Cost Burden > 50%

Data Source: 2009-2013 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	5,780	3,790	3,525	1,675	14,770	1,280	1,575	2,955	1,860	7,670
Multiple, unrelated family households	690	805	530	450	2,475	195	600	970	480	2,245
Other, non-family households	320	430	475	240	1,465	29	20	90	0	139
Total need by income	6,790	5,025	4,530	2,365	18,710	1,504	2,195	4,015	2,340	10,054

Table 11 – Crowding Information – 1/2

Data Source: 2009-2013 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

According to MHDC's 2015 Housing Needs Assessment, single person renter households were one subpopulation with high cost burden rates at 50%; single parent renter households were another subpopulation disproportionately impacted with cost burden at 56%.

Link to study:

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Missouri Coalition Against Domestic and Sexual Violence's (MCADSV) 2016 MCADSV Member Programs' Domestic and Sexual Violence Statistics reports Missouri programs in 2016 provided 347,668 nights of shelter to domestic and sexual violence victims and provided 65,233 nights of safety in longer-term transitional housing to domestic violence victims. Missouri works with and relies on MCADSV and their member agencies for input on housing needs, policies and procedures.

https://www.mocadsv.org//FileStream.aspx?FileID=817

Based on the HUD report published in 2015, "A Picture of Disability and Designated Housing," almost 80% of disabled households in the Midwest are at or below 30% AMI, and of those 30% AMI households, over 70% of them do not receive HUD assistance. Using these statistics as a baseline and applying them to Missouri, approximately 137,000 households in Missouri at the lowest income level alone need HUD housing assistance.
https://www.huduser.gov/portal/sites/default/files/pdf/mdrt_disability_designated_housing.pdf

https://www.census.gov/quickfacts/MO

What are the most common housing problems?

Missouri's most common housing problem is cost burden. MHDC's Housing Needs Assessment Report, 2015, showed that "approximately one-third of (all) Missouri households are cost burdened" and one-half (50.9%) of Missouri renters pay more than 30% of their household income for housing. According to CHAS data, Missouri households with the lowest incomes pay more in housing costs than households living at low and moderate income levels. While the data show that Missouri households face other housing problems, cost burden affects ten times more households than the next most prevalent issue cited – overcrowding. Through the HOME, ESG and HTF programs, and other funding sources, Missouri addresses cost burden through homeowner rehabilitation, rental and utility assistance, new construction of affordable housing and the preservation and rehabilitation of existing affordable housing stock.

Additional housing issues, as identified in The Missouri Statewide Fair Housing Impediments Analysis, include landlord / tenant laws that are perceived to favor landlords, a lack of affordable, accessible housing that is decent and safe, reliance on sub-standard, rental properties for low and extremely low income households, and overall negative perceptions of low income populations.

Are any populations/household types more affected than others by these problems?

MHDC's 2015 Housing Needs Assessment Report identified four subpopulations that face high rental cost burdens: disabled renter households (59%), African American renter households (57%), single parent renter households (56%), and single person renter households (50%).

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The BoS CoC, administered by MHDC, supports 101 rural counties. In these rural counties, there are many individuals and families who are "doubled-up" and are at high risk of becoming homeless. These individuals and families find themselves in this vulnerable position for a variety of reasons: lack of employment, a change in family make up, mental illness, substance abuse disorder or sub-standard housing. ESG funds and other state resources in these areas can assist with "homelessness prevention" providing housing search and placement in addition to financial assistance and services. Individuals and families at imminent risk of homelessness are often in desperate need of assistance with rental and utility deposits, payment of arrears and continuing assistance to remain in permanent housing.

The characteristics of homeless individuals and families can include but are not limited to, domestic violence, mental illness, substance abuse disorder, loss of job or underemployment. ESG funds and other state resources in these areas can assist with "rapid re-housing" providing housing search and placement in addition to financial assistance and services. Homeless individuals and families in need of assistance with rental and utility deposits, payment of arrears, and continuing assistance to obtain and remain in permanent housing. MHDC has adjusted its statewide grant program, the Missouri Housing Trust Fund (MHTF), to provide assistance to homeless individuals and families and individuals and families at risk of homelessness with eligible activities that mirror those eligible in the ESG program.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Missouri does not currently estimate the statewide at-risk population. The Missouri BoS CoC allows for county leaders to provide any surveys recorded during the annual Point-in-Time Count for individuals or families reported as doubled-up, but this information is voluntary and this is not a HUD required element of the Point-in-Time Count.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The connection between housing instability and low income households or households that are at risk of becoming homeless is one that has been well explored. The ESG program prioritizes programs that provide permanent housing solutions that incorporate a housing first model. The new CE system required to be in place by all CoCs in January, 2018 will serve to further identify indicators such as income, race, gender, disability and employment status that are linked to housing instability and an increased risk of homelessness through its assessment process. On an annual basis, MHDC implements a Qualified Allocation Plan (QAP) in connection with administration of low-income housing tax credits (LIHTC). While the scope of the Consolidated Plan does not include LIHTC funding, the QAP is an important document that warrants mention; both HTF and HOME funding fall within the scope of the Consolidated Plan and both are used as equity gap funding in conjunction with LIHTC funding. Developments receiving HTF or HOME as equity gap funding under the LIHTC program must comply with the provisions of the QAP. Since 2011, MHDC's QAP has included provisions prioritizing permanent housing for special needs or vulnerable populations including persons who are physically, emotionally or mentally impaired or suffer from mental illness, who are developmentally disabled, who are homeless including survivors of domestic violence and sex trafficking, and youths aging out of foster care. MHDC has consistently met its goals in connection with the funding priority. Further, the QAP addresses the development of service enriched housing including the sufficiency of services and the financial resources needed to sustain the services provided by community organizations. New HTF monies will provide funds to develop housing for extremely low income households, a cost-burdened population that continues to face profound challenges in finding and remaining in affordable housing. All of the funding programs share a common goal of providing safe, quality, affordable housing, and incorporate various elements to extend housing stability to Missourians including: at-risk households, individuals living with mental illness, adults living with developmental and physical disabilities, households that have multiple barriers to independence, households that may have experienced previous periods of homelessness and households living in poverty.

Discussion

The data reflects the most pressing need for Missouri's extremely low, low and moderate income households; more quality, affordable housing. 2016 ACS data shows the average gross rent for the state is $822. CHAS data shows that 106,375 low income renters (>30% to less than or = 50% HAMFI) pay more than 30% of their household income to housing and 35,845 pay more than 50% of their income towards housing. Missouri's extremely low income renters (less than or = 30% HAMFI) show higher rates of cost burden; with 153,155 households paying more than 30% of household income to housing and 126,135 paying more than half of their household income to housing. The 2016 State of the State Poverty Report examines housing affordability for the poorest households in the state, taking into account the costs associated with energy and overcrowding. The report states that Missouri households earning less than $30,000 paid an average of 26% of their household's income towards energy costs in 2014, an increase of 10% between 2001 and 2014. Overcrowding for Missouri's housing units increased

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exponentially between 2000 and 2013, 39,126 units being reported as overcrowded in 2013 versus the 3,211 units reported in 2000 (an increase of 1118.49%). "Substandard housing is another barrier that low-income families face. Older homes tend to have issues with energy efficiency, electrical and plumbing problems that require expensive maintenance, and reduced air quality." This data indicates that more Missourians are paying more of their household income towards housing costs, reflecting a need for more affordable housing options for renters and homeowners.

Link to study:

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

2016 data from the Joint Center on Budget and Policy Priorities shows that for the 96,000 Missouri households receiving federal rental assistance, the majority of assistance used comes from the Housing Choice Voucher program, followed by Section 8 Project Based, Public Housing, USDA and lastly, housing assistance for the elderly and disabled. "More than 22,500 Missouri households receiving rental assistance live in non-metropolitan areas", which underscores the need for affordable housing throughout the state.

Link to study:

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	218,221	45,356	18,030
White	149,807	34,804	11,689
Black / African American	52,864	7,974	4,595
Asian	2,718	244	817
American Indian, Alaska Native	1,337	458	95
Pacific Islander	109	30	10
Hispanic	7,040	946	534

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	169,603	109,424	0
White	126,039	93,603	0
Black / African American	31,646	11,312	0
Asian	1,919	695	0
American Indian, Alaska Native	1,111	435	0
Pacific Islander	212	89	0
Hispanic	6,001	1,952	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	148,290	271,424	0
White	118,083	229,106	0
Black / African American	20,943	28,656	0
Asian	1,952	2,422	0
American Indian, Alaska Native	640	976	0
Pacific Islander	78	90	0
Hispanic	4,076	6,315	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	52,082	207,975	0
White	44,248	179,507	0
Black / African American	4,856	18,868	0
Asian	1,063	2,113	0
American Indian, Alaska Native	156	866	0
Pacific Islander	95	104	0
Hispanic	1,035	4,472	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Discussion

Data indicates that Missouri's lowest income households encounter the greatest number of housing problems more often than households earning more. The connection between poverty and housing insecurity is well established. When a household pays more of their net income towards housing they have less to spend on other areas – utilities, transportation, food, and healthcare. In 2016, there were only 4 counties in Missouri with a poverty rate less than 10%; 6 Missouri counties have more than 40% of their children living in poverty. Census data for 2010 showed an increase in the percentage of Missourians living in poverty areas where 20% or more people have incomes below the FPL; that percentage was 10.0% -19.9% in 2000 and was 20.0% - 24.9% in 2010. MEP 2016 data showed that 908,628 Missourians lived at 100% of below the FPL; 287,081 of those are children. That same report showed that 1,190,600 Missourians visited a local food bank in 2014, over 500,000 claimed the EITC, 140,000 utilized LIHEAP assistance, and 37,021 Missouri households received federal rental assistance. 32.5% of total Missouri households are renter households and $14.07 is the hourly wage a renter needs to earn in order to afford a two bedroom unit (HUD FMR) without paying more than 30% of their household income towards housing. Data from the National Housing Conference shows that

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some workers in St. Louis have to see more than 6.5% increase in their personal income, over a one year period of time, to afford a 2 bedroom apartment at FMR rates; workers in Kansas City have to realize an increase of almost 6% over a twelve month period of time to afford such a unit. With this data in mind, future housing plans should take into account the poverty rate for the county, how that rate has changed over time, and what activity has taken place with regard to the production of affordable housing development in the community in the past. Occupational and wage data for communities,workforce development opportunities and educational attainment would also assist in crafting more targeted strategies for community development including affordable housing plans. Since the 2013-2018 Consolidated Plan, MHDC has been expanding the process by which "need" is defined. Using poverty rate as one component in a larger review of community assets and deficiencies allows MHDC to target money where it can provide the most benefit. Examining poverty in a larger context of educational literacy, past development, cost burden, community investment, and the availability of support services / amenities, helps provide a more complete picture of a community's overall need. Further, that analysis enables MHDC to identify how housing resources can answer some of the community deficits identified. MHDC's QAP (which incorporates provisions that must be followed when a development is awarded HOME or HTF equity gap funding) includes a funding priority for developments built in opportunity areas that provide access to high performing school systems, transportation, employment and low poverty rates. MHDC's 2015 Housing Needs Assessment Report noted that of the four subpopulations highlighted (disabled renters, single person renters, single parent renters, African Americans) "low income households are disproportionately represented in (all) subpopulations, particularly African Americans." The report goes on to state that while cost burden impacts renters across the state, African Americans and Hispanics have higher cost burden rates (57% and 56%, respectively) than white households (45%)."MHDC is dedicated to using our resources to address needs throughout the state, to improve the lives of the individuals and families living in our communities and to provide opportunities for more households to realize permanent, affordable, and stable housing.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

2016 data from the Joint Center on Budget and Policy Priorities shows that for the 96,000 Missouri households receiving federal rental assistance, the majority of assistance used comes from the Housing Choice Voucher program, followed by Section 8 Project Based, Public Housing, USDA and lastly, housing assistance for the elderly and disabled. "More than 22,500 Missouri households receiving rental assistance live in non-metropolitan areas" underscoring the need for affordable housing throughout the state.

Link to study:

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	172,688	90,897	18,030
White	116,782	67,776	11,689
Black / African American	43,022	17,836	4,595
Asian	2,390	566	817
American Indian, Alaska Native	1,087	706	95
Pacific Islander	109	30	10
Hispanic	5,795	2,193	534

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2009-2013 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	69,960	209,161	0
White	51,485	168,054	0
Black / African American	12,657	30,310	0
Asian	995	1,619	0
American Indian, Alaska Native	547	995	0
Pacific Islander	97	204	0
Hispanic	3,029	4,919	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2009-2013 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	39,225	380,279	0
White	31,284	315,854	0
Black / African American	4,622	44,987	0
Asian	713	3,667	0
American Indian, Alaska Native	202	1,423	0
Pacific Islander	78	90	0
Hispanic	1,497	8,909	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2009-2013 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,485	248,446	0
White	9,432	214,251	0
Black / African American	893	22,816	0
Asian	361	2,820	0
American Indian, Alaska Native	71	951	0
Pacific Islander	75	124	0
Hispanic	455	5,049	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2009-2013 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Discussion

Data indicates that Missouri's lowest income households encounter the greatest number of housing problems more often than households earning more. The connection between poverty and housing insecurity is well established. When a household pays more of their net income towards housing they have less to spend on other areas – utilities, transportation, food, and healthcare. In 2016, there were only 4 counties in Missouri with a poverty rate less than 10%; 6 Missouri counties have more than 40% of their children living in poverty. Census data for 2010 showed an increase in the percentage of Missourians living in poverty areas where 20% or more people have incomes below the FPL; that percentage was 10.0% -19.9% in 2000 and was 20.0% - 24.9% in 2010. 2016 MEP data showed that 908,628 Missourians lived at 100% of below the FPL; 287,081 of those are children. That same report showed that 1,190,600 Missourians visited a local food bank in 2014, over 500,000 claimed the EITC, 140,000 utilized LIHEAP assistance, and 37,021 Missouri households received federal rental assistance. 32.5% of total Missouri households are renter households and $14.07 is the hourly wage a renter needs to earn in order to afford a two bedroom unit (HUD FMR) without paying more than 30% of their household income towards housing. Data from the National Housing Conference shows that some workers in St. Louis have to see more than 6.5% increase in their personal income, over a one year period of time, to afford a 2 bedroom apartment at FMR rates; workers in Kansas City have to realize an increase of almost 6% over a twelve month period of time to afford such a unit. With this data in mind, future housing plans should take into account the poverty rate for the county, how that rate has changed over time, and what activity has taken place with regard to the production of affordablehousing development in the community in the past. Occupational and wage data for communities, workforce development opportunities and educational attainment would also assist in crafting more targeted strategies for community development including affordable housing plans. Since the 2013-2018 Consolidated Plan, MHDC has been expanding the process by which "need" is defined. Using poverty rate as one component in a larger review of community assets and deficiencies allows MHDC to target money where it can provide the most benefit. Examining poverty in a larger context of educational literacy, past development, cost burden, community investment, and the availability of support services / amenities, helps provide a more complete picture of a community's overall need. Further, that analysis enables MHDC to identify how housing resources can answer some of the community deficits identified. MHDC's QAP (which incorporates provisions that must be followed when a development is awarded HOME or HTF equity gap funding) includes a funding priority for developments built in opportunity areas that provide access to high performing school systems, transportation, employment and low poverty rates. MHDC's 2015 Housing Needs Assessment Report noted that of the four subpopulations highlighted (disabled renters, single person renters, single parent renters, African Americans) "low income households are disproportionately represented in (all) subpopulations, particularly African Americans." The report goes on to state that while cost burden impacts renters across the state, African Americans and Hispanics have higher cost burden rates (57%

and 56%, respectively) than white households (45%).” MHDC is dedicated to using our resources to address needs throughout the state, to improve the lives of the individuals and families living in our communities and to provide opportunities for more households to realize permanent, affordable, and stable housing.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

2016 ACS data shows that of the total renter-occupied units in Missouri, 40% of the households living in those units are paying more than 30% of their total income towards rent. NILHC’s Out of Reach 2017 supported the conclusion that many Missouri renters pay more of their income towards housing than is considered reasonable: almost 41% of renter households in KC were rent burdened, 52% of renter households in Moberly were rent burdened, 46% of St. Louis renters were cost burdened, and in Sedalia, Missouri 52% of renters were cost burdened and 27% severely burdened.

Link to study:

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1,674,144	361,224	269,308	18,701
White	1,475,274	285,305	193,612	12,053
Black / African American	124,595	54,149	56,887	4,786
Asian	18,531	4,454	4,040	852
American Indian, Alaska Native	5,773	1,624	1,685	95
Pacific Islander	734	185	257	10
Hispanic	30,620	9,731	7,757	614

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2009-2013 CHAS

Discussion

Data indicates that Missouri's lowest income households encounter the greatest number of housing problems more often than households earning more. The connection between poverty and housing insecurity is well established. When a household pays more of their net income towards housing they have less to spend on other areas – utilities, transportation, food, and healthcare. In 2016, there were only 4 counties in Missouri with a poverty rate less than 10%; 6 Missouri counties have more than 40% of their children living in poverty. Census data for 2010 showed an increase in the percentage of Missourians living in poverty areas where 20% or more people have incomes below the FPL; that percentage was 10.0% -19.9% in 2000 and was 20.0% - 24.9% in 2010. 2016 MEP data showed that 908,628 Missourians lived at 100% of below the FPL; 287,081 of those are children. That same report showed that 1,190,600 Missourians visited a local food bank in 2014, over 500,000 claimed the EITC, 140,000 utilized LIHEAP assistance, and 37,021 Missouri households received federal rental assistance. 32.5% of total Missouri households are renter households and $14.07 is the hourly wage a renter needs to earn in order to afford a two bedroom unit (HUD FMR) without paying more than 30% of their household income towards housing. Data from the National Housing Conference shows that some workers in St. Louis have to see more than 6.5% increase in their personal income, over a one year period of time, to afford a 2 bedroom apartment at FMR rates; workers in Kansas City have to realize an increase of almost 6% over a twelve month period of time to afford such a unit. With this data in mind, future housing plans should take into account the poverty rate for the county, how that rate has changed over time, and what activity has taken place with regard to the production of affordable housing development in the community in the past. Occupational and wage data for communities, workforce development opportunities and educational attainment would also assist in crafting more targeted strategies for community development including affordable housing plans. Since the 2013-2018 Consolidated Plan, MHDC has been expanding the process by which "need" is defined. Using poverty rate as one component in a larger review of community assets and deficiencies allows MHDC to target money where it can provide the most benefit. Examining poverty in a larger context of educational literacy, past development, cost burden, community investment, and the availability of support services / amenities, helps provide a more complete picture of a community's overall need. Further, that analysis enables MHDC to identify how housing resources can answer some of the community deficits identified. MHDC's QAP (which incorporates provisions that must be followed when a development is awarded HOME or HTF equity gap funding) includes a funding priority for developments built in opportunity areas that provide access to high performing school systems, transportation, employment and low poverty rates. MHDC's 2015 Housing Needs Assessment Report noted that of the four subpopulations highlighted (disabled renters, single person renters, single parent renters, African Americans) "low income households are disproportionately represented in (all) subpopulations, particularly African Americans." The report goes on to state that while cost burden impacts renters across the state, African Americans and Hispanics have higher cost burden rates (57% and 56%, respectively) than white households (45%)." MHDC is dedicated to using our resources to address needs throughout the state, to improve the lives of the individuals and families living in our communities and to provide opportunities for more households to realize permanent, affordable, and stable housing.

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

MHDC's 2015 Housing Needs Assessment Report noted that of the four subpopulations highlighted (disabled renters, single person renters, single parent renters, African Americans), "low income households are disproportionately represented in (all) subpopulations, particularly African Americans." The report goes on to state that while cost burden impacts renters across the state, African Americans and Hispanics have higher cost burden rates (57% and 56%, respectively) than white households (45%)."

Link to study:

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

If they have needs not identified above, what are those needs?

Data from KIDS COUNT, a project by the Annie E. Casey Foundation, showed that between the years of 2011-2015, the total number of African American, Missouri "children living in areas of concentrated poverty" was higher than for Missouri children of other races (White, Hispanic and multi-racial). For purposes of this response, KIDS COUNT data center defines "children living in areas of concentrated poverty" as children living in census tracts with poverty rates of 30% or more. That same data source looked at the number of Missouri children living in a household where the "household head lacks a high school diploma by race and ethnicity". The results showed that in 2015, 75,000 White Missouri children lived in such a home, 18,000 African American Missouri children lived in such a home, 28,000 Hispanic Missouri children lived in such a home, 3,000 Asian Missouri children lived in such a home and 7,000 multi-racial Missouri children lived in such a home. The connection between educational attainment, employment opportunity and household income is one worth exploring when prioritizing community development funds for Missouri families. While housing is an integral component to a households' long term stability, it is not the only one capable of changing the trajectory for Missouri families. SAIPE data from 2015 showed that for 11 counties in Missouri, there was a statistically significant increase in the poverty rate from 2007 to 2015 – Cape Girardeau, Dunklin, Greene, Jackson, Marion, Morgan, Nodaway, Ozark, St. Charles, St. Louis County and Warren. The median household income decreased in all but 1 county studied over that same eight year period of time – Cass, DeKalb, Franklin, Green, Jackson, Jefferson, Johnson, Lincoln, St. Louis County, Taney and Warren - Adair county showed an increase in median household income for this time. While the data does not represent the state as a whole, it does support the assertion that poverty is not exclusively an urban issue. Community investment and affordable housing development is needed in all areas of Missouri. The State's Consolidated Plan reflects funding priorities for the non-entitlement communities throughout the state with HOME, ESG, and HTF funding available to both non-entitlement and entitlement jurisdictions.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

MHDC's 2015 Housing Needs Assessment Report showed seven counties that "have higher proportions of African American populations than the Missouri average". Louis City, Pemiscot, Mississippi, Jackson, St. Louis, New Madrid, and Pulaski Counties. Three of these counties account for almost 80% of Missouri's African American residents – St. Louis and Jackson Counties and St. Louis City. Missouri's Hispanic population represents almost 4% of the state's total population with the majority living in Jackson, Clay, St. Louis Counties as well as St. Louis City. The state of Missouri's Consolidated Plan reflects funding priorities for the non-entitlement communities throughout the state with HOME and HTF funding available to both non-entitlement and entitlement jurisdictions.

NA-35 Public Housing – (Optional)

Introduction

The State's Consolidated Plan partners – DED, MHDC, DSS and DHSS - do not manage or oversee funds to any of the PHAs throughout the state. The state consulted MONAHRO to solicit data and significantly increase PHA input for the 2018-2022 Consolidated Plan with good success. 25 PHAs in non-entitlement areas of the state agreed to participate in the 2018-2022 Consolidated Plan process. This ongoing collaboration will benefit and improve the state's affordable housing and community development strategies and ultimately help more Missourians find homes in healthy communities. MONAHRO worked with MHDC to coordinate the data and consultation process for those PHAs participating. Each organization acting as a liaison to the larger community – MONAHRO for participating PHAs and MHDC for the Consolidated Plan partners. The 2018-2022 State of Missouri Consolidated Plan PHA Survey was sent to participating PHAs through MONAHRO. Participation was voluntary and participants needed both individual email addresses and access to the internet to complete the survey. While PHAs were able to engage some of their residents, large scale resident outreach was ultimately not successful. Challenges cited by PHAs included residents not having access to a computer, no email addresses for residents, the survey was not user friendly, and not enough time was given to fill out the survey. All participating PHAs were provided with the data requests for pertinent sections of the Consolidated Plan. MONAHRO extended the invitation to all PHAs to work with the Consolidated Plan partners, the 25 listed here agreed to actively participate in that process. All of the PHAs listed received both the Community Input and PHA Survey for consultation. All participating PHAs were asked to distribute the PHA Survey to their residents, the Community Input Survey to their staff and community partners, and all participating PHAs received the PHA questions listed in the Consolidated Plan. Participating PHAS: Bernie, Bloomfield, Boonville, Brookfield, Cabool, Cameron, Carrollton, Chillicothe, Clinton, Dexter, Excelsior Springs, Hannibal, Independence, Jefferson City, Kirksville, Liberty, Marceline, Marshall, Mexico, Moberly, Nevada, Noel, Rolla, Salem, and Slater. All Public Housing data and analysis is provided by the PHAs who participated in the 2018-2022 Consolidated Plan. All PHA data as it was submitted to the State is attached for review.The 2018-2022 Consolidated Plan reflects a partnership between PHAs and state community development and housing providers that has not been present with previous five year plans. Missouri's Consolidated Partners will continue to work with MONAHRO and PHAs throughout the state to improve access to processes, encourage collaboration and better align affordable housing priorities.

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Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	63	16,407	38,059	160	36,908	245	281	241

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	290	108	0	47	60	1
# of Elderly Program Participants (>62)	0	10	4,868	4,917	85	4,756	17	7
# of Disabled Families	0	8	4,445	10,499	29	9,993	129	56
# of Families requesting accessibility features	0	63	16,407	38,059	160	36,908	245	281

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Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	13	9,117	16,029	51	15,517	91	98	152
Black/African American	0	50	7,002	21,697	109	21,069	151	181	84
Asian	0	0	105	62	0	62	0	0	0
American Indian/Alaska Native	0	0	86	170	0	161	2	2	4
Pacific Islander	0	0	97	101	0	99	1	0	1
Other	0	0	0	0	0	0	0	0	0
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	397	538	2	521	4	2	3
Not Hispanic	0	63	16,010	37,521	158	36,387	241	279	238

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

How do these needs compare to the housing needs of the population at large

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Discussion:

The State's Consolidated Plan partners – DED, MHDC, DSS and DHSS - do not manage or oversee funds to any of the PHAs throughout the state. The state consulted MONAHRO to solicit data and significantly increase PHA input for the 2018-2022 Consolidated Plan with good success. 25 PHAs in non-entitlement areas of the state agreed to participate in the 2018-2022 Consolidated Plan process. This ongoing collaboration will benefit and improve the state's affordable housing and community development strategies and ultimately help more Missourians find homes in healthy communities. MONAHRO worked with MHDC to coordinate the data and consultation process for those PHAs participating. Each organization acting as a liaison to the larger community – MONAHRO for participating PHAs and MHDC for the Consolidated Plan partners. The 2018-2022 State of Missouri Consolidated Plan PHA Survey was sent to participating PHAs through MONAHRO. Participation was voluntary and participants needed both individual email addresses and access to the internet to complete the survey. While PHAs were able to engage some of their residents, large scale resident outreach was ultimately not successful. Challenges cited by PHAs included residents not having access to a computer, no email addresses for residents, the survey was not user friendly, and not enough time was given to fill out the survey. All participating PHAs were provided with the data requests for pertinent sections of the Consolidated Plan. MONAHRO extended the invitation to all PHAs to work with the Consolidated Plan partners, the 25 listed here agreed to actively participate in that process. All of the PHAs listed received both the Community Input and PHA Survey for consultation. All participating PHAs were asked to

distribute the PHA Survey to their residents, the Community Input Survey to their staff and community partners, and all participating PHAs received the PHA questions listed in the Consolidated Plan. Participating PHAS: Bernie, Bloomfield, Boonville, Brookfield, Cabool, Cameron, Carrollton, Chillicothe, Clinton, Dexter, Excelsior Springs, Hannibal, Independence, Jefferson City, Kirksville, Liberty, Marceline, Marshall, Mexico, Moberly, Nevada, Noel, Rolla, Salem, and Slater. All Public Housing data and analysis is provided by the PHAs who participated in the 2018-2022 Consolidated Plan. All PHA data as it was submitted to the State is attached for review. The 2018-2022 Consolidated Plan reflects a partnership between PHAs and state community development and housing providers that has not been present with previous five year plans. Missouri's Consolidated Partners will continue to work with MONAHRO and PHAs throughout the state to improve access to processes, encourage collaboration and better align affordable housing priorities.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

MHDC is tasked with drastically reducing and ultimately ending homelessness in Missouri. MHDC administers the Bos CoC, ESG program in collaboration with DSS, and the HTF. In addition, MHDC administers a variety of federal, state or locally funded programs with the same objectives that are outside the scope of the Consolidated Plan. MHDC requires funded agencies to attend meetings of their CoC and to participate in the CE system of the CoC. MHDC also solicits feedback for each application received from the CoC to understand the diverse needs of each CoC. Consolidated oversight for the majority of the homeless assistance programs throughout Missouri allows targeting of funds, consistency of program goals and policies and helps reduce and ultimately end homelessness in Missouri. MHDC collaborates with and maintains an ongoing relationship with the GCEH which was established with a mission to promote public and private coordination and collaboration, develop new strategies to evaluate and reallocate resources, remove barriers to accessing services, evaluate unmet needs and provide supportive services and affordable housing needs, implement effective solutions to build economic security and promote and support activities that prevent homelessness. The GCEH is a Governor appointed committee consisting of state departments, non-profit agencies, eight CoC, and formerly homeless citizens. All agencies participating in the Consolidated Planning Process have a seat on this committee. Additionally, each CoC performs at least one Point-in-Time Count of sheltered and unsheltered homeless individuals and families.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	731	64	795	0	0	90
Persons in Households with Only Children	176	33	209	0	0	90
Persons in Households with Only Adults	2,699	888	3,587	0	0	90
Chronically Homeless Individuals	578	378	935	0	0	90

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Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Chronically Homeless Families	200	45	245	0	0	90
Veterans	528	87	615	0	0	90
Unaccompanied Child	175	33	208	0	0	90
Persons with HIV	42	10	52	0	0	90

Table 26 - Homeless Needs Assessment

Alternate Data Source Name:
CoC Homeless Population

Data Source Comments: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Indicate if the homeless population is: Partially Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	170	34	204	0	0	90
Persons in Households with Only Children	31	5	36	0	0	90

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Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Only Adults	531	226	757	0	0	90
Chronically Homeless Individuals	45	89	134	0	0	90
Chronically Homeless Families	48	19	67	0	0	90
Veterans	88	27	115	0	0	90
Unaccompanied Youth	31	5	36	0	0	90
Persons with HIV	2	3	5	0	0	90

Table 27 - Homeless Needs Assessment

Alternate Data Source Name:
CoC Homeless Population

Data Source Comments: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

Table 27 provides information for the 2016 Missouri BoS CoC which includes 101 counties in the state, most of them rural counties. In January, 2016 there were 997 homeless individuals and families in rural Missouri of which 732 were sheltered and 265 were unsheltered.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

MHDC conducts a homeless study every other year; to provide policy makers and advocates a statewide picture of homelessness. In the State of Homelessness in Missouri, 2015 Report, over 29,000 school aged children and over 6,000 adults were counted as homeless. The homeless study

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gathers information from the HMIS systems and Point-In-Time Counts (PITC). In the January 2016 PITC, 265 people were reported as unsheltered, rural, homeless individuals and 732 individuals were reported as sheltered, rural and homeless.

MHDC does not have data on the “number of days that persons experience homelessness” in Missouri. CE implementation will help with providing this data in the future.

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Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	2,632	907
Black or African American	2,198	267
Asian	25	3
American Indian or Alaska Native	66	44
Pacific Islander	15	3
Ethnicity:	**Sheltered:**	**Unsheltered (optional)**
Hispanic	209	77
Not Hispanic	4,966	1,189

Alternate Data Source Name:
CoC Homeless Population

Data Source Comments: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The 2016 PITC counted 528 sheltered and 87 unsheltered Veterans, for a total of 615. It also revealed that 200 sheltered and 45 unsheltered persons in chronically homeless families and 731 sheltered and 64 unsheltered households with at least one child. This estimates over 615 individual Veterans and over 800 homeless families. The estimate of housing assistance is much greater when considering those at imminent risk of homelessness for which data is not able to be collected.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The chart above demonstrates that out of 6,441 homeless households, 55% are White, 38% are Black or African-American, 2% are American Indian or Alaska Native, 4% are Multiple Races and less than 1% are Asian, Native Hawaiian or Other Pacific Islander.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2016 PITC Report estimates that there were 1,266 unsheltered homeless individuals and families and 5,175 sheltered homeless individuals and families, for a total of 6,441 homeless individuals and families. 42% of all homeless individuals were in households with at least one child or households with only children. Of the 6,441 homeless individuals and families 1,180 were chronically homeless, 1,301 report chronic substance abuse and 1,141 are victims of domestic violence. 93 percent were white or Black or African-American. 1,431 total homeless persons were reported in the BoS CoC, which includes the 101 more rural counties in the State, meaning that 22 percent of homeless individuals and families

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were reported in rural areas.78 percent of homeless individuals and families are from a more metropolitan area in one of the other seven Missouri CoC. The PITC does not account for people who are “doubled-up” or at-risk of homelessness.

Discussion:

Missouri has multiple HMIS systems that capture information on homeless individuals and families, making the process for statewide data collection difficult. Statewide information is captured through HUD CoC Homeless Assistance Programs Homeless Populations and Subpopulations reports and the Missouri Homeless Study performed by MHDC every other year. The 2017 Missouri Homeless Study is expected to be released in early 2018. Information presented above was provided by the 2016 HUD CoC Homeless Assistance Programs Homeless Populations and Subpopulations report which combines the information from all Missouri CoC PITC as well as data from all three HMIS systems (CaseWorthy, Service Point, MAAC Link) used throughout the state.

The 2015 Missouri Homeless Study reports “the number of homeless individuals and families declined by 16.2 percent between 2013 and 2014. The decline in PITC resulted from a sustained decrease over a four-year period, bringing the 2015 total to a level 36 percent below its value in 2012 and 6 percent less than its 2009 value.” From 2015 to 2016 Missouri saw an increase of 41 homeless individuals and an increase in those reporting in all subpopulations except parenting youth under 18. The 2017 AHAR Report, Pt. 1, shows Missouri’s decrease in homelessness from 2011 to 2017 second only to Kentucky when looking at border-states; 32.8% and 33.3% respectively. For HUD Region 7 states, Missouri’s decrease in homelessness shows the largest improvement from 2011 to 2017, and the tenth largest decrease when comparing Missouri to all the other states.

Other sources of data used:

https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_CoC_MO-606-2015_MO_2016.pdf

https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_State_MO_2016.pdf

https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_State_MO_2015.pdf

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

Missouri Department of Health and Senior Services coordinates HOPWA funds with enrollment in the Ryan White Part B Case Management system in the outstate regions of Missouri to provide homeless prevention among HIV positive individuals and their families. The HOPWA program provides direct assistance, without the use of subcontractors, for short term rent, short term utilities, long term rent and short term mortgage assistance.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	13,925
Area incidence of AIDS	124
Rate per population	2
Number of new cases prior year (3 years of data)	409
Rate per population (3 years of data)	2
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	12,606
Area Prevalence (PLWH per population)	207
Number of new HIV cases reported last year	517

Table 28 – HOPWA Data

Data Source Comments: Source: Missouri Department of Health and Senior Services (DHSS), Bureau of Reportable Disease Informatics (BRDI), enhanced HIV/AIDS Reporting System (eHARS)

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	175
Short-term Rent, Mortgage, and Utility	150
Facility Based Housing (Permanent, short-term or transitional)	0

Table 29 – HIV Housing Need

Alternate Data Source Name:
Missouri Department of Health and Senior Services

Data Source Comments: Source: Missouri Department of Health and Senior Services (DHSS), Bureau of Reportable Disease Informatics (BRDI), enhanced HIV/AIDS Reporting System (eHARS)

Describe the characteristics of special needs populations in your community:

The HIV/AIDS population in the outstate regions are composed of low to extremely low income individuals and families. Individuals and families can be referred to the Ryan White program by self, Department of Health Disease Investigators or from any health department or AIDS Service Organization. Many individuals have multiple diagnoses upon enrollment into Ryan White Case Management system or are identified through the assessment.

What are the housing and supportive service needs of these populations and how are these needs determined?

Once individuals or families are enrolled in the Ryan White case management system they are assessed and screened for immediate needs for housing and health care. Depending on family size and income, individuals or families can qualify for medical case management, emergency assistance, medical care, mental health counseling, substance abuse counseling, oral health services, HIV medications, health insurance assistance and medical transportation.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

In the rural and outstate regions of Missouri the Ryan White Part B program serves approximately 1,200 clients annually. Twenty-five percent of these clients will access some type of housing assistance within the first year if not immediately in order to stabilize the housing situations so health related issues can be addressed. Of those clients, most will enter the case management system with no payer source for health care and will have no income due to job loss and health deteriorating.

Discussion:

Individuals and families enrolled in the Ryan White Case Management system are evaluated every six months or more frequently if needed for care and treatment of HIV disease. Because of the in-depth analysis that continually occurs the client needs are addressed prior to situations happening to prevent homelessness and health related issues from being compounded.

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

The need for public facilities in the non-entitled areas of Missouri is evidenced by the number of applications received for the "Community Facilities" category each year. Over the past five years, the state CDBG program has received 53 unduplicated applications from local entities seeking new or renovated facilities to house their service programs, totaling $12,550,353 in requested funds. More than $5.3 million (24 projects) were denied.

The types of Community Facilities for which requests are made vary greatly. However, it is clear that the need for rural fire stations and general community centers are high priorities. These types of projects are followed closely senior centers, ADA improvement, food pantries and nutrition centers. The breakdown of funding requests for community facilities over the past five years is as follows:

Fire Stations: 20%
General Community Centers: 20%
Senior Centers: 17%
ADA Improvements: 10.3%
Food Pantries: 10.3%
Nutrition Centers: 10.3%
Sheltered Workshops: 0.06%
Libraries: .03%

How were these needs determined?

A careful analysis of applications submitted in the state CDBG Community Facilities application category over the past 5 years was conducted. In addition, a state-wide Consolidated Plan Community Input survey was conducted to determine if a need for public facilities exists in non-entitlement areas of the state. An overwhelming 57.2% of those surveyed responded that yes, there is absolutely an extensive need for financial assistance to public service types of facilities, particularly in smaller communities.

Describe the jurisdiction's need for Public Improvements:

Water and Sewer Improvements:

Despite the fact that the state annually designates over 40% of its CDBG allocation to water and wastewater projects, there is still much more demand than funding available.

Additionally, our contacts at the Missouri Department of Natural Resources provided information from the EPA on water and wastewater infrastructure needs. The EPA link to the 2012 Clean Watersheds Needs Survey is: http://www.epa.gov/cwns .

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Information on the 2011 Drinking Water Infrastructure Needs Survey may be found here: http://epa.gov/drinkingwatersrf.

Transportation:

The Missouri Department of Transportation has a published plan for the Statewide Transportation Improvement Program, which can be viewed at: http://www.modot.org/plansandprojects/construction_program/STIP2018-2022/index.htm

Rural Broadband:

The expansion of broadband for rural Missouri is also an infrastructure priority. In early 2017, a team of statewide leaders from the Missouri Department of Economic Development, Missouri Department of Agriculture, Missouri Farm Bureau and the University of Missouri System came together to discuss strategies to better connect Missouri residents and businesses to high-speed internet. Access to high-speed internet has become a necessity for business and community development efforts and many of our rural communities are currently unserved or underserved. In July of 2017, a Missouri Broadband Stakeholder Meeting was held in Jefferson City, bringing together more than 100 individuals representing local, regional, state and federal government, education, agriculture, healthcare, business groups, broadband providers and many more to discuss Missouri's current broadband issues, needs and opportunities.

How were these needs determined?

Water and Sewer Improvements:

Despite the fact that the state annually designates over 40% of its CDBG allocation to water and wastewater projects, there is still much more demand than funding available. Additionally, our contacts at the Missouri Department of Natural Resources provided information from the EPA on water and wastewater infrastructure needs. The EPA link to the 2012 Clean Watersheds Needs Survey is: **http://www.epa.gov/cwns.** Information on the 2011 Drinking Water Infrastructure Needs Survey may be found here: **http://epa.gov/drinkingwatersrf.**

Transportation:

The Missouri Department of Transportation has a published plan for the Statewide Transportation Improvement Program, which can be viewed at: **http://www.modot.org/plansandprojects/construction_program/STIP2018-2022/index.htm**

Rural Broadband:

In January 2018, Governor Eric Greitens announced that the Missouri Department of Economic Development (DED) in partnership with the Missouri Department of Agriculture will launch a new statewide initiative to expand broadband infrastructure in unserved and underserved areas. Missouri's rural communities are at a competitive disadvantage when it comes to business development, healthcare, and farming techniques because of a lack of high-speed internet. The FCC Broadband Progress Report shows that 1.25 million Missourians – or 20% -- don't have access to high-speed Internet (25mpbs/3mbps). The majority of those citizens reside in rural communities. A Missouri Rural Broadband Manager will lead the effort and serve as a liaison between federal, state, regional and local broadband discussions. The position will build and strengthen partnerships between public and private stakeholders, and align efforts statewide to improve broadband access. In addition, the need for rural broadband was also a priority for those that responded to the state-wide Consolidated Plan Community Input Survey. Out of the 970 responses, 70% thought that the expansion of broadband access for rural Missouri was a significant priority.

Economic Development:

DED is initiating a statewide Business Retention and Expansion Program with its regional and local economic developers. The initiative tracks industry trends and establishes a survey and feedback system with the businesses that make up the significant portion of the 10 regional economies in the state. The goal is to facilitate the maintenance of jobs in a region as well as facilitate opportunities for job growth. In addition, the Department consults regularly with the state's Regional Planning Commissions concerning the needs of their areas.

Public Improvements Needs Continued

<u>Economic Development</u>

In April 2011, Governor Nixon launched the 2010 Strategic Initiative for Economic Growth (http://www.ded.mo.gov/Strategic.aspx). One of the strategies employed within the document is "Missouri will provide the infrastructure necessary for companies and communities to be successful." Missouri works on multiple fronts to engage regional and local communities in the identification, funding and construction of key projects related to road, rail, port, drinking water, sewer and utilities infrastructure. Missouri's competitive position to attract business and industry is strongly influenced by the infrastructure capacity it can offer to existing businesses, prospect companies and residents. Even as budgets tighten at the state and federal levels, many cities are coming to grips with the need to replace aging infrastructure; this is coupled with the constant requirement to build new infrastructure to support growth. Regional Planning Commission Directors told us via survey that the most viable economic development/job creation tool in their respective regions was Industrial Infrastructure grants that assists local governments in the development of public infrastructure that allows industries to locate new facilities, expand existing facilities, and prevent the closing of a facility or the relocation of a

facility outside the state. Other viable tools mentioned in the survey were job training programs and small business development loans.

Describe the jurisdiction's need for Public Services:

The State has not identified Public Services as a priority need and has not allocated funding for this activity.

How were these needs determined?

N/A

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

ACS data for 2016 shows that Missouri has a total of 2,760,226 housing units, of which almost 86% of those units are occupied. Missouri has a homeownership rate at 66% and a renter rate of almost 40%. Data shows that Missouri's housing stock reflects a relatively consistent variety in terms of age with the majority of units built before 2000. Over 565,000 housing units in the state are located in multi-unit dwellings (duplexes up to 20 or more units) making up 20% of the total housing units in the state. ACS data available on Missouri renters reflect that in 2016 the rental vacancy rate sat at 6.9%, slightly lower than the national vacancy for rental units available for July 2017, 7.3%. The number of vacant units, for rent and for sale statewide, stands at 388,036 for 2016. CHAS and ACS data further illustrate the condition of Missouri's housing units and the needs facing individuals. 43% of Missouri renters report one condition with their current housing – as defined by HUD, those conditions are substandard housing, overcrowding, severe overcrowding, and housing costs. For Missouri homeowners reporting one condition, that figure is 22%. 57% of owner occupied units and 63% of renter occupied units built before 1980 (meaning an increased risk of lead paint exposure) have children present. The average household size for Missouri is 2.5 individuals; the average family household for the state is slightly larger at 3 individuals. The issue of cost is one that continues to present a significant challenge for Missouri households. 2016 ACS data shows the average gross rent for the state is $822. CHAS data shows that 106,375 low income renters (>30% to less than or = 50% HAMFI) pay more than 30% of their household income to housing and 35,845 pay more than 50% of their income towards housing. Missouri's extremely low income renters (less than or = 30% HAMFI) show higher rates of cost burden; with 153,155 households paying more than 30% of household income to housing and 126,135 paying more than half of their household income to housing.

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MA-10 Number of Housing Units – 91.310(a)

Introduction

ACS data shows that the majority of Missouri's residential properties are overwhelmingly single unit, detached properties (70%), followed by small multi-unit properties (2-4 units / 8%) with the least prevalent being a single unit, attached structure (3%).

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All residential properties by number of units

Property Type	Number	%
1-unit detached structure	1,902,338	70%
1-unit, attached structure	93,132	3%
2-4 units	221,308	8%
5-19 units	195,125	7%
20 or more units	116,559	4%
Mobile Home, boat, RV, van, etc	182,044	7%
Total	***2,710,506***	***100%***

Table 30 – Residential Properties by Unit Number

Data Source: 2009-2013 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	3,062	0%	23,590	3%
1 bedroom	35,328	2%	176,172	24%
2 bedrooms	317,590	20%	305,887	42%
3 or more bedrooms	1,270,409	78%	226,232	31%
Total	***1,626,389***	***100%***	***731,881***	***100%***

Table 31 – Unit Size by Tenure

Data Source: 2009-2013 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

As the state housing finance agency, MHDC does not routinely target specific areas of the state, types of housing, or numbers of units produced, for allocations above and beyond the regional goals stated in the QAP (which incorporates provisions that must be followed when a development is awarded HOME or HTF equity gap funding). The QAP does include a funding priority for developments built in opportunity areas that provide access to high performing school systems, transportation,

employmentand low poverty rates (census tracts with a 15% or lower poverty rate). The 2018 QAP lays out the following regional goals for the production of affordable housing: utilize 33% of federal LIHTC's in the St. Louis region, 19% in the Kansas City region, and the remaining 48% in the "Out State Region."

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

For affordable housing developments within MHDC's portfolio, 56 developments opted out from October 1, 2012 to December 31, 2016, for a total of 1,987 units. Nine additional properties have opted out from January 1, 2017 to present (October 2017), for an additional 133 units. Further, ten more properties, with a total of 355 units, are currently in varying stages of the opt-out process with MHDC. Based on the number of opt-out applications submitted to MHDC's Asset Management Department on an annual basis from 2006 to 2016, an average of twelve MHDC properties submit opt-out applications annually. Applying this average to the five year period of time covered under the 2018-2022 Consolidated Plan, it is estimated that of the affordable housing developments within MHDC's portfolios, an additional 60 developments will no longer be available to renters at restricted income levels.

Does the availability of housing units meet the needs of the population?

Data from MHDC's 2015 Housing Needs Assessment Report suggests that the supply of affordable housing does not meet the demand for such housing. The 2015 report noted that "Statewide there is a gap between the need for and supply of affordable housing. There are 149,000 publicly affordable units (Missouri) but 618,000 households below the 60% AMI, 342,000 renter households below 60% AMI, and 278,000 cost burdened renter households below 60% AMI. The scale of the gap between need and supply varies across urban and rural (Missouri) counties."

Describe the need for specific types of housing:

MHDC's 2015 Housing Needs Assessment Report identified four subpopulations that face high rental cost burdens: disabled households, African American households, single parent households, and single person households. For purposes of this question, a focus on disabled households holds particular value. Missouri's Statewide Fair Housing Impediments Analysis noted the perception from interviewees that housing for disabled adults and elderly residents who wish to age in place is not available as often as it is needed. "The strongest statement regarding disadvantages experienced by members of a protected class in dealing with the housing market pertained to persons with disabilities. Too much of existing and new housing planned or already being constructed is not designed to meet the needs" of these two subpopulations. "For those with mobility problems, finding suitable housing could take months of searching, despite the presence of units advertised as fully accessible, but which may fall short on the special needs that a person with disabilities may have to accommodate." Similar frustration was shared for disabled persons who wish to purchase their own home, "Persons who rely on government assistance face virtually insurmountable hurdles in purchasing a home."

Discussion

This assessment of market conditions and housing needs cannot be complete without an understanding of poverty within the area being studied, and if/how that poverty has changed over a period of time. 2016 ACS data shows that 14% of the state's population is living below the FPL limit. Census data shows that the percentage of Missouri's population living in neighborhoods where 20% or more people have incomes below the FPL grew between 2000 and 2010, a trend that mirrors the rest of the country. The Joint Center for Housing Studies revealed that the number of people living below the FPL in America had grown between 2000 and 2015, to 47.7 million and that "over half of the nation's poor now live in high-poverty neighborhoods" up from only 43% in 2000. In 2000, Missouri had 10-19.9% of its population living in such areas, in 2010 that percentage had grown to between 20-24.9% of the state's population. Data from the KIDS COUNT data center shows that percentage of Missouri children living in high child poverty zones increased from 22% in 2010, to 23% in 2011 to 25.5% in 2015. That same data source reported Missouri's poverty rate for seniors in 2014 was 9%, child poverty rate of 22.6% and the percentage of Missouri women living in poverty was 17.4%.

Missouri's Statewide Fair Housing Impediments Analysis explored a variety of conditions that exacerbate the gap between stable housing and low income households. "Whether or not they belong to a protected class, low income populations do not appear to have equal access to decent, safe, affordable housing, particularly where availability of housing is limited." Interviews conducted for the report indicate that in many of Missouri's non-entitlement counties, affordable and accessible housing is at a premium. "The problem lies in the fact that low income residents of rural Missouri face a rental housing market that is largely characterized by shortages and substandard conditions. Properties of better quality are beyond what low income individuals can afford." The question of need for Missourians who wish to own a home faced a similar answer. Interview responses about homeownership opportunities showed that restrictions put into place after the 2008 recession curtailed such access for many low income Missouri households. "This obstacle is so significant that interviewees had virtually no knowledge of problems arising from home purchases and areas of potential abuse related to that process: home appraisals, home insurance and of course, lending. Under these conditions, the most vulnerable among Missouri's rural populations cannot afford the housing they might otherwise choose."

MA-15 Cost of Housing – 91.310(a)

Introduction

2016 ACS data shows that of the total renter-occupied units in Missouri, 40% of the households living in those units are paying more than 30% of their total income towards rent. NILHC's Out of Reach 2017 supported the conclusion that many Missouri renters pay more of their income towards housing than is considered reasonable: almost 41% of renter households in KC were rent burdened, 52% of renter households in Moberly were rent burdened, 46% of St. Louis renters were cost burdened, and in Sedalia, Missouri 52% of renters were cost burdened with 27% severely burdened.

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Cost of Housing

	Base Year: 2000	Most Recent Year: 2013	% Change
Median Home Value	86,900	138,400	59%
Median Contract Rent	384	540	41%

Table 32 – Cost of Housing

Data Source: 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

Rent Paid	Number	%
Less than $500	338,423	46.2%
$500-999	342,376	46.8%
$1,000-1,499	37,259	5.1%
$1,500-1,999	7,411	1.0%
$2,000 or more	6,412	0.9%
Total	***731,881***	***100.0%***

Table 33 - Rent Paid

Data Source: 2009-2013 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	59,095	No Data
50% HAMFI	237,810	151,250
80% HAMFI	509,495	415,505
100% HAMFI	No Data	608,405
Total	***806,400***	***1,175,160***

Table 34 – Housing Affordability

Data Source: 2009-2013 CHAS

Monthly Rent

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 35 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

Missouri's low and extremely low income households continue to face significant challenges finding affordable housing, whether they are renting or looking to own their homes. Data from the Center on Budget and Policy Priorities, Missouri Fact Sheet, cites 96,000 Missouri households as households receiving rental assistance and 178,000 Missouri households as "un-assisted low income renter households paying more than half of their income for housing."

How is affordability of housing likely to change considering changes to home values and/or rents?

Recent ACS data on Missouri's poverty rates and in particular, the increased number of poor households living in poor communities, does not provide a hopeful perspective for low and extremely low income households throughout the state. Public funding for affordable housing development has seen reductions over the last ten years and the current policy debate on the issue provides no confident opportunities for change. The LIHTC continues to be the primary vehicle for production and rehabilitation, however, tax reform on both the state and national level has not reached a consensus on the future of the program. National data suggests that more people will continue to bear housing cost burdens, much of the new housing production will continue to be geared towards higher income households, and as more of those higher income households come into the rental market, there will be fewer units available to households that are living at or below the FPL.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

In over 90% of the counties in Missouri, the low-HOME rent is higher than what is considered affordable for the county average household income, making affordable housing development very difficult in these areas. It is MHDC's intention to provide funding for housing that is below market rates whenever possible.

Through the application and underwriting process, developers submit a market study that details the primary market area and affordable rents. When underwriting proposals, MHDC strives to approve unit

rents at at-least 15% below the market rents. For rents that are affordable to households at 50% AMI, MHDC underwrites those unit rents at least 15% below the 60% AMI rents.

It is unlikely MHDC can approve and fund enough units to meet the need for affordable housing across Missouri. This is especially true when considering the disparity between income and rent affordability for many Missourians.

Discussion

The data reinforces the suggestion that Missouri's lowest income households encounter the greatest number of housing problems more often than households earning more. This coupling is not new; the connection between poverty and housing insecurity is well established. When a household pays more of their net income towards housing they have less to spend on other areas – utilities, transportation, food, and healthcare. In 2016, there were only 4 counties in Missouri with a poverty rate less than 10%; 6 Missouri counties have more than 40% of their children living in poverty. Census data for 2010 showed an increase in the percentage of Missourians living in poverty areas where 20% or more people have incomes below the FPL; that percentage was 10.0% -19.9% in 2000 and was 20.0% - 24.9% in 2010. The 2016 State of the State, Poverty in Missouri showed that 908,628 Missourians lived at 100% of below the FPL; 287,081 of those are children. That same report showed that 1,190,600 Missourians visited a local food bank in 2014, over 500,000 claimed the EITC, 140,000 utilized LIHEAP assistance, and 37,021 Missouri households received federal rental assistance. 32.5% of total Missouri households are renter households and $14.07 is the hourly wage a renter needs to earn in order to afford a two bedroom unit (HUD FMR) without paying more than 30% of their household income towards housing. Data from the National Housing Conference shows that some workers in St. Louis have to see more than 6.5% increase in their personal income, over a one year period of time, to afford a 2 bedroom apartment at FMR rates; workers in Kansas City have to realize an increase of almost 6% over a twelve month period of time to afford such a unit. With this data in mind, future housing plans should take into account the poverty rate for the county, how that rate has changed over time, and what activity has taken place with regard to the production of affordable housing development in the community in the past. Occupational and wage data for communities, workforce development opportunities and educational attainment would also assist in crafting more targeted strategies for community development including affordable housing plans. Since the 2013-2018 Consolidated Plan, MHDC has been expanding the process by which "need" is defined. Using poverty rate as one component in a larger review of community assets and deficiencies allows MHDC to target money where it can provide the most benefit. Examining poverty in a larger context of educational literacy, past development, cost burden, community investment, and the availability of support services / amenities, helps provide a more complete picture of a community's overall need. Further, that analysis enables MHDC to identify how housing resources can answer some of the community deficits identified. The provision and upkeep of adequate, affordable housing is critical to remedying the long standing link between low income households and substandard housing. Missouri's Statewide Fair Housing Impediments Analysis provides a stark picture; "The problem lies in the fact that low income residents of rural Missouri face a rental housing market that is largely characterized by shortages and substandard conditions. Properties

of better quality are beyond what low income individuals can afford. Under these conditions, the most vulnerable among Missouri's rural populations cannot afford the housing they might otherwise choose."

MA-20 Condition of Housing – 91.310(a)

Introduction:

CHAS and ACS data illustrate the condition of Missouri's housing units and the needs facing individuals. 43% of Missouri renters report one condition with their current housing – as defined by HUD, those conditions are substandard housing, overcrowding, severe overcrowding, and housing costs. For Missouri homeowners reporting one condition, that figure is 22%. The percentage of housing units built before 1980 (units that carry an increased risk of lead based paint exposure) and that have children present, is 57% for owner occupied units and 63% for renter occupied units.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Definitions

"Substandard condition" is defined as "housing that does not meet local building, fire, health and safety codes". "Substandard condition but suitable for rehabilitation" is defined as "housing that does not meet local building, fire, health and safety codes but is both financially and structurally feasible for rehabilitation".

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	364,154	22%	311,806	43%
With two selected Conditions	7,957	0%	16,242	2%
With three selected Conditions	1,233	0%	1,572	0%
With four selected Conditions	117	0%	56	0%
No selected Conditions	1,252,928	77%	402,205	55%
Total	***1,626,389***	***99%***	***731,881***	***100%***

Table 36 - Condition of Units

Data Source: 2009-2013 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	242,153	15%	87,704	12%
1980-1999	463,963	29%	184,387	25%
1950-1979	623,222	38%	302,818	41%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Before 1950	297,051	18%	156,972	21%
Total	***1,626,389***	***100%***	***731,881***	***99%***

Table 37 – Year Unit Built

Data Source: 2009-2013 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	920,273	57%	459,790	63%
Housing Units build before 1980 with children present	171,600	11%	116,535	16%

Table 38 – Risk of Lead-Based Paint

Data Source: 2009-2013 ACS (Total Units) 2009-2013 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	338,483	0	338,483
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 39 - Vacant Units

Data Source Comments: MHDC is unable to detail the vacant unit information any further than the number of vacant units through out the whole state.

Need for Owner and Rental Rehabilitation

Results from the 2018-2022 State of Missouri Consolidated Plan Community Input survey show that the majority of respondents see the need for home repair programs for low and moderate income homeowners as the number one housing priority for the state. A portion of Missouri's HOME funds are used for a home-owner repair program, Home Repair Opportunity program, or HeRO. The HeRO program provides funding to non-metropolitan areas of the state administered by a network of community service organizations. The network of community service organizations consists of community action agencies and non-profit organizations. In previous years, municipalities were a part of the network; however municipalities have been eliminated as eligible grantees for the HeRO program due to the burden of increased environmental compliance placed upon units of government. For the FY 2017 funding year (still in progress) the HeRO program is projected to assist 92 homeowners, while in FY 2016 the program assisted a total of 101 homeowners. Each provider organization has the discretion develop its own unique program within the boundaries of the HOME rules and regulations to administer the HeRO program. Consequently, measuring the unmet need for these communities is not

standardized. The majority of organizations accept applications for assistance until the funds are depleted. However, some agencies maintain a waiting list for assistance. For many HeRO organizations, the primary challenge is not the availability of funds, but rather having the administrative capacity to satisfy the program's regulatory requirements (income eligibility, environmental review, etc.) and tocomplete the repairs for the eligible households during the relatively short time period within which much of the work must be done. The highest performing organization in the HeRO program completed repairs on 18 homes for the FY2016 funding year. However, several of the organizations only have the capacity to complete repairs on 2 to 3 homes per year. There are simply not enough providers throughout the state to maximize the effectiveness of the program. More than half of Missouri's HeRO-eligible counties have no providers. Without an adequate numbers of provider organizations and capable contractors to complete the work, the program is unworkable for some of Missouri's most vulnerable and isolated households. Further, the administrative responsibilities for the program are significant. Several agencies eligible for HeRO funds refused the funding because the financial obligation to provide staff to oversee the program and time needed to satisfy the regulatory requirements outweighed the administrative fees allowed under the HOME rules. Starting with the 2018-2022 Consolidated Plan, $3,500,000 in annual HOME funds will be allocated for the HeRO program; an increase from the 2012-2018 Consolidated Plan which allocates $2,200,000 annually. The increase in funding meets the demand reflected in the 2018-2022 State of Missouri Consolidated Plan Community Input survey as the top housing priority for the state – the provision of home repair programs for low and moderate income homeowners. Further, the increase speaks to the need for more providers throughout the state and the administrative funds to help those providers satisfy the regulatory requirements for the program. MHDC will continue to work with HeRO agencies to ensure additional funds can be fully utilized and progress meeting the goals for the program is adequately monitored.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Data shows that Missouri's housing stock reflects a relatively consistent variety in terms of age with the majority of units built before 2000. ACS data shows that the percentage of housing units built before 1980, that carry an increased risk of lead based paint exposure, and that have children present, is 57% for owner occupied units and 63% for renter occupied units. MHDC does not maintain data to connect the number of low or moderate income families to those households that are living in housing units that contain lead-based paint hazards. MHDC developments that receive financing for production and/or rehabilitation must meet environmental standards and adhere to all applicable regulations pertaining to lead based paint.

Discussion:

Interviews conducted for Missouri's Statewide Fair Housing Impediments Analysis cited landlord neglect of private properties as a significant challenge for Missouri's low and extremely low income renters. Missouri counties have different building codes (or none at all), varying levels of funding and staff for code inspections / violations. This patchwork of regulations presents very real consequences

for low and extremely low income renters – the worst of those being substandard housing and few incentives for landlords to make costly repairs to homes that are likely to rent regardless of their condition.

MA-25 Public and Assisted Housing – (Optional)

Introduction:

The State's Consolidated Plan partners – DED, MHDC, DSS and DHSS - do not manage or oversee funds to any of the PHAs throughout the state. The state consulted MONAHRO to solicit data and significantly increase PHA input for the 2018-2022 Consolidated Plan with good success. 25 PHAs in non-entitlement areas of the state agreed to participate in the 2018-2022 Consolidated Plan process. This ongoing collaboration will benefit and improve the state's affordable housing and community development strategies and ultimately help more Missourians find homes in healthy communities. MONAHRO worked with MHDC to coordinate the data and consultation process for those PHAs participating. Each organization acting as a liaison to the larger community – MONAHRO for participating PHAs and MHDC for the Consolidated Plan partners. The 2018-2022 State of Missouri Consolidated Plan PHA Survey was sent to participating PHAs through MONAHRO. Participation was voluntary and participants needed both individual email addresses and access to the internet to complete the survey. While PHAs were able to engage some of their residents, large scale resident outreach was ultimately not successful. Challenges cited by PHAs included residents not having access to a computer, no email addresses for residents, the survey was not user friendly, and not enough time was given to fill out the survey. All participating PHAs were provided with the data requests for pertinent sections of the Consolidated Plan. MONAHRO extended the invitation to all PHAs to work with the Consolidated Plan partners, the 25 listed here agreed to actively participate in that process. All of the PHAs listed received both the Community Input and PHA Survey for consultation. All participating PHAs were asked to distribute the PHA Survey to their residents, the Community Input Survey to their staff and community partners, and all participating PHAs received the PHA questions listed in the Consolidated Plan. Participating PHAS: Bernie, Bloomfield, Boonville, Brookfield, Cabool, Cameron, Carrollton, Chillicothe, Clinton, Dexter, Excelsior Springs, Hannibal, Independence, Jefferson City, Kirksville, Liberty, Marceline, Marshall, Mexico, Moberly, Nevada, Noel, Rolla, Salem, and Slater. All Public Housing data and analysis is provided by the PHAs who participated in the 2018-2022 Consolidated Plan. All PHA data as it was submitted to the State is attached for review. The 2018-2022 Consolidated Plan reflects a partnership between PHAs and state community development and housing providers that has not been present with previous five year plans. Missouri's Consolidated Partners will continue to work with MONAHRO and PHAs throughout the state to improve access to processes, encourage collaboration and better align affordable housing priorities.

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Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	67	17,670	42,699	189	16,517	1,812	2,691	3,036
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 40 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

All PHA data as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Discussion:

The State's Consolidated Plan partners – DED, MHDC, DSS and DHSS - do not manage or oversee funds to any of the PHAs throughout the state. The state consulted MONAHRO to solicit data and significantly increase PHA input for the 2018-2022 Consolidated Plan with good success. 25 PHAs in non-entitlement areas of the state agreed to participate in the 2018-2022 Consolidated Plan process. This ongoing collaboration will benefit and improve the state's affordable housing and community development strategies and ultimately help more Missourians find homes in healthy communities. MONAHRO worked with MHDC to coordinate the data and consultation process for those PHAs participating. Each organization acting as a liaison to the larger community – MONAHRO for participating PHAs and MHDC for the Consolidated Plan partners. The 2018-2022 State of Missouri Consolidated Plan PHA Survey was sent to participating PHAs through MONAHRO. Participation was voluntary and participants needed both individual email addresses and access to the internet to complete the survey. While PHAs were able to engage some of their residents, large scale resident outreach was ultimately not successful. Challenges cited by PHAs included residents not having access to a computer, no email addresses for residents, the survey was not user friendly, and not enough time was given to fill out the survey. All participating PHAs were provided with the data requests for pertinent sections of the Consolidated Plan. MONAHRO extended the invitation to all PHAs to work with the Consolidated Plan partners, the 25 listed here agreed to actively participate in that process. All of the PHAs listed received both the Community Input and PHA Survey for consultation. All participating PHAs were asked to distribute the PHA Survey to their residents, the Community Input Survey to their staff and community partners, and all participating PHAs received the PHA questions listed in the Consolidated Plan. Participating PHAS: Bernie, Bloomfield, Boonville, Brookfield, Cabool, Cameron, Carrollton, Chillicothe, Clinton, Dexter, Excelsior Springs, Hannibal, Independence, Jefferson City, Kirksville, Liberty, Marceline, Marshall, Mexico, Moberly, Nevada, Noel, Rolla, Salem, and Slater. All Public Housing data and analysis is provided by the PHAs who participated in the 2018-2022 Consolidated Plan. All PHA data as it was submitted to the State is attached for review. The 2018-2022 Consolidated Plan reflects a partnership between PHAs and state community development and housing providers that has not been present with previous five year plans. Missouri's Consolidated Partners will continue to work with MONAHRO and PHAs throughout the state to improve access to processes, encourage collaboration and better align affordable housing priorities.

MA-30 Homeless Facilities – 91.310(b)

Introduction

In Missouri, the goal is to safely reduce the length of stay for families and individuals in shelter in order to create housing first opportunities for them to be rapidly and permanently housed. This model removes the traditional tiered system that offers limited services and imposes unnecessary requirements on individuals and families in order to obtain permanent housing. Missouri recognizes that there will always be specific populations that require emergency shelter and services - including but not limited to homeless youth, survivors of domestic violence, sex and human trafficking, and homeless individuals struggling with substance abuse - but hopes to incorporate ways to safely shorten these episodes of homelessness and move individuals and families directly into a permanent housing situation through rapid re-housing. Information in the following chart was provided by the HUD 2016 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report for the state of Missouri.

Results from the 2018-2022 State of Missouri Consolidated Plan Community Input survey show that the provision of affordable rental housing for persons who are homeless is one of the top priorities for respondents.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	1,661	435	1,417	2,747	1,661
Households with Only Adults	2,421	435	1,086	2,775	0
Chronically Homeless Households	0	0	0	850	0
Veterans	401	0	273	1,185	0
Unaccompanied Youth	239	0	163	19	0

Table 41 - Facilities Targeted to Homeless Persons

Alternate Data Source Name:
CoC Homeless Population

OMB Control No: 2506-0117 (exp. 06/30/2018)

Data Source Comments: In the past Missouri has reported numbers for the BoS CoC, new HUD reports that incorporate all CoCs for state numbers have been used for this response. https://www.hudexchange.info/resource/reportmanagement/published/CoC_HIC_State_MO_2016.pdf

Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons

Each CoC in Missouri holds regular meetings of the Continuum either monthly or quarterly. This is an opportunity to bring together mainstream service providers and homeless assistance providers to facilitate collaboration. Mainstream services are used to complement services targeted to homeless persons in a variety of supportive housing programs as a requirement of funding. Each CoC holds a seat on the GCEH where state partners such as health, mental health, and employment services are able to share resources and information that is communicated to the CoC. Additionally, ESG funded agencies are required to collaborate and connect clients with other mainstream resources. MHDC is actively engaged with all Missouri CoCs and the GCEH.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Missouri funding has prioritized funding for agencies serving chronically homeless individuals and families, veterans and unaccompanied youth. Through new CE requirements funding will be required to be prioritized for the individuals and families most in need based on objective scoring tools selected by each CoC. By prioritizing housing and then providing services to homeless individuals and families, all Continua will be able to prioritize requests for funding for services and facilities that meet the needs of the homeless populations and through the CENI program will be able to identify gaps in services. As more is required of the CoCs, the CoCs are relied upon at a state level to implement policies and procedures based on community input and collaboration.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

Missouri instituted a statewide discharge policy in December of 2011; this ensures that those persons returning from mental and physical health institutions are not discharged into homelessness.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	0
PH in facilities	0
STRMU	0
ST or TH facilities	0
PH placement	0

Table 42 – HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

HOPWA Explanation

The Missouri Department of Health and Senior Services (DHSS) coordinates HOPWA Funds with enrollment in the Ryan White Part B Case Management system in the outstate regions of Missouri to provide homeless prevention among HIV positive individuals and their families. The HOPWA program provides direct assistance, without the use of subcontractors, for short term rent, short term utilities, long term rent and short term mortgage assistance. Once enrolled in the Ryan White Case Management system the client is provided access to core and support services through the case management system including; housing related services, medical Care, mental health counseling, substance abuse counseling, oral health services, emergency assistance, HIV medications, health insurance assistance, and medical transportation.

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

All Missouri CoCs are implementing a Coordinated Entry (CE) system. The CE system will serve as a single point of access for those at-risk of or experiencing homelessness. CE is required to be in place for each Missouri Continuum of Care by January, 2018. Funding for pilot programs to establish CE systems within CoCs and regions within those CoCs has been made available and is collecting data on the coordination between multiple state departments and local stakeholders. The CE Network Initiative (CENI) is a collaboration between MHDC, DSS, DHSS, DOC and DMH. CENI's pilot project has been implemented in

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two regions in the Missouri BoS; region 8 (Dent, Douglas, Howell, Laclede, Oregon, Ozark, Shannon, Texas and Wright counties) and region 10 (Bates, Benton, Cass, Henry, Johnson, Lafayette, Pettis, Saline and St. Clair counties). CENI's objective is to help provide a more efficient process for those experiencing homeliness or a housing crisis to access the homeless service delivery system, identify cross-sections of service utilizers between the collaborating agencies and to provide data that will enable the state to better understand housing and service needs within Missouri. ESG programs are required to participate in the CE System if it is operational. The goal of programs funded under the ESG program is to reduce the length of stay for individuals and families utilizing emergency shelters during their housing crisis in order to reduce the length of time that individual or family experiences homelessness. In addition, service providers receiving ESG Homelessness Prevention and Rapid Re-housing programs have a goal of assisting households experiencing homelessness or at imminent risk of homelessness with housing stability within 30 days. The GCEH established a Discharge Policy in 2011 that was adopted by all Missouri CoCs and state partners. The discharge policy establishes the following guiding principles: homelessness is unacceptable in Missouri; efforts to secure permanent housing shall be made prior to being discharged from a state or public facility, such as a mental health facility, substance abuse treatment facility, long-term care facility, or jail/prison; if "temporary" shelter placement is unavoidable, the reasons for this should be documented; if after having exhausted efforts to engage the client in a discharge plan, if the client continues to refuse services, the efforts will be noted; and if a client receiving out-patient services becomes homeless, the state or public facility should work actively with available community resources to locate suitable housing. Results from the 2018-2022 State of Missouri Consolidated Plan Community Input survey show that when asked what the three most important priorities for the state were with regard to affordable rental housing, the provision of housing for veterans was number one (56%) followed by the provision of housing for persons who are physically, emotionally or mentally impaired (49%) and the provision of housing for persons who are homeless was ranked third (47%).

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

All Missouri CoCs are implementing a CE system. The CE system will serve as a single point of access for those at-risk of or experiencing homelessness. CE is required to be in place for each Missouri Continuum of Care by January, 2018. Funding for pilot programs to establish CE systems within CoC's and regions within those CoC's has been made available and is collecting data on the coordination between multiple state departments and local stakeholders. The CE Network Initiative (CENI) is a collaboration between MHDC, DSS, DHSS, DOC and DMH. CENI's pilot project has been implemented in two regions in the Missouri BoS; region 8 (Dent, Douglas, Howell, Laclede, Oregon, Ozark, Shannon, Texas and Wright counties) and region 10 (Bates, Benton, Cass, Henry, Johnson, Lafayette, Pettis, Saline and St. Clair counties). CENI's objective is to help provide a more efficient process for those experiencing homeliness or a housing crisis to access the homeless service delivery system, identify cross-sections of service utilizers between the collaborating agencies and to provide data that will enable the state to better understand housing and service needs within Missouri. ESG programs are required to participate in the CE System if it is operational. The goal of programs funded under the ESG

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program is to reduce the length of stay for individuals and families utilizing emergency shelters during their housing crisis in order to reduce the length of time that individual or family experiences homelessness. In addition, service providers receiving ESG Homelessness Prevention and Rapid Re-housing programs have a goal of assisting households experiencing homelessness or at imminent risk of homelessness with housing stability within 30 days. The GCEH established a Discharge Policy in 2011 that was adopted by all Missouri CoCs and state partners. The discharge policy establishes the following guiding principles: homelessness is unacceptable in Missouri; efforts to secure permanent housing shall be made prior to being discharged from a state or public facility, such as a mental health facility, substance abuse treatment facility, long-term care facility, or jail/prison; if "temporary" shelter placement is unavoidable, the reasons for this should be documented; if after having exhausted efforts to engage the client in a discharge plan, if the client continues to refuse services, the efforts will be noted; and if a client receiving out-patient services becomes homeless, the state or public facility should work actively with available community resources to locate suitable housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The 2018 QAP, under which HOME funding is provided, defines the term "special needs" as: "a person who is (a) physically, emotionally, or mentally impaired or is diagnosed with a mental illness; or (b) developmentally disabled. The 2018 QAP creates a "vulnerable persons" priority which is defined as: "a person who is (a) homeless, including survivors of domestic violence and human or sex trafficking; or (b) a youth transitioning out of foster care." The 2018 QAP sets aside 33% of federal LIHTCs for the development of affordable housing for special needs and vulnerable persons populations. The award of HOME funds is part of the administration of that funding. MHDC has consistently met the goal of producing special needs units utilizing the 33% set aside since its implementation. Further, MHDC's Board of Commissioners has authorized new affordable housing units for homeless veterans, disabled adults and families, chronically homeless individuals and individuals living with persistent mental illness. MHDC continues to assess the needs of at risk individuals including those with special needs and other vulnerable populations and strategically adjusts program definitions, rules and requirements to best serve the citizens of Missouri. Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved by MHDC Board of Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

N/A

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Barriers noted in the 2012-2017 Consolidated Plan persist and continue to impact the growth of affordable housing development in Missouri. LIHTC regulations governing income eligibility, particularly the AMI rent restriction limits and how those restrictions impact LIHTC development in small, rural counties, continue to present challenges for financing housing developments that are truly affordable to households in these communities. Limited funding for homeownership and affordable housing programs further exacerbates the gap between the need for housing and the available supply. Funding for housing programs geared towards low and extremely low income households has not significantly increased despite the growing number of households that fall into these categories. Taken together, these barriers pose very real challenges to housing providers, developers, advocates, and those in need of housing. The state will continue to promote its mission of developing safe, affordable housing while being asked to do more with fewer economic resources. Additional housing issues, as identified in The Missouri Statewide Fair Housing Impediments Analysis, include landlord / tenant laws that are perceived to favor landlords, a lack of affordable, accessible housing that is decent and safe, reliance on sub-standard, rental properties for low and extremely low income households, and overall negative perceptions of low income populations. All of these issues are rooted, in part, to public policies that attempt to address the need for affordable housing and a community's response to that need. The Consolidated Plan partners began to review county and municipal zoning regulations within the state of Missouri in 2016. Recognizing that the Consolidated Plan partners have limited authority to change these regulations, the goal, in part, was to establish a base of understanding where the balance between renters and landlords, homeowners and communities, becomes inequitable. The tension between state and local governance has always had the opportunity to produce inconsistent application of fair housing law. Regulatory barriers created with differing rules present very real consequences for individuals looking for and providing housing. Conflicting laws, rules and regulations create ambiguity that could result in the denial of housing.

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	49,885	15,476	2	1	-1
Arts, Entertainment, Accommodations	261,469	320,284	9	12	3
Construction	169,570	127,930	6	5	-1
Education and Health Care Services	683,994	606,574	24	23	-1
Finance, Insurance, and Real Estate	189,654	160,426	7	6	-1
Information	57,216	54,018	2	2	0
Manufacturing	319,724	263,477	11	10	-1
Other Services	135,141	78,451	5	3	-2
Professional, Scientific, Management Services	264,358	375,529	9	14	5
Public Administration	123,766	100,953	4	4	0
Retail Trade	336,015	303,992	12	12	0
Transportation and Warehousing	141,797	113,138	5	4	-1
Wholesale Trade	75,407	119,850	3	5	2
Total	2,807,996	2,640,098	--	--	--

Table 43- Business Activity

Alternate Data Source Name:
American Community Survey - State of Missouri

Data Source Comments: Other Data Sources Include:2015 ACS (Workers), 2015 Longitudinal Employee-Household Dynamics (Jobs)ACS - Employee Survey (Individual citizens)LEHD - Employer Survey (via industry)

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Labor Force

Total Population in the Civilian Labor Force	3,040,778
Civilian Employed Population 16 years and over	2,897,820
Unemployment Rate	4.90
Unemployment Rate for Ages 16-24	10.80
Unemployment Rate for Ages 25-65	3.50

Table 44 - Labor Force

Alternate Data Source Name:
American Community Survey - State of Missouri
Data Source Comments: 2016, ACS

Occupations by Sector	Number of People
Management, business and financial	224,476
Farming, fisheries and forestry occupations	12,348
Service	1,175,840
Sales and office	436,279
Construction, extraction, maintenance and repair	120,580
Production, transportation and material moving	364,558

Table 45 – Occupations by Sector

Alternate Data Source Name:
American Community Survey - State of Missouri
Data Source Comments: 2016, BLS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	1,837,472	68%
30-59 Minutes	731,435	27%
60 or More Minutes	149,369	5%
Total	***2,718,276***	***100%***

Table 46 - Travel Time

Alternate Data Source Name:
American Community Survey - State of Missouri
Data Source Comments: 2016, ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	140,977	16,081	128,590
High school graduate (includes equivalency)	614,581	32,798	253,909
Some college or Associate's degree	752,658	34,779	212,014
Bachelor's degree or higher	803,333	17,087	126,212

Table 47 - Educational Attainment by Employment Status

Alternate Data Source Name:
American Community Survey - State of Missouri
Data Source Comments: 2016, ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	13,237	9,936	17,227	15,258	38,747
9th to 12th grade, no diploma	89,134	58,314	42,661	105,375	65,852
High school graduate, GED, or alternative	157,382	213,141	205,923	550,620	308,826
Some college, no degree	152,746	149,532	132,399	268,228	138,350
Associate's degree	20,010	93,435	86,686	183,613	60,025
Bachelor's degree	37,353	210,834	167,314	322,610	135,857
Graduate or professional degree	3,816	102,818	102,521	199,318	93,195

Table 48 - Educational Attainment by Age

Alternate Data Source Name:
American Community Survey - State of Missouri
Data Source Comments: 2016, ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	21,505
High school graduate (includes equivalency)	29,902
Some college or Associate's degree	32,334
Bachelor's degree	45,701
Graduate or professional degree	57,229

Table 49 – Median Earnings in the Past 12 Months

Alternate Data Source Name:
American Community Survey - State of Missouri
Data Source Comments: 2016, ACS

Based on the Business Activity table above, what are the major employment sectors within the state?

The table above reflects high levels of employment *in* the *Education and Health Care Services* sector, the *Arts, Entertainment, Accommodations* sector, and the *Retail Trade* sector. Additionally, annual data from 2016 Bureau of Labor Statistics for Missouri shows six Missouri business sectors that have a higher location quotient (LQ) than the national average. Location Quotient refers to the concentration of employment in an area. Any LQ larger than 1.00 indicates a higher concentration in that area compared to the nation as a whole. Missouri's *Manufacturing* sector, with a statewide LQ of 1.10, has a larger share of the state's total employment compared to the nation. The *Education and Healthcare Services* had an employment concentration of 1.05, greater than the nation*. Finance, Retail Trade, Wholesale Trade* and *Transportation & Warehousing* were also all above 1.0 compared to the nation.

Describe the workforce and infrastructure needs of business in the state.

Workforce needs vary by industry, but according to the Missouri Division of Workforce Development (DWD), the most common theme among businesses is the need for workers proficient in basic applied math, reading, and soft skills. These findings are supported by an annual St. Louis business survey, conducted by the St. Louis Community College, which consistently show fundamental skills such as communication, teamwork, and problem solving are top shortcomings of job applicants.

Long-term job projections and online job advertisements show that healthcare, business and sales, and management and support jobs are the most in-demand occupations for Missouri. Technology jobs are also in-demand, especially when considering recent online job postings, possibly indicating the expanding need for increased productivity and computer skills. A 2016 comparison of Missouri labor demand and the supply of job seekers showed that many healthcare, business & sales, and science & technology jobs were available with few people chasing those opportunities.

While many jobs are available to lower-skilled applicants, such as entry-level retail, food, and customer service positions, a large sector of the job market is open for middle-skilled positions (4 in 10 jobs). Top middle-skilled occupations by projected job openings are *Nursing Assistants*, *Maintenance and Repair Workers*, and *Restaurant Cooks*. Overall, large opportunities for middle-skilled jobs are found in *Installation, Maintenance, and Repair*, *Healthcare Support*, *Production*, and *Construction* occupations due in large part to retiring workers.

Besides a competent and skilled workforce, other infrastructure needs of the business community include quality transportation and broadband systems to move people, goods, and information efficiently to all parts of the state.

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Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

In early 2017, a team of statewide leaders from the Missouri Department of Economic Development, Missouri Department of Agriculture, Missouri Farm Bureau and the University of Missouri System came together to discuss strategies to better connect Missouri residents and businesses to high-speed internet. Access to high-speed internet has become a necessity for business and community development efforts and many of our rural communities are currently unserved or underserved. In July of 2017, a Missouri Broadband Stakeholder Meeting was held in Jefferson City, bringing together more than 100 individuals representing local, regional, state and federal government, education, agriculture, healthcare, business groups, broadband providers and many more to discuss Missouri's current broadband issues, needs and opportunities. Since the Stakeholder Meeting, efforts are continuing towards the development of a statewide strategy to address the unserved and underserved areas of Missouri.

The Missouri Certified Sites Program was created by the Missouri Department of Economic Development to provide prospect companies and site consultants with consistent standards regarding the availability and development potential of commercial or industrial development sites. Site-certification criteria were established through partnerships with the Missouri Economic Development Council, Ameren UE, Empire Electric, KCP&L, Missouri Electric Cooperatives and the Missouri Department of Natural Resources based on the requirements of industry.

The site-certification process incorporates factors such as availability of utilities, site access, environmental concerns, land use conformance, and potential site development costs. In addition to efforts focused on broadband accessibility and site certification, Missouri works on multiple fronts to engage regional and local communities in the identification, funding and construction of key projects related to road, rail, port, water, sewer and utilities infrastructure. It goes without saying that Missouri's competitive position would be strongly influenced by the infrastructure capacity it can offer to existing businesses, prospect companies and residents.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

Workforce needs vary by industry, but according to the Missouri Division of Workforce Development, the most common theme across industry is the need for workers with baseline skills in communication, writing, organization and problem solving. While each industry also has specific targeted-skill needs, basic skills cover a broad range including reading, writing, applied math, logic flows, and information gathering – just as examples. Reports stemming from an Industry Competency Model analysis indicates that workers will need to enhance their skill sets in order to meet the needs of the ever-changing

technologies in today's industry sectors. Most jobs will need post-secondary training, especially to fill many of the middle-to-high skilled positions available to workers.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

Most immediate, is the Certified Work Ready Communities initiative sponsored by ACT. Missouri was one of four states chosen to implement CWRC, which takes local communities and through partnerships between education, workforce, and economic development, benchmarks the workforce skills level in that community with the purpose to raise the levels and document it. This is largely done by implementing National Career Readiness certificates to all present and future workforce members. Once done, it is an important economic development tool.

Through sector strategies, partnerships between all workforce stakeholders are formed. Career pathways are developed between these partnerships, including employers, the education system, and workforce system. Within the career pathways, an individual has multiple entry and exit points based on current skills and knowledge, as well as the person's willingness and capacity to continue to learn on the job, or through formal classroom education and/or training programs. The continued efforts of all workforce partners ensure that all eligible persons, including those with disabilities, obtain skills to become or remain employed in high-demand, well-paid occupations.

Describe any other state efforts to support economic growth.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

MHDC's 2015 Housing Needs Assessment Report studied the state's housing markets and needs on a regional level. The report identified areas of concentration, defined as: 1. Regions that have "relatively high proportions of special needs populations (veterans, people with disabilities and the elderly) and 2. Whether regions experience one of more indicators of disadvantage in the form of poverty, low area median income, or unemployment." Based on these definitions the report found "nine regions where there are particularly high proportions" of special needs populations – Bolivar, Lake Ozark, Nevada, Poplar Bluff, Southwest, Bootheel, Northwest, South Central and Warrensburg. "It should be noted that these are mainly the most rural regions of the state." Regions that were identified as having high disadvantages, as defined in the report, were St. Louis City, Poplar Bluff, Bootheel, South Central, Bolivar, Jackson County, Southwest, and Lake Ozark.

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Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

MHDC's 2015 Housing Needs Assessment Report showed seven counties that "have higher proportions of African American populations than the Missouri average"; those include St. Louis City, Pemiscot, Mississippi, Jackson, St. Louis, New Madrid, and Pulaski Counties. Three of these counties account for almost 80% of Missouri's African American residents – St. Louis and Jackson Counties and St. Louis City. Missouri's Hispanic population represents almost 4% of the state's total population with the majority living in Jackson, Clay, St. Louis Counties as well as St. Louis City. The state of Missouri's Consolidated Plan reflects funding priorities for the non-entitlement communities throughout the state with HOME and HTF funding available to both non-entitlement and entitlement jurisdictions.

What are the characteristics of the market in these areas/neighborhoods?

Data from the National Housing Conference shows that some workers in St. Louis have to see more than a 6.5% annual increase in their personal income to afford a 2 bedroom apartment at FMR rates, while workers in Kansas City have to realize an annual increase of almost 6% to afford such a unit. To compare, workers in Springfield, Missouri have to see a 3% annual increase in pay to afford that same 2 bedroom apartment, 50% less than renters in Missouri's two largest cities. For workers looking to buy a home in St. Louis (2017 median price for homes - $149,000) they would need to see a 15% annual increase in pay to purchase a home at that price. Workers in Kansas City (2017 median price for homes - $179,000) would have to earn 14% more in annual wages to be able to purchase their own home. For Springfield workers looking to buy a home, an annual increase of 10% in wages would be needed to afford a home.

Are there any community assets in these areas/neighborhoods?

Many communities throughout the state draw from a variety of resources when addressing their community's housing needs. Local non-profit organizations, churches, municipal governments, neighborhood organizations and school boards all play an important role in housing plans for a particular community. Missouri Community Action Network (Missouri CAN) and all of its member Community Action Agencies are instrumental in providing much needed housing services, especially in the rural areas. Many of these agencies are sub-grantees for MHDC's homeowner rehabilitation program, and many also apply for the CHDO set-aside funds provided by the HOME program. Agencies that apply for CHDO set-aside funds must meet certain criteria to be eligible for those funds. Missouri's Community Action Agencies are able to work with those hard-to-reach rural communities, and MHDC has been able to partner with these agencies and build successful housing developments. MHDC collaborates with and maintains an ongoing relationship with the GCEH which was established with a mission to promote public and private coordination and collaboration, develop new strategies to evaluate and reallocate resources, remove barriers to accessing services, evaluate unmet needs and provide supportive services and affordable housing needs, implement effective solutions to build economic security and promote and support activities that prevent homelessness. The GCEH is a Governor appointed committee consisting of state departments, non-profit agencies, eight CoC, and formerly homeless citizens. All agencies participating in the Consolidated Planning Process have a seat on this committee.

Are there other strategic opportunities in any of these areas?

Kansas City and St. Louis City have both been awarded HUD Choice Neighborhoods funds expected to run throughout the five year, 2018-2022 Consolidated Plan; allowing these communities to reinvest in targeted areas with housing development, neighborhood / infrastructure improvements, and community amenities for residents who have historically been marginalized.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The State has identified a number of high priority needs, and has targeted available resources toward several specific goals that are designed to address those needs. These needs include affordable housing for low income persons, the elderly, homeless and special needs persons, public improvements and facilities for low and moderate income persons, and economic development opportunities for low and moderate income persons. The State uses a gap financing approach on the targeting of these resources, and targets them in areas that are not met via other resources. The state agencies charged with developing and implementing this plan partner with other state, federal and local agencies to deliver the programs that meet the identified needs. In addition, these resources are used to leverage other

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existing resources via these partner agencies. The State also has a monitoring plan that ensures program statutory and regulatory compliance, as well as consistency with this plan.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Table 50 - Geographic Priority Areas

1	**Area Name:**	Balance of State Continuum of Care
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The BoS CoC is made up of 101 rural counties in Missouri. The counties in the Balance of State exclude: St. Louis City, St. Louis, Lincoln, Warren, St. Charles, Andrew, Buchanan, DeKalb, Jackson, Greene, Webster, Christian, Jasper and Newton.
	Include specific housing and commercial characteristics of this target area.	Rural Missouri exhibits resource scarcity for families and individuals who are experiencing or are at-risk of homelessness. Often times, people are doubled-up or couch surfing in rural counties and an accurate county of the need is understated.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	MHDC holds regular CoC meetings and offers training throughout the state in order to bring together mainstream service providers and homeless assistance providers to facilitate collaboration. During CoC meetings, providers and citizens provide input on the needs of their communities to find solutions to address homelessness.

	Identify the needs in this target area.	• Permanent Affordable Housing Rapid Re-Housing Programs Homeless Prevention Programs Programs that practice Housing First Transportation Emergency Assistance Home Repair Street Outreach Implementation and maintenance of CE Systems
	What are the opportunities for improvement in this target area?	MHDC will continue to provide resources to build permanent affordable housing in rural communities. MHDC will continue to provide funding opportunities for programs that utilize the housing first model. Under the ESG program, transportation is an allowable expense and could be used as a resource.
	Are there barriers to improvement in this target area?	Often rural homelessness is hidden and the general public is not aware of the severity of the problem. Therefore, the community is not aware of the problem and thus, does not adequately address the issue. CE will assist in removing some of these barriers by producing a coordinated effort to deliver assistance to these rural regions. In addition, the lack of funding and safe, decent and sanitary housing continues to be a barrier to rural homelessness.
2	**Area Name:**	Non-Entitlement Community & Economic Development
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	

	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
3	**Area Name:**	Non-Entitlement Housing
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Housing
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The HOME funds allocated for HeRO program will provide assistance with the repair, rehabilitation or reconstruction of owner-occupied units. The property must be located in the rural communities (non-metropolitan areas) or an area that has been declared a disaster area within the previous three years. A non-metropolitan area is defined as any areas or community located outside the city limits or boundaries of Columbia, Joplin, Kansas City, Springfield, St. Joseph, St. Louis City, and St. Louis County. The grantee agencies receive an allocation of funds to be used in a defined geographic region. Each participating agency may choose to target specific counties, towns, or neighborhoods in their governing areas based on their own program criteria.

	Include specific housing and commercial characteristics of this target area.	Eligible properties shall be owner-occupied single-family units. Property occupied by non-owners, mobile or manufactured homes not permanently affixed to a foundation, semi-detached homes, condominium units, town homes, one-half of a duplex, or properties held in contract-for-deed title shall not be eligible. The property may not be located in floodplain (flood zone A) and the home must have been owned and occupied by the applicant for at least three years. In addition, the unit may not be a timeshare or cooperative home, and the unit cannot be income producing property such as a ranch or farm. Only homes with a value equal to or less than the Maximum Property Value are eligible for rehabilitation. For purposes of the this program, Maximum Property Value is defined as the value of a home after rehabilitation which may not exceed 95% of the area median purchase price for the county within which the property is located, as determined by HUD.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Before the State adopts the Consolidated Plan, citizens, public agencies and other interested parties are given access to information about the programs involved in the consolidated plan, including the amount of assistance the program expects to receive and the types of activities that are permitted. To ensure the community opportunity to have input on the proposed activities, the Commission conducts public hearings before the proposed draft Consolidated Plan is published to discuss the housing and community development needs.

	Identify the needs in this target area.	In 1978, the U.S. Consumer Product Safety Commission banned the residential use of paint containing more than 0.06 lead. The U.S. Center of Disease Control and Prevention (CDC) calls childhood lead poisoning "the most common environment disease for young children." According to the Housing Market Analysis identified earlier in our Consolidated Plan (MA-20), the number of owner-occupied units built prior to 1979 is 971,631 pose a challenge for the state to address. These units may be considered to be at risk for Lead – Based Paint contamination. In addition the possibility of the lead contamination, the energy efficiency of any properties built prior to 1978 must be assessed. The Commission's Homeowner Repair Program provides assistance in lead risk reduction and improvements in heating/ cooling cost in addition to providing assistance with accessibility for the special needs population. The following home repair activities are as described below. • Rehabilitation – Activities such as the repair or updating of existing systems, including HVAC, plumbing or electrical wiring; repair replacement of all or part of a roof; interior or exterior painting including necessary preparation; permanent floor coverings; replacement siding; and repair of sidewalks, steps, porches, and railings. • Lead Risk Reduction – Activities to reduce the possibility of lead poisoning, such as the removal or encapsulation of lead or lead-bearing wood trim, siding, interior or exterior walls, windows, and gutters; the removal of contaminated carpeting or flooring; and the removal and/or replacement of contaminated topsoil. • Weatherization – Activities determined to reduce heating and/or cooling costs and to improve the overall safety and comfort of the home, such as the repair or replacement of

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		HVAC, installation of insulated windows, caulking, and sealing of exterior walls. • Accessibility – Activities that will make an elderly or disabled person better able to enter or move about his/her home, or to improve the overall quality of life. This includes improvements to allow the elderly to age in place, including ramps, lifts (but not elevators), re-locating light switches and service outlets, widening doorways, lowering kitchen counters, and installing roll-in showers. Disaster Relief / Emergency Repairs- Activities involving the repairs or reconstruction of single-family owner-occupied unit where either the Governor has proclaimed a state disaster declaration or the President has issued a federal disaster declaration.
	What are the opportunities for improvement in this target area?	An opportunity for improvement of the HeRO home repair program is to expand the network of providers in an effort to provide services throughout all rural areas of the state. MHDC is committed to providing information to all community action agencies regarding opportunities to administer the program in an effort to achieve full saturation throughout the rural areas of the state.

	Are there barriers to improvement in this target area?	One of the major barriers for improving the target areas is the lack of available network providers. The participating agencies across the state sometimes lack the expertise to property administer the program and lack necessary funding hire experts. The HOME rule establishes a requirement to use the Uniform Physical Condition Standards (UPCS) inspection process for every property using HOME funds. The UPCS is not designed nor was it intended to apply to single family homes. It is an inspection process that was designed for major construction of multifamily developments and includes inspection of parking lots and common areas and playgrounds. The inspection is required to be completed on the entire property (even parts of the property not involved in the repair) and it must pass with no defects. The HOME rule requires that all major systems have at least a five year life span. Taken together, all of the proposed requirements result in a higher funding per project ratio thereby reducing the number of households eligible for assistance and the overall effectiveness of the program.
4	**Area Name:**	Statewide Housing
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Housing
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	MHDC utilizes its HOME and HTF funds set-aside for rental housing throughout the state of Missouri, so the boundaries for this target area would be the state lines.

	Include specific housing and commercial characteristics of this target area.	ACS data for 2016 shows that Missouri has a total of 2,760,226 housing units; almost 86% of those units are occupied. Missouri has a homeownership rate at 66% and a renter rate of almost 40%. Data shows that Missouri's housing stock reflects a relatively consistent variety in terms of age with the majority of units built before 2000. Over 565,000 housing units in the state are located in multi-unit dwellings (duplexes up to 20 or more units) making up 20% of the total housing units in the state.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	MHDC holds public hearings throughout the state where citizens and representatives such as developers, communities, and public agencies can voice their thoughts on our proposed housing units and programs in their areas. The information and opinions offered at these meetings provide MHDC insights on where housing should be located within the state.
	Identify the needs in this target area.	The issue of cost is one that continues to present a significant challenge for Missouri households. 2016 ACS data shows the average gross rent for the state is $822. CHAS data shows that 106,375 low income renters (>30% to less than or = 50% HAMFI) pay more than 30% of their household income to housing and 35,845 pay more than 50% of their income towards housing. Missouri's extremely low income renters (less than or = 30% HAMFI) show higher rates of cost burden; with 153,155 households paying more than 30% of household income to housing and 126,135 paying more than half of their household income to housing.

	What are the opportunities for improvement in this target area?	Missouri has many communities in urban, rural and suburban areas that are in close proximity to employment, good schools, transportation and other essential services. MHDC will strive to rehabilitate older housing and build new housing that is affordable to low, very low, extremely low, and moderate income families in communities with the greatest need. As noted throughout this report, Missouri's aging housing stock is a significant concern for low-income residents in the state. Homeowner rehabilitation will continue to be a priority as long as MHDC is able to perform the requirements of this valuable program.

	Are there barriers to improvement in this target area?	Barriers noted in the 2013-2017 Consolidated Plan persist and continue to impact the growth of affordable housing development in Missouri. LIHTC regulations governing income eligibility, particularly the AMI rent restriction limits and how those restrictions impact LIHTC development in small, rural counties, continue to present challenges for financing housing developments that are truly affordable to households in these communities. Limited funding for homeownership and affordable housing programs further exacerbates the gap between the need for housing and the available supply. Funding for housing programs geared towards low and extremely low income households has not significantly increased despite the growing number of households that fall into these categories. Taken together, these barriers pose very real challenges to housing providers, developers, advocates, and those in need of housing. The state will continue to promote its mission of developing safe, affordable housing while being asked to do more with fewer economic resources. Additional housing issues, as identified in the Missouri Statewide Fair Housing Impediments Analysis, include landlord / tenant laws that are perceived to favor landlords, a lack of affordable, accessible housing that is decent and safe, reliance on sub-standard, rental properties for low and extremely low income households, and overall negative perceptions of low income populations. All of these issues are rooted, in part, to public policies that attempt to address the need for affordable housing and a community's response to that need.

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The State does not target specific geographical locations for project funding. As the State administers all Consolidated Plan programs for the nonentitlement areas of Missouri, project need is the primary basis for funding rather than geographical distribution.

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SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 51 – Priority Needs Summary

1	**Priority Need Name**	Affordable Housing for Low-Income Households
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Rural Individuals Families with Children Mentally Ill veterans Unaccompanied Youth Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	Statewide Housing
	Associated Goals	Affordable Housing for Low-Income Household HIV AIDS
	Description	In the year 2013, there were 138,400 renter households in Missouri who paid more than 50% of their gross income for rent and utilities. If a family must pay more than half of all of its income for their housing costs alone, this does not allow for much spending on other basic necessities such as food, clothing, health care, education, transportation, and it has an extremely negative impact on their overall quality of life. This number is an 8% increase from the previous Consolidated Plan for 2013-2018. At the same time the number of severe cost-burdened households is increasing, those households paying between 30% and 50% of their income on rent decreased – by 49%.

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	Basis for Relative Priority	Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved by MHDC Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations.
2	**Priority Need Name**	Preservation of Affordable Housing for Low-Income
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Rural Individuals Families with Children Mentally Ill veterans Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions
	Geographic Areas Affected	Non-Entitlement Housing Statewide Housing
	Associated Goals	Preservation of Affordable Housing for Low-Income

	Description	As Missouri's affordable housing stock continues to age, more emphasis must be given to the rehabilitation and preservation of affordable housing for low-income persons and families. According to 2016 ACS data, 1,302,332 or 54.9% of all housing units in Missouri were built before 1980. Therefore, we expect that the current affordable housing stock is also showing signs of aging and in need of substantial rehabilitation. Substandard housing is a concern for many households in the state: Census Data indicates there are 16,885 housing units in Missouri that meet the Census Bureau's definition of substandard housing. However, there are many additional units which have serious deficiencies in their electrical or plumbing systems; lack safe or adequate heating systems; or have other major structural deficiencies and are in need of substantial rehabilitation. MHDC is placing an emphasis on the preservation of affordable housing for low-income persons and families. MHDC will use HOME and other available resources to provide financing equity for non-profit and private developers who propose to rehabilitate and preserve older affordable rental housing developments. MHDC has established a HOME Repair Program for qualified non-profit agencies for the purpose of home repair, weatherization, accessibility improvements and lead abatement in owner-occupied homes. The HeRO program is available to non-profit agencies that undertake the eligible activities on behalf of low and moderate-income families in non-metropolitan areas. Eligible homeowners must have incomes that do not exceed 80% of the area median income. Eligible homeowners may receive assistance in an amount not to exceed $22,500 per home.
	Basis for Relative Priority	The state of Missouri has an aging rental and homeowner housing stock. For owner-occupied homes, MHDC works to keep homes affordable and safe through the rural Home Repair Opportunity Program (HeRO). Additionally, rental rehabilitation is a priority for MHDC, and since 2013, over 56% of the HOME rental units delivered have been in rehabilitation projects.
3	**Priority Need Name**	Affordable Housing for Seniors
	Priority Level	High

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	Population	Extremely Low Low Elderly Rural Individuals Mentally Ill veterans Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	Statewide Housing
	Associated Goals	Affordable Housing for Seniors
	Description	The State of Missouri, county, and city government officials, non-profit, and faith-based organizations and private sector must prepare now for a potential crisis in housing and related seniors in the very near future. Missouri's senior population age 65 and older is projected to increase from about 13.9% of the state's population in 2010 to more than 20% in 2030. This dramatic increase in the number of seniors will undoubtedly have a profound and far-reaching impact on the supply, demand, and availability and cost of housing and related services for seniors. These seniors must make difficult choices between paying their housing and utility costs and other basic necessities such as food, medicine, healthcare, and transportation. This is a stark reality that too many seniors must confront every day in Missouri. The State will continue to take action to provide more accessible and affordable housing for seniors as well as the necessary integrated and coordinated social services to help seniors successfully age in place. MHDC, as the state's housing finance agency, has the ability to impact the number of units of senior housing that is built in the state each year. An internal review of MHDC data showed that approximately 55% of the total, authorized, affordable rental housing developments financed in whole or in part with MHDC assistance in recent years, were designated as housing for senior citizens aged 55 or older. MHDC emphasizes to developers and builders the need to utilize Universal Design standards as part of its ongoing rental production programs; single-family homes, and duplexes built as part of MHDC programs must be designed according to Universal Design concepts.

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	Basis for Relative Priority	Affordable housing for the elderly continues to be a need for the state of Missouri. Since 2013, MHDC averages a 58% approval rate for senior HOME rental units, and we expect the current trend to continue. Through housing development, MHDC is in a position to meet the needs of seniors such as stable affordable housing costs and proximity to services.
4	**Priority Need Name**	Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Public Housing Residents
	Geographic Areas Affected	Non-Entitlement Community & Economic Development
	Associated Goals	CDBG Disaster Recovery Job Training/Creation
	Description	Missouri works on multiple fronts to engage regional and local communities in the identification, funding and construction of key projects related to road, rail, port, drinking water, sewer and utilities infrastructure. Missouri's competitive position to attract business and industry is strongly influenced by the infrastructure capacity it can offer to existing businesses, prospect companies and residents.
	Basis for Relative Priority	Increase the number of people provided with new or improved availability/accessibility of economic opportunity through job creation, retention and business infrastructure assistance to for-profit companies.
5	**Priority Need Name**	Public Improvements and Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents

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	Geographic Areas Affected	Non-Entitlement Community & Economic Development
	Associated Goals	CDBG Disaster Recovery Public Infrastructure & Improvement
	Description	Water and wastewater systems improvement needs in the state of Missouri exceed the available resources. Additionally, the state's Transportation Department (MoDOT) depends heavily on fuel tax and federal funds. The State collects less fuel tax now due to public efforts to reduce fuel usage. The State CDBG Program often partners with USDA Rural Development, MoDOT, and Missouri Department of Natural Resources as a gap financer to meet public infrastructure needs.
	Basis for Relative Priority	Increase the number of people with new or improved accessibility, availability, or quality of suitable living environments through construction/rehabilitation or public facilities to benefit areas with an LMI percentage of 51% or higher.
6	**Priority Need Name**	Public Facilities
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Individuals Families with Children Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Non-Entitlement Community & Economic Development

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	Associated Goals	CDBG Disaster Recovery Public Facilities
	Description	The need for public facilities in the non-entitles areas of Missouri is evidenced by the number of applications received for the Community Facilities category each year. Over the past five years, the state CDBG program has received 53 unduplicated applications from local entities seeking new or renovated facilities to house their service programs, totaling $12,550,353 in requested funds. More than $503 million (24 projects) were denied.
	Basis for Relative Priority	Increase the number of people provided with new or improved sustainability of suitable living environments through slum and blight reduction, emergency assistance, and other rehabilitation of existing public facilities in LMI areas.
7	**Priority Need Name**	Services to Homeless Individuals and Families
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Statewide Housing
	Associated Goals	Emergency Solutions Grant (ESG) HIV AIDS
	Description	The ESG Program is designed to identify sheltered and unsheltered homeless individuals and families, as well as those at risk of homelessness through the CE System, and provide services necessary to help persons quickly regain stability in permanent housing after experiencing homelessness or a housing crisis.

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	Basis for Relative Priority	Stable permanent housing for people who are experiencing homelessness or are in a housing crisis.
8	**Priority Need Name**	Coordinated Rural Homeless Services
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Balance of State Continuum of Care
	Associated Goals	Continuum of Care (CoC)
	Description	The CoC Program is designed to promote community wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness. MHDC Includes victims of sex and human trafficking in the definition of Victims of Domestic Violence. Youth aging out of foster care is included in the unaccompanied youth category listed below.

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	Basis for Relative Priority	CE System implementation and maintenance ensures homelessness is rare, brief and non-reoccurring. Continua in Missouri are all working to meet local and federal goals to (1) Increase utilization of Continuum of Care monies for permanent, supportive housing and rapid re-housing, (2) Increase access to mainstream services for those experiencing homelessness, and (3) Coordinate with Public Housing Agencies to assure that citizens apply for rental assistance vouchers.
9	**Priority Need Name**	Set-Aside Preference
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Statewide Housing
	Associated Goals	Set-Aside Preference

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	Description	MHDC's Set-Aside Housing goal includes two separate and distinct populations: Special Needs and Vulnerable Persons. A person with special needs is a person who is: (a) physically, emotionally or mentally impaired or is diagnosed with mental illness; or (b) developmentally disabled. A vulnerable person is a person who is: (a) homeless, including survivors of domestic violence and human or sex trafficking; or (b) a youth transitioning from foster care. MHDC includes victims of sex and human trafficking in the definition of Victims of Domestic Violence.
	Basis for Relative Priority	Increase the number of special needs units designated for the special needs and vulnerable populations.

Narrative (Optional)

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Recently, MHDC has not utilized its state HOME funds for TBRA. If it is later determined that HOME Funds could be better utilized for this purpose, MHDC will explore the feasibility of doing so. ESG utilizes homelessness prevention and rapid re-housing funds to provide TBRA.
TBRA for Non-Homeless Special Needs	MHDC does not utilize its HOME funds for TBRA. If it is later determined that HOME Funds could be better utilized for this purpose, MHDC will explore the feasibility of doing so.

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Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
New Unit Production	MHDC does not set specific goals or market characteristics to influence the use of HTF or HOME funds for new unit production, but we take other priorities into consideration such as: set-aside housing, service-enriched housing, preservation and Qualified Census Tracts. MHDC serves the entire state of MO, funding is therefore allocated based on the needs of each community.
Rehabilitation	MHDC does not set specific goals or market characteristics to influence the use of HOME funds for new unit production, but we take other priorities into consideration such as: set-aside housing, service-enriched housing, preservation and Qualified Census Tracts. MHDC serves the entire state of Missouri, funding is therefore allocated based on the needs of each community. ESG does not allow for the rehabilitation or conversion of shelters.
Acquisition, including preservation	MHDC does not set specific goals or market characteristics to influence the use of HTF or HOME funds for new unit production, but we take other priorities into consideration such as: set-aside housing for special needs vulnerable persons, service-enriched housing, preservation and Qualified Census Tracts. MHDC serves the entire state of Missouri, funding is therefore allocated based on the needs of each community. ESG does not allow for acquisition or construction of new emergency shelters.

Table 52 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made annually in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved by MHDC Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations.

All Public Hearings, webinars, posted plans, and additional consultations included estimated funding amounts for all formula allocations based previous awards. The State made it clear that all proposed activities were based on were estimated amounts, all proposed activities' budgets would be proportionately increased or decreased to match actual allocation amounts when made available by HUD.

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Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	22,537,848	0	5,000,000	27,537,848	90,151,392	Calculation is based on the FY18 allocation of $22,537,848 million annually. During FY18, the State may use up to $5,000,000 of prior year recaptured CDBG funding for emergency projects resulting from flooding (Presidentially Declared Disaster FEMA 4317-DR)

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HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	12,514,589	6,500,000	0	19,014,589	76,000,000	The purpose of the HOME Investment Partnerships (HOME) Program is to expand the supply of decent, safe and affordable housing for extremely low, very low and low income households. The HOME program requires an annual match based on the amount of HOME funds drawn down from the Commission HOME Investment Trust fund account for the fiscal year. The Commission will utilize the following sources to meet the required annual match: 1. Loans originated from the proceeds of multi-family bonds issued by the Commission. The amount of the bond contributed to the match would never exceed the 25 percent of bond proceeds used to meet its annual match requirement. 2. The Commission funds (non- federal funds) will be used to provide loans for Multi-family developments that are not HOME assisted developments. The program income estimation is based on the last five years

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
								solely for the purpose of this Consolidated Plan.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	701,900	0	0	701,900	2,807,600	The Missouri Department of Health and Senior Services administer the HOPWA program to prevent homelessness for the HIV case managed clients in the Outstate regions of Missouri. Because the HOPWA program is centralized within the case management system the funding is utilized for direct client services paid directly the service provider or landlord. This process has proved to be successful for several years and has reduced the number of homeless HIV individuals within the program.

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ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	2,554,390	0	0	2,554,390	10,000,000	The state of Missouri receives an annual allocation of ESG funds to identify sheltered and unsheltered homeless individuals and families, as well as those at risk of homelessness, to provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing homelessness or a housing crisis. DSS receives the state allocation of ESG funds and grants the allocation to MHDC, who then administers the program and provides funds to units of local government and non-profit agencies. Units of local government may sub grant with a PHA. The ESG Program requires a 100% match, CoC and CE participation. MHDC and DSS match any administration funds that are retained at 100%. The units of local government and non-profit agencies administering the ESG program must also provide a 100% match on any grant funds they are awarded. State ESG recipients are exempt from matching the first $100,000

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
								of their allocation as long as the exemption is passed on to the agencies administering the program. MHDC will pass this match exemption on to qualified agencies. All Grantees/sub-grantees must provide at least a 100% match consisting of documented non- McKinney resources.
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,970,270	0	0	3,970,270	12,500,000	The purpose of the HTF program is to expand the supply of decent, safe and affordable housing for extremely low and very low income households.

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
Continuum of Care	public - federal	Financial Assistance Permanent housing placement Rental Assistance Supportive services Other	6,000,000	0	0	6,000,000	24,000,000	The CoC Program is designed to assist individuals and families experiencing homelessness and to provide coordinated services needed to help move to permanent housing. The CoC is self-governed by a board put in place by the community and projects will be reviewed for the annual competition utilizing the priorities set forward by each yearÃ¢Â¿Â¿s review committee.

Table 53 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

MHDC leverages its federal funding, such as HOME funds, in the rental production and rehabilitation program with many funding sources such as LIHTCs, bond proceeds, the Missouri Affordable Housing Assistance Program, MHDC's funds, private equity, and many other outside sources. Of the sixty-eight HOME developments approved since 2013, over ninety percent of them have additional MHDC resources, such as tax credits, tax-exempt bonds, or MHDC general funds.

The HOME program requires an annual match based on the amount of HOME funds drawn down from the Commission's HOME Investment Trust fund account for the fiscal year. The Commission will utilize the following sources to meet the required annual match: 1. Loans originated from the proceeds of multi-family bonds issued by the Commission. The amount of the bond contributed to the match would never exceed the

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25 percent of bond proceeds used to meet its annual match requirement. 2. The Commission funds (non- federal funds) will be used to provide loans for Multi-family developments that are not HOME assisted developments. The program income estimation is based on the last five years solely for the purpose of this Consolidated Plan.

The CDBG program does not require a local match, but uses CDBG as a gap financing tool. Local governments are required to exhaust all local and other state/federal funding sources prior to using CDBG for the final funding gap for the project. Generally, state CDBG funds are the last component of a project's funding package. Local and other state/federal funding resources are committed prior to the injection of CDBG.

If appropriate, describe publically owned land or property located within the state that may be used to address the needs identified in the plan

N/A

Discussion

Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made annually in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved by MHDC Board of Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations.

Missouri's system of funding water and wastewater projects is a formal multi-agency partnership, and is coordinated by the Department of Economic Development. It also includes the State Department of Natural Resources and the U.S. Department of Agriculture-Rural Development. This partnership maximizes the use of available loan funds, using CDBG, USDA , and DNR grant dollars as gap financing tools to keep the project affordable for low and moderate income communities.

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SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Missouri Department of Economic Development	Government	Economic Development Non-homeless special needs public facilities public services	State
Missouri Housing Development Commission	Government	Homelessness Non-homeless special needs Rental neighborhood improvements	State
Missouri Department of Health and Senior Services	Government	Homelessness	State
Missouri Department of Social Services	Government	Homelessness	State

Table 54 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

MHDC is tasked with drastically reducing and ultimately ending homelessness in Missouri. MHDC administers the ESG program in collaboration with DSS and also administers HTF. In addition, MHDC administers a variety of federal, state or locally funded programs with the same objectives that are outside the scope of the Consolidated Plan. MHDC requires funded agencies to attend meetings of their CoC and to participate in the CE system of the CoC. MHDC also solicits feedback for each application received from the CoC to understand the diverse needs of each CoC. Consolidated oversight for the majority of the homeless assistance programs throughout Missouri allows targeting of funds, consistency of program goals and policies and helps reduce and ultimately end homelessness in Missouri.

MHDC collaborates with and maintains an ongoing relationship with the GCEH which was established with a mission to promote public and private coordination and collaboration, develop new strategies to evaluate and reallocate resources, remove barriers to accessing services, evaluate unmet needs and provide supportive services and affordable housing needs, implement effective solutions to build economic security and promote and support activities that prevent homelessness. The GCEH is a

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Governor appointed committee consisting of state departments, non-profit agencies, eight CoC, and formerly homeless citizens. All agencies participating in the Consolidated Planning Process have a seat on this committee.

The Department of Economic Development partners with various state and federal agencies (including, but not limited to the Missouri Department of Natural Resources, Missouri Department of Transportation, Delta Regional Authority, U.S. Department of Agriculture - Rural Development, U.S. Department of Commerce, Small Business Administration, State and Federal Emergency Management Agencies, and the Economic Development Administration) to collectively meet the needs of eligible areas of the State. In addition, the Department has an excellent relationship with the Missouri Regional Planning Commissions.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy		X	
Legal Assistance		X	
Mortgage Assistance		X	X
Rental Assistance		X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement		X	
Mobile Clinics		X	
Other Street Outreach Services		X	
Supportive Services			
Alcohol & Drug Abuse		X	X
Child Care		X	
Education		X	
Employment and Employment Training		X	
Healthcare		X	X
HIV/AIDS		X	X
Life Skills		X	
Mental Health Counseling		X	X
Transportation		X	X
Other			
		X	

Table 55 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

MDHSS coordinates HOPWA Funds with enrollment in the Ryan White Part B Case Management system in the outstate regions of Missouri to provide homeless prevention among HIV positive individuals and their families. The HOPWA program provides direct assistance, without the use of subcontractors, for short term rent, short term utilities, long term rent and short term mortgage assistance. Once enrolled in the Ryan White Case Management system the client is provided access to core and support services through the case management system including; housing related services, medical care, mental health counseling, substance abuse counseling, oral health services, emergency assistance, HIV medications, health insurance assistance, and medical transportation.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

MHDC is tasked with drastically reducing and ultimately ending homelessness in Missouri. For the purpose of the 2018-2022 Consolidated Plan and the priorities listed herein, that task is carried out through the administration of the ESG program, in collaboration with DSS, the BoS CoC, and Missouri's HTF monies. MHDC requires funded agencies to attend meetings of their CoC and to participate in the CE system of the CoC. MHDC solicits feedback for the HTF Allocation Plan as well as for each application received from the CoC to understand the diverse needs of each CoC. Consolidated oversight for the majority of the homeless assistance programs throughout Missouri allows targeting of funds, consistency of program goals and policies and helps reduce and ultimately end homelessness in Missouri.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

MHDC is tasked with drastically reducing and ultimately ending homelessness in Missouri. For the purpose of the 2018-2022 Consolidated Plan and the priorities listed herein, that task is carried out through the administration of the ESG program, in collaboration with DSS, the BoS CoC, and Missouri's HTF monies. MHDC requires funded agencies to attend meetings of their CoC and to participate in the CE system of the CoC. MHDC solicits feedback for the HTF Allocation Plan as well as for each application received from the CoC to understand the diverse needs of each CoC. Consolidated oversight for the majority of the homeless assistance programs throughout Missouri allows targeting of funds, consistency of program goals and policies and helps reduce and ultimately end homelessness in Missouri.

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The state plans to utilize CE as a strategy to identify and overcome gaps in the service delivery system as individuals are assessed and prioritized for services.

The Department of Economic Development will continue its relationship with partner agencies (state, federal and local) to meet the non-housing community development needs of Missouri.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HIV AIDS	2018	2022	Affordable Housing	Statewide Housing	Affordable Housing for Low-Income Households Services to Homeless Individuals and Families	HOPWA: $3,509,500	HIV/AIDS Housing Operations: 8125 Household Housing Unit
2	Job Training/Creation	2018	2022	Non-Housing Community Development	Non-Entitlement Community & Economic Development	Economic Development	CDBG: $31,500,000	Jobs created/retained: 1575 Jobs
3	Public Infrastructure & Improvement	2018	2022	Non-Housing Community Development	Non-Entitlement Community & Economic Development	Public Improvements and Infrastructure	CDBG: $55,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 110000 Persons Assisted
4	Public Facilities	2018	2022	Non-Housing Community Development	Non-Entitlement Community & Economic Development	Public Facilities	CDBG: $22,308,570	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 64000 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Affordable Housing for Low-Income Household	2018	2022	Affordable Housing	Statewide Housing	Affordable Housing for Low-Income Households	HOME: $31,111,949 HTF: $8,682,162	Rental units constructed: 331 Household Housing Unit Homelessness Prevention: 485 Persons Assisted
6	Preservation of Affordable Housing for Low-Income	2018	2022	Affordable Housing	Non-Entitlement Housing Statewide Housing	Preservation of Affordable Housing for Low-Income	HOME: $50,263,051 HTF: $5,788,108	Rental units rehabilitated: 372 Household Housing Unit Homeowner Housing Rehabilitated: 846 Household Housing Unit Homelessness Prevention: 422 Persons Assisted
7	Affordable Housing for Seniors	2018	2022	Affordable Housing	Statewide Housing	Affordable Housing for Seniors	HOME: $27,897,431 HTF: $6,750,000	Rental units constructed: 113 Household Housing Unit Rental units rehabilitated: 167 Household Housing Unit
8	Continuum of Care (CoC)	2018	2022	Homeless	Balance of State Continuum of Care	Coordinated Rural Homeless Services	Continuum of Care: $30,000,000	Overnight/Emergency Shelter/Transitional Housing Beds added: 100 Beds

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Emergency Solutions Grant (ESG)	2018	2022	Homeless	Statewide Housing	Services to Homeless Individuals and Families	ESG: $125,054,390	Tenant-based rental assistance / Rapid Rehousing: 3000 Households Assisted Homelessness Prevention: 4400 Persons Assisted
10	Set-Aside Preference	2018	2022	Affordable Housing	Statewide Housing	Set-Aside Preference	HOME: $42,018,352 HTF: $4,050,000	Rental units constructed: 300 Household Housing Unit Rental units rehabilitated: 91 Household Housing Unit
11	CDBG Disaster Recovery	2008	2019	Non-Housing Community Development	Non-Entitlement Community & Economic Development	Economic Development Public Facilities Public Improvements and Infrastructure	CDBG: $8,880,670	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 17500 Persons Assisted

Table 56 – Goals Summary

Goal Descriptions

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1	**Goal Name**	HIV AIDS
	Goal Description	Increase the number of families/persons with HIV/AIDS with availability of decent housing through short term rent, utiliy, mortgage and long term assistance.
2	**Goal Name**	Job Training/Creation
	Goal Description	Increase the number of people provided with new or improved availability/accessibility of economic opportunity through job creation, business retention and business infrastructure assistance to for-profit companies
3	**Goal Name**	Public Infrastructure & Improvement
	Goal Description	Increase the number of people with new or improved accessibility, availability or quality of suitable living environments through construction/rehabilitation of public facilities to benefit areas with an LMI percentage of 51% or higher.
4	**Goal Name**	Public Facilities
	Goal Description	Increase the number of people provided with new or improved sustainability of suitable living environments through slum and blight reduction, emergency assistance and other construction/rehabilitation of public facilities in LMI areas.
5	**Goal Name**	Affordable Housing for Low-Income Household
	Goal Description	In the year 2013, there were 152,270 renter households in Missouri who paid more than 50% of their gross income for rent and utilities. If a family must pay more than half of all of its income for housing costs alone, this does not allow for much spending on other basic necessities such as food, clothing, health care, education, transportation, and it has an extremely negative impact on their overall quality of life. In addition, 140,040 households pay more than 30% of their gross income for their housing costs.

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6	**Goal Name**	Preservation of Affordable Housing for Low-Income
	Goal Description	As the affordable housing stock continues to age, more emphasis must be given to the rehabilitation and preservation of affordable housing for low-income persons and families. According to 2016 ACS Data, 1,302,332 (54.9%) of all housing structures in Missouri were built before 1980. Much of this affordable housing stock is showing signs of aging and in need of substantial rehabilitation. Substandard housing is a concern for many households in the state; Census Data indicates there are 16,885 housing units in Missouri that meet the Census Bureau's definition of substandard housing. However, there are many additional units which have serious deficiencies in their electrical or plumbing systems, lack safe or adequate heating systems, or have other major structural deficiencies and are in need of substantial rehabilitation, but do not fully meet the definition of substandard housing. MHDC emphasizes the preservation of affordable housing for low-income persons and families. MHDC will use HOME and other available resources to provide financing equity for non-profit and private developers who propose to rehabilitate and preserve older affordable rental housing developments. MHDC has established the HeRO qualified non-profit agencies for the purpose of home repair, weatherization, accessibility improvements and lead abatement in owner-occupied homes. This program is available to non-profit agencies that undertake the eligible activities on behalf of low and moderate-income families in non-metropolitan statistical areas. Eligible homeowners must have incomes that do not exceed 80% of the area median income and may receive assistance in an amount not to exceed $22,500 per home.

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7	**Goal Name**	Affordable Housing for Seniors
	Goal Description	The State of Missouri, county, and city government officials, non-profit, and faith-based organizations and private sector must prepare now for a potential crisis in housing and related seniors in the very near future. Missouri's senior population age 65 and older is projected to increase from about 13.9% of the state's population in 2010 to more than 20% in 2030. This dramatic increase in the number of seniors will undoubtedly have a profound and far-reaching impact on the supply, demand, and availability and cost of housing and related services for seniors. These seniors must make difficult choices between paying their housing and utility costs and other basic necessities such as food, medicine, healthcare, and transportation. This is a stark reality that too many seniors must confront every day in Missouri. The State will continue to take action to provide more accessible and affordable housing for seniors as well as the necessary integrated and coordinated social services to help seniors successfully age in place. MHDC, as the state's housing finance agency, has the ability to impact the number of units of senior housing that is built in the state each year. An internal review of MHDC data showed that approximately 55% of the total, authorized, affordable rental housing developments financed in whole or in part with MHDC assistance in recent years, were designated as housing for senior citizens aged 55 or older. MHDC emphasizes to developers and builders the need to utilize Universal Design standards as part of its ongoing rental production programs; single-family homes, and duplexes built as part of MHDC programs must be designed according to Universal Design concepts.
8	**Goal Name**	Continuum of Care (CoC)
	Goal Description	The Continuum of Care was instituted in 1994 as a process for obtaining Supportive Housing, Shelter Plus Care, and Single Room Occupancy Mod Rehab dollars. The goal of the BoS CoC is to coordinated homeless services throughout rural Missouri.

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9	**Goal Name**	Emergency Solutions Grant (ESG)
	Goal Description	The goal of programs funded under the ESG program is to reduce the length of stay for individuals and families utilizing emergency shelters during their housing crisis in order to reduce the length of time that individual or family experiences homelessness. In addition, as a goal, the state will increase the quality of service delivery by decreasing the length of time between the receipt of sub-grantee requests for payment and reimbursement.
10	**Goal Name**	Set-Aside Preference
	Goal Description	Set-Aside Preferences is defined in MHDC's QAP. The State will continue to take action to provide more accessible and affordable housing for MHDC's set-aside populations. The Set-aside Preferences shall consist of two separate and distinct priorities: Special Needs and Vulnerable Persons. A person with special needs is a person who is: (a) physically, emotionally or mentally impaired or is diagnosed with mental illness; or (b) developmentally disabled. A vulnerable person is a person who is: (a) homeless, including survivors of domestic violence and human or sex trafficking; or (b) a youth transitioning from foster care.
11	**Goal Name**	CDBG Disaster Recovery
	Goal Description	Increase the number of people provided with new or improved sustainability of suitable living environments in disaster declared areas through slum and blight reduction, emergency assistance, rehabilitation of existing housing stock and public facilities in LMI areas.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The Missouri Department of Health and Senior Services (MDHSS) will accept and distribute an estimated $619,625in HOPWA formula funding in 2018. HOPWA program funding is divided between Tenant-Based Rental Assistance (TBRA) and Short-Term Rent Mortgage and Utility Assistance (STRMU), with an estimated $511,008 allocated to TBRA to serve 175 individuals/families and $108,617 allocated to STRMU to serve 150 households, for a total of 325 individuals/families for the 2018 program year.

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SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Activities to Increase Resident Involvements

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the 'troubled' designation

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

Barriers noted in the 2012-2017 Consolidated Plan persist and continue to impact the growth of affordable housing development in Missouri. LIHTC regulations governing income eligibility, particularly the AMI rent restriction limits and how those restrictions impact LIHTC development in small, rural counties, continue to present challenges for financing housing developments that are truly affordable to households in these communities. Limited funding for homeownership and affordable housing programs further exacerbates the gap between the need for housing and the available supply. Funding for housing programs geared towards low and extremely low income households has not significantly increased despite the growing number of households that fall into these categories. Taken together, these barriers pose very real challenges to housing providers, developers, advocates, and those in need of housing. The state will continue to promote its mission of developing safe, affordable housing while being asked to do more with fewer economic resources. Additional housing issues, as identified in The Missouri Statewide Fair Housing Impediments Analysis, include landlord / tenant laws that are perceived to favor landlords, a lack of affordable, accessible housing that is decent and safe, reliance on sub-standard, rental properties for low and extremely low income households, and overall negative perceptions of low income populations. All of these issues are rooted, in part, to public policies that attempt to address the need for affordable housing and a community's response to that need. The Consolidated Plan partners began to review county and municipal zoning regulations within the state of Missouri in 2016. Recognizing that the Consolidated Plan partners have limited authority to change these regulations, the goal, in part, was to establish a base of understanding where the balance between renters and landlords, homeowners and communities, becomes inequitable. The tension between state and local governance has always had the opportunity to produce inconsistent application of fair housing law. Regulatory barriers created with differing rules present very real consequences for individuals looking for and providing housing. Conflicting laws, rules and regulations create ambiguity that could result in the denial of housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Notable changes have been made to the QAP (which incorporates provisions that must be followed when a development is awarded HOME or HTF equity gap funding) in recent years to address barriers to housing choice. Set-aside preferences have been created for: special needs populations, vulnerable persons, developments that meet service enriched criteria, preservation, developments promoting independence enabling housing units (IEHU), veteran's housing, MBE/WBE participation, property disposition, extended use affordability periods, developments affordable to households living at or below 50% AMI, workforce housing, transit oriented developments, developments that are included in a community redevelopment plan, and those located in opportunity areas. All new construction projects must be designed and built in accordance with the principles of universal design. Additional changes include geographic limits for new affordable housing development in large metropolitan regions (KC and STL), focus on mixed income developments, and prohibiting new construction or conversion

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developments in areas where publically subsidized housing constitutes more than 20% of all units in the census tract where the development will be located. As affordable units age, deterioration removes them from the available stock; replacing those units with safe, decent, and sanitary affordable housing is critical to ensuring that moderate, low and very low income households continue to live and work in both rural and urban communities. MHDC continues to categorize the preservation of affordable housing as a funding priority. Recent data on LIHTC tenants show that more than 40% of LIHTC tenants are considered extremely low income – and more than 70% of those tenants receive some form of additional rental assistance. Programs such as ESG allow MHDC to utilize funds to provide rental assistance. The Missouri Statewide Fair Housing Impediments Analysis underscored the fact that housing discrimination continues despite increased education and improved housing access in some communities. The report noted that for low income renters, that discrimination is most pronounced. For some populations, discrimination can, to an extent, be mitigated. The VAWA of 2013 expands housing protections to eligible residents living in LIHTC developments. MHDC will continue to work with the MCADSV to ensure housing developers, providers and property management companies understand their responsibilities under VAWA. MHDC requires all affordable developments to adopt fair housing marketing plans prior to the issuance of funding and makes state and federal fair housing resources available on their website. Creating more affordable housing options for all Missourians, educating property managers about fair housing choice, and improving access to affordable housing resources for those who need it, will continue to be priorities for MHDC. The 2018-2022 Consolidated Plan reflects a partnership between PHAs and state community development and housing providers that has not been present with previous five year plans. Missouri's Consolidated Partners will continue to work with MONAHRO and PHAs throughout the state to improve access to processes, encourage collaboration and better align affordable housing priorities.

SP-60 Homelessness Strategy – 91.315(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

MHDC assists communities with hosting Project Homeless Connect events throughout the state that provide the opportunity to reach out to unsheltered homeless individuals and families. Missouri conducts the Point-in-Time Count annually which allows for outreach to unsheltered homeless individuals and families. Additionally, ESG funds allow for agencies to apply for street outreach dollars. Each CoC is expected to discuss outreach strategies in their CoC applications.

Addressing the emergency and transitional housing needs of homeless persons

In Missouri, the goal is to safely reduce the length of stay for families and individuals in shelter in order to create housing first opportunities for them to be permanently re-housed. This model removes the traditional tiered system that offers limited services and imposes unnecessary requirements on individuals and families in order to obtain permanent housing. Missouri recognizes that there will always be specific populations that require emergency shelter and services - including but not limited to homeless youth, survivors of domestic violence and homeless individuals struggling with substance abuse - but hopes to incorporate ways to safely shorten these episodes of homelessness and move individuals and families directly into a permanent housing situation through rapid re-housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Missouri is working through the ESG, CoC and other state funded homeless assistance programs to prioritize funding to agencies who are targeting chronically homeless, homeless families, homeless veterans and unaccompanied youth. Missouri utilizes a housing first approach to house individuals and families and second provide the services they need to remain in permanent housing with a plan tailored for them and with them. Diversion methods incorporated into the CE system are expected to prevent those at-risk of becoming homeless and utilizing scarce funds for those who are literally homeless based on objective assessment tools selected by each CoC.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving

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assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Missouri's GCEH established a Discharge Policy in 2011 that was adopted by all Missouri CoCs and state partners. The discharge policy establishes the following guiding principles: homelessness is unacceptable in Missouri; efforts to secure permanent housing shall be made prior to being discharged from a state or public facility, such as a mental health facility, substance abuse treatment facility, long-term care facility, or jail/prison; if "temporary" shelter placement is unavoidable, the reasons for this should be documented; if after having exhausted efforts to engage the client in a discharge plan, if the client continues to refuse services, the efforts will be noted; and if a client receiving out-patient services becomes homeless, the state or public facility should work actively with available community resources to locate suitable housing. All Missouri CoCs are implementing a CE System. The CE system will serve as a single point of access for those at-risk of or experiencing homelessness. CE is required to be in place for each Missouri Continuum of Care by January, 2018. Funding has been made available for pilot programs to establish CE systems within CoCs and regions within those CoCs and data is being collected to provide information on the coordination between multiple state departments and local stakeholders. The CE Network Initiative (CENI) is a collaboration between MHDC, DSS, DHSS, DOC and DMH. CENI's pilot project has commenced in two regions in the Missouri BoS: region 8 (Dent, Douglas, Howell, Laclede, Oregon, Ozark, Shannon, Texas and Wright counties) and region 10 (Bates, Benton, Cass, Henry, Johnson, Lafayette, Pettis, Saline and St. Clair counties). CENI's objective is to help provide a more efficient process for those experiencing homelessness, or a housing crisis, to access the homeless service delivery system, identify cross-sections of service utilizers between the collaborating agencies, and to provide data that will enable the state to better understand housing and service needs within Missouri.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

MHDC's Lead Based Paint Policy and Procedures for the rental rehabilitation program, can be found in the Environmental Review Guidelines, Exhibit B.

All approved developments must follow the requirements in 24 CFR part 35:* Complete the HUD Partner Worksheet, including exhibits. Developers must provide MHDC all pertinent information including informal and informal consultations with state and federal agencies and non-federal agencies.* Developer's must provide MHED with the analysis to back up the type of lead-based paint investigation done for a project. This can include the reports, certifications, licenses, and pamphlets.

Developers are encouraged to review the lead-based paint requirements located on the HUD Exchange website and the Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing.

In addition to these procedures, MHDC has guidelines for the Physical Needs Assessment, which is submitted with the application for funding. Among other things, this document addresses the need and requirement for a lead-based paint assessment.

The HeRO Program also contains lead-based paint requirements. Sub-recipients are required to provide their own procedures for addressing lead-based paint issues within the single-family homes they will be rehabilitating, including staff and contractor certifications and procedures for lead risk assessment.

In the 2016 HOME Program year, 36 of the 138 HOME rental units rehabilitated triggered a Lead Based Paint Investigation because they were initially constructed before January 1, 1978. Of the 105 single-family homeowner occupied units that were rehabilitated through the HeRO Program, 88 were built before 1978. These 124 units directly increased access to housing units throughout Missouri with Lead-Based paint hazards remediated.

The ESG program requires a lead-based paint visual assessment for all being assisted with ESG financial assistance (rent assistance, utility assistance, utility/rent deposits, or arrears), if the unit was constructed prior to 1978, and a child under the age of six is or will be living in the unit. This screening must be completed and kept in client files for review during compliance visits.

How are the actions listed above integrated into housing policies and procedures?

All of the information listed above is located within MHDC's official manuals and/or must be addressed in applications for funding. MHDC has staff devoted to all environmental hazards that may arise at any point during the development and construction phases, including lead based paint.

The ESG program requires that agencies keep written policies and procedures for the administration of ESG, including how they will meet the requirements of lead-based paint screenings for shelters or housing units which are reviewed upon compliance.

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

MHDC is tasked with drastically reducing and ultimately ending homelessness in Missouri. MHDC administers ESG and HTF, along with other federal, state and local programs. By consolidating administration of the homeless assistance programs throughout Missouri, funding can be effectively coordinated for the goal of ending homelessness in Missouri. Missouri addresses poverty-level families through the network of community action agencies who apply for homeless assistance funding, provide disaster services and reach rural communities. MHDC and many other partners participate on the Missourians to End Poverty (MEP), a committee facilitated by the Missouri Community Action Network bringing the community together to end poverty. MEP focuses on the five key elements that can be addressed to impact the conditions of poverty in Missouri including food, health, education, energy and

housing and family and economic security. Each element has multiple goals listed in the MEP policy platform. http://www.moendpoverty.org/uploads/4/0/7/9/40792405/policy_platform.pdf

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The Missourians to End Poverty have committed to supporting policy changes that create opportunities for families to have permanent affordable housing, support sustained investments in the Housing Trust Fund to help families and create new housing opportunities, increase support for low-income families for heating and energy assistance and promote the weatherization of homes and energy conservation.

MHDC is tasked with drastically reducing and ultimately ending homelessness in Missouri. MHDC administers the ESG program in collaboration with DSS and also administers HTF. In addition, MHDC administers a variety of federal, state or locally funded programs with the same objectives that are outside the scope of the Consolidated Plan. MHDC requires funded agencies to attend meetings of their CoC and to participate in the CE system of the CoC. MHDC also solicits feedback for each application received from the CoC to understand the diverse needs of each CoC. Consolidated oversight for the majority of the homeless assistance programs throughout Missouri allows targeting of funds, consistency of program goals and policies and helps reduce and ultimately end homelessness in Missouri. Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made in accordance with the QAP and other allocation plans approved by MHDC Board of Commissioners. Federal resources will be coupled with private equity and other resources as they are available to MHDC.

SP-80 Monitoring – 91.330

Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Each agency involved in the Consolidated Planning process will monitor its own grantees in accordance with established procedures and standards for the particular program. ESG: MHDC, as the DSS sub-grantee of Missouri's ESG, will monitor ESG grants made to City/County governments and non-profit sub-recipients for compliance. Monitoring will include on-site review of payment requests and back-up documentation submitted to MHDC for reimbursement as required by each grant agreement. The compliance officer will review in-kind matching documentation and ensure that ESG expenditures are obligated and spent within regulatory deadlines and reviews all shelters for minimum habitability standards. Agencies found to be out of compliance will be required to submit a corrective action

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plan. HOME/Rental Housing Production: MHDC's standard construction financing procedures require that a regulatory agreement be recorded along with other loan documents for all rental production developments funded through HOME and HTF. The Asset Management Department examines Tenant Eligibility and Income Certifications on a regular basis. The owner is responsible for delivering or obtaining appropriate management services for the development to ensure that the units are suitable for occupancy, meet UPCS, and meet local health, safety, and building codes. MHDC may audit HOME-funded developments each year. HeRO Program: In addition to periodic monitoring of the project, the sub-grantee must also establish and maintain sufficient records to enable HUD and MHDC to determine whether the sub-grantee has followed all requirements. The agency will be audited annually to ensure the projects comply with IRS and HUD regulations. 10% of the selected homes will be visited to ensure the ER Report was accurate. McKinney-Vento Homeless Assistance Funds: MHDC serves as the Collaborative Applicant for the BoS CoC and performs annual review of projects in the continuum. MHDC provides technical assistance to agencies but HUD is the ultimate grantor of funds to the BoS agencies and performs all monitoring visits. CDBG: Monitoring checklists are provided to all grantees during the initial training for grant administration, they are also located in the CDBG Admin Manual. The grantee is required to submit all required ordinances/resolutions involving excessive force, anti-lobbying, and fair housing; all financial paperwork; and ER paperwork. All federal wage determinations are requested through the CDBG office to assure compliance with labor standards. CDBG staff evaluate new projects in terms of risk or need for oversight or assistance. The four primary components of CDBG monitoring are: progress on planned activities, program compliance, fiscal management, and fiscal compliance. In addition to complying with all appropriate provisions, recipients must be assured that outside contractors and delegate agencies are likewise in compliance with the various laws and regulations. HOPWA: DHSS performs an on-site monitoring visit at least twice yearly to the fiduciary agent for the HOPWA program. Standard monitoring forms are used to record compliance on major aspects of program performance (employment standards, record confidentiality/retention, budget/fiscal record, and annual fiscal audit). DHSS also monitors goal progress by reviewing client files at case management sites to assure that HOPWA funds are targeted to those most in need, at adequate levels to purchase appropriate housing, and to assure that recipients are provided sufficient support to reach independence.

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made annually in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved by MHDC Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations.

All Public Hearings, webinars, posted plans, and additional consultations included estimated funding amounts for all formula allocations based previous awards. The State made it clear that all proposed activities were based on were estimated amounts, all proposed activities' budgets

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would be proportionately increased or decreased to match actual allocation amounts when made available by HUD.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	22,537,848	0	5,000,000	27,537,848	90,151,392	Calculation is based on the FY18 allocation of $22,537,848 million annually. During FY18, the State may use up to $5,000,000 of prior year recaptured CDBG funding for emergency projects resulting from flooding (Presidentially Declared Disaster FEMA 4317-DR)

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HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	12,514,589	6,500,000	0	19,014,589	76,000,000	The purpose of the HOME Investment Partnerships (HOME) Program is to expand the supply of decent, safe and affordable housing for extremely low, very low and low income households. The HOME program requires an annual match based on the amount of HOME funds drawn down from the Commission HOME Investment Trust fund account for the fiscal year. The Commission will utilize the following sources to meet the required annual match: 1. Loans originated from the proceeds of multi-family bonds issued by the Commission. The amount of the bond contributed to the match would never exceed the 25 percent of bond proceeds used to meet its annual match requirement. 2. The Commission funds (non- federal funds) will be used to provide loans for Multi-family developments that are not HOME assisted developments. The program income estimation is based on the last five years

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
								solely for the purpose of this Consolidated Plan.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	701,900	0	0	701,900	2,807,600	The Missouri Department of Health and Senior Services administer the HOPWA program to prevent homelessness for the HIV case managed clients in the Outstate regions of Missouri. Because the HOPWA program is centralized within the case management system the funding is utilized for direct client services paid directly the service provider or landlord. This process has proved to be successful for several years and has reduced the number of homeless HIV individuals within the program.

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ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	2,554,390	0	0	2,554,390	10,000,000	The state of Missouri receives an annual allocation of ESG funds to identify sheltered and unsheltered homeless individuals and families, as well as those at risk of homelessness, to provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing homelessness or a housing crisis. DSS receives the state allocation of ESG funds and grants the allocation to MHDC, who then administers the program and provides funds to units of local government and non-profit agencies. Units of local government may sub grant with a PHA. The ESG Program requires a 100% match, CoC and CE participation. MHDC and DSS match any administration funds that are retained at 100%. The units of local government and non-profit agencies administering the ESG program must also provide a 100% match on any grant funds they are awarded. State ESG recipients are exempt from matching the first $100,000

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
								of their allocation as long as the exemption is passed on to the agencies administering the program. MHDC will pass this match exemption on to qualified agencies. All Grantees/sub-grantees must provide at least a 100% match consisting of documented non- McKinney resources.
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,970,270	0	0	3,970,270	12,500,000	The purpose of the HTF program is to expand the supply of decent, safe and affordable housing for extremely low and very low income households.

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
Continuum of Care	public - federal	Financial Assistance Permanent housing placement Rental Assistance Supportive services Other	6,000,000	0	0	6,000,000	24,000,000	The CoC Program is designed to assist individuals and families experiencing homelessness and to provide coordinated services needed to help move to permanent housing. The CoC is self-governed by a board put in place by the community and projects will be reviewed for the annual competition utilizing the priorities set forward by each year's review committee.

Table 57 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

MHDC leverages its federal funding, such as HOME funds, in the rental production and rehabilitation program with many funding sources such as LIHTCs, bond proceeds, the Missouri Affordable Housing Assistance Program, MHDC's funds, private equity, and many other outside sources. Of the sixty-eight HOME developments approved since 2013, over ninety percent of them have additional MHDC resources, such as tax credits, tax-exempt bonds, or MHDC general funds.

The HOME program requires an annual match based on the amount of HOME funds drawn down from the Commission's HOME Investment Trust fund account for the fiscal year. The Commission will utilize the following sources to meet the required annual match: 1. Loans originated from the proceeds of multi-family bonds issued by the Commission. The amount of the bond contributed to the match would never exceed the

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25 percent of bond proceeds used to meet its annual match requirement. 2. The Commission funds (non- federal funds) will be used to provide loans for Multi-family developments that are not HOME assisted developments. The program income estimation is based on the last five years solely for the purpose of this Consolidated Plan.

The CDBG program does not require a local match, but uses CDBG as a gap financing tool. Local governments are required to exhaust all local and other state/federal funding sources prior to using CDBG for the final funding gap for the project. Generally, state CDBG funds are the last component of a project's funding package. Local and other state/federal funding resources are committed prior to the injection of CDBG.

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If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Discussion

Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made annually in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved by MHDC Board of Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations.

Missouri's system of funding water and wastewater projects is a formal multi-agency partnership, and is coordinated by the Department of Economic Development. It also includes the State Department of Natural Resources and the U.S. Department of Agriculture-Rural Development. This partnership maximizes the use of available loan funds, using CDBG, USDA , and DNR grant dollars as gap financing tools to keep the project affordable for low and moderate income communities.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing for Low-Income Household	2013	2017	Affordable Housing	Statewide Housing	Affordable Housing for Low-Income Households	HOME: $6,222,390 HTF: $2,143,946	Rental units constructed: 59 Household Housing Unit Homelessness Prevention: 97 Persons Assisted
2	Preservation of Affordable Housing for Low-Income	2013	2017	Affordable Housing	Statewide Housing	Preservation of Affordable Housing for Low-Income	HOME: $9,052,610 HTF: $1,419,297	Rental units rehabilitated: 75 Household Housing Unit Homeowner Housing Rehabilitated: 169 Household Housing Unit Homelessness Prevention: 84 Persons Assisted
3	Affordable Housing for Seniors	2013	2017	Affordable Housing	Statewide Housing	Affordable Housing for Seniors	HOME: $5,579,486 HTF: $1,350,000	Rental units constructed: 22 Household Housing Unit Rental units rehabilitated: 33 Household Housing Unit
4	Continuum of Care (CoC)	2013	2017	Homeless	Balance of State Continuum of Care	Coordinated Rural Homeless Services	Continuum of Care: $6,000,000	Housing for Homeless added: 35 Household Housing Unit

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Emergency Solutions Grant (ESG)	2013	2017	Homeless	Statewide Housing	Services to Homeless Individuals and Families	ESG: $2,554,390	Tenant-based rental assistance / Rapid Rehousing: 600 Households Assisted Homelessness Prevention: 900 Persons Assisted
6	Set-Aside Preference	2013	2017	Affordable Housing	Statewide Housing	Set-Aside Preference	HOME: $8,403,670 HTF: $1,071,973	Rental units constructed: 59 Household Housing Unit Rental units rehabilitated: 18 Household Housing Unit
7	HIV AIDS	2013	2017	Affordable Housing	Statewide Housing	Set-Aside Preference	HOPWA: $701,900	Tenant-based rental assistance / Rapid Rehousing: 175 Households Assisted Other: 150 Other
8	Job Training/Creation	2013	2017	Non-Housing Community Development	Non-Entitlement Community & Economic Development	Economic Development	CDBG: $6,300,000	Jobs created/retained: 315 Jobs
9	Public Infrastructure & Improvement	2013	2017	Non-Housing Community Development	Non-Entitlement Community & Economic Development	Public Improvements and Infrastructure	CDBG: $11,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 22000 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Public Facilities	2013	2017	Non-Housing Community Development	Non-Entitlement Community & Economic Development	Public Facilities	CDBG: $4,461,714	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 13000 Persons Assisted Buildings Demolished: 80 Buildings

Table 58 – Goals Summary

Goal Descriptions

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1	**Goal Name**	Affordable Housing for Low-Income Household
	Goal Description	The data reflects the most pressing need for Missouri's extremely low, low and moderate income households; more quality, affordable housing. 2016 ACS data shows the average gross rent for the state is $822. CHAS data shows that 106,375 low income renters (>30% to less than or = 50% HAMFI) pay more than 30% of their household income to housing and 35,845 pay more than 50% of their income towards housing. Missouri's extremely low income renters (less than or = 30% HAMFI) show higher rates of cost burden; with 153,155 households paying more than 30% of household income to housing and 126,135 paying more than half of their household income to housing. Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved by MHDC Board of Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations. More specific information on evaluation factors and selection criteria can be found in the most recent QAP; www.mhdc.com

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2	**Goal Name**	Preservation of Affordable Housing for Low-Income
	Goal Description	As the affordable housing stock continues to age, more emphasis must be given to the rehabilitation and preservation of affordable housing for low-income persons and families. According to 2016 ACE data, 1,302,332 (54.9%) of all housing units in Missouri were built before 1980, leading to signs of aging and the need for substantial rehabilitation. Substandard housing is a concern for many households in the state: Census Data indicates there are 16,885 housing units in Missouri that meet the Census Bureau's definition of substandard housing. In addition, many other units have serious deficiencies in their electrical or plumbing systems, lack safe or adequate heating systems, or have other major structural deficiencies and are in need of substantial rehabilitation but do not meet the definition of substandard housing. MHDC is placing an emphasis on the preservation of affordable housing for low-income persons and families. MHDC will use HOME and other available resources to provide financing equity for non-profit and private developers who propose to rehabilitate and preserve older affordable rental housing developments. MHDC has established a HOME Repair Program for qualified non-profit agencies for the purpose of home repair, weatherization, accessibility improvements and lead abatement in owner-occupied homes. The HeRO program is available to non-profit agencies that undertake the eligible activities on behalf of low and moderate-income families in non-metropolitan statistical areas. Eligible homeowners must have incomes that do not exceed 80% of the area median income and eligible homeowners may receive assistance in an amount not to exceed $22,500 per home.

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3	**Goal Name**	Affordable Housing for Seniors
	Goal Description	The State of Missouri, county, and city government officials, non-profit, and faith-based organizations and private sector must prepare now for a potential crisis in housing and related seniors in the very near future. Missouri's senior population age 65 and older is projected to increase from about 13.9% of the state's population in 2010 to more than 20% in 2030. This dramatic increase in the number of seniors will undoubtedly have a profound and far-reaching impact on the supply, demand, and availability and cost of housing and related services for seniors. These seniors must make difficult choices between paying their housing and utility costs and other basic necessities such as food, medicine, healthcare, and transportation. This is a stark reality that too many seniors must confront every day in Missouri. The State will continue to take action to provide more accessible and affordable housing for seniors as well as the necessary integrated and coordinated social services to help seniors successfully age in place. MHDC, as the state's housing finance agency, has the ability to impact the number of units of senior housing that is built in the state each year. An internal review of MHDC data showed that approximately 55% of the total, authorized, affordable rental housing developments financed in whole or in part with MHDC assistance in recent years, were designated as housing for senior citizens aged 55 or older. MHDC emphasizes to developers and builders the need to utilize Universal Design standards as part of its ongoing rental production programs, single-family homes, and duplexes. Units built as part of MHDC programs must be designed according to Universal Design concepts promoting greater accessibility for seniors.
4	**Goal Name**	Continuum of Care (CoC)
	Goal Description	The BoS CoC prioritizes funding in each annual competition based on feedback from each region and other stakeholders through the Board of Directors and review committee.
5	**Goal Name**	Emergency Solutions Grant (ESG)
	Goal Description	The ESG Program is designed to identify sheltered and unsheltered homeless individuals and families, as well as those at risk of homelessness, and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing homelessness or a housing crisis.

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6	**Goal Name**	Set-Aside Preference
	Goal Description	Set-Aside Preferences is defined in MHDC's QAP. The State will continue to take action to provide more accessible and affordable housing for MHDC's set-aside populations. The Set-aside Preferences shall consist of two separate and distinct priorities: Special Needs and Vulnerable Persons. A person with special needs is a person who is: (a) physically, emotionally or mentally impaired or is diagnosed with mental illness; or (b) developmentally disabled. A vulnerable person is a person who is: (a) homeless, including survivors of domestic violence and human or sex trafficking; or (b) a youth transitioning from foster care.
7	**Goal Name**	HIV AIDS
	Goal Description	Helping individuals living with HIV/AIDS maintain stable housing, medication assistance and access to medical care to increase viral load suppression.
8	**Goal Name**	Job Training/Creation
	Goal Description	Increase the number of people provided with new or improved availability/accessibility of economic opportunity through job creation, retention and business infrastructure assistance to for-profit companies.
9	**Goal Name**	Public Infrastructure & Improvement
	Goal Description	Increase the number of people with new or improved accessibility, availability, or quality of suitable living environments through construction/rehabilitation of public facilities to benefit areas with an LMI percentage of 51% or higher.
10	**Goal Name**	Public Facilities
	Goal Description	Increase the number of people provided with new or improved sustainability of suitable living environments through slum and blight reduction, emergency assistance and other construction/rehabilitation of public facilities in LMI area.

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AP-25 Allocation Priorities – 91.320(d)

Introduction:

The Allocation Priorities section details how the state of Missouri will prioritize our federal housing and community development funds.

All of MHDC's HOME Funds are directed to affordable housing for low-income households, and all subsequent goals are included in the over-all goal of safe, sanitary, and decent housing for Missourians.

Funding Allocation Priorities

	Affordable Housing for Low-Income Household (%)	Preservation of Affordable Housing for Low-Income (%)	Affordable Housing for Seniors (%)	Continuum of Care (CoC) (%)	Emergency Solutions Grant (ESG) (%)	Set-Aside Preference (%)	HIV AIDS (%)	Job Training/Creation (%)	Public Infrastructure & Improvement (%)	Public Facilities (%)	Total (%)
CDBG	0	0	0	0	0	0	0	29	50	21	**100**
HOME	0	0	0	0	0	0	0	0	0	0	**0**
HOPWA	0	0	0	0	0	0	100	0	0	0	**100**
ESG	0	0	0	0	100	0	0	0	0	0	**100**
HTF	0	0	0	0	0	0	0	0	0	0	**0**
Continuum of Care	0	0	0	100	0	0	0	0	0	0	**100**

Table 59 – Funding Allocation Priorities

Reason for Allocation Priorities

MHDC's HOME and HTF annual goals and objectives are broken down as follows:Preservation of Affordable Housing: 56% of HOME= $6,973,899 /40% of HTF=1,419,297/Affordable Housing for Seniors: 40% of HOME = $4,955,139/HTF= $1,350,000 All of MHDC's HOME and HTF Funds are directed to affordable housing for low-income households, and all subsequent goals are included in the over-all goal of providing safe, sanitary, and decent housing for Missourians. The numbers listed above total more than 100% because HOME and HTF funds can be allocated

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to activities that serve multiple goals.

Distribution Among Categories: The amount of CDBG funds the state will receive from the Department of Housing and Urban Development for FY2018 is $22,537,848 . The following is a more detailed description of CDBG allocation by category for FY2018.

Water and Wastewater: $7,500,000; **Community Facility:** $3,000,000; **Demolition:** $600,000; **General Infrastructure:** $3,500,000; **Emergency:** $861,714; **Economic Development:** $6,300,000; **State Administration:** $550,756; **State Technical Assistance:** $225,378.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

All of MHDC's HOME and HTF Funds are directed to affordable housing for low-income households, and all subsequent goals are included in the over-all goal of providing safe, sanitary, and decent housing for MissouriansCDBG funds are used for area-wide benefit low-moderate income, limited clientele and/or removal of slum and blight.

The purpose of CDBG is to provide local governments with funding opportunities for improved public facilities and infrastructure, redevelopment opportunities and opportunities for economic development, primarily for the benefit of low and moderate income persons.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

Distribution Methods

Table 60 - Distribution Methods by State Program

1	**State Program Name:**	Community Development Block Grant
	Funding Sources:	CDBG

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	Describe the state program addressed by the Method of Distribution.	The State is expected to distribute approximately $21,761,714 in FY2018 CDBG funds to "units of general local government" in non-entitlement areas (incorporated municipalities under 50,000 and counties under 200,000). Cities and counties in Missouri that are not eligible for these non-entitlement funds are: Blue Springs, Columbia, Florissant, Independence, Jefferson City, Joplin, Kansas City, O'Fallon, Springfield, St. Joseph, St. Peters, Lee's Summit, St. Louis (city), Jefferson County (and the cities within Jefferson County who have elected to participate in the Jefferson County entitlement program), St. Charles County (and the the cities who have elected to participate in the entitlement program) and St. Louis County (and the cities within St. Louis County who have elected to participate in the St. Louis County entitlement program). Eligible Activities: Section 105(a) of the Community Development Act and HUD regulations specified the activities that are eligible for CDBG assistance. A general listing of eligible activities is outlined in Appendix A, and a detailed description is provided in 105(a) of the Act and in 24 CFR 570.482. While all activities may be eligible, some program categories may prioritize the funding of some activities. A list of ineligible activities is also outlined in Appendix A. Any grantee with a delinquent audit for any year, whether or not the grant is closed, is ineligible to apply for funding. This applies to all CDBG categories. Also, a grantee with any **open** project awarded prior to April 2016, which is not **closed** by the last business day of March 2018, is ineligible to apply in **any** FY18 funding category. All documentation necessary for close-out must be received by March 1, 2018. This may apply to the grantee or the on behalf of applicant(s), whichever is applicable. All CDBG applicants will be required to submit a Schedule of Projected Expenditures as part of the CDBG application process. The Schedule outlines by quarter and by activity the estimated timeline for expenditures of the grant award, if selected for funding. If awarded funding, grantees are required to submit any updates to expenditure projections on a quarterly basis, or in any event where the original timeline for full expenditure will be revised to a future date. CDBG grant agreements will have a specified end date; this end date will be three years from the award date of the grant. If the grant is not completed by the end of the three-year period, the grantee must deobligate any remaining funds, or request an extension from DED. This extension

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		must be for cause, and documentation as to why the project was not completed within the required three- year period must accompany the request along with a timeline for completion. It will be DED's discretion as to the length of the extension. **Extensions are not automatic**.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	**Water and Wastewater – Construction**: Each project proposal will be reviewed by the Missouri Water and Wastewater Review Committee (MWWRC). The MWWRC is comprised of the Missouri Department of Economic Development (CDBG Program), Missouri Department of Natural Resources (State Revolving Fund), and USDA (Rural Development). Applications scoring a minimum of 65 points will receive a recommendation for award. Successful completion of the MWWRC process results in an award of 50 points to an application. Local Effort (25 points); Past (CDBG) performance (5 points). A list of water and wastewater priorities is listed in Appendix A **Water and Wastewater – Engineering Facility Plan/Plans and Specs Grants**: MWWRC Review (50 points); Local Effort (30 points). **Community Facility** - Need (35 points); Impact (35 points); Local Effort (25 points); Past Efforts (5 points). **Demolition**: Need and Impact (45 points); Code Enforcement and Map (10 points); Leveraging (15 points); Strategy (30 points). **General Public Infrastructure**: Need (35 points); Impact (35 points); Local Effort (25 points); Past Efforts (5 points). **Emergency**: The need must be a serious threat to health or safety, be immediate, have developed or greatly intensified within the past 18 months, and be unique in relation to the problem not existing in all other communities within the state. Natural disasters are allowable under this program. Also, the applicant must lack the resources to finance the project. Only the emergency portion of a project will receive assistance. The applicant must exhaust its resources before CDBG funds may be used. **Economic Development**: Approval is based on compliance with eligibility criteria and availability of funds. The minimum eligibility criteria varies on different types of businesses based on the projected economic impact, such as proposed wages, spin-off benefits, and projected industry growth. The specific eligibility criteria for each type of business will be stated in the program guidelines**.**

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	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	The full Method of Distribution can be found in Appendix A. The Application/Guidelines may be found at: https://ded.mo.gov/content/community-development-block-grants
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	N/A
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A
	Describe how resources will be allocated among funding categories.	

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	Describe threshold factors and grant size limits.	Please see Appendix A for CDBG Threshold Factors.
	What are the outcome measures expected as a result of the method of distribution?	This method of distribution is designed to result in an increased number of people provided with new or improved availability/accessibility of economic opportunity through job creation, retention and business infrastructure assistance to for-profit companies. Additionally, it will increase the number of people with new or improved accessibility, availability, or quality of suitable living environments through construction/rehabilitation of public facilities to benefit areas with an LMI percentage of 51% or higher. Finally, this method of distribution should increase the number of people provided with new or improved sustainability of suitable living environments through slum and blight reduction, emergency assistance and other rehabilitation of existing public facilities in LMI areas. The estimated amount of CDBG funds which will benefit LMI persons is $19,700,000 or 93% of the non-administrative allocation for FY2018. HUD requires that a minimum of 70% of the state's annual allocation be awarded on projects benefiting primarily LMI persons; however, Missouri has certified that it will meet the 70% LMI benefit requirement in aggregate over the three year period 2017 - 2019.
2	**State Program Name:**	Emergency Solutions Grant
	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	ESG is distributed based on an annual allocation plan that is approved by Department of Social Services and MHDC.

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	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Completeness of the application, extent to which the applicant demonstrates an understanding of the HEARTH Act regulations, past performance, strength of program design, implementation strategy, unmet need, data used to describe need, procurement of outside resources, organizational experience, financial reporting, extent to which program serves 100% homeless persons, collaboration with local plans, extent to which project meets priorities in CoC plan, match funds available, amount of funds requested, participation in the CoC, participation in CE and measureable performance goals and objectives.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	N/A
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	MHDC will make the ESG funds available to local government first through a first right of refusal process. If the local government declines funding, the funds will be made available to direct non-profit organizations. MHDC will conduct an annual application training and will be available for any application questions. Once the applications are received, MHDC will score each application based on the criteria listed above and will make recommendations to the MHDC Commissioners and DSS each year. The recommendations will also be based on the state Allocation Plan approved annually for ESG funds.

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	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A
	Describe how resources will be allocated among funding categories.	Missouri state ESG resources will be allocated at the 60% maximum limit for emergency shelter and street outreach activities and no less than 40% for homelessness prevention and rapid re-housing activities.
	Describe threshold factors and grant size limits.	City/County sub-grantees are limited to apply for $50,000 per sub-grantee, up to $150,000 total. Direct non-profit applicants may apply for up to $50,000, or up to $100,000 if they serve multiple counties, but no direct non-profit may allocate more than $50,000 to one county. Entitlement areas that already receive funds from HUD are capped and this is reflected in the allocation plan that is approved by DSS and MHDC, using the CoC boundaries.
	What are the outcome measures expected as a result of the method of distribution?	Due to the emphasis on performance, each ESG grantee will be held to the outcome and performance measurements established by the CoC they belong to as required by the regulations.
3	**State Program Name:**	HOME
	Funding Sources:	HOME

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	Describe the state program addressed by the Method of Distribution.	Currently MHDC uses its HOME Funds in two ways: multi-family rental production and rehabilitation and homeowner rehabilitation. MHDC does not utilize its state HOME funds for Tenant Based Rental Assistance. If it is later determined that HOME Funds could be better utilized for that purpose, MHDC will explore the feasibility of doing so. MHDC does not currently utilize HOME funds for homeownership assistance. However, MHDC is exploring the feasibility and practical application of a program providing homeownership opportunities for low- to moderate-income Missourians. If it is later determined that HOME funds should be utilized for this purpose, MHDC will fully develop and implement such a program. The multi-family HOME allocation is part of MHDC's larger rental production and rehabilitation application process, and its annual HOME allocation is used to finance rental production at a very low interest rate. Rental applications are reviewed according to primary and secondary thresholds, selection criteria as described in the QAP, and the geographic priority. MHDC allocates a minimum of 15% of its HOME allocation to Community Housing Development Organizations (CHDO). The homeowner rehabilitation program – HeRO – has its own application process. MHDC will award HeRO funds based on a statewide competition. All applications will be reviewed and compared based on the items described in the application, and each item will be reviewed and a score determined at MHDC's sole and absolute discretion will be assigned. Once scores are calculated, the applications shall be ranked in order of the highest score to the lowest score and funding will be based upon such ranking. Currently, HeRO funds are used in non-metropolitan areas or areas that have been declared as a disaster area.

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	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	For the rental production and rehabilitation program, applications will be evaluated using Section 42 requirements: • Those serving lowest income tenants, • Those serving qualified tenants for the longest period, and • Projects located in Qualified Census Tracts, the development of which contributes to a concerted community revitalization plan. Additionally, MHDC will give preference among selected projects to: • Project location, • Housing needs characteristics, • Project characteristics, including whether the project involves the use of existing housing as part of a community revitalization plan, • Projects intended for eventual tenant ownership, • Tenant populations with special housing needs • Sponsor characteristics, • Tenant populations of individuals with children, • Public housing waiting lists, • Energy efficiency, and • Historic character The HeRO program will evaluate applications based primarily on the written policies and procedures documenting the organization's intended implementation which includes but are not limited to: requirements for household participation, household application process, intended rehabilitation activities, lead hazard reduction requirements, the marketing plan, rehabilitation standards, appraisal process, and contractor participation qualifications.

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	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	N/A
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	N/A
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A

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	Describe how resources will be allocated among funding categories.	MHDC intends to allocate 15 – 20% of the yearly state allocation to the homeowner rehabilitation program, 10% for administrative purposes, and the remaining amount to the rental production and rehabilitation program.
	Describe threshold factors and grant size limits.	Currently there is no grant/loan size limit for the rental production and rehabilitation program, but MHDC utilizes its HOME funds as gap-financing for larger developments. Ideally, MHDC would like its individual HOME fund allocations to be a small but important part of these developments. The exception is with the CHDO developments; because these projects are often much smaller than a private developer's, HOME is often the only funding source. The HeRO program also does not have a grant limit for the sub-grantees, but MHDC works to stretch these funds as far as possible across the state, so we grant based on the quality of applications/applicants and the number of applications submitted. Currently there is a $22,500 limit on improvements made to homes.
	What are the outcome measures expected as a result of the method of distribution?	Based on current funding levels, MHDC expects to develop or rehabilitate 123 HOME rental units and rehabilitate approximately 106 owner occupied homes.
4	**State Program Name:**	HOPWA
	Funding Sources:	HOPWA

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	Describe the state program addressed by the Method of Distribution.	MDHSS does not utilize project sponsors in order to maximize HOPWA funds. In order to qualify for HOPWA assistance an HIV positive individual must be enrolled in the Ryan White Missouri HIV medical case management system, and assessed to be in need of housing assistance by the medical case manager. Medical Case Managers are strategically located throughout regions where the client base is located. The Medical Case Manager completes all required paperwork to ensure the client qualifies for services and then forwards the service referral request within the statewide database to the MDHSS program manager for approval. The service referral payment is expedited through the fiscal agent directly to the landlord, utility company or mortgage company.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	MDHSS does not utilize project sponsors in order to maximize HOPWA funds.
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	N/A

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	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	N/A
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	MDHSS does not utilize project sponsors in order to maximize HOPWA funds.
	Describe how resources will be allocated among funding categories.	MDHSS targets all HOPWA funding towards direct housing assistance payments in order to fully maximize the funding. Any client identified at intake with a housing need is immediately referred to either Ryan White emergency assistance or HOPWA housing services through a statewide reporting system to expedite payment for the assistance.
	Describe threshold factors and grant size limits.	N/A

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	What are the outcome measures expected as a result of the method of distribution?	The HOPWA program provides direct assistance, without the use of subcontractors, for short term rent, short term utilities, long term rent and short term mortgage assistance. Once enrolled in the Ryan White Case Management system the client is provided access to core and support services through the case management system including; housing related services, medical Care, mental health counseling, substance abuse counseling, oral health services, emergency assistance, HIV medications, health insurance assistance (premium, out of pocket, and co-pay), and medical transportation. **Goal Outcome Indicator:** • Short-term rent, mortgage, and utility assistance payments for 750 households • Tenant-based rental assistance for 875 households Total: 1,625 households

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Recipient Application Requirements

1. Will the State require that all recipient applications contain a description of the eligible activies to be conducted with HTF funds as required in Section 93.200 - Eligible activities?

* YES

2. Will the State require that each eligible recipient certify that housing assisted with HTF funds will comply with HTF requirements?

*YES

Discussion:

Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved by MHDC Board of Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations.

AP-35 Projects – (Optional)

Introduction:

Project Summary Information - N/A

#	Project Name

Table 61 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

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AP-38 Project Summary

Project Summary Information

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AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No

Available Grant Amounts

N/A

Acceptance process of applications

N/A

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No

State's Process and Criteria for approving local government revitalization strategies

Not at this time, but it may be considered for program year 2019 funding.

AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

The Consolidated Plan is being written to reflect needs and assets throughout the state; subsequently, the goals articulated in this section are written from the same statewide perspective.

The departments of Economic Development and Health & Senior Services do not direct CDBG and HOPWA funding, respectively, on a geographic basis. Funding is based primarily on need.

MHDC will strive to award ESG funding in each CoC of the state, subject to the quality of the applications received and the applicant's ability to meet eligibility criteria. In the event that an insufficient number of applications are received within a geographic area, any remaining funds will be allocated to other regions. Any funds recaptured will be reallocated at the discretion of MHDC. As the state housing finance agency, MHDC does not routinely target specific areas of the state for allocations above and beyond the regional goals stated in the QAP. MHDC serves the entire state of Missouri.

Geographic Distribution

Target Area	Percentage of Funds
Non-Entitlement Housing	
Non-Entitlement Community & Economic Development	
Balance of State Continuum of Care	
Statewide Housing	

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As the state housing finance agency, MHDC does not routinely target specific areas of the state for allocations above and beyond the regional goals stated in the QAP. MHDC serves the entire state of

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Missouri.

MHDC allocates HeRO funds to the non-entitlement areas of the state. These communities typically do not have access to the federal funds available to larger metropolitan areas of the state for homeowner rehabilitation work.

ESG funds are geographically allocated by Missouri CoC in an effort to coordinate homeless assistance funds with the needs of each CoC and are based on requested and awarded funds for previous program years.

Discussion

The state of Missouri's Consolidated Plan reflects funding priorities for the non-entitlement communities throughout the state with HOME and HTF funding available to both non-entitlement and entitlement jurisdictions.

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved annually by MHDC Board of Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations.

One Year Goals for the Number of Households to be Supported	
Homeless	49
Non-Homeless	73
Special-Needs	73
Total	195

Table 63 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0

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One Year Goals for the Number of Households Supported Through	
The Production of New Units	0
Rehab of Existing Units	68
Acquisition of Existing Units	0
Total	68

Table 64 - One Year Goals for Affordable Housing by Support Type

Discussion:

In Missouri, the goal is to safely reduce the length of stay for families and individuals in shelter in order to create housing first opportunities for them to be permanently re-housed. This model removes the traditional tiered system that offers limited services and imposes unnecessary requirements on individuals and families in order to obtain permanent housing. Missouri recognizes that there will always be specific populations that require emergency shelter and services - including but not limited to homeless youth, survivors of domestic violence and homeless individuals struggling with substance abuse - but hopes to incorporate ways to safely shorten these episodes of homelessness and move individuals and families directly into a permanent housing situation through rapid re-housing.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

The State's Consolidated Plan partners – DED, MHDC, DSS and DHSS - do not manage or oversee funds to any of the PHAs throughout the state. The state consulted MONAHRO to solicit data and significantly increase PHA input for the 2018-2022 Consolidated Plan with good success. Twenty-five PHAs in non-entitlement areas of the state agreed to participate in the 2018-2022 Consolidated Plan process. This ongoing collaboration will benefit and improve the state's affordable housing and community development strategies and ultimately help more Missourians find homes in healthy communities. MONAHRO worked with MHDC to coordinate the data and consultation process for those PHAs participating. Each organization acting as a liaison to the larger community – MONAHRO for participating PHAs and MHDC for the Consolidated Plan partners. The 2018-2022 State of Missouri Consolidated Plan PHA Survey was sent to participating PHAs through MONAHRO. Participation was voluntary and participants needed both individual email addresses and access to the internet to complete the survey. While PHAs were able to engage some of their residents, large scale resident outreach was ultimately not successful. Challenges cited by PHAs included residents not having access to a computer, no email addresses for residents, the survey was not user friendly, and not enough time was given to fill out the survey. All participating PHAs were provided with the data requests for pertinent sections of the Consolidated Plan. MONAHRO extended the invitation to all PHAs to work with the Consolidated Plan partners, the 25 listed here agreed to actively participate in that process. All of the PHAs listed received both the Community Input and PHA Survey for consultation. All participating PHAs were asked to distribute the PHA Survey to their residents, the Community Input Survey to their staff and community partners, and all participating PHAs received the PHA questions listed in the Consolidated Plan. Participating PHAS: Bernie, Bloomfield, Boonville, Brookfield, Cabool, Cameron,

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Carrollton, Chillicothe, Clinton, Dexter, Excelsior Springs, Hannibal, Independence, Jefferson City, Kirksville, Liberty, Marceline, Marshall, Mexico, Moberly, Nevada, Noel, Rolla, Salem, and Slater. All Public Housing data and analysis is provided by the PHAs who participated in the 2018-2022 Consolidated Plan. All PHA data as it was submitted to the State is attached for review. The 2018-2022 Consolidated Plan reflects a partnership between PHAs and state community development and housing providers that has not been present with previous five year plans. Missouri's Consolidated Partners will continue to work with MONAHRO and PHAs throughout the state to improve access to processes, encourage collaboration and better align affordable housing priorities.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Actions planned during the next year to address the needs to public housing

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

Actions to encourage public housing residents to become more involved in management and participate in homeownership

All PHA data, as it was submitted to the State, is attached for review.

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

All PHA data, as it was submitted to the State, is attached for review.

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Discussion:

The State's Consolidated Plan partners – DED, MHDC, DSS and DHSS - do not manage or oversee funds to any of the PHAs throughout the state. The state consulted MONAHRO to solicit data and significantly increase PHA input for the 2018-2022 Consolidated Plan with good success. Twenty-five PHAs in non-entitlement areas of the state agreed to participate in the 2018-2022 Consolidated Plan process. This ongoing collaboration will benefit and improve the state's affordable housing and community development strategies and ultimately help more Missourians find homes in healthy communities. MONAHRO worked with MHDC to coordinate the data and consultation process for those PHAs participating. Each organization acting as a liaison to the larger community – MONAHRO for

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participating PHAs and MHDC for the Consolidated Plan partners. The 2018-2022 State of Missouri Consolidated Plan PHA Survey was sent to participating PHAs through MONAHRO. Participation was voluntary and participants needed both individual email addresses and access to the internet to complete the survey. While PHAs were able to engage some of their residents, large scale resident outreach was ultimately not successful. Challenges cited by PHAs included residents not having access to a computer, no email addresses for residents, the survey was not user friendly, and not enough time was given to fill out the survey. All participating PHAs were provided with the data requests for pertinent sections of the Consolidated Plan. MONAHRO extended the invitation to all PHAs to work with the Consolidated Plan partners, the 25 listed here agreed to actively participate in that process. All of the PHAs listed received both the Community Input and PHA Survey for consultation. All participating PHAs were asked to distribute the PHA Survey to their residents, the Community Input Survey to their staff and community partners, and all participating PHAs received the PHA questions listed in the Consolidated Plan. Participating PHAS: Bernie, Bloomfield, Boonville, Brookfield, Cabool, Cameron, Carrollton, Chillicothe, Clinton, Dexter, Excelsior Springs, Hannibal, Independence, Jefferson City, Kirksville, Liberty, Marceline, Marshall, Mexico, Moberly, Nevada, Noel, Rolla, Salem, and Slater. All Public Housing data and analysis is provided by the PHAs who participated in the 2018-2022 Consolidated Plan. All PHA data as it was submitted to the State is attached for review. The 2018-2022 Consolidated Plan reflects a partnership between PHAs and state community development and housing providers that has not been present with previous five year plans. Missouri's Consolidated Partners will continue to work with MONAHRO and PHAs throughout the state to improve access to processes, encourage collaboration and better align affordable housing priorities.

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AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

MHDC is tasked with drastically reducing and ultimately ending homelessness in Missouri. MHDC administers the ESG program in collaboration with DSS and also administers HTF. In addition, MHDC administers a variety of federal, state or locally funded programs with the same objectives that are outside the scope of the Consolidated Plan. MHDC requires funded agencies to attend meetings of their CoC and to participate in the CE system of the CoC. MHDC also solicits feedback for each application received from the CoC to understand the diverse needs of each CoC. Consolidated oversight for the majority of the homeless assistance programs throughout Missouri allows targeting of funds, consistency of program goals and policies and helps reduce and ultimately end homelessness in Missouri.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness

including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

All Missouri CoC's conduct an annual PITC in January and are responsible for establishing a CE system by January, 2018. Through these collaborative projects the state expects to reach unsheltered individuals and families who will be assessed and prioritized for services resulting in identification of gaps and a reduction in the unsheltered homeless population.

Addressing the emergency shelter and transitional housing needs of homeless persons

In Missouri, the goal is to safely reduce the length of stay for families and individuals in shelter in order to create housing first opportunities for them to be permanently re-housed. This model removes the traditional tiered system that offers limited services and imposes unnecessary requirements on individuals and families in order to obtain permanent housing. Missouri recognizes that there will always be specific populations that require emergency shelter and services - including but not limited to homeless youth, survivors of domestic violence and homeless individuals struggling with substance abuse - but hopes to incorporate ways to safely shorten these episodes of homelessness and move individuals and families directly into a permanent housing situation through rapid re-housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

All Missouri CoC's conduct an annual PITC in January and are responsible for establishing a CE system by January, 2018. Through these collaborative projects the state expects to reach unsheltered individuals and families who will be assessed and prioritized for services resulting in identification of gaps and a reduction in the families with children, veterans and unaccompanied youth unsheltered homeless population which are priorities in the federal and state plant to end homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services,

employment, education, or youth needs

The GCEH established a Discharge Policy in 2011 that was adopted by all Missouri CoCs and state partners. The discharge policy establishes the following guiding principles: homelessness is unacceptable in Missouri; efforts to secure permanent housing shall be made prior to being discharged from a state or public facility, such as a mental health facility, substance abuse treatment facility, long-term care facility, or jail/prison; if "temporary" shelter placement is unavoidable, the reasons for this should be documented; if after having exhausted efforts to engage the client in a discharge plan, if the client continues to refuse services, the efforts will be noted; and if a client receiving out-patient services becomes homeless, the state or public facility should work actively with available community resources to locate suitable housing.

All Missouri CoCs are implementing a CE System. The CE system will serve as a single point of access for those at-risk of or experiencing homelessness. ESG programs are required to participate in the CE System if it is operational. Through pilot programs the Department of Corrections, Department of Health and Senior Services, Department of Mental Health and Department of Social Services are participating in referrals to the CE system. The goal of programs funded under the ESG program is to reduce the length of stay for individuals and families utilizing emergency shelters during their housing crisis in order to reduce the length of time that individual or family experiences homelessness. In addition, service providers receiving ESG Homelessness Prevention and Rapid Re-housing programs have a goal of assisting households experiencing homelessness or at imminent risk of homelessness with housing stability within 30 days.

Discussion

MHDC is tasked with drastically reducing and ultimately ending homelessness in Missouri. MHDC administers the ESG program in collaboration with DSS and also administers HTF. In addition, MHDC administers a variety of federal, state or locally funded programs with the same objectives that are outside the scope of the Consolidated Plan. MHDC requires funded agencies to attend meetings of their CoC and to participate in the CE system of the CoC. MHDC also solicits feedback for each application received from the CoC to understand the diverse needs of each CoC. Consolidated oversight for the majority of the homeless assistance programs throughout Missouri allows targeting of funds, consistency of program goals and policies and helps reduce and ultimately end homelessness in Missouri.

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AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	150
Tenant-based rental assistance	175
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	325

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AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

Barriers noted in the 2013-2017 Consolidated Plan persist and continue to impact the growth of affordable housing development in Missouri. LIHTC regulations governing income eligibility, particularly the AMI rent restriction limits and how those restrictions impact LIHTC development in small, rural counties, continue to present challenges for financing housing developments that are truly affordable to households in these communities. Limited funding for homeownership and affordable housing programs further exacerbates the gap between the need for housing and the available supply. Funding for housing programs geared towards low and extremely low income households has not significantly increased despite the growing number of households that fall into these categories. Taken together, these barriers pose very real challenges to housing providers, developers, advocates, and those in need of housing. The state will continue to promote its mission of developing safe, affordable housing while being asked to do more with fewer economic resources.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

To the extent it is feasible, the Consolidated Plan partners will continue to work with stakeholders including but not limited to MCHR, housing and social service providers, property management companies and PHAs on fair housing outreach and education, to ensure individuals understand their housing rights and the resources available to them. To the extent it is feasible, the Consolidated Partners will provide information and resources to policy makers as they work towards reconciling differences in state and local regulations as they pertain to housing, zoning, and discrimination.

Discussion:

The Missouri Statewide Fair Housing Impediments Analysis underscored the fact that housing discrimination continues despite increased education and improved housing access in some communities. The report noted that for low income renters, that discrimination is most pronounced. For some populations, discrimination can, to an extent, be mitigated. The Violence Against Women Reauthorization Act (VAWA) of 2013 expands housing protections to eligible residents living in LIHTC developments. MHDC will continue to work with the Missouri Coalition Against Domestic & Sexual Violence (MCADSV) to ensure housing developers, providers and property management companies understand their responsibilities under VAWA. MHDC requires all affordable developments to adopt fair housing marketing plans prior to the issuance of funding and makes state and federal fair housing resources available on their website. Creating more affordable housing options for all Missourians, educating property managers about fair housing choice, and improving access to

affordable housing resources for those who need it, will continue to be priorities for MHDC.

The 2018-2022 Consolidated Plan reflects a partnership between PHAs and state community development and housing providers that has not been present with previous five year plans. Missouri's Consolidated Partners will continue to work with MONAHRO and PHAs throughout the state to improve access to processes, encourage collaboration and better align affordable housing priorities.

AP-85 Other Actions – 91.320(j)

Introduction:

Actions planned to address obstacles to meeting underserved needs

MHDC is tasked with drastically reducing and ultimately ending homelessness in Missouri. MHDC administers the ESG program in collaboration with DSS and also administers HTF. In addition, MHDC administers a variety of federal, state or locally funded programs with the same objectives that are outside the scope of the Consolidated Plan. MHDC requires funded agencies to attend meetings of their CoC and to participate in the CE system of the CoC. MHDC also solicits feedback for each application received from the CoC to understand the diverse needs of each CoC. Consolidated oversight for the majority of the homeless assistance programs throughout Missouri allows targeting of funds, consistency of program goals and policies and helps reduce and ultimately end homelessness in Missouri.

The Department of Economic Development will continue its relationship with partner agencies (state, federal and local) to meet the non-housing community development needs of Missouri.

Actions planned to foster and maintain affordable housing

Many of Missouri's affordable housing resources are coordinated by MHDC. As the state housing finance agency, MHDC is dedicated to strengthening communities and the lives of Missourians through the financing, development and preservation of affordable housing. Funding decisions are made in accordance with the QAP and other allocation plans (including the HTF allocation plan) approved annually by MHDC Board of Commissioners. Federal resources, including HOME and HTF are leveraged with alternative funding resources as they become available in connection with the private/public partnership programs involving the production of rental property. MHDC is committed to ensuring that all allocation plans for the various funding sources effectively meet the needs of the Missouri citizens including individuals and families who represent special needs populations and other vulnerable or at-risk populations.

Actions planned to reduce lead-based paint hazards

MHDC's Lead Based Paint Policy and Procedures for the rental rehabilitation program can be found in

the Environmental Review Guidelines, Exhibit B.

All approved developments must follow the requirements in 24 CFR part 35: * Complete the HUD Partner Worksheet, including exhibits. Developers must provide MHDC all pertinent information including informal and informal consultations with state and federal agencies and non-federal agencies.* Developer's must provide MHED with the analysis to back up the type of lead-based paint investigation done for a project. This can include the reports, certifications, licenses, and pamphlets.

Developers are encouraged to review the lead-based paint requirements located on the HUD Exchange website and the Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. In addition to these procedures, MHDC has guidelines for the Physical Needs Assessment, which is submitted with the application for funding. Among other things, this document addresses the need and requirement for a lead-based paint assessment.

The HeRO program contains lead-based paint requirements. Sub-recipients are required to provide their own procedures for addressing lead-based paint issues within the single-family homes they will be rehabilitating, including staff and contractor certifications and procedures for lead risk assessment. In the 2016 HOME Program year, 36 of the 138 HOME rental units rehabilitated triggered a Lead Based Paint Investigation because they were originally constructed before January 1, 1978. Of the 105 single-family homeowner occupied units that were rehabilitated, 88 were built before 1978. These 124 units directly increased access to housing units throughout Missouri with Lead-Based paint hazards remediated. The ESG program requires a lead-based paint visual assessment for all units being assisted with ESG financial assistance (rent assistance, utility assistance, utility/rent deposits, or arrears), if the unit was constructed prior to 1978, and a child under the age of six is or will be living in the unit. This screening must be completed and kept in client files for review during compliance visits.

Actions planned to reduce the number of poverty-level families

MHDC collaborates with and maintains an ongoing relationship with the GCEH which was established with a mission to promote public and private coordination and collaboration, develop new strategies to evaluate and reallocate resources, remove barriers to accessing services, evaluate unmet needs and provide supportive services and affordable housing needs, implement effective solutions to build economic security and promote and support activities that prevent homelessness. The GCEH is a Governor appointed committee consisting of state departments, non-profit agencies, eight CoC, and formerly homeless citizens. All agencies participating in the Consolidated Planning Process have a seat on this committee. Missouri addresses poverty-level families through the network of community action agencies who apply for homeless assistance funding, provide disaster services and reach rural communities. MHDC and many other partners participate in the Missourians to End Poverty (MEP), a committee facilitated by the Missouri Community Action Network bringing the community together to end poverty. MEP focuses on the five key elements that can be addressed to impact the conditions of poverty in Missouri including food, health, education, energy and housing and family and economic security. Each element has multiple goals listed in the MEP policy

platform. http://www.moendpoverty.org/uploads/4/0/7/9/40792405/policy_platform.pdf MEP has committed to supporting policy changes that create opportunities for families to have permanent affordable housing, support sustained investments in the HTF to help families and create new housing opportunities, increase support for low-income families for heating and energy assistance and promote the weatherization of homes and energy conservation.

Actions planned to develop institutional structure

All Missouri CoC's are required to implement a CE System to coordinate and prioritize homeless assistance funding by January 2018. This structure will facilitate collaboration and improve institutional structures.

The Department of Economic Development partners with various state and federal agencies (including, but not limited to the Missouri Department of Natural Resources, Missouri Department of Transportation, Delta Regional Authority, U.S. Department of Agriculture – Rural Development, U.S. Department of Commerce – Small Business Administration, State and Federal Emergency Management Agencies, and the Economic Development Administration) to collectively meet the needs of eligible areas of the State. In addition, the Department has an excellent relationship with the Missouri Regional Planning Commissions.

Actions planned to enhance coordination between public and private housing and social service agencies

All Missouri CoCs are implementing a CE System. The CE system will serve as a single point of access for those at-risk of or experiencing homelessness. CE is required to be in place for each Missouri Continuum of Care by January, 2018. Funding has been made available for pilot programs to establish CE systems within CoCs and regions within those CoCs and data is being collected to provide information on the coordination between multiple state departments and local stakeholders. The CE Network Initiative (CENI) is a collaboration between MHDC, DSS, DHSS, DOC and DMH. CENI's pilot project has commenced in two regions in the Missouri BoS: region 8 (Dent, Douglas, Howell, Laclede, Oregon, Ozark, Shannon, Texas and Wright counties) and region 10 (Bates, Benton, Cass, Henry, Johnson, Lafayette, Pettis, Saline and St. Clair counties). CENI's objective is to help provide a more efficient process for those experiencing homelessness, or a housing crisis, to access the homeless service delivery system, identify cross-sections of service utilizers between the collaborating agencies, and to provide data that will enable the state to better understand housing and service needs within Missouri.

The state began working with MONAHRO to solicit data and significantly increase PHA input for the 2018-2022 Consolidated Plan. This ongoing collaboration will benefit and improve the state's affordable housing and community development strategies and ultimately help more Missourians find homes in

healthy communities.

Discussion:

The Missouri Statewide Fair Housing Impediments Analysis underscored the fact that housing discrimination continues despite increased education and improved housing access in some communities. The report noted that for low income renters, that discrimination is most pronounced. For some populations, discrimination can, to an extent, be mitigated. The Violence Against Women Reauthorization Act (VAWA) of 2013 expands housing protections to eligible residents living in LIHTC developments. MHDC is working with properties to provide education about their responsibilities under. MHDC requires all affordable developments to adopt fair housing marketing plans prior to the issuance of funding. MHDC continues working to expand outreach to potential tenants and to make fair housing resources available to current residents. Creating more affordable housing options for all Missourians, educating our property managers about fair housing choice, and improving access to affordable housing resources for those who need it, will continue to be priorities for MHDC.

The 2018-2022 Consolidated Plan reflects a partnership between PHAs and state community development and housing providers that has not been present with previous five year plans. Missouri's Consolidated Partners will continue to work with MONAHRO and PHAs throughout the state to improve access to processes, encourage collaboration and better align affordable housing priorities.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

The Program Specific Requirements section looks at how MHDC, the Department of Economic Development, Department of Social Services, and the Department of Health and Senior Services administer the statewide federal funds.

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	100,000

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2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	**100,000**

Other CDBG Requirements

1. The amount of urgent need activities	861,714
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	93.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.320(k)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

   MHDC does not utilize its HOME funds for any forms of investment outside of those listed in Section 92.205

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

   MHDC does not currently utilize its state HOME funds for homeownership assistance. However, MHDC is exploring the feasibility and practical application of a program providing homeownership opportunities for low- to moderate-income Missourians. If it is later determined that HOME funds should be utilized for this purpose, MHDC will fully develop and implement such a program.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

   MHDC does not currently utilize its state HOME funds for homeownership assistance. However, MHDC is exploring the feasibility and practical application of a program providing homeownership opportunities for low- to moderate-income Missourians. If it is later determined that HOME funds

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should be utilized for this purpose, MHDC will fully develop and implement such a program.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

   MHDC does not currently use its HOME funds to refinance existing debt.

Emergency Solutions Grant (ESG)
Reference 91.320(k)(3)

1. Include written standards for providing ESG assistance (may include as attachment)

   Grantees/sub-grantees must develop and implement written standards that must include:

- Standard policies and procedures for evaluating individuals' and families' eligibility for assistance.
- Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families will receive rapid re-housing assistance.
- Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.
- If funding essential services related to street outreach; standards for targeting and providing these services.
- If funding any emergency shelter activities; policies and procedures for admission, diversion, referral and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations and persons with the highest barriers to housing.
- If the grantee's CoC, or a portion of their CoC, currently has a centralized or coordinated assessment system and the grantee or any sub-grantees utilize the centralized or coordinated assessment

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system, the recipient must describe the assessment system and how they will participate.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

   All Missouri CoC's are in the process of establishing a CE System by January, 2018. The BoS CoC has established a regional CE for a large rural CoC. All CE Systems will have policies and procedures. The BoS CoC CE Committee has created policies and procedures which were approved by the governing body and are applicable to all ten regions. The CE Committee is responsible for maintaining and updating policies and procedures and presenting to the BoS CoC board for final approval.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

   DSS sub-contracts the state ESG funds to MHDC. MHDC has a competitive application process in which units of local government and nonprofit organizations can apply for funds. The first right of refusal is given to units of local government and if they are refused, then nonprofit agencies are able to apply directly to MHDC for funding. The state of Missouri allocation is also available at a capped amount to other ESG entitlement communities in the state. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG. The state of Missouri and MHDC meet the homeless participation requirement 24 CFR 576.405(a).

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

   ESG grantees are required to provide proof of homeless participation in a board or advisory capacity to their agency at the time of the grant agreement.

5. Describe performance standards for evaluating ESG.

   As stated in the HEARTH Act the ESG and CoC programs must collaborate on the creation of performance standards. ESG funded agencies must strive to meet minimum performance measures established by HUD and any additional performance measures established by their own CoC.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

☑ Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

All participants must be in good standing with MHDC. In addition to satisfactory previous performance, participants must be aware that:

All identities of interest between members of the development team must be documented to MHDC's satisfaction. This includes, but is not limited to, identities of interest between a property/land seller and purchaser and identities of interest between any two or more development team members such as developer, general partner(s), syndicator(s), investor(s), lender(s), architect(s), general contractor, sub-contractor(s), attorney(s), management agent, etc.

All participants must adhere to all federal, state, and local laws, as well as any and all applicable regulations, guidance, revenue rulings and the like as may be promulgated by the IRS, HUD, or any other federal or state agency. Participants are solely responsible for ensuring their own compliance with any such laws, regulations, and guidance, and are encouraged to seek the advice of their own legal counsel with respect to such compliance.

When available and feasible, best efforts must be employed to use local vendors, suppliers, contractors, and laborers.

*Remainder of answer starts on page 2 of "2018 Housing Trust Fund" document located at:

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b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

An "Application" is defined as: (1) the MHDC Application - FIN100 (Exhibit A), (2) one tabbed, three ring binder with all required exhibits and original signatures, where required, (3) digital media with electronic exhibits, and (4) the appropriate application fee. The MHDC FIN-125 (Application Workbook) (Exhibit B) will identify exhibits to be submitted in the three ring binder and exhibits to be submitted digitally. Three ring binder and digital media exhibit names must match the FIN-125 exhibit names. The Application Checklist and FIN-100 are attached as exhibits.

Applicants must request HTF as well as indicate whether they are seeking a 9% Tax Credit or a 4% Tax Credit (for Bond Developments). Although not required, it is highly recommended that Tax Credits be coupled with HTF requests due to the limited allocation of HTF funds. MHDC does not require nor accept separate proposals unless the applicant wishes to have a proposal considered for both 9% Credits and 4% Credits.

Each applicant is required to submit exhibits applicable to the type of development it is proposing. A completed and executed FIN-100 (Rental Housing Programs Application) with appropriate certifications and elections made, digital media, application fee, development narrative and questionnaire, site review information, applicant site control, market study, and financing commitments constitute the Primary Documentation. Secondary documentation includes local jurisdiction contact verification, statutorily required documentation, housing priority documentation (if applicable), zoning verification, architectural items, sustainable housing information, relocation data (if applicable), PHA approved utility allowances, developer and general partner information, and management company information.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

While the housing priorities may give a development extra consideration, the selection criteria below indicate what factors are used in making funding recommendations. All submitted applications which successfully make it to the competitive review stage will be evaluated by MHDC staff using the selection criteria described below.

- Project location;
- Housing needs characteristics;
- Project characteristics, including whether the project involves the use of existing housing as part

of a community revitalization plan;

- Tenant populations with special housing needs or consisting of vulnerable persons;
- Sponsor characteristics;
- Tenant populations of individuals with children;
- Public housing waiting lists; and
- Energy efficiency and overall sustainability.

*Remainder of answer starts on page 3 of "2018 Housing Trust Fund" document located at:

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Recommendations for geographic distribution are based on estimated population as reported by U.S. Census Bureau, poverty population, housing cost burden as reported by U.S. Census Bureau and Point-in-Time Count data as reported by each Missouri Continuum of Care. Due to the limited funding, MHDC will focus on projects with the most impact. This category has the least weight in the Selection Criteria. It will be considered if more than one application receives the same total evaluation. MHDC will rank applications to award funds throughout the state.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

A development team's experience with affordable housing, MHDC, and the type of development being proposed is important. The following development team members will be evaluated: Developer(s), General Partner(s), Management Agent, Syndicator(s)/Investor(s), Contractor, Architect, Sustainable Design Team, Consultant(s), Lead Referral Agency (for special needs or vulnerable persons housing), and the service provider for service-enriched housing. Each of these members are evaluated by various members of MHDC staff. For example, the Contractor is reviewed by MHDC's architect, Mortgage Credit Department, and the MBE/WBE department. Each staff member reviews the team members for

different reasons.

*Remainder of answer starts on page 10 of "2018 Housing Trust Fund" document located at:

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f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

A development with a committed Project Based Rental Assistance is preferred over a proposal without.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The minimum period of affordability is 30 years.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Merits of the Project is a list of MHDC's development priorities for the HTF. This category, along with the Underwriting Department's evaluation, have the most weight when considering final rankings. Each priority is evaluated based on the quality of the required documentation and how the priority improves the proposal and community it is intended to serve.

*Remainder of answer starts on page 11 of "2018 Housing Trust Fund" document located at:

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

A preference in funding will be extended to applicants proposing developments utilizing contributions or

financial support from Owners, General Partners or otherwise derived from non-federal sources. Items that result in the reduction of development costs, reduced tenant rents and reduce the need for federal subsidy or funding such as donated cash, donated real estate, donated or reduced cost materials, abatement of local taxes and waiver of fees will be viewed favorably. Leveraging from non-federal contributions help make an application more competitive. Leveraging will be evaluated during underwriting. The overall HTF subsidy per unit, development cost per unit, rent advantage compared to market and other affordable units, and rent paid by tenant will be compared to other HTF applications. This will affect ranking. The ability to reduce development costs and/or rents is more important than the type of leverage. However, similar proposals that show more leverage than others will be given preference.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. **Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. **Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.** Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy

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amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

MHDC will use the same Cost Limits (Exhibit D) for the HTF that it uses for the Low Income Housing Tax Credit program; these published cost limits vary across the state based on hard and soft construction costs and the cost of labor. Since 2014, MHDC has conducted Cost Analysis Reports on all approved MHDC developments. Analysis from these reports indicate that developers and contractors are able to provide quality housing while staying under the cost limits. MHDC believes the published cost limits are such that developers are able to provide housing that will last the affordability period while still being an efficient and responsible use of resources. MHDC will use the Section 234-Condominium Housing basic mortgage limits, for elevator-type projects, as adjusted. MHDC will use the 270% High Cost Percentage (HCP) factor for both Kansas City and St. Louis, and then group all Missouri counties into eight different "Key Localities," which use either Kansas City or St. Louis as the base for cost comparison; a high cost percentage is calculated for each Key Locality by a multiplier (as determined by Marshall & Swift Multiplier) to adjust for costs in each locality relative to either Kansas City and St. Louis. MHDC uses these limits for the Tax Credit Program. Using this calculation method will allow the HTF to work seamlessly with other funding sources.

8. **Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

MHDC Rehab standards are located at the following link:

https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

9. **Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. **HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

☑ The grantee has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

N/A

11. **Grantee Limited Beneficiaries or Preferences.** Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

The Set-aside Preferences consist of priorities for Special Needs and Vulnerable Persons and serve as incentives for developers to build housing that is safe, decent, affordable, and targeted to the most vulnerable individuals and families. This is accomplished by providing a home for individuals and families with special needs combined with social services to stabilize them once in place. MHDC will prioritize applications that meet this goal. Developments applying under the Set-aside Preferences must select either the Special Needs Priority or the Vulnerable Persons Priority, but not both.

12. **Refinancing of Existing Debt.** Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum

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level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

N/A

Discussion:

Appendix - Alternate/Local Data Sources

1	**Data Source Name** American Community Survey - State of Missouri
	List the name of the organization or individual who originated the data set. Census Bureau 2016 Community Survey Data
	Provide a brief summary of the data set. 2016 Missouri data
	What was the purpose for developing this data set? To access more updated and precise data on housing
	Provide the year (and optionally month, or month and day) for when the data was collected. 2016
	Briefly describe the methodology for the data collection. Survey
	Describe the total population from which the sample was taken. Unknown
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. state of Missouri and when pertintent, MHDC used county level data
2	**Data Source Name** 2010 Census
	List the name of the organization or individual who originated the data set. Census Bureau
	Provide a brief summary of the data set. 2010 census information
	What was the purpose for developing this data set? more data on United State population
	Provide the year (and optionally month, or month and day) for when the data was collected. 2010
	Briefly describe the methodology for the data collection. survey and interviews

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	Describe the total population from which the sample was taken. state of Missouri
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. unknown
3	**Data Source Name** 2015 Homeless Study
	List the name of the organization or individual who originated the data set. Missouri Housing Development Commission
	Provide a brief summary of the data set. homelessness information from state Point-in-Time-Counts and HMIS data. link to complete study: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18
	What was the purpose for developing this data set? a more specific picture of homelessness in the state of Missouri
	Provide the year (and optionally month, or month and day) for when the data was collected. 2015
	Briefly describe the methodology for the data collection. Point-in-Time-Counts and HMIS data from all 8 CoCs
	Describe the total population from which the sample was taken. homeless and nearly homeless across the state
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. homeless and nearly homeless across the state
4	**Data Source Name** HUD FMR Data
	List the name of the organization or individual who originated the data set. Department of Housing and Urban Development
	Provide a brief summary of the data set. Fair market rent information by county

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	What was the purpose for developing this data set? establishing fair market and affordable rents in affordable developments
	Provide the year (and optionally month, or month and day) for when the data was collected. 2012
	Briefly describe the methodology for the data collection. unknown
	Describe the total population from which the sample was taken. county by county in the state of Missouri
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. unknown
5	**Data Source Name** Missouri Economic Research and Information Center
	List the name of the organization or individual who originated the data set. Missouri Economic Research and Information Center Missouri Department of Economic Development
	Provide a brief summary of the data set. Non-Housing Community Development Assets
	What was the purpose for developing this data set? To correctly reflect non-housing community development assets in the state of Missouri
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Statewide data
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? Created in July 2012 with data based on the 2010 census
	What is the status of the data set (complete, in progress, or planned)? complete
6	**Data Source Name** Missouri Department of Health and Senior Services
	List the name of the organization or individual who originated the data set. Chiquita Small, HOPWA Administrator

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	Provide a brief summary of the data set. Baseline data gathered by the program administrator.
	What was the purpose for developing this data set? To gather HOPWA outcomes on Access to Care and Support
	Provide the year (and optionally month, or month and day) for when the data was collected. 2016
	Briefly describe the methodology for the data collection. Unknown
	Describe the total population from which the sample was taken. HIV/AIDS individuals
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Unknown
7	**Data Source Name** CoC Homeless Population
	List the name of the organization or individual who originated the data set. https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_State_MO_2016.pdf
	Provide a brief summary of the data set. https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_State_MO_2016.pdf
	What was the purpose for developing this data set? https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_State_MO_2016.pdf
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_State_MO_2016.pdf
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_State_MO_2016.pdf

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	What is the status of the data set (complete, in progress, or planned)? https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_State_MO_2016.pdf
8	**Data Source Name** MHDC Housing Needs Assessment Report
	List the name of the organization or individual who originated the data set. Public Policy Research Center UMSL, Institute of Public Policy Harry S. Truman School of Public Affairs University of Missouri, Center for Applied Research and Environmental Systems (CARES)
	Provide a brief summary of the data set. Housing needs assessment / state of Missouri Link to actual report: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18
	What was the purpose for developing this data set? Update statewide housing data
	Provide the year (and optionally month, or month and day) for when the data was collected. 2015
	Briefly describe the methodology for the data collection. Unknown
	Describe the total population from which the sample was taken. Unknown
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Unknown
9	**Data Source Name** MO Statewide Fair Housing Impediments Analysis 13-
	List the name of the organization or individual who originated the data set. Public Policy Research Center UMSL

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	Provide a brief summary of the data set. Fair housing analysis Link to study: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18
	What was the purpose for developing this data set? Update Missouri's Analysis of Impediments for Fair Housing (AI)
	Provide the year (and optionally month, or month and day) for when the data was collected. 2014
	Briefly describe the methodology for the data collection. Unknown
	Describe the total population from which the sample was taken. state of Missouri
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Unknown
10	**Data Source Name** SAIPE Data
	List the name of the organization or individual who originated the data set. US Census Bureau
	Provide a brief summary of the data set. Census data / small areas
	What was the purpose for developing this data set? Unknown
	Provide the year (and optionally month, or month and day) for when the data was collected. 2015
	Briefly describe the methodology for the data collection. Unknown
	Describe the total population from which the sample was taken. Unknown

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	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Unknown
11	**Data Source Name** Consolidated Plan PHA Data
	List the name of the organization or individual who originated the data set. All PHA data, as it was submitted to the State, is attached for review. link: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18
	Provide a brief summary of the data set. All PHA data, as it was submitted to the State, is attached for review. link: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18
	What was the purpose for developing this data set? All PHA data, as it was submitted to the State, is attached for review. link: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18
	Provide the year (and optionally month, or month and day) for when the data was collected. All PHA data, as it was submitted to the State, is attached for review. link: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18
	Briefly describe the methodology for the data collection. All PHA data, as it was submitted to the State, is attached for review. link: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18
	Describe the total population from which the sample was taken. All PHA data, as it was submitted to the State, is attached for review. link: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. All PHA data, as it was submitted to the State, is attached for review. link: https://1drv.ms/f/s!AuhPSgaH-dEUbq-KInhinEgVC18

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Appendix A

Distribution Methods – CDBG

General Requirements

1) Eligible Applicants: The State will distribute an estimated $20,300,000 in FY2018 CDBG funds to "units of general local government" in non-entitlement areas (incorporated municipalities under 50,000 and counties under 200,000). Cities and counties in Missouri that are not eligible for these non-entitlement funds are: Blue Springs, Columbia, Florissant, Independence, Jefferson City, Joplin, Kansas City, Springfield, St. Joseph, Lee's Summit, St. Louis (city), Jefferson County and the cities within Jefferson County who have elected to participate in the County entitlement program (Arnold , Pevely, Herculaneum, Festus, Crystal City, Kimmswick, De Soto, Olympian Village, Hillsboro, Byrnes Mill), St. Charles County and the cities within St. Charles County who have elected to participate in the County entitlement program (Cottleville, Dardenne Prairie, Lake St. Louis, St. Charles, St. Paul, St. Peters, Weldon Spring, and Wentzville), St. Louis County, and the cities within St. Louis County who have elected to participate in the County entitlement program (Ballwin, Bella Villa, Bellefontaine Neighbors, Bellerive, Bel-Nor, Bel-Ridge, Berkeley, Beverly Hills, Breckenridge Hills, Brentwood, Bridgeton, Calverton Park, Charlack, Cool Valley, Country Club Hills, Dellwood, Edmundson, Ellisville, Eureka, Fenton, Ferguson, Flordell Hills, Glen Echo Park, Glendale, Greendale, Hanley Hills, Hazelwood, Hillsdale, Jennings, Kinloch, Kirkwood, Mackenzie, Maplewood, Maryland Heights, Moline Acres, Normandy, Northwoods, Norwood Court, Olivette, Overland, Pagedale, Pasadena Hills, Pasadena Park, Pine Lawn, Richmond Heights, Riverview, Rock Hill, St. Ann, St. John, Sycamore Hills, University City, Uplands Park, Valley Park, Velda Village, Velda Village Hills, Vinita Park, Vinita Terrace, Webster Groves, Winchester, and Woodson Terrace).

2) Eligible Activities: Section 105(a) of the Community Development Act and HUD regulations specified the activities that are eligible for CDBG assistance. A general listing of eligible activities is below, and a detailed description is provided in 105(a) of the Act and in 24 CFR 570.482. While all activities may be eligible, some program categories may prioritize the funding of some activities:

1. Property Acquisition
2. Property Disposition
3. Property Clearance
4. Architectural Barrier Removal
5. Senior Center

6. Community Facilities
7. Centers for the Handicapped
8. Historic Properties
9. Water Treatment
10. Sanitary Sewer Collection
11. Storm Sewers
12. Flood and Drainage Facilities
13. Streets (or Roads)
14. Street Accessories
15. Parking Facilities
16. Bridges
17. Sidewalks
18. Pedestrian Malls
19. Recycling or Conversion Facilities
20. Parks and Recreation Facilities
21. Fire Protection/Facility Equipment
22. Solid Waste Disposal Facilities
23. Other Utilities
24. Public Service/Supportive Services
25. Rehabilitation of Private Residential Properties
26. Rehabilitation of Public Residential Properties
27. Payments for Loss of Rental Income
28. Relocation
29. Code Enforcement
30. Energy Use Strategy
31. Non-Federal Share Payment
32. Interim Assistance
33. Planning
34. Commercial or Industrial Facilities
35. Administration
36. Engineering/Design
37. Housing Rehab Inspection
38. Engineering/Construction Inspection
40. Audit
41. Port Facility
42. Airports
43. Natural Gas Lines
44. Electrical Distribution Lines

45. Rail Spurs
46. Security Lighting
47. Other Professional Services
48. Security Fencing
49. Site Preparation
50. Purchase Land/Building
51. Facility Construction Renovation
52. Machinery/Equipment
53. Working Capital
54. Sewage Treatment
55. LDC Homeownership Assistance – up to $15,000 to purchase a new home
56. Legal
57. 911 Emergency Systems
60. Homeowners Assistance – up to $5,000 to purchase an existing DSS home
61. Lead-Based Paint Evaluation
62. Asbestos Removal
63. Job Training*
64. Home-Ownership Counseling
65. Substantial Reconstruction of private residential properties on same lot – up to $15,000
66. Water Distribution
67. Lead Reduction NOT incidental to rehab
68. Asbestos Inspection

*Job training activities must be approved by the Division of Workforce Development or the Workforce Investment Board.

3) <u>Ineligible Activities are as Follows:</u>

   a) Maintenance or operation costs. **
   b) General government expenses.
   c) Political activities.
   d) Improvements to city halls and courthouses, except those required to meet the Americans with Disabilities Act.
   e) Purchase of equipment, except for fire protection, public services, landfills, or recreation.
   f) Income payments, except for loss of rental income due to displacement.
   g) Application preparation costs or a bonus award for writing a successful application.

h) Religious purposes.

** Maintenance and Operation Costs: Any cost that recurs on a regular basis (generally, less than five years) is considered a maintenance or operation cost, therefore ineligible for CDBG assistance. It is the responsibility of the applicant to provide these revenues from user fees or taxes. Additionally, if such maintenance or operation revenues are not sufficient to adequately support a facility or service assisted by CDBG funds, the project will not be awarded. The determination whether such revenues are sufficient will be made by the applicant's professional engineer, the Department of Natural Resources (for related projects), and/or DED. The preliminary engineering report required for all public works projects should discuss the revenues available for operation and maintenance of the facility or service.

4) Application Submission: Only one application may be submitted in any individual category by a city or county on behalf of itself. A city may submit one other application for activities to be carried out on behalf of a sub-recipient public body or an incorporated non-profit agency. A county may submit two other applications for activities to be carried out on behalf of a sub-recipient public body or an incorporated non-profit agency. In all instances, the application must represent the applicant's community development or housing needs. An applicant (or sub-recipient) must have legal jurisdiction to operate in (or serve) the proposed project area (or beneficiaries). Proof must be submitted with the application. As the grantee, the city or county has final responsibility for the project implementation and compliance. There is no limit on the number of applications that may be submitted for economic development and emergency projects. The State reserves the right to place a limit on grants under its interim financing program. All applications must be submitted on forms prescribed by DED and in accordance with the guidelines issued for each program. While an applicant may be selected as a grantee, the final grant amount and scope of activities may be modified by DED.

Application Request Limits: The following are the minimum and maximum amount of funds an applicant may request per application:

Application Category	**Minimum application amount**	**Maximums**
Water and Wastewater Engineering Facility Plan/Plans and Specs Grants	$10,000 $5,000	$500,000 or $5,000/$7,500household (see water/wastewater section for details) **80% of amount equal to ASCE table (found on page 32 of the CDBG FY2018 Application and Guidelines Manual)** **not to exceed $50,000**
Community Facility	$10,000	$350,000 or $5,000/household
General Infrastructure	$10,000	$500,000 or $5,000/household
Demolition	$10,000	$125,000 for residential demolition only $250,000 including commercial demolition
Economic Development	varies	(See specific maximums and per job maximums outlined in each of the Economic Development Application Categories, pages 24-29 of this appendix)
Emergency	N/A	varies

NOTES RELEVANT TO PROGRAM CATEGORIES

- For economic development, the maximum CDBG funds allowed per project, combining the Industrial Infrastructure grant and Action Fund loan, may not exceed $2 million. The maximum CDBG funds (not including float loans) outstanding for any company (or

related companies, including parent, subsidiaries, or ownership of 51% or more in a company), regardless of location in Missouri, may not exceed $3 million. The amount outstanding is based on the principal amount remaining for loans, or, for infrastructure grants, the original grant amount with a 10-year declining basis. NOTE: DED reserves the right to exceed these maximums at the Department's discretion.

- Housing demolition only applications are limited to $125,000; if commercial demolition is included the maximum application is raised to $250,000. Commercial demolition only is also set at a maximum of $250,000. Owners of residential structures are required to commit to at least $500 of the demolition cost of their structure as match. For commercial properties in the demolition application, the owner of the commercial property is responsible for 20% of the demolition costs for that property. All properties must be vacant and infeasible to rehabilitate.
- Engineering facility plan/plans and specs applications must meet LMI national objective and project must be listed on Missouri Department of Natural Resources Intended Use Plan or have a USDA Rural Development letter of conditions. An invitation to apply must be obtained from DED prior to submission of application.

Low and Moderate Income Requirements:

a) Low and moderate income (LMI) is defined for the CDBG program as 80% of the median income of the county. The most recent available HUD HOME income limits specified by county are applicable to the CDBG program.

b) At least 51% of the beneficiaries of a public facility/public project activity must be low and moderate-income (LMI) persons and families, and 100% of the beneficiaries of housing activities must be LMI. At least 51% of the hookups of a project funded under the water and wastewater category must also be residential. At least 51% of the beneficiaries of economic development projects must be low and moderate-income persons.

c) Emergency projects must meet the test of Section 104(b)(3) of the Act which states *"...activities which the grantee certifies are designed to meet community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs..."*

d) Funding for certain projects may utilize the **limited clientele** criteria outlined in the regulation for meeting the required national objective criteria. Those persons defined as limited clientele are automatically considered to be primarily (51%) LMI. Further

guidance can be found at 24 CFR 570.208 of September 6, 1988, and published state guidelines.

e) The amount of CDBG funds which will benefit LMI persons is approximately $19,700,000 or 93% of the non-administrative allocation for FY2018. HUD requires that a minimum of 70% of the state's annual allocation be awarded on projects benefiting primarily LMI persons; however, Missouri has certified that it will meet the 70% LMI benefit requirement in aggregate over the three-year period 2017 - 2019. The 2018 percentage is derived by the following calculations:

Total Grant	**$22,537,848**
State Administration	- $550,756
State Technical Assistance	- $225,378
Estimated local administration	- $600,000
Total non-administrative funds	**$21,161,714**
Non-LMI Benefit	
Emergency - Urgent Threat	$861,714
Demolition - Slum/Blight	$600,000
Total non-LMI benefit	**$1,461,714**
LMI Benefit	
Total non-administrative funds	$21,161,714
Total non-LMI benefit	- $1,461,714
Total LMI benefit	**$19,700,000**
Total non-administrative funds	÷ $21,161,714
Percent total estimated LMI benefit	**93%**

5) Performance Requirements for Grantees:

a. Any grantee with a delinquent audit for any year, whether or not the grant is closed, is ineligible to apply for funding. This applies to all CDBG categories. Also, a grantee with any **open** project awarded prior to April 1, 2016, which is not **closed** by the last business day of March 2018, is ineligible to apply in **any**

FY2018 funding category. All documentation necessary for close-out must be received by March 1, 2018. This may apply to the grantee or the on behalf of applicant(s), whichever is applicable.

b. All CDBG applicants will be required to submit a Schedule of Projected Expenditures as part of the CDBG application process. This schedule outlines by quarter and by activity the estimated timeline for expenditures of the grant award, if selected for funding. If awarded funding, grantees are required to submit any updates to expenditure projections on a quarterly basis, or in any event where the original timeline for full expenditure will be revised to a future date.

c. CDBG grant agreements will have a specified end date; this end date will be three years from the award date of the grant. If the grant is not completed by the end of the three year period, the grantee must:

   i. deobligate any remaining funds, or

   ii. request an extension from DED. This extension must be for cause, and documentation as to why the project was not completed within the required three- year period must accompany the request along with a timeline for completion. It will be DED's discretion as to the length of the extension. **Extensions are not automatic**.

6) Contingent Funding: If an applicant proposes other state, federal, local, or private funds, or any other contingency item, **which are unconfirmed at the time of application**, they will be ineligible for FY2018 funds, except for otherwise specifically categories. The only other exceptions are bond elections, tax credit donations, and where referenced in the categories in the application. Applicants should notify DED of election results within a week of the election. If election fails, the application will be withdrawn from the consideration.

7) Affordable Rents: The state must provide criteria for *affordable rents* according to CFR 570.208(a)(3) as published September 6, 1988. The state will use HUD's Section 8 assisted Housing Program Fair Market Rents for this purpose.

8) First-time Homebuyer: The term first-time homebuyer means an individual or an individual and her or his spouse who have not owned a home during the prior 3-year period. A first-time homebuyer may purchase a home with CDBG down payment assistance, except that:

   a. Any individual who is a displaced homemaker may not be excluded from consideration as a first-time homebuyer under this guideline on the basis that

the individual, while a homemaker, owned a home with her or his spouse or resided in a home owned by the spouse;

b. Any individual who is a single parent may not be excluded from consideration as a first-time homebuyer under this guideline on the basis that the individual, while married, owned a home with her or his spouse or resided in a home owned by the spouse; and

c. An individual shall not be excluded from consideration as a first-time homebuyer under this guideline on the basis that the individual owns or owned, as a principal residence during such 3-year period, a dwelling unit whose structure is

i. not on a permanent foundation in accordance with local or other applicable regulations, or

ii. not in compliance with state, local, or model building codes, or other applicable codes, and cannot be brought into compliance with such codes for less than the cost of constructing a permanent structure, or

iii. a mobile home, not attached to a permanent foundation, and which is not considered real estate by the state.

The household may not own another residence even if that residence is rented.

In addition, recovering victims of catastrophic loss (e.g., the death of the family's principal wage earner, a failed self-employment business situation, loss of employment due to factory shutdown or an employer's reduction in force), victims of domestic violence that are legally separated from their spouses, and households who have purchased a home on a contractual basis but would otherwise qualify are also eligible as first-time homebuyers.

9) Displacement Policy: The state will discourage applicants from proposing displacement, unless a feasible alternative exists. Alternatives will be reviewed for feasibility, and technical assistance will be provided to applicants in order to minimize displacement. If displacement must occur, assistance under one of the following will be provided, depending upon the circumstances: the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended; Section 104(d), Section 104(k), or 105(a)(11) of the Housing and Community Development Act, as amended.

10) Program Income: Program income is the gross income received by a grantee or its sub-recipient from any grant-supported activity.

a) Program income includes, but is not limited to:

i. Income from fees for services performed;

ii. Proceeds from the sale of commodities or items fabricated under a grant agreement;

iii. Income from the sale or rental of real or personal properties acquired with grant funds;

iv. Payments of principal and interest on loans made with grant funds, including payback on deferred loans.

b) If interest is earned on grant funds for any calendar year, the interest must be returned to the U.S. Treasury through DED.

c) Uses of program income:

i. Program income shall be used prior to draw down of additional active grant funds unless a reuse plan has been approved prohibiting same;

ii. Used in accordance with requirements of Title I of the Housing and Community Development Act;

iii. If generated by activities other than economic development loans, the expenditure shall be used for block grant eligible activities as approved by the state; and

iv. Program income generated by economic development loans shall be returned to the state.

d) Local governments shall report the receipt and expenditure of program income to the Department of Economic Development as of June 30 and as of December 31 of each year, within fifteen days after each date.

11. Professional Services: An applicant has the option to select their engineer, architect, or administrator for their CDBG project prior to the preparation of an application or after a grant is awarded. They must, however, comply with state established procedures in their procurement practices if CDBG funds are to be used to finance such services. If the services are engineering or architectural, an applicant must comply with RSMo 8.285-8.292, unless a similar policy has been enacted by the applicant. If CDBG funds will be used for such professional services, there will be a maximum cost based on prescribed standards as follows:

a) Engineering Design – standards set by ASCE Manual #45, pages 37 to 42. Engineering costs calculated per Table A or B (found on page 32 of the CDBG FY2018 Application and Guidelines Manual) should depend on the complexity of the project.

b) Architectural Design – 10% of construction costs.

c) Construction Inspection – 75% of the cost of engineering design (a) or architectural design (b).

d) Administration - 4% of the non-administrative CDBG project costs plus $10,000 (water/wastewater, community facility, general infrastructure, demolition, economic development, and emergency.) **However, DED has discretion to offer less than the maximum administration limit, depending on the complexity of the project and the relevance of all compliance areas.** There are no administration funds offered from CDBG for engineering plans and specification or planning projects. These amounts represent the maximum amounts available for CDBG projects. The state reserves the right to apply less money to a project of low complexity. It is not DED policy to include administration funding on loan projects (Action Fund, Interim Financing.) Administrative costs related to loan projects are generally a local responsibility.

   i. Administration funding includes **all** components of CDBG grant administration including, but not limited to, environmental review, financial management, procurement, contract management, labor standards, and equal opportunity/fair housing.

   ii. If a grantee wishes to commence the environmental review process prior to grant approval, but wants those costs to be eligible for CDBG if the project is funded, the grantee <u>must</u> pre-select a grant administrator in accordance with CDBG procurement requirements, who will then either prepare the environmental review or subcontract it to another firm or individual. If the project is awarded CDBG funds, and this procurement of grant administrator meets minimum CDBG requirements, the portion of the administration cost related to environmental review will then be an eligible CDBG cost. If the project is not awarded CDBG funds, any such costs are the responsibility of the grantee.

Administrative Methods - There are three different methods that have been used to administer CDBG projects:

I. <u>Use of existing staff members</u>. If persons presently on staff have sufficient time to devote to administer the project, then this

method is preferable if those persons are adequately qualified. However, CDBG funds cannot be used to replace salaries or expenses, which previously had been paid by the grantee. Also, no city or county employee, elected or employed, can be contracted with to perform any portion of a grant, either by the grantee or by an outside firm.

II. Hiring of new staff members. Applicants proposing this method should consider that training a new staff member may cause a delay in program implementation, and it may be difficult to find qualified persons for temporary, part-time, positions. There is no guarantee an applicant will receive funds on an ongoing year-to-year basis.

III. Contract with an outside firm or agency. If CDBG funds are used to pay for administrative services, the service must be procured according to CDBG guidelines. Engineering firms may qualify to administer a grant. However, the same firm or any principal or employee thereof, cannot perform both engineering and administration on the same project, regardless of the source of payment.

Cities and counties which are member organizations of a regional planning commission (RPC) or council of governments (COG) may contract directly with that RPC or COG if both of the following conditions are met:

I. The city or county, as the CDBG grantee, must be a dues-paying member in good standing of the RPC or COG for a minimum of 12 consecutive months prior to entering into the administration contract, and must be able to provide documentation of its membership in good standing.

II. The CDBG application was prepared either by the city/county itself, or by the RPC or COG. If another third-party entity assisted the city/county with the application preparation, grant administration must then be procured in accordance with CDBG guidelines.

III. City and county grantees are not required to use the RPC/COG, and may elect to procure for grant administration even if both of the above conditions are met. This is simply an option that city and county grantees may use.

e) Audit – as required.

f) Other Professional Services – as allowed

g) Demolition inspection – $425/unit

Note: One firm or any principal or employee thereof cannot perform both engineering and administrative services on the same grant, regardless of source of payment. Professional services amounts will be based upon and approved for CDBG activities only.

Grantees may use their own procurement procedures, which reflect applicable state and local laws and regulations, provided that the procurement conforms to federal procurement regulations specified in 24 CFR Part 570, except that the minimum threshold for advertised, sealed bids shall remain at $25,000 (consistent with 34 RSMo).

12) Timely Expenditure of Funds: HUD measures the following:

a) Obligation rate of funds (95% @ 12 months and 100% @ 15 months) and,

b) Expenditure rate of funds (a percentage of the amount of funds available in the line of credit as compared to the total annual award amount; not to exceed 2.0-2.5)

The State achieves the required obligation ratios. However, the State does not always achieve the targeted expenditure rate of 2.0-2.5 measured at each month-end. It is imperative that recipient communities draw and spend the funds in a responsible time period. This requires close attention to project management.

13) Department of Economic Development Direction, Outcomes, and Desired Uses of Funds:

a) Priority for CDBG will be those projects making an economic impact to the community: increased jobs, increased private investment, and/or increased local revenue streams;

b) Flexible, eligible uses of CDBG funds to meet the demands of the difficult and changing economic climate are important. The public is encouraged to suggest program opportunities consistent with the priorities listed above, and the Department may enlist them as amendments to this plan.

CDBG FUNDS DISTRIBUTION

14) Distribution Among Categories: The estimated amount of CDBG funds the state will receive from the Department of Housing and Urban Development for FY2018 is $20,300,000.

Category	Allocation	Percentage
Water and Wastewater	7,500,000	33%
Community Facility	3,000,000	13%
Demolition	600,000	3%
General Infrastructure	3,500,000	16%
Emergency	861,714	4%
Economic Development	6,300,000	28%
State Administration	550,756	2%
State Technical Assistance	225,378	1%
TOTAL	$22,537,848	100%

15) Categorical Adjustment - The Department of Economic Development retains the ability to transfer up to 25% of the total CDBG allocation for use as needed among categories**.** An adjustment of more than 25% of the total allocation, or the creation/elimination of a category will require a substantial amendment of this plan. The amount for state administration may not exceed $100,000 plus 2% of the total allocation. The Department reserves the right to allocate up to 1% of the total annual amount for technical assistance activities in accordance with the Department Housing and Urban Development regulations.

Should CDBG funds be used in a statewide initiative (restricted to areas eligible for State CDBG and meeting a national objective), funds may be transferred to existing application categories (up to 25% of total annual allocation) and may be used in a different funding cycle (competitive or open cycle) without requiring a substantial amendment. Funds used in this manner may also be subject to a different maximum per project.

16) Other Funds Distribution - Funds recaptured or otherwise reallocated from a previous fiscal year CDBG, state and HUD allocation may be allocated to any program category as determined by the Department. DED reserves the right to increase any category listed in the chart above with available program income and/or recaptured funds from prior year

allocations by adding to the amount available at the deadline or accepting applications on an open cycle basis, pending availability and timing of those recaptured funds. Any additional funding added to a category may result in increased thresholds such as amount per household or amount per project.

a) Program income may be added to any project category as needed. Program income received from interim financing projects shall be used to honor previous funding commitments. The state may use up to 2% of all program income for state administration.

b) The maximum amount of FY2018 funds that will be awarded for Interim Financing projects will be $10,000,000 for 12, 18, and 24-month loans. The Department may extend the individual term of any interim financing loan beyond the agreed upon period subsequent to the Department's written determination and justification of the need for and feasibility of such an extension. The total amounts of CDBG funds committed to interim financing projects will not exceed $12,000,000, in aggregate (including past years' allocations), regardless of any extensions of the loan term.

c) In the event the amount received from HUD is different from the amount identified in this document, the difference will be reflected as closely as feasible to the percentages above.

17) Selection Criteria by Category: The criteria used to select the projects in the various CDBG programs are presented below. Detailed guidance is provided in application materials developed for each program.

General Application Definitions

NEED refers to the extent to which adequate documentation supports the actual demand.

IMPACT refers to the extent to which the project impacts a significant portion of the population defined in need.

LOCAL EFFORT measures the extent to which local support is offered to the project as compared to what is available to offer.

PAST EFFORTS are defined as all previous actions taken by the applicant to address the need.

HEALTH AND SAFETY measures the relationship between actual existing or the likeliness of the potential of physical harm to the population defined in the need. Third party documentation rather than general statements enhances the scoring in this category.

STRATEGY is the extent to which the method chosen to fix the problem represents the most efficient and effective solution while maintaining a direct relationship to solving the need. A clear, fair representation of examination of alternatives leading to the final strategy chosen is requested with each application.

RESILIENCE is defined as the ability to anticipate, prepare for, and adapt to changing conditions and withstand, respond to, and recover rapidly from disruptions. Such disruptions may include, for example, a local drought, a precipitous economic change, social unrest or riots, short-term or intermittent failure or under-performance of infrastructure such as the electrical grid. Resilience may be incorporated into the project strategy.

COST EFFECTIVENESS is measured as the extent the applicant has undertaken to evaluate the best possible cost for the result. This measure is often calculated as cost per beneficiary from total project costs and cost per beneficiary from CDBG costs only.

OPERATION AND MAINTENANCE is measured by the actual documented process for which a budget, experienced personnel, and written plan are available and provided in the application.

PROJECT READINESS is measured by the actual upfront administrative work completed that provided the ability of the project to begin immediately after award. Applicants must demonstrate, via documented means, their ability to start and complete the proposed project in a timely manner. Applicants must provide a proposed expenditure schedule as part of the application (included in Form B) and must demonstrate the ability to meet that schedule of performance. Examples of project readiness are, but are not limited to: preselection of grant administrator and/or engineer/architect, and substantial completion of environmental review.

LEVERAGING is defined as the percentage of local funds dedicated to the project in relation to what the applicant's budget/financial statement shows.

IN-KIND CONTRIBUTION is defined as the non-cash local effort that is committed to the project by the applicant. A clear indication of value for labor and equipment should be included to substantiate the total amount offered.

USE is defined as the volume and frequency of use by the population benefiting from the project.

REPETITIVE PROPERTY DAMAGE is the actual number of times and the frequency (can be last 10 years) that damage has occurred.

ECONOMIC IMPACT refers to the impact that the completed project will have on the local economy. This consists of increased jobs, increased private investment, and/or increased local

revenue stream. The project must contribute by positively impacting the conditions that allow these measures to increase.

MEASURABLE OUTCOMES OR GOALS is the degree to which the applicant has the ability to measure the impact and success. The need, strategy, and goals and ways to measure success should be intertwined and clearly represented in the application. For each application incorporating a resilience building component, a distinct series or measurable outputs and outcomes related to the resiliency component must be included in the application and subsequently included in project reporting.)

ENVIRONMENTAL IMPACT is the degree to which the problem or need has a documented negative impact on the environment. Environment takes a broad definition that includes all of the issues related to the National Environmental Policy Act (NEPA) process.

TMF NEED stands for local need for technical, managerial, and financial capacity related to the operation of a water and wastewater system

TMF CAPACITY INCREASE is the extent to which the project will naturally cause an increase in the technical, managerial, and financial capacity related to the operation of a water or wastewater system.

FUTURE SUSTAINABILITY is the likelihood that the project will be functional and operational well into the future and will perpetuate its own growth.

PAST PERFORMANCE represents the performance of the applicant (city/county) on prior funded CDBG projects. In addition, it represents the performance on prior CDBG projects of the subapplicant (nonprofit or district) if the subapplicant was involved in a previous CDBG project. It also includes the prior performance on CDBG projects of the grant administrator and engineer/architect, if those firms/persons are known (pre-selected) at the time of the application. Past performance includes timeliness of project completion and compliance with CDBG requirements.

EXISTING/ESTABLISHED COMPANIES (more than 3 years of financial history): LOWER of $2,000,000 per project or $20,000 per new full time job.

START-UP COMPANIES (3 years or less of financial history): funding shall be limited to the LOWER of $350,000 per project; 50% of cost of the infrastructure activities; or $20,000 per new full time job. DED may, at its discretion, award up to $500,000 if the participating company provides a personal guaranty OR an Irrevocable Letter of Credit from an acceptable financial institution for the amount which exceeds $350,000. (Maximums of $20,000 per job and 50% of infrastructure costs still apply.)

Application Categories

Water and Wastewater – Construction funds

Cycle – Open cycle based on availability of funding. Maximum award $500,000 or $5,000 per family benefitting, whichever is less. At Department discretion, for communities with fewer than 100 families benefitting, the maximum grant is $500,000 or $7,500 per family benefitting, whichever is less.

National Objective - Minimum 51% LMI benefit for community-wide or target area projects. LMI benefit may be documented by HUD census data or survey conducted in accordance with prescribed standards.

Eligible Activities - Water and wastewater activities only, including treatment, distribution, and collection. Normal operation and maintenance activities are not eligible. Projects must benefit 51% or more residential units.

Application Procedure - Applicants anticipating the use of state and/or federal funds to finance water or wastewater system improvements must complete a preliminary project proposal, consisting of a two-page summary and preliminary engineering report. Each project proposal will be reviewed by the Missouri Water and Wastewater Review Committee (MWWRC). The MWWRC is comprised of the Missouri Department of Economic Development (Community Development Block Grant Program), Missouri Department of Natural Resources (State Revolving Fund), and the U.S. Department of Agriculture (Rural Development). The MWWRC review process will occur as follows:

a) An original and five copies **(six total)** of the project proposal are submitted to one of the MWWRC agencies.

    d) Upon receipt, the receiving agency distributes the project proposal to the remainder of the MWWRC members.

    e) The committee meets monthly. Proposals received by the first of the month will be reviewed during that month's meeting.

    f) Following its review, the MWWRC will reply to the applicant by written correspondence. This correspondence shall include a summary of the MWWRC comments pertinent to the technical, operational, or financial aspect of the project proposal. Substantive comments by the MWWRC must be resolved prior to receiving a recommendation from the MWWRC. A recommendation from the MWWRC will state the appropriate agency or multiple agencies from which to seek financial assistance. However, a recommendation from the MWWRC does

not assure funding from each appropriate agency. Each agency on the MWWRC will receive a copy of all correspondence stated above.

g) Each funding agency will follow its own full application process. Applicants seeking funding from multiple agencies must submit a full application to each particular agency.

h) If a full application varies significantly from the recommended project proposal, or if the facts have changed such that the feasibility of the proposed warrants further investigation, any member of the MWWRC may request that the project be reviewed again.

i) Assistance will be recommended only to the extent necessary to complete project activities over and above local efforts, and for solutions considered appropriate and feasible by the MWWRC.

If a project proposal receives a recommendation from the MWWRC, a full CDBG application is required for submission. The following selection criteria will be used in reviewing the full application.

Selection Criteria – Applications scoring a minimum of 65 points will receive a recommendation for award.

The primary project review for water or wastewater is the MWWRC process, and consists of interagency financial and technical review by finance staff and engineers. Successful completion of the MWWRC process results in an award of 50 points to an application. CDBG staff will continue to evaluate the applications for completeness and missing documents.

MWWRC Review (50 points) – Applicants successfully completing the MWWRC process will receive 50 points, based on need for grant funding, project/engineering strategy and rate structure. Points include up to 5 points for resiliency component.

Local Effort (25 points)

0-15 pts – Leveraging: Leveraging is defined as the percentage of local funds dedicated to the project in relation to what the applicant's budget/financial statement shows available.

0-05 pts – Taxes: Tax score is defined as the revenues or taxes the applicant receives divided by population and per capita income, and multiplied by 100.

0-05 pts – In-Kind Contribution: Points are awarded to applicants committing in-kind or non-cash related services to the project.

Past (CDBG) performance (5 points)

CDBG priorities for water and wastewater are defined as:

Lack of existing needed facility (Tier 1 Priority): Needed facility represents elimination of a threat and safety and at the same time is offered to a community that has the TMF capacity to own it.

System Failure (Tier 1 Priority): Not related to poor operation and maintenance; failure proven to the degree of documentation – DNR support.

Obsolescence of an existing facility – not defined as "design life" (Tier 2 Priority): Asbestos pipe, lead, radionuclides

Regulatory requirements which mandate improvements (Tier 2 Priority): Differentiate between abatement orders versus abatement due to poor operation and maintenance.

Natural or manmade disaster (Tier 2 Priority): Defining manmade to include pollution or contamination, not poor operation and maintenance.

Improper design of existing facility (Tier 3 Priority): Definition must include what it is causing.

Significant and unexpected growth (Tier 3 Priority): Economic development driven, regionalization, and government driven.

Comprehensive, strategic, or capital improvement plan (Tier 3 Priority)

Inherent social/economic factors (Tier 3 Priority): Unemployment, age, LMI.

Potential or anticipated growth (Tier 4 Priority)

Improper maintenance (Tier 4 Priority)

Pre-agreement costs – DED encourages the earliest possible completion of the CDBG environmental review for water/wastewater projects. MWWRC proposals that include CDBG will be encouraged to commence the CDBG environmental review at the time of the initial response letter from the MWWRC. See Section 11(d)(ii) regarding pre-selection of grant administration services, including environmental review preparation.

Water and Wastewater – Engineering Facility Plan/Plans and Specs Grants

Cycle - Open cycle based upon availability of funds. Maximum $50,000 or 80% of the ASCE table (found on page 32 of the CDBG FY2018 Applications and Guidelines Manual). **If an applicant is awarded a plans/specs CDBG grant and also a later grant for project construction,**

the maximum aggregate CDBG total is $500,000. The amount of the plans/specs grant will be deducted from the maximum allowable on the project construction grant.

National Objective - Minimum 51% LMI for community wide or target area projects. LMI benefit may be documented by HUD census data or survey conducted in accordance with prescribed standards.

Eligible activities – Allows for procurement of a professional engineer to complete the facility plan and plans and specifications necessary for progress in the State Revolving Loan Fund Intended Use Plan process to access loan funds, or must have a Letter of Conditions (LOC) from USDA-Rural Development. Applicants must be on the IUP or have the LOC from USDA and must demonstrate an inability to finance the engineering. Eligible costs include engineering costs only, no administration.

Selection Criteria –

MWWRC Review (50 points) – Applicants successfully completing the MWWRC process will receive 50 points, based on need for grant funding, project/engineering strategy and rate structure. Points include up to 5 points for resiliency component.

Local Effort (30 points)

0-15 pts – Leveraging: Leveraging is defined as the percentage of local funds dedicated to the project in relation to what the applicant's budget/financial statement shows available.

0-05 pts – Taxes: Tax score is defined as the revenues or taxes the applicant receives divided by population and per capita income, and multiplied by 100.

0-10 pts – TMF and in-kind

Priorities for all Water/Wastewater Projects: Projects that have achieved a responsible level of local participation by pursuing their debt capacity; projects that have initiated a responsible rate structure that provide adequately for operation and maintenance, employee overhead, debt service, reserve, and emergency funding; projects that represent a solid history of operation and maintenance; projects that can indicate the use of CDBG funds will provide rate affordability; projects that meet threats to health and safety.

Community Facility

Cycle – Application deadline – April 2, 2018. Competitive process. Maximum $350,000 or $5,000 per family benefitting.

National Objective - Minimum 51% LMI benefit for community-wide or target area projects. LMI benefit may be documented by HUD census data, survey conducted in accordance with prescribed standards, or Limited Clientele if criteria met.

Eligible Activities – Community facilities include, but are not limited to, senior centers, technical education facilities, training facilities, daycare/early childhood education, community centers, sheltered workshops, recycling facilities, youth centers, 911, rural health clinics (facilities without dedicated state funding), telecommunications, shared spaces for the purposes of business development, group homes, transitional housing, special needs housing and all eligible activities designed to provide a service or group of services from one central location for a prescribed area of residents or users. This may include the infrastructure necessary to support the facility as well.

Selection Criteria –

Need (35 points)

0-20 pts – Addressed Need for Facility including Description of proposed facility; lack of existing facility

0-05 pts – Health/Safety/Education/Training

0-10 pts –Potential users; measure growth/decline for past 5 years

Impact (35 points)

0-20 pts – Strategy (up to 3 points for resilience component)

0-10 pts – Operation and Maintenance

0-05 pts – Project Readiness

Local Effort (25 points)

0-15 pts – Leveraging: Leveraging is defined as the percentage of local funds dedicated to the project in relation to what the applicant's budget/financial statement shows available.

0-05 pts – Taxes: Tax score is defined as the revenues or taxes the applicant receives divided by population and per capita income, and multiplied by 100.

0-05 pts – In-Kind Contribution: Points are awarded to applicants committing in-kind or non-cash related services to the project.

Past Efforts (5 points)

0-05 pts – Past efforts are defined as all previous actions taken by the applicant to address the need.

General Public Infrastructure

Cycle – Application deadline – April 2, 2018. Competitive process. Maximum $500,000 or $5,000 per family benefitting.

National Objective - Minimum 51% LMI benefit for community-wide or target area projects. LMI benefit may be documented by HUD census data or survey conducted in accordance with prescribed standards. Slum/blight removal is also possible national objective.

Eligible Activities – Eligible activities include, but are not limited to, bridge, street, drainage, broadband, and activities not addressed with an existing CDBG funding category.

NOTE: When using CDBG Economic Development Infrastructure funding as a match to the Missouri Department of Transportation's (MoDOT) Cost-Share Program, under the CDBG General Public Infrastructure application category, the CDBG application must be submitted to DED on or before April 2, 2018.

Priorities – Infrastructure activities meeting a defined and documented community need.

Selection Criteria –

Need (35 points)

0-07 pts – Health and Safety

0-07 pts – Number of Persons Impacted

0-07 pts – Documentation of Problem

0-07 pts – Economic Impact

0-07 pts – Measurable Outcomes or Goals

Impact (35 points)

0-10 pts – Strategy (up to 3 points for resilience component)

0-10 pts – Cost Effectiveness

0-10 pts – Operation and Maintenance

0-05 pts – Project Readiness

Local Effort (25 points)

0-15 pts – Leveraging: Leveraging is defined as the percentage of local funds dedicated to the project in relation to what the applicant's budget/financial statement shows available.

0-05 pts – Taxes: Tax score is defined as the revenues or taxes the applicant receives divided by population and per capita income, and multiplied by 100.

0-05 pts – In-Kind Contribution: Points are awarded to applicants committing in-kind or non-cash related services to the project.

Past Efforts (5 points)

0-05 pts – Past efforts are defined as all previous actions taken by the applicant to address the need.

Demolition (Residential/Commercial)

Cycle – Application deadline – April 2, 2018. Competitive process. Maximum $125,000 for residential demolition; $250,000 if commercial demolition is included. The maximum for commercial demolition (without residential) is also $250,000.

National Objective – slum/blight removal (spot and area basis).

A structure is blighted when it exhibits objectively determinable signs of deterioration sufficient to constitute a threat to health, safety, and public welfare.

Communities participating in this activity must, at a minimum, determine blighted structures by declaring the use of an existing dangerous building ordinance, building code level of violation or applicable occupancy or habitability designation and applying such ordinance, code violation, or designation in a manner consistent with the definition. The ordinance, code violation or designation must be applied to the specific structure, not to the area as a whole. The predominance of blight in an area does not allow blight to be assumed for each structure inside the area.

Eligible activities – Demolition, demolition inspection, asbestos inspection, asbestos removal, administration.

Selection criteria:

Need and Impact (45 points)

0-20 pts – Number of units proposed compared to total dilapidated units, both occupied and vacant (2D/D+DX)

0-25 pts – Number of units proposed compared to the total number of vacant dilapidated units (2D/DX)

Code Enforcement & Map (10 points)

0-05 pts – Applicant's code enforcement

0-05 pts – Map identify all dilapidated structures and all purposed structures

Leveraging (15 points)

0-15pts – Document $1,000 cash or in-kind match for each unit proposed for demolition

Commercial property owners must commit 20% of the demolition costs of their structure in writing as a cash commitment. Residential property owners must commit per structure a minimum of $500 of the demolition costs in writing as a cash commitment.

Strategy (30 points)

0-15 pts – Interest of community and property owners (number of consent forms)

0-10 pts – Project readiness; ready to start/capacity to complete/realistic timeframe

0-05 pts – Size/cost per unit/hazardous waste (especially asbestos) identified; cost effectiveness

If commercial properties are proposed for demolition, than all vacant dilapidated commercial structures must be included on the applicant's map and Form F as ZDXs. They will be included in the application rating with the vacant residential structures.

Emergency

Cycle – Open cycle based on availability of funding.

Minimum criteria (other than items previously mentioned in this document) - The need must be a serious threat to health or safety, be immediate, have developed or greatly intensified within

the past 18 months, and be unique in relation to the problem not existing in all other communities within the state. Natural disasters are allowable under this program. Also, the applicant must lack the resources to finance the project. Only the **emergency** portion of a project will receive assistance. The applicant must exhaust its resources before CDBG funds may be used.

Economic Development

Cycle – Open cycle based on availability of funding.

National Objective - Minimum 51% LMI Job Creation. At least 51% of the new jobs created must be occupied by applicants qualifying as a low and moderate income person (those individuals with household incomes at or below 80% of median household income.)

Eligibility – Application approval is based on compliance with eligibility criteria and availability of funds. The minimum eligibility criteria stated below will vary on different types of businesses based on the projected economic impact, such as proposed wages, spin-off benefits, and projected industry growth. The specific eligibility criteria for each type of business will be stated in the program guidelines.

NOTE: When multiple CDBG funding tools are used for a project, CDBG funding from all programs is limited to $25,000 per job. For purposes of any CDBG economic development project, a "start-up" company is defined by DED as being a company with a financial history of three years or less. In addition, DED reserves the right to exceed funding maximums at the Department's discretion.

Economic Development Industrial Infrastructure - Grants for the improvement of public infrastructure, which cause the creation or retention of full-time permanent employment by a private company(s) benefiting from the infrastructure.

CDBG funding is limited to $20,000 per job to be created, and a maximum grant of $2 million.

NOTE: For CDBG Industrial Infrastructure applications in which the participating company meets the definition of a "start-up company" (as defined by DED), the maximum allowable CDBG award will not exceed the lesser of:

- 50% of the cost of the public infrastructure activity(ies),
- $20,000 per job to be created, or
- $350,000

For all CDBG industrial infrastructure projects, see below for required local government financial participation.

The use of CDBG funds in Economic Development projects is not an entitlement and the per job maximums and total grant maximums are measures **not to exceed**. All projects will be evaluated on the least amount necessary to achieve the deal.

In addition, an assisted company must pledge and document private investment toward the total project costs (public and private costs combined) in an amount no less than the CDBG funds awarded for the project.

Local government grantees are required to participate financially in the public infrastructure to the maximum extent possible within their means. That amount may be no less than 15% of the total CDBG funding requested from DED. The 15% may be provided in a combination of cash or in-kind. It may be used for the same public infrastructure activity as proposed for CDBG or it may be documented from another public infrastructure activity necessary to support, and included in, the same defined project for the same company location or expansion.

The local government participation must be committed by letter at the proposal stage, if applicable and/or by resolution in the application. In addition, please see above restrictions on the maximum amount available when the participating business is a start-up company.

If the local government does not have the funds to meet the 15% requirement or does not have a means to access the funds, documentation and a request may be provided to DED to waive this requirement. DED reserves the right to accept or deny any waiver request and limit its participation to no more than 85% of any public infrastructure cost, regardless of the formula calculation of benefits.

The Department has established manufacturing industries as the priority beneficiary of economic development infrastructure funding. However, certain service industries and incubators are eligible to participate in economic development infrastructure projects.

The use of CDBG economic development infrastructure funding is generally limited to publicly owned infrastructure. However, privately owned infrastructure may be addressed with CDBG funding when 1) regulated as a public utility; 2) is a unique circumstance when private funding is unavailable to address the infrastructure; and 3) the project will result in high impact to the local economy in terms of job creation and private investment.

NOTE: When using CDBG Economic Development Infrastructure funding as a match to the Missouri Department of Transportation's (MoDOT) Cost-Share Program, the CDBG application must be submitted to DED on or before the Cost-Share application is submitted to MoDOT.

Missouri Rural Economic Opportunities Infrastructure Grant - Grants for public infrastructure (including facilities if the facility is either publicly or nonprofit owned) for projects intending to facilitate significant transformation of the local economy and the creation or retention of full time permanent employment by a private company benefitting from the infrastructure. The development must be unique to the region and must:

- Include activities that add value to the existing economic circumstances and create jobs and investment, and
- Use existing assets of the local economy and transition those assets in such a manner that creates jobs and investment and
- Add a technological component to an asset of the local economy and
- Include either a federal partnership/participation or university partnership/participation.

CDBG funds are limited to $50,000 per job created/retained, and up to a maximum of $1 million CDBG participation per project. CDBG funds may not be the majority share of funds in the total project costs.

Local government grantees are required to participate financially in the public infrastructure to the maximum extent possible within their means. That amount may be no less than 15% of the total CDBG funding requested from DED. The 15% may be provided in a combination of cash or in-kind. It may be used for the same public infrastructure activity as proposed for CDBG or it may be documented from another public infrastructure activity necessary to support, and included in, the same defined project for the same company location or expansion.

The local government participation must be committed by letter at the proposal stage, if applicable and, or by resolution in the application.

If the local government does not have the funds to meet the 15% requirement or does not have a means to access the funds, documentation and a request may be provided to DED to waive this requirement. DED reserves the right to accept or deny any waiver request and limit its participation to no more than 85% of any public infrastructure cost, regardless of the formula calculation of benefits.

The Department has established manufacturing, research, and technology industries as the priority beneficiary of these funds. However, certain service industries and incubators are eligible to participate in a Rural Opportunities Infrastructure project.

The use of CDBG funds is generally limited to publicly owned infrastructure. However, privately owned infrastructure may be addressed with CDBG funding when 1) regulated as a public utility, 2) is a unique circumstance when private funding is unavailable to address the infrastructure, and 3) the project will result in high impact to the local economy in terms of job creation and private investment.

Action Fund - Loans, equity investments, or other type investments may be made to a **private company** for buildings, equipment, working capital, land, and other facilities or improvements in order to cause a project to occur which will result in the creation or retention of full-time permanent employment. Selection shall be determined by the need for assistance through a financial analysis of the company, and the documentation of the public benefit to be derived from the project.

- **CDBG funds are limited to the lesser of $400,000 per project,**
- **50% of the project costs,**
- **and a maximum CDBG cost per job created or retained of $35,000.**

NOTE: For start-up companies, CDBG funds are limited to the lesser of $100,000 per project, 30% of the project costs, and a maximum CDBG cost per job created or retained of $25,000.

The interest rate of the loan will to be determined by DED. The term of the loan will be determined by cash flow projections that will allow for the fastest repayment of principal and interest, but not more than 20 years or the depreciable life of the collateral assets. Working capital loans will have a term not to exceed 10 years. Nonprofit, public or quasi-public entities are not eligible to participate in the Action Fund program.

The Department has established manufacturing industries as the priority beneficiary of the Action Fund program. However, certain service industries are eligible to participate in the Action Fund program. Retail firms are not eligible to participate.

Interim Financing (Float) - Loans by grantee to a company for buildings, equipment, working capital, land, and other facilities or improvement where appropriate, in order to cause the creation or retention of a full-time employment. Basis of selection shall be the economic impact of the project and the amount of funds necessary to cause the project to occur.

- **Loans are limited to 30% of the project costs,**
- **$25,000 per job created or retained,**

- **or $1 million per project, whichever is less.**

NOTE: For start-up companies, loans are limited to 30% of the project costs, $25,000 per job created or retained, or $100,000 per project, whichever is less.

Loans must be secured by a Letter of Credit from a financial institution acceptable to DED or other acceptable collateral. The grantee shall be made aware of the policy of state recapture of program income.

The Department will continue to offer a program that uses CDBG funds that may be already obligated to projects, but not distributed. Such a program puts such funds at an element of risk. The applicant for interim financing programs shall be made aware of the policy for local retention of program income. Activities which may be performed in this program may include, but are not limited to, interim construction financing and other incentives for the creation of jobs, primarily for low and moderate income persons. No more than $10,000,000 per funding year will be obligated, in aggregate, for all float funded projects.

***Revolving loan fund/Microenterprise**:* Loans by a grantee (or multiple grantees) to a business with less than five existing employees (including owners) for up to $25,000 per business, or 70% of the project cost, whichever is lower. Funds may be used for machinery and equipment, working capital, land, and buildings. Loans to more than one company may be included in one grant to a city or county. At least one full-time equivalent job must be created or retained for each $15,000 in loan proceeds with 51% or more to be low and moderate-income persons. RLF for redevelopment purposes may be considered as well, if the proposed RLF is part of a defined redevelopment effort.

Job Training: A grantee may request funds to subcontract with a qualified non-profit or public entity to provide job training to persons who will be or are presently employed by a company (for profit or nonprofit). The funds would be used only for instructors, materials, or related training aids and expenses thereof. The maximum grant per company would be $100,000, or $2,000 per new job created/retained, whichever is less. At least 51% of the new jobs created/retained must be low and moderate-income persons.

MISSOURI STATEWIDE FAIR HOUSING IMPEDIMENTS ANALYSIS 2013-2014

SUMMARY AND ANALYSIS OF INTERVIEWS CONDUCTED

Public Policy Research Center
University of Missouri-St. Louis

April 30, 2014

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Interview Results Missouri Fair Housing Analysis of Impediments 2013-2014

EXECUTIVE SUMMARY

Introduction

The Department of Economic Development (DED) is conducting a fair housing impediments analysis for the State of Missouri. DED contracted with the Public Policy Research Center (PPRC), a research unit based at the University of Missouri-St. Louis (UMSL), for a portion of this work. DED directed PPRC to conduct a series of interviews with regional planning, community service and other professionals regarding statewide fair housing conditions in Missouri's non-entitlement counties.

DED also suggested legal aid personnel and statewide advocates for protected classes. PPRC expanded on the DED recommendations by contacting legal aid offices with coverage in most sections of the state, as well as additional statewide advocates. A total of 24 interviews were conducted with 29 individuals.

This report summarizes the themes that emerged.

Overview of Findings

A. EVIDENCE OF FAIR HOUSING VIOLATIONS

The interviews supplied information related to a variety of discriminatory actions that would justify attention in the State's future housing and economic development planning. That said, the results summarized in this report will be best employed in setting a direction for further investigation.

While interview content offers exceptionally rich source of data, conclusions drawn from it reflect the subjective nature of interviewee remarks.

In describing fair housing violations referred to in the interviews, this report supplies information regarding the origin of the information. In some instances, interviewees had direct knowledge of discriminatory behavior, typically arising from a client's request for assistance. In other cases, interviewees observed conditions that they believed pointed to discriminatory actions.

The interviewees were frank about admitting that some of what they reported had not been verified or – where this was the case – was based on hearsay. Because of this, it's essential that the results presented in this report be used with a clear understanding of the data's limitations.

The bulk of interviewee comments dealt with the rental market. In general, interviewees were much less familiar with recent real estate activity. The majority reported that their clients weren't eligible for home loans – not for reasons related to fair housing, but because of their financial situation.

In general, the interviewees had little information to provide on the real estate market or mortgage lending industry. They indicated that regulations enacted since the financial crisis in 2008 had introduced restrictions in home purchasing that essentially disqualified the clients they dealt with from assuming a home loan.

Interviewees acknowledged that fair housing violations can be difficult to detect and to prove. Among the reasons for this, they cite:

1) **USE OF PRETEXTS FOR DENIAL OF HOUSING**: Interviewees described instances where protected class members were denied housing, but for reasons that could be seen as legitimate: a poor credit history, previous eviction, or prior involvement in criminal behavior. Landlords can decline applications for housing on these bases with impunity. Whether they mask discriminatory considerations is very difficult to prove without resorting to paired testing.

2) **LIMITED PRESENCE OF SOME PROTECTED CLASSES:** Populations in many areas of rural Missouri tend to be fairly homogeneous, with interviewees describing the vast majority as "white Protestant." In their view, the small number of different races in the population reduces the incidence of housing discrimination against groups within that protected class. Most of the interviewees acknowledged that there is still potential for this type of violation to occur, however. Other considerations – such as risk of retaliation from landlords – are also a factor in the extent to which a member of any protected class is likely to file a complaint.

When asked whether they believe that impediments to fair housing exist in Missouri, nearly all of the interviewees responded in the affirmative. Not all of those we talked to offered examples, but based on the ones provided, it appears that the majority of protected classes are affected, with the exception of religion and ancestry. None of the interviewees mentioned these as a factor in denial of housing.

> While emphasizing that discrimination is much less prevalent than in the past, most interviewees believe that impediments to fair housing exist in Missouri.

Many of those we spoke to indicated that, where and when abuses arise, they are not part of a larger pattern, but instead isolated instances that happen at the instigation of "bad actors". The interviewees indicated that landlords and other housing professionals understand the consequences of violating fair housing laws. This has reduced the prevalence of such patterns – in previous decades, the norm in many areas of the state.

While a heightened awareness of repercussions is a positive development, analysis of the interviews points to areas where the state continues to face challenges. This report argues that housing conditions in the non-entitlement counties create a climate where fair housing is difficult to achieve. This is particularly true with respect to the rental market. This sector has the most far-reaching implications for many protected class members, but most prominently for those that are low-income.

B. II. THE QUESTION OF "FAIR HOUSING"

In presenting the interview data, PPRC has attempted to place apparent fair housing violations into the context of discriminatory actions and attitudes that affect a broader segment of Missouri's population. It is our view that discriminatory actions which fall outside the strict parameter of fair housing law deserve attention to the extent that they affect availability of decent, safe housing that is both affordable and accessible.

In addition to the violations that are spelled out under the fair housing laws, analysis of the interviews suggests that additional factors should be taken into account:

1) **SYSTEMIC IMPEDIMENTS:** This refers to flaws in systems that inadvertently cause impediments to housing for protected class members and other vulnerable groups within Missouri's rural population. Among those affected are persons with disabilities: they may seldom face situations where they are denied housing, but frequently confront a shortage of housing suitable for their needs.

   Efforts are underway to address systemic problems in this area, a prime example being the movement to incorporate universal design into new construction. The Missouri Housing Development Commission (MHDC) has taken an active role in this effort, although some interviewees believe that MHDC might adopt a more aggressive approach by increasing the percentage of new housing stock that accommodates universal design.

   According to advocates of persons with disabilities, private developers are beginning to embrace universal design, to understand that its implementation will not affect their bottom-line and to appreciate the extent to which it expands the market for their products.

   Another area prominent in interviewee comments relates to Missouri's landlord-tenant law and the advantages that landlords possess in their dealings with tenants. This situation affects a much broader swathe of the rural population, including protected class members and others within the ranks of the low-income.

Many interviewees responded to questions about fair housing by underscoring the lack of affordable housing in their region. Some pointed to this as the most major impediment to fair housing for protected class members.

Even where discrimination is not a factor, the housing that protected class members are able to obtain may be far from decent, safe or affordable. Landlords, for example, may be in good standing with regard to fair housing, but allow the condition of the properties they rent to deteriorate to a point where they are no longer habitable. Despite this fact, the cost of these units tends to remain high – higher, as some interviewees pointed out – than a monthly mortgage payment.

In fact, questions about impediments to fair housing most frequently prompted interviewees to talk about the lack of affordable housing in their regions and the implications this has for low-income populations – regardless of protected class.

2) **DISCRIMINATORY ATTITUDES/ACTIONS**: Without question, fair housing laws have had a significant positive impact on access to housing in Missouri. Several interviewees contrasted the blatant attitudes and behaviors that protected classes faced 10 to 20 years ago with the reduced evidence of those barriers in the present day. The apparent decline in overt discrimination does not mean that housing transactions are free from the behavior that the fair housing laws were designed to eradicate. As previously noted, discrimination that would otherwise be covered by fair housing laws can be hidden.

   Nor can housing be considered "fair" for many people. Neither federal nor Missouri law uses income levels to designate a protected class, but low-income populations encompass many in those classes: for example, the disabled who are on a fixed income; single mothers; immigrants or refugees with limited resources; and minorities who live at or below the poverty level. Lack of resources compounds problems that would not affect protected class members who command a higher income.

   What became apparent in the course of the interviews is that, in some regions of Missouri, blatant discrimination continues to have an effect. It is less likely to be directed at protected class members, however, than at individuals who are low-income.

Interview Results
Fair Housing in Missouri, 2013-2014

I. Introduction

Between February and April 2014 the Public Policy Research Center (PPRC), a research institute at the University of Missouri-St. Louis, conducted a series of interviews on the subject of fair housing in non-entitlement areas in Missouri. PPRC staff completed a total of 24 interviews with the participation of 29 individuals.

Among those who provided data, there was representation from:

- 9 community action agencies
- 8 legal aid agencies
- 5 statewide agencies
- 4 regional planning commissions/councils of government

Additional details on the data collection process are available in the Methodology section (See Appendix A.) Appendix B provides a full list of the professionals interviewed, along with the geographic area in which each individual works.

Since its enactment in the 1960s, the fair housing law has continued to evolve, most notably by broadening safeguards for protected classes. For example, in August 2013 HUD implemented the Equal Access Rule, which further expands fair housing protections to cover sexual orientation and sexual identity. Attitudes and behaviors in Missouri have evolved along with the laws and interviewees point to considerable change in the last two decades. Despite this progress, isolated problems remain.

The interview process that PPRC conducted resulted in a rich array of data.

Despite the breadth of commentary and its in-depth nature, interviews as a source of data have their limitations. They are subjective in nature, and are most effective at capturing the opinions or impressions of interviewees.

Themes can emerge from these data that illustrate where there may be consensus on particular topics. This approach is adopted in this report.

Themes can also be valuable as a starting point for further data collection: for example, in development of questionnaires for more in-depth, potentially quantitative data collection that reaches a broader base of respondents.

Recommendations for further investigation of fair housing conditions in Missouri's non-entitlement counties are included in Section IX.

II. About this Report

The interviews covered a wide range of information on housing, regional economic conditions and community dynamics in rural areas as contrasted to small towns or municipalities. (Appendix C includes the interview protocol used for all interviews.) Interviewees commented on housing-related issues affecting the protected classes as defined by fair housing law, as well as other groups seeking housing without the benefit of those protections. The questions posed by interviewers gave experts and informed sources an opportunity to:

- address multiple aspects of fair housing, from landlord/tenant relations to community attitudes
- identify violations or highlight other behavior that they view as abusive
- suggest remedies that they believe might be beneficial in furthering fair housing
- suggest alternatives for dealing with fair housing.

Some of the interviewees contributed factual information: for example, complaints filed with a community action agency or situations that legal aid attorneys described as typical of their case loads. One interviewee cited documentation, in the form of a community plan that included strategies to address identified fair housing problems.

The majority of interviewees, however, responded to questions with their assessment of community conditions. In general, these assessments were based on situations they were aware of without being directly involved in official complaints. In a number of instances, discriminatory actions were reported to interviewees, but were not verified. In these situations an interviewee might be engaged in providing other services: e.g., locating a rental unit for a protected class member denied, or unable to find, housing elsewhere. In other cases, interviewees admitted that they obtained information about a discriminatory action second hand.

An interview process of this type can result in a rich array of data. This is undoubtedly the case with these interviews conducted by PPRC. To best represent the information provided, PPRC staff has analyzed the interview transcripts to identify the most prevalent themes. This is intended to capture points of relative consensus among the people we spoke to. We have also noted areas that received little attention and suggested an interpretation of what this may signal with regard to fair housing in the state.

Matrix 1 below (see Page 33) shows in a grid format the themes that were addressed most frequently. These themes are discussed in detail in later sections.

III. Overview of Findings

While a few interviewees were unaware of any abuses in their area, most had heard of, observed or dealt directly with some types of housing discrimination. These instances involved housing for the disabled, persons of national origin distinct from local inhabitants, and households with difficulties finding accommodations due to familial status or race. This subject is covered in more detail in Section V and Section VI.

At the same time, interviewees with a longer tenure the housing professions or legal aid services stressed that discriminatory behavior is much less prevalent than 10 to 20 years ago. Expression of discriminatory attitudes, where evident, also tends to be more muted. This may reflect a positive change in attitudes or it may reflect behavior that has been adopted to safeguard against potential complaints.

If blatant discrimination was still a factor in rural Missouri in the 1990s and the first decade of this century, this suggests that adherence to fair housing law and awareness of the consequences of violating it have been slow to take hold.

It also gives some indication that efforts in the last 2 decades have been more effective in reaching some sectors of the rural population. While discriminatory practices may continue, they have become more covert and much more difficult to prove.

Interviewees with longer tenure in housing and dealing with landlord/tenant disputes indicate that in the last 2 decades adherence to fair housing law has significantly improved in rural Missouri.

Fair housing is not that meaningful, however, if housing conditions offer protected classes only the least desirable choice of living accommodations. In the opinion of the interviewees, evidence of the more egregious abuses related to housing shortages are readily apparent.

When asked about fair housing violations, many interviewees prefaced their comments with an emphasis on the lack of available housing. This suggests that they recognize how closely intertwined successful implementation of fair housing is with a supply of homes or rental units that meets the needs of the local population.

IV. Conditions Conducive to Fair Housing Violations

Housing conditions in Missouri create an environment where many of those seeking housing are at a disadvantage.

C. LANDLORD/TENANT LAWS FAVOR LANDLORDS:

Several interviewees stressed that it is very easy, under the Missouri statutes governing landlord/tenant interactions, for a landlord to evict an unwanted tenant. This compounds the difficulties faced by low-income individuals and protected class members at lower income levels. Prior evictions remain on a tenant's record and may be grounds for denial of future housing. Evictions are also difficult to fight. Interviewees indicate that tenants who reach this point in their relationships with landlords frequently are in arrears on their rent payments. This alone is grounds for eviction and courts will rule in favor of the landlord, unless the tenant can demonstrate that he/she has retained the rent money, and can pay if a settlement is reached.

Low-income tenants are vulnerable to the risk of eviction. To avoid reaching this point with a landlord, many tenants are reluctant to raise complaints about discriminatory behavior or lack of repairs.

The challenge of finding other living arrangements and relocating is augmented by the cost incurred in doing so. For the low-income population, accumulating the money for the security deposits as well as the first and last month's rent required to obtain a lease may be out of reach financially. For persons with disabilities, particularly those with mobility issues or mental impairments, the prospect of relocating is even more daunting.

The fact that tenants have limited recourse to fight evictions has multiple repercussions:

- Tenants are afraid to complain about discriminatory behavior or lack of repairs.
- Tenants will accept substandard housing, often at rents that interviewees consider higher than warranted, given the condition of the property.

Housing shortages in many regions of the State give landlords an additional advantage. They can reject potential tenants with reasonable certainty that they will get further applications from more desirable applicants.

D. LACK OF AFFORDABLE, ACCESSIBLE HOUSING THAT IS DECENT AND SAFE:

The Missouri Show Me Fair Housing Project defines fair housing as:

> *" … all people have equal access to the housing of their choice that they can afford. Fair housing laws ensure this equal access."*[1]

Whether or not they belong to a protected class, low-income populations do not appear to have equal access to decent, safe, affordable housing, particularly where availability of housing is limited. Interviewee comments indicate that in many of Missouri's non-entitlement counties, affordable housing is at a premium. This is also true of accessible housing, despite the efforts of the Missouri Housing Development Corporation (MHDC) and USDA Rural Development to increase the available stock. This finding and the sentiments of most interviewees are consistent with the position of the National Rural Housing Coalition regarding accessibility of affordable housing.[2]

> *Low-income individuals in rural Missouri do not have the financial resources that would make homeownership possible or give them access to better quality rental housing.*

The problem lies in the fact that low-income residents of rural Missouri face a rental housing market that is largely characterized by shortages and substandard conditions. Properties of better quality are beyond what low-income individuals can afford. Even housing of very poor quality can claim a rent amount that is more than 50 percent of the tenant's income, well beyond the federal standard of 30 percent for a total of rent and utilities.

As for homeownership, interviewees indicate that restrictions implemented since the 2008 financial crisis have curtailed home buying among those without resources for the 20 percent down-payment required for mortgage approval. This obstacle is so significant that interviewees had virtually no knowledge of problems arising from home purchase or areas of potential abuse related to that process: this would include home appraisals, home insurance and of course lending.

Under these conditions, the most vulnerable among Missouri's rural populations cannot afford the housing they might otherwise choose.

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[1] http://labor.mo.gov/mohumanrights/fair_housing_project.asp
[2] http://ruralhousingcoalition.org/overcoming-barriers-to-affordable-rural-housing. Accessed March 14, 2014.

E. RELIANCE ON SUB-STANDARD PROPERTIES FOR HOUSING:

One of the more frequent interviewee observations relates to landlord neglect of properties. Interviewees stressed that there are both good landlords and bad, and what is true of some is not true of all. But it appears that those landlords who are more negligent have had a significant impact on the housing stock in rural Missouri.

In many areas of Missouri, there is minimal regulation of privately held properties and the extent to which they are kept in habitable condition. Non-entitlement counties may not have building codes in place – either at the city or county level. Even where codes are in place, lack of staff to make inspections or pressure from local interests may nullify their effect.

Interviewees stressed that in their regions there are many private landlords who maintain their properties according to building codes. Landlords who are less conscientious, however, have significantly affected the quality of the housing stock in rural Missouri.

As a result, privately held rental housing stock in many areas of the State is in a deteriorated condition. Interviewees described instances where furnaces were out of service during the coldest part of the winter – in one case, for as long as 6 weeks; where sewer lines under a house backed up; where roofs leaked and ceilings deteriorated to such an extent that squirrels coming in through the roof fell onto the first floor.

Some landlords – particularly those who are more small-scale – may lack the resources to make needed repairs. Other landlords are either slow to act on repairs or simply will not make the necessary investments in the properties they own.

Interviewees point out that from the perspective of many landlords, bringing their properties up to code will simply prompt rent increases. Among them, a small number understand the implications this can have for low-income individuals: i.e., if properties are better quality, but rents are higher, those units will no longer be affordable for those most in need of affordable rental housing. According to one landlord, his properties may be substandard, but without them many of the low-income would be homeless. In some cases increases to rents are justified to cover the cost of repairs; in other cases, landlords simply view improved quality as an opportunity for rent increases.

Even properties with what would be considered code violations are leased at rents that many interviewees describe as exorbitant. Housing shortages and lack of financial resources may prompt low-income individuals to accept these sorts of conditions.

F. NEGATIVE PERCEPTIONS OF LOW-INCOME POPULATIONS:

Although nation-wide the low-income population includes many protected class members, income itself is not one of the factors that defines a protected class under the fair housing provisions. Based on interviewee comments, low-income individuals face some of the same prejudices that the fair housing law was intended to eradicate.

At both the neighborhood and the city level, there is often evident resistance to developments that would bring low-income or multi-family housing to a rural area or municipality. The reasons may be strictly economic: for example, a city council's decision not to rezone a commercial district for a multi-family development or a community's fear of how proximity to low-income housing may affect property values. Nevertheless, according to the interviewees, the sentiments that have traditionally been associated with fair housing violations – i.e., "We don't want those people living in our area" – are in many Missouri communities most frequently directed at the low-income population.

IV. Geographic Considerations

In an effort to obtain a balanced view of fair housing in the State as a whole, PPRC researchers contacted housing, planning and advocacy professionals working in all non-entitlement regions of the State. PPRC also conducted interviews with representatives of some agencies with a statewide emphasis. In addition to gaining a statewide perspective, PPRC was interested in determining if there are regional differences.

While there was some variation, from a regional perspective the differences in fair housing were minor. In some areas of the State, developers are active in producing new housing units. This creates an environment where affordable housing is easy – or easier – to locate. In other areas of the Missouri, new developments are a rarity; some interviewees mentioned that the last one they could remember was in the late 1990s.

A. RURAL AREAS OF THE STATE AS COMPARED TO MUNICIPAL:

Some interviewees took note of the contrast between the type of fair housing issues found in their mostly rural regions and what they knew of the type of issues encountered metropolitan regions. Without diminishing the challenges their own areas face, their perception is that urban areas have much more significant problems.

In their comments, interviewees also drew contrasts between conditions in the rural, less densely populated areas of their region with the small towns or cities also located there. These contrasts primarily focused on:

1) CODE ENFORCEMENT: In the non-entitlement counties, adoption of building codes is sporadic. According to the interviewees, in some sections of the state – for example, Southeast Missouri – most towns and cities have some type of building codes. This is not the norm, however, in most regions. Interviewees most often referred to code adoption in larger cities, while in rural areas they were largely absent. Interviewees indicated that, even where codes are in place, enforcement is erratic. Not all cities can budget for code enforcement personnel. Where city or county governments have staff with this responsibility, the personnel may be over-extended, expected to cover new building as well as existing properties.

   From a fair housing perspective, a lack of code enforcement can reduce the supply of safe, decent, livable housing for protected classes and other low-income individuals to draw on.

2) TYPE OF HOUSING STOCK: Interviewees characterize less densely populated areas of non-entitlement counties as dominated by single-family dwellings. Units available for rent may be previously-occupied farm houses. Single-family units may also constitute the majority of housing in small towns, but larger towns and cities will have multi-family dwellings. Some interviewees noted that there have been instances where neighborhood residents have protested the introduction of multi-family housing in areas adjacent to their communities. While developments designed to serve the elderly or disabled may be welcome, similar developments for low-income families can arouse opposition. Arguments range from fear of crime to a decline in property values. Many interviewees could cite instances where neighborhood residents were successful in blocking construction.

B. REGIONAL CHARACTERISTICS

The regional demarcations that such entities as the Missouri Association of Community Action Agencies use cover a wide range of counties where conditions may vary from large urban areas to rural communities dominated by farms and sparse population. Although interviewee remarks suggest patterns in housing across the rural areas are not consistent, some characteristics are more dominant than others.

1) **TIGHT RENTAL MARKETS:** Most prevalent were regions where rural areas had a limited supply of affordable, accessible rental housing. As previously mentioned, the majority of these areas had significant deterioration in the housing stock due to owner neglect, and inadequate code enforcement.

2) **HIGH RENTS:** Despite substandard quality, housing units command high rents in response to demand. According to interviewees, regions where towns and municipalities take steps to adopt and enforce building codes have addressed this problem to a certain extent, but in more rural areas outside these jurisdictions, interviewees describe landlords as a law unto themselves. Interviewees mentioned that in some of the cases they were aware of, an individual might pay in excess of 50 percent of their income for rent.

3) **HIGH DEMAND FOR SUBSIDIZED HOUSING**: Interviewees reported that in some regions of Missouri, subsidized housing is the best quality housing available. Unlike private landlords who are subject to lax code enforcement, HUD requires inspection of Section 8 and public housing units. All units must meet HUD's Housing Quality Standards (HQS). In an environment where private landlords fail to make needed repairs to their rental properties, subsidized housing offers a distinctly superior option for those who qualify.

   As a result, waiting lists for public housing and Section 8 vouchers tend to be full. In some cases, the wait time to be added to a list for subsidized housing is 3-1/2 to 5 years.

In a few parts of the state, other conditions prevailed. Each of these conditions was reported during a single interview and refer to only one section of the state:

1) **HIGH VACANCY RATES**: One rural area reported high vacancy rates (10 to 15 percent) among its housing stock. According to the interviewees who reported it, there are ample units in this area for rent. They were unaware of any discrimination in housing, and pointed to the supply of housing units as the reason.

4) **GROWTH IN HOUSING STOCK**: A few rural areas reported an influx of new housing stock that was positively affecting availability. These sections of the state appear to benefit from the presence of an economic driver that stimulates growth in other sectors, as well as housing. Taney and Stone Counties, with their proximity to Branson fit this model. Webster, which is adjacent to Greene County (where Springfield is located), is another example. Interviewees indicated that the increased competition from new developments prompted landlords of existing housing to make improvements to their properties in order to attract renters. Unfortunately, other rural sections of the state lack similar economic impetus. The existing housing reflects this.

Additional characteristics are summarized in Table 1. The details provided reflect the comments of interviewees and are not based on more objective sources of data. They address those regions where we had sufficient data for a preliminary profile. The remarks are very general and are more intended to show common denominators among the regions.

This is a topic that would require much more data collection to be comprehensive.

TABLE 1: REGIONAL HOUSING CHARACTERISTICS FOR SELECTED MISSOURI REGIONS

REGION	CONDITIONS IMPACTING FAIR HOUSING
Southeast	Interviewees noted that there is limited public housing. The entire area is served by only one housing authority. Although municipalities have discussed introducing more low-income housing, community leaders have not moved forward. Section 8 waiting lists are opened once a year and fill up within a matter of hours. Most of the municipalities have building codes that are strictly enforced. Occupancy permits are also routinely used in municipalities. Despite code enforcement, there are problems with private landlords not repairing properties. Tenants who complain risk eviction. Interviewees indicated that fair housing issues are not prevalent, but suggest this may be more related to a lack of familiarity with, and understanding of, the law, as well as an absence of recent investigation, such as paired testing, in this area.
South Central	Interviewees described this area as one with a need for low-to-moderate income housing. Unlike the Southeast, this region has limited communities with building codes and few building inspectors. Existing housing stock, specifically that dating from the 1950s and 1960s, lacks up-to-date wiring and plumbing which would not meet typical code requirements. Interviewees indicate that across the region, there are waiting lists for subsidized housing. Low-to-moderate income households rely on trailer homes rather than pursue homeownership. In the opinion of interviewees, the region is not attractive to developers due to low population density and income levels that would limit the market for home purchase. Also, interviewees indicated there have been incidents of resistance to multi-family housing developments.

TABLE 1 [continued]: REGIONAL HOUSING CHARACTERISTICS FOR SELECTED MISSOURI REGIONS

REGION	CONDITIONS IMPACTING FAIR HOUSING
Southwest	Southwest Missouri includes areas with distinctly different housing characteristics. The far southwest tends to be more rural and, according to the interviewees, encompasses some counties where there are high rates of poverty, as well as deteriorated properties. Joplin, one of the larger municipalities in the area, lost older housing stock in the 2011 tornado, which has reduced the housing available to the very low-income. In the adjacent region, however, single-family and multi-family developments have enlivened the housing market with both new construction and rehab of older properties, which now have to compete with the availability of recently built units. Although Greene County is an entitlement jurisdiction and so excluded from this study, both Springfield and Branson may serve as economic drivers in attracting developers.
Northeast	Many of the towns have occupancy standards. There are roughly 800 Section 8 units in the region, but housing professionals believe landlords are not receptive to Section 8 tenants. Individuals with vouchers may be unsuccessful in finding housing they can afford. Neglect of properties by private landlords is also prevalent here. The towns in the area have adopted occupancy standards, but this does not govern what goes on outside their jurisdiction.
North Central	This is one region where interviewees saw an adequate amount of housing. Low-incoming housing has been developed to the extent that interviewees reported one county in the region refuses to allow any further developments of this type to be built in that area. There are, however, problems with private landlords. Some ethnic populations in the region have experienced unfair treatment with regard to rents charged.
Central	Conditions in this area are influenced by the presence of the state capitol (Jefferson City) and the Missouri's most sizable land-grant university (located in Columbia). Despite the influence of these larger, more economically active municipalities, interviewees commenting on this area emphasized that the factor most impeding fair housing was the lack of affordable, accessible housing that could be considered decent and safe. Many of the towns in the region have property maintenance codes, but as in other regions private landlords can circumvent code enforcement.
West Central	This region, too, has similar problems with neglected properties and lax maintenance of rental units. As was true for the Central region, interviewees located in this area cited the lack of decent, safe, affordable housing as the biggest obstacle to fair housing. One interviewee noted that the homogeneity of the population and lack of diversity made it difficult to generalize about the sort of housing discrimination that ethnic minorities and others in protect classes might face. Interviewees stressed the need for rural development.
East Central	Interviewees reported a disparity in the availability of Section 8 vouchers from one county to the next, leading those in need of subsidized housing to move to areas where vouchers were more plentiful. While this is significant, it points to the degree that the low-income population in this region needs more affordable housing. Zoning regulations in one county have resulted in a housing stock lacking in low-to-moderate income housing, a policy that is now in the process of being reversed.

V. Protected Classes

Most interviewees stressed that they had only limited experience or knowledge of what we would consider stereotypical discriminatory acts – i.e., groups denied housing through a rental or home purchase transaction due to race or skin color, religion, gender, or ancestry. The instances they reported are summarized in Section VI. As an introduction, this section provides some additional remarks on specific protected classes.

A. Race/Color as compared to Religion and Ancestry

Two of the protected classes of significant concern when the fair housing laws were first enacted – religion and ancestry – received little attention from interviewees. Neither was mentioned as a source of discriminatory behavior related to housing. Instead, interviewees stressed the homogeneous nature of Missouri's rural population. They believe this reduces the incidence of discrimination related to protected classes traditionally targeted for discrimination, including those covered by race and color. Interviewees described the rural populations in their service areas as largely "white, European and Protestant."

In fact, none of the discriminatory incidents that interviewees reported cited religion or ancestry as a reason to deny housing to someone. This was not true for race. Mixed race couples, for example, brought complaints to legal aid attorneys or to community action agencies. With regard to race, however, interviewees suggested that this type of discrimination may occur more frequently than the number of complaints would suggest.

While fair housing law appears to have prompted a change in behaviors, attitudes are more elusive and can induce a landlord to deny housing to a protected class member, but in a way that does not violate the law.

Several interviewees noted that landlords have become savvier about avoiding the use of discriminatory language. One by-product of the heightened awareness of fair housing law among landlords is the care taken with regard to language. As interviewees put it, landlords have learned what they can and can't say and that certain statements risk triggering a fair housing violation. Landlords can legitimately use some criteria for denial of housing. Interviewees indicated that credit checks are frequently a barrier. Poor rental history is another, especially if there are previous evictions, as is any prior conviction that comes to light during background checks.

While these reasons are perfectly valid, they may also serve as a "pretext" for turning away someone the landlord would prefer not to have as a tenant. Legal aid attorneys indicate that in these situations, fair housing violations are very difficult to prove without paired testing. In some cases, people have done this informally with friends and in that way disclosed what was clearly a violation.

B. National Origin

Issues related to national origin tend to be most prevalent in large metropolitan areas, such as St. Louis and Kansas City. Interviewees reported some incidents in more rural areas of the state, however.

In some situations, differences in cultural norms were a factor in predisposing landlords to avoid renting to certain groups. Language barriers compounded the problems that interviewees cited. Laboring under a limited grasp of English, immigrants or refugees seeking housing accept what they understand the landlords to be telling them. In one example, an interviewee indicated that members of an ethnic group who were unable to find housing were told by a landlord that if they didn't learn English they wouldn't be able to stay in this country.

Not surprisingly, immigration status is another factor that can give a landlord distinct advantages. Of all the protected classes, this group is perhaps the most vulnerable to abuse.

C. Familial Status

A number of interviewees stressed the conservatism of the rural populations in their region. Conservative views of what constitutes a "family" appear to be at the root of several incidents of fair housing violation. Interviewees described landlords refusing to rent to single mothers; a single mother and her boyfriend; and unmarried couples.

In other instances, regulations presented an impediment. For example, restrictions in zoning or neighborhood covenants prevent multi-generational families from locating in the housing covered by their terms. Even subsidized housing imposed, in some cases, undue restrictions through its regulations: for example, in not allowing a father with a criminal record to visit his family at their public housing unit. In other instances, families caring for children based on informal arrangements with the children's parents have been deemed ineligible for subsidized housing until they can arrange a formal guardianship.

D. Sex/Sexual Orientation and Gender Identity

Based on reports from interviewees, incidents of discrimination associated with the sex of the individual seeking or lodged in housing were infrequent, but the incidents reported in the interviews underscore the vulnerability of the tenant in the landlord-tenant relationship. Some interviewees described incidents of sexual harassment. In these cases, if the tenant was in arrears in paying rent, had requested needed repairs or a favor, the landlord appeared to see some justification in making exploitive demands. In other instances, with respect to older women, the landlord simply refused to provide maintenance.

Added to the protected classes under the Equal Access ruling of August 2013, sexual orientation is an adjustment to the fair housing laws that many landlords and housing professionals (ones less diligent about training) are not yet aware of. A few of the interviewees cited problems that had come to their attention, either in relation to property managers or landlords. Although the number is small, this is an issue that has been taken up by advocates and may grow in significance as awareness of the ruling grows.

VI. Fair Housing Violations

Although some interviewees were more qualified in their response than others, 26 of the 29 professionals interviewed believe that impediments to fair housing are a factor in the availability of housing for protected class members.

Consistent with this position, interviewees believe there is still a need for education of the public and in particular those most frequently involved in housing transactions for the low-income: landlords and the tenants themselves.

Table 2 below lists descriptions of the type of discriminatory practices that interviewees pointed to as problems.

A. Descriptions of fair housing violations

1) **Discriminatory Acts and Their Resolution**: Not all interviewees could point to instances of overt discrimination, but many described problems they had encountered or become aware of. The examples that were given have been culled from the interview transcripts and assembled in Table 2, grouped by protected class.

   The majority of the ones described stem from requests for assistance from a client ("Client Contacts"), usually to an agency that assisted with filing a claim, contacting a landlord or property manager or providing alternative housing options. Still others arose from observation of conditions. Some relate to incidents that interviewees heard about, but could not confirm with direct evidence.

   Several interviewees representing service agencies noted that many incidents they dealt with resulted from ignorance of fair housing law. Usually these incidents were quickly resolved through contact with a property manager, an owner or an owner's attorney.

   The table notes the type of professional who supplied the information and provides some background regarding the source.

   The instances that are described should not be viewed as verified. PPRC did not check to determine which incidents ultimately resulted in a complaint to HUD or, alternatively, litigation.

Several of those we spoke to indicated that they more often encountered discriminatory behavior that resulted from ignorance of the fair housing law. Even where there were clear violations, notifying the offending party was enough to rectify the problem. In these cases, providing information about the law resolved the issue for the injured party, so that filing a claim or taking legal action was unnecessary.

2) **ISOLATED VIOLATIONS**: Although the items in Table 2 in some cases reflect patterns of behavior, most interviewees portrayed the violations of fair housing law as isolated instances. They believe that blatant abuses affecting most of the protected classes have their source in "bad actors" and not in a climate that condones widespread discrimination. This is in contrast to what could be considered "systemic" violations, where there are systems – for example, production of housing that is governed by policy decisions or commercial interests – that result in a failure to meet the needs of one or more groups.

> *In the opinion of the interviewees, to the extent that there are fair housing violations in rural Missouri, they occur as isolated incidents rather than being part of a widespread pattern of abuse.*

3) **SYSTEMIC DISCRIMINATION:** Interviewee responses were more cautious in relation to availability of housing suitable for persons with disabilities. Only 18 of the interviewees gave an answer to the question: "Is there enough accessible housing in your region?" Of these, 15 indicated there was a shortage. Although a few felt the stock was adequate, several interviewees were hesitant to answer due to:

- New developments underway in their area that would increase the availability, but by an unknown quantity.
- A lack of sufficient information

Some interviewees referred us to independent living centers located in their area, emphasizing that they could cite data that they tracked on a consistent basis about available units. We attempted to contact two centers serving the northern areas of the state, but were unable to arrange interviews.

Nonetheless, the strongest statement regarding disadvantages experienced by members of a protected class in dealing with the housing market pertained to persons with disabilities. According to interviewees, too much of existing and new housing planned or already being constructed is not designed to meet the needs of persons with disabilities or elderly individuals who want to age in place.

The situation has less to do with an effort to deny housing than a failure of systems that directly impact housing stock, as well as the resources that persons with disabilities have at their disposal in obtaining housing.

Interviewees believe that developers and other housing producers have failed to understand the extent of need, both short-term and long-term, for accessible units that adhere to universal design standards. Advocates for the persons with disabilities see some positive change in this arena, particularly in the receptiveness of private developers to incorporation of universal design in new developments. At the same time, interviewees were discouraged by current conditions faced by individuals with disabilities. For those with mobility problems, finding suitable housing could take months of searching, despite the presence of units advertised as fully accessible, but which may fall short of the special needs that a person with disabilities may have to accommodate.

While persons with disabilities face the same disadvantages in relation to landlords, systemic flaws that reduce the stock of suitable housing as well as the resources they have for housing present barriers that are even greater.

This also extends to the statutes or regulations that govern state and federal aid. Based on comments from interviewees, persons with disabilities who rely on government assistance face virtually insurmountable hurdles in purchasing a home.

- **Restrictions on Ownership Of Assets**: There are restrictions on the amount of assets that a person receiving state aid can hold. For example, to be eligible for the MO HealthNet for the Aged, Blind and Disabled program, which supplies medical care, persons with disabilities are limited to accumulation of between $1,000 and $4,000 in cash, securities or other property.[3] This excludes the value of a home, if the individual already owns one, but puts accumulation of sufficient capital for a down payment out of reach for anyone who finds it necessary to rely on state aid.

- **Limited State and Federal Aid**: In 2014, the maximum amount paid out for SSI is $721 for a single person and $1,082 for a couple. Persons with disabilities can work, but the amount of SSI awarded is based on an individual's income. The benefit will be reduced if income exceeds a certain limit.

[3] See http://dss.mo.gov/fsd/massist.htm for a summary of MO HealthNet restrictions.

4) **COVERT**: As noted in the discussion on race as a protected class, interviewees emphasize that discrimination can be difficult to prove. Because of this, the listing provided in Table 2 represents isolated occurrences that interviewees were willing to comment on. If this is only a limited list, this is an inadvertent by-product of the fair housing law itself. Persons in a position to discriminate (landlords, property managers, etc.) have recognized that certain language is problematic, but that "pretexts" can be employed to avoid the appearance of discrimination. The most effective way to circumvent these tactics is with paired testing. In St. Louis, the Equal Housing Opportunity Council does this. There have also been efforts in other areas of the state – both in Columbia and Jefferson City – to collect test data. If further research on impediments in Missouri is conducted, collaboration among these resources might be a productive avenue of enquiry.

B. CHARACTERISTICS OF LANDLORDS

Several interviewees criticized the neglect of properties in rural communities. They described it as endemic among the housing stock in several regions of the state where landlords failed to take steps to halt deterioration. Some were quick to point out that not all landlords were like this; that abuses were limited to those who lacked the resources to make repairs or to those who were not interested in investing in the property they owned.

Problems could also be traced, to a limited extent, to the type of landlords:

- **"MOM AND POP":** Interviewees characterized these owners as generally small-scale landlords with 1 to 2 properties, although in some instances they had established family businesses where they were managing up to 10 to 15 units. The smaller-scale landlords were portrayed as having a more personal interest in who they were renting to. They also tended to be less well-informed about fair housing law. Interviewees also stressed the conservatism of the rural communities, particularly among this group of landlords and particularly with regard to how they define families.
  This tended to make them prone to violation of fair housing laws related to familial status, e.g., such as refusing to rent to a single mother or an unmarried couple. Interviewees indicated they could be more diligent about keeping their properties in good condition, but it was also true they might be more challenged to find the necessary resources. In some cases, these landlords purchase a second home – perhaps a retirement home – and rely on rental income from the first property to defray the mortgage on the second.
- **ABSENTEE**: There were few references to absentee landlords, but in some areas they were a factor and were seen as making little effort to keep their properties in livable condition.
- **LARGE-SCALE LANDLORDS WITH MULTIPLE UNITS OR PROPERTIES**: In general, interviewees portrayed large landlords as better informed about fair housing law.

Table 2: DISCRIMINATORY ACTIONS DESCRIBED BY INTERVIEWEES

Description of Incident or Discriminatory Behavior	Protected Class Involved	Source	Comments
Landlords refuse or are reluctant to rent to migrant workers of another nationality with cultural practices inconsistent with local norms	National Origin	Hearsay	Local agencies and the worker's employer are providing language classes and orientation in landlord expectations
Landlords charge members of a particular ethnic group higher rent than non-minorities: for example, a landlord charges an ethnic family a rent of $200 per bedroom while a non-minority Caucasian male rents an entire house for $300.	National Origin / Ancestry	Observation	Reported by a community action agency
An Hispanic family, unable to find housing, was told by a landlord that if they didn't learn English, they couldn't stay in this county.	National Origin	Client contact	Reported to a community action agency
Section 8 landlords and public housing management restrict visitation of unmarried spouses	Familial status	Client contact	Reported to legal aid attorney
Landlords notify a housing authority of a property they have for rent; landlord specifies they want an "elderly couple"	Familial status	Observed	Housing authority representative alerted the landlord to the violation
A landlord declines to rent to an unmarried mother and her boyfriend.	Familial status	Client contact	Reported by a legal aid attorney
Landlords tell a prospective tenant – a young woman with children -- that they wouldn't rent to a single mother.	Familial status	Client contact	Reported by a legal aid attorney; not verified
Neighborhood developments implement covenants that restrict residents to nuclear family only	Familial status	Observed	Reported by an advocacy group
Landlords initially agree to a rental, but size of the family may cause them to strictly adhere to the occupancy license (limits number of people that can be housed).	Familial status	Observed	City housing plan set this as a problem to address
In dealing with families including children who are not offspring of the household adults (e.g., a niece or nephew), Housing Authorities will require that the family file for guardianship on that child before considering them eligible for housing.	Familial status	Client contact	Reported by legal aid attorney as a typical case.
Public sentiment and the focus of developers interested in government support for developments results in construction of new housing for the elderly as opposed to families.	Familial status	Opinion	Assessment of a housing professional managing Section 8 property
An elderly woman was challenged by the property manager for taking a second meal from an apartment complex buffet for a disabled person who could not leave her room. She was subsequently served with an eviction notice.	Disabled	Client contact	Reported by legal aid attorney
A young woman, permanently wheelchair-bound, searches for 7 months before finding an accessible apartment, despite the assistance of a service agency.	Disabled	Client contact	Reported by an advocacy group

Description of Incident or Discriminatory Behavior	Protected Class Involved	Source	Comments
Community residents block efforts to re-zone an "R3" residential area to zoning suitable for a group home for people with disabilities	Disabled	Observed	Reported by a regional council of government representative
A multi-family complex, approved as 100% accessible and advertising its units as universally designed, has a 6" lip in all showers	Disabled	Observed	Reported by an advocacy group
Landlords refuse to deal with tenants that have mental issues. If there are problems, the landlord will simply find ways to get them to move out.	Disabled	Client contact	Cases handled by legal aid attorneys
Landlords, even in some cases housing authorities, will disallow a tenant with a service animal due to prohibitions about pets	Disabled	Client contact	Legal services attorneys will contact the landlords and clarify the HUD regulations
A landlord charges a pet fee for a service animal.	Disabled	Client contact	Legal services attorneys will contact the landlords and clarify the HUD regulations
A multifamily complex, advertising its units as universally-designed, has limited provisions for protecting the disabled with mobility problems during a fire	Disabled	Client contact	Reported by service agency representative
A woman who had had a stroke was in danger of losing her housing because she continued to leave her walker in a causeway when she sat on the complex's porch.	Disabled	Client contact	Reported to a legal aid attorney
Despite production of new developments with federal and state funding, only a limited percentage of housing originated or managed by the administrative agencies is fully accessible.	Disabled	Observed	Reported by service agency representative
Neighborhood groups block a provider agency from building a group home for persons with disabilities.	Disabled	Agency update	Reported by advocacy agency representative
A person with limited mobility lives in a supposedly handicapped unit where the kitchen is only a few inches wider than his wheelchair.	Disabled	Client contact	Reported by a legal aid attorney
Although a disabled person has the right to modify a rental unit to make it more accessible, he/she must pay for the work themselves. An individual on a fixed income of roughly $700 per month will not have the resources for this sort of expenditure. In one instance, a disabled person is told she could make the necessary accommodations, but would have to return the unit to its original condition when she moved out.	Disabled	Client contact	Reported by service agency that assisted the young woman in finding an accessible unit
Landlords refuse to rent to a young male who occasionally engages in cross-dressing.	Sexual orientation	Client contact	Victim contacted a community action agency for help with housing
A woman alleges that she is treated differently by the property manager of her apartment complex after her girlfriend moves in with her.	Sexual orientation	Client contact	Victim contacted a community action agency for help with housing

Description of Incident or Discriminatory Behavior	Protected Class Involved	Source	Comments
A landlord resorts to sexual harassment in dealing with a young woman who falls behind in her rent.	Sex	Client contact	Victim sought help from a community action agency
Landlords neglect to make repairs to properties rented to single mothers or elderly single women.	Sex	Client contact	Series of complaints made to a community action agency
An African-American woman enquires about an apartment and is told it's already rented. She has a friend who is white contact the landlord about the same unit and the landlord indicates it's available.	Race	Client contact	Reported to a legal aid attorney
All minorities live in one section of a county or city/small town	Race	Observed	Information from a community action agency
A black family looks at a Mid-Missouri home, but the neighbors appear with the realtor and tell the family that they will not be able to survive in that area.	Race	Hearsay	Information from a community action agency
A tenant is told that the landlord won't rent to him/her because they have a girlfriend / boyfriend of another race.	Race	Client contact	Reported to a legal aid attorney; not verified
A mixed race couple complains about discrimination because a landlord won't rent to them, although the landlord cites poor credit history as the reason	Race	Client contact	Reported to a legal aid attorney
A landlord evicts an African American tenant for missing rent payments, while the same landlord "works with" a white person exhibiting the same behavior.	Race	Client contact	Reported to a legal aid attorney
Some landlords don't want renters with Section 8 vouchers. Advertising may include terms such as "No pets, no housing," "housing" being an abbreviated reference to Section 8 housing. Interviewees implied this could be a proxy for race or national origin.	Race/national origin	Client contact	Community action agency representative reported that people with Section 8 vouchers return to the agency, having been unable to find a place to live. (Another community action agency serving another part of the State made the same observation.)

C. AREAS SUBJECT TO POTENTIAL VIOLATIONS

The interview protocol covered with the interviewees included the following question: "Do you believe there are impediments to fair housing at work in Missouri today?" This question was followed with a series of probes that gave the interviewees the opportunity to talk in more detail about specifics in different sectors of the housing market. This section provides an overview of responses.

1) **RENTAL HOUSING MARKET**: As will be evident from the data provided in Table 2 above, the majority of discriminatory instances mentioned by interviewees involved the rental housing market.

2) **REAL ESTATE AND MORTGAGE LENDING**: Although one instance was reported which bore all the hallmarks of discrimination in the 1960's, most of the interviewees could not recall any recent discriminatory problems with either real estate transactions or mortgage lending. Some attributed this to regulation of these industries, as well as routine training of industry professionals. More interviewees, however, pointed to the effect of the 2008 financial crisis, which has introduced stricter regulations on the criteria for obtaining a mortgage: for example, potential homebuyers are required to have the 20 percent downpayment to qualify. These restrictions apply across the board, and appear to have nothing to do with practices that might show evidence of fair housing violations.

   Increased regulation has curtailed activity in these sectors to the extent that most interviewees had no knowledge of problems. In addition, for the low-income individuals served by many of the agency personnel interviewed, home purchase is out of reach. For these individuals, paying rent is a challenge. This is particularly true with respect to persons with disabilities who rely on SSI or SSID.

3) **HOME INSURANCE, HOME APPRAISALS and PROPERTY TAX POLICIES**: Interviewees either knew of no problems in these areas or any problems they had heard of were not discriminatory.

4) **ACCESSIBLE HOUSING & HOUSING CONSTRUCTION**: Some interviewees were closely attuned to the needs of persons with disabilities and were emphatic about the lack of housing that is both accessible and affordable housing. Others were reluctant to estimate whether their region has adequate housing to meet the needs of persons with disabilities in their region's population. Very few were sure they had an adequate supply.

One representative of a community action agency indicated that their staff had been unable to rent a fully accessible unit that they had available for some time. The representative had been told it was the location. This seems possible, since the unit was located in a small community where there was public housing with a HUD-set preference for persons with disabilities and elderly persons.

In other areas, the shortage is exemplified by the length of time it can take a person with a disability with significant mobility challenges to find a suitable residence. This is true even in areas that are known for their efforts to supply accessible housing. Advocates believe this is due to a lack of understanding of what constitutes universal design or ADA compliance. For example, units advertised as fully universal design can have a 6-inch lip in the showers or be too small for a wheelchair to maneuver. As noted in Table 2, a tenant who was wheelchair-bound had a unit (advertised as "handicapped") equipped a kitchen with less than 2-inch clearance for his wheelchair.

5) **LAND USE POLICIES/ZONING LAWS:** A number of interviewees talked about instances they were aware of in which cities or larger towns in rural areas declined to relax zoning laws to block the introduction of multi-family or low income housing. This was mentioned earlier in relation to the negative perception of low-income populations that prevails in some communities. A representative of a community action agency reported that their organization is prohibited from working on any further developments in one county in their service area. This is due to the county's belief that it has too much low-income housing.

   In another instance, a county's zoning practices eliminated all low-to-moderate income housing. While not a violation of fair housing law, such policies impact the availability of housing for protected class members among the low-income.

6) **NEIGHBORHOOD OR COMMUNITY DEVELOPMENT POLICIES**: Interviewees described instances where community demands prevailed in decisions regarding the introduction or location of low-income and multi-family housing. As a prime example, protests by neighborhood groups influenced city councils in decisions about developments. Again, this is not a fair housing violation, but as mentioned with regard to zoning laws, it limits the housing available to protected class members.

Neighborhood covenants can also have a more discriminatory effect, if they restrict residences to habitation by no one other than the members of a nuclear family. This violates fair housing provisions regarding familial status and also national origin, since many families from other countries have distinctly different cultural norms with regard to generations living together. Interviewees also mentioned this in relation to unmarried same-sex partners.

VII. Other Prevalent Themes in the Interviews

Several interviewees reported the prevalence of the following challenges:

A. Disadvantages of low income populations:

- **EXPEDIENTS TO MANAGE RENT COSTS:** Regardless of the condition of rental properties, landlords can command high rents due to a shortage of housing units. In order to reduce expenses, low-income extended families may double up in excess of health department requirements for space per person. This may be especially true among low-income families with cultural norms that accommodate multiple generations and in-laws sharing a living situation. This was mentioned in relation to migrant workers in particular.

- **BIASES IN GOVERNMENT OR COMMUNITY LEADERSHIP:** Interviewees indicated that in small towns or cities located in rural communities, low-income populations are not viewed as a desirable element. Several cited instances where a city council or neighborhood blocked proposed low-income housing developments due to a perception that crime would increase and property values would fall. At the same, leadership can assume that low-income individuals have the same options available to them as others with more resources at their disposal. For example, there may be an expectation that if a dwelling isn't habitable, a tenant should simply move out. Individuals who are on a fixed income or who live paycheck to paycheck may not have the funds necessary to relocate, when in many cases a landlord expects first and last month's rent, as well as a security deposit as an up-front payment.

- **FORMER PRISONERS RE-ENTERING SOCIETY**: Housing – particularly multifamily housing or housing of non-homeowners – frequently raises concerns about crime. The sentiments of community residents who want to protect the safety of their neighborhoods directly affects the ability of former convicts to find rental units. Unfortunately, former prisoners can face similar restrictions in public housing, where regulations may prohibit them from even visiting a public housing development, much less qualifying for housing. Interviewees raised this issue with regard to both subsidized and private housing. Legal Aid of Western Missouri is currently working on a project related to lowering the barriers to ex-offenders who need subsidized housing.

B. IMPACT OF LANDLORD PRACTICES

- **LIMITED ENFORCEMENT OF BUILDING CODES:** In communities where there is limited enforcement of building codes or occupancy standards, many landlords fail to make necessary repairs to keep their properties livable. While some regions in the state have widely implemented building codes, in other sections of the state they are a rarity. Where they have been adopted, communities may not have adequate staff to enforce them. This removes any regulation of landlord maintenance. This contrasts with subsidized housing where inspections are mandated. Some comments from interviewees indicated that in some areas of the state, subsidized housing is of a higher quality than any available on the private market. This accounts for 3-1/2 to 5 year waiting lists to be considered for a unit.

- **APPROVAL FROM LANDLORD FOR TENANT REPAIRS:** Tenants who are willing to make repairs themselves are prohibited by Missouri statutes from doing so without the written permission from the landlord. There is also a ceiling on the cost of repairs that the tenant can have done and deduct from the rent.[4]

[4] Missouri statutes allow tenants who are willing to make repairs to deduct the costs from the rent, as long as certain stipulations are met. Prior to initiating any repair work, the tenant must first notify the landlord. He/she is allowed 14 days to respond, either by undertaking the work needed or by disputing (in writing) the necessity for repairs. If the landlord denies that repairs are necessary, the tenant is required to obtain a written certification from the local government entity that the condition of the property violates housing or building codes. There are further restrictions on the amount of reimbursement, with a cap of one-half of one month's rent. *Missouri Revised Statutes*, Chapter 441. Landlord and Tenant. Section 441.234, dated August 28, 2013. Accessed February 26, 2014 at: http://www.moga.mo.gov/statutes/C400-499/4410000234.HTM

C. INCREASING THE AVAILABILITY OF AFFORDABLE HOUSING

- **LIMITED INCENTIVES FOR DEVELOPERS**: Despite the limited availability in some areas, developers have little incentive to build affordable housing to meet the needs of low-income populations. Interviewees indicated that, in their opinion, developing affordable housing in their area simply could not be profitable enough, particularly when developers faced opposition from communities. In some instances, the efforts of developers to put in low-income housing have not been welcome. Municipalities may be reluctant to re-zone potential development sites, preferring to keep them zoned commercial. In other cases, neighborhood residents have lodged complaints about multi-family construction, out of a perception that the influx of apartment dwellers will increase crime and lower property values.

C. THE NEED FOR EDUCATION VERSUS ENFORCEMENT

- EDUCATION: In general, interviewees viewed education as vital to the success of fair housing in Missouri. They were inclined to focus less on realtors or lenders – in line with the lack of commentary on the real estate market – and more on the public. Most who expressed an opinion felt public education was very important, both in communicating the parameters of fair housing law and in dispelling misconceptions about it and protected class members.

  With regard to training, several expressed an interest in seeing property managers trained. Currently, training is sporadic, inconsistent and not consistently applied to new hires. In organizations where there's high turnover, property managers brought in to replace someone who left may be unfamiliar with important regulations and certainly not with fair housing law. Another group that interviewees suggested needed training were builders and developers, along with agencies making policy decisions about housing and protected classes.

  There was also mention of training for landlords. Some thought it would be appropriate; others took a more jaundiced view and indicated that the only thing likely to make a difference would be enforcement, in the form of fines.

- ENFORCEMENT: Various types of enforcement were discussed. Some argued that HUD's enforcement should be more aggressive. Interviewees more often referred to assisting protected class members in filing complaints. The most crucial area, however, and the one most likely to make a significant difference to protected classes in rural Missouri seems to be code enforcement.

VIII. BEST PRACTICES:

Some of the non-entitlement localities or regions have adopted an approach to fair housing that might be considered for implementation in other areas:

1) HOUSING RESOURCE COUNCILS: Joplin has kept the HUD-established Housing Resource Council active. Apparently, it is one of the last remaining entities of its type in the country. Its value has been evident in the role it played in Joplin's rebuilding in the aftermath of the 2011 tornado. Its members described it as a forum where fair housing issues could be identified and incorporated into plans for resolution.
2) PUBLIC EDUCATION: In addition, Joplin has found engaging ways to conduct the impediment actions that HUD requires in April of each year as part of Fair Housing Month. Joplin holds a poster contest for middle school students and uses the ones designed as part of a media campaign. This is a simple, yet effective way to communicate the importance, as well as important facts, about fair housing to a wider public. This could easily be expanded statewide, with competitions in all school districts.
3) TENANT EDUCATION: Many of the community action agencies and housing authorities working with Housing Choice Vouchers conduct more intensive briefings for voucher holders. One interviewee described a process that included a group orientation, with a video presentation, and then individual orientation with each household prior to their beginning a search for housing.
4) LANDLORD/TENANT ASSOCIATIONS: In general only the metropolitan regions have landlord tenant associations. Joplin has had one, however, with some benefit, although one interviewee characterized tenants in his region as too mobile for any sort of organization.

IX. RECOMMENDATIONS FOR FURTHER RESEARCH

The limitations of interview data collection have been outlined in this report. The importance of these data as a starting point for further investigation and analysis should not be underestimated. Here are some avenues for additional work:

1) SURVEY RESEARCH: Many fair housing studies completed in recent years have incorporated data from questionnaires. With the advent of online survey data collection, this method of data collection has become both inexpensive and efficient. It's particularly effective in reaching professionals who have Internet access. It streamlines both data collection and data analysis.

   This would be an effective means of obtaining more quantitative data for the entire state.

2) SECONDARY DATA: Various types of secondary data are available that could provide additional context for fair housing in rural areas of the state.

    - Examine websites for governmental entities in the non-entitlement jurisdictions to determine how many address fair housing in their ordinances
    - Review zoning laws for restrictions related to fair housing
    - Engage in content analysis of available commission or council meetings for references to fair housing issues
    - Compile statistics from HMDA and other data sets related to real estate and mortgage lending
3) COMPLAINT DATA: PPRC staff did not review complaint data, but this would be a way of substantiating the information received from the interviewees, as well as determining the scope of complaints that have been filed, by geographic area.

X. CONCLUSION

Since its enactment in the 1960s, the fair housing law has continued to evolve, most notably by broadening safeguards for protected classes. For example, in August 2013 HUD implemented the Equal Access Rule, which further expands fair housing protections to cover sexual orientation and sexual identity.

The impression derived from the interviews conducted as part of this study is a sense that the fair housing law must continue to evolve, if it is to provide real protections to the most vulnerable individuals seeking decent and safe housing. With the exception of areas of the state where some type of economic engine promotes growth, housing in rural Missouri, as well as its towns and small municipalities, is often both sub-standard and expensive. This is the housing stock that many protected class members find it necessary to draw on in their search for living arrangements. This creates a situation where, regardless of protected class status, low-income individuals are distinctly at a disadvantage.

Matrix 1: TOPICS RELATED TO PROTECTED CLASS VIOLATIONS & OTHER ISSUES PERTAINING TO FAIR HOUSING OR DISADVANTAGED POPULATIONS

PROTECTED CLASSES	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Race	◆			◆		◆		◆			◆			◆		◆								
National origin	◆			◆																			◆	
Disabled/Elderly					◆								◆	◆	◆		◆					◆		◆
Familial status		◆	◆						◆		◆	◆	◆				◆	◆			◆	◆	◆	
Sex								◆																
Sexual orientation								◆	◆													◆		
GROUPS NOT PROTECTED UNDER FAIR HOUSING:																								
Low-income	◆		◆	◆		◆		◆	◆	◆			◆	◆	◆		◆	◆			◆		◆	◆
Groups with different cultural practices	◆																							
PROBLEMS CITED	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21			
Lack of Affordable Housing	◆		◆	◆	◆	◆	◆	◆	◆	◆	◆		◆	◆	◆		◆	◆			◆			◆
Lack of Accessible Housing	◆				◆	◆	◆		◆					◆			◆	◆			◆	◆		◆
Landlords	◆	◆	◆	◆		◆	◆	◆		◆	◆	◆	◆	◆	◆	◆	◆	◆			◆			
• Property neglect	◆			◆		◆	◆	◆		◆	◆	◆	◆	◆	◆	◆	◆	◆			◆			
• High rents	◆					◆	◆		◆	◆	◆													
• Evictions			◆							◆	◆		◆		◆		◆				◆			
• Landlord/tenant law											◆		◆		◆		◆							
Lack of building codes	◆										◆			◆		◆		◆						
Non-enforcement of building codes						◆				◆	◆		◆				◆	◆			◆			
Failure to adhere to regulations [PHA]												◆	◆	◆			◆				◆	◆		
City/Town/Community resistance to:																								
• re-zoning for low-income, disabled group homes, multi-family	◆		◆								◆							◆			◆	◆		
• public housing, low-income developments			◆			◆							◆											
Lack of education on fair housing, tenant rights			◆	◆	◆	◆				◆	◆		◆		◆	◆						◆		◆
Use of pretexts to mask discrimination				◆			◆		◆	◆		◆	◆	◆										
Public apathy			◆																					
High demand for subsidized housing	◆	◆	◆	◆		◆			◆						◆			◆			◆			
NOT AWARE OF ANY MAJOR PROBLEMS																			◆	◆				
PROBLEMS EXIST, BUT EVIDENCE LIMITED			◆	◆						◆	◆		◆											

APPENDIX A: Methodology

RECRUITMENT OF INTERVIEWEES: Prior to initiating scheduling, PPRC submitted an interviewee roster to the Department of Economic Development for review and approval. The finalized roster included potential interviewees from entities in the following categories:

- Regional Planning Commissions and Councils of Government
- Community Action Agencies
- Statewide agencies working on behalf of protected classes or other groups
- Legal aid agencies

In an effort to get a balanced view of fair housing conditions in various regions, PPRC expanded on this initial listing, particularly in including more legal aid attorneys. In the course of recruiting interviewees, PPRC contacted approximately 55 professionals in housing, community development, advocacy and legal fields. The goal was to obtain interviews with individuals having sufficient involvement in housing to have a perspective on possible discrimination.

QUESTIONS ASKED: The Center adapted an interview protocol (see Appendix C) from other fair housing impediments analyses. Interviewees received a copy of the protocol questions in advance of the interview and were encouraged to follow up with requests for additional information.

The protocol questions used during the interviews were supported by "probes" (clarifying questions) that enabled interviewees to think more comprehensively about fair housing practices in their regions. Those who submitted written answers tended to opt for "Yes"/"No" responses, with limited comments.

In these instances, Center staff attempted to schedule interviews with individuals who would have equivalent familiarity with the region for which written responses were provided.

Center staff conducted all interviews by phone. Due to time constraints, some of those contacted about participating preferred to submit a reply in writing. In general, this resulted in inferior responses.

To encourage frankness in the responses, emails containing background information on the study and the interview process contained an assurance of anonymity, expressed in the following statement:

> "As we analyze the responses we obtain from interviewees, we will be looking for themes in the comments. In our reporting to the state, we will not quote anyone by name and will not use any of your comments without first asking your permission."

ANALYSIS: All except one of the interviews were digitally recorded. The interview not recorded was summarized from hand-written notes, but for the other interviews, transcriptions were completed. Analysis of the text was done with ATLAS.ti v 6.2 to isolate themes. ATLAS.ti does tabulations of codes, but frequency data were not incorporated in the report.

A list of interviewees appears in Appendix B.

APPENDIX B: List of Interviewees

Name and Title	Affiliation	Agency Coverage Area	Counties Served	
Randy Railsbeck Executive Director **Lance Raines** Community Planner	Green Hills Regional Planning Commission	North Central	Caldwell Carroll Chariton Daviess Grundy	Harrison Linn Livingston Mercer Putnam Sullivan
Mary Garcia Housing Director	Green Hills Community Action Agency	North Central	Caldwell Daviess Grundy Harrison	Linn Livingston Mercer Putnam Sullivan
Carla Potts Deputy Director for Housing Development & Grants	North East Community Action Corporation (NECAC)	Northeast	Lewis Lincoln Macon Marion Monroe Montgomery Pike Ralls Randolph Shelby St. Charles [excl] Warren	**NECAC also handles properties in**: Adair Audrain Crawford Franklin Sullivan
Jerre Moore Staff Attorney [Landlord / Tenant Law]	Legal Aid of Western Missouri St. Joseph Office	Northwest / North Central	Andrew Atchison Buchanan Caldwell Clinton Daviess DeKalb Gentry Grundy	Harrison Holt Linn Livingston Mercer Nodaway Putnam Sullivan Worth
William Shull Managing Attorney **Kim Basinger** Paralegal	Legal Aid of Western Missouri Warrensburg Office	West Central	Benton Camden Carroll Cass Henry Hickory	Johnson Lafayette Morgan Pettis Ray Saline St. Clair
Chuck Kohzadi Housing Director	West Central Missouri Community Action Agency	West Central	Bates Benton Cass Cedar Henry	Hickory Morgan St. Clair Vernon *Jackson: City of Grandview*
Ronda Wickham Housing/Weatherization Director **Mary Cramer** Housing/Weatherization	Missouri Valley Community Action Agency	West Central	Carroll Chariton Johnson	Lafayette Pettis Ray Saline

Name and Title	Affiliation	Agency Coverage Area	Counties Served	
Nancy Masner Housing Assistance Program Director	Public Housing Authority for Greene County Ozark Area Community Action Corporation	Southwest	Barry Christian Dade Dallas Greene [excl]	Lawrence Polk Stone Taney Webster
Debbie Markman Housing & Development Director Member, Joplin Community Housing Resource Board	Economic Security Corporation of Southwest Area	Southwest	Barton Jasper McDonald Newton	
Denae Murphy Housing Director	Noel Housing Authority	Southwestern Corner	McDonald	
Janice Franklin Managing Attorney Member, Joplin Community Housing Resource Board	Legal Aid of Western Missouri Joplin Office	Southwest	Barton Bates Jasper	McDonald Newton Vernon
Johnny Murrell Executive Director	South Central Ozark Council of Governments	South Central	Douglas Howell Oregon	Ozark Shannon Texas Wright
Michael Carney Managing Attorney, Housing	Mid-Missouri Legal Services	Central	Audrain Boone Callaway Chariton Cole	Cooper Howard Miller Moniteau Osage Randolph
Dianna Moore Director of Housing & Economic Development	Central Missouri Community Action (CMCA)	Central	Audrain Boone Callaway Cole	Cooper Howard Moniteau Osage
Joe Hills Managing Attorney	Legal Services of Southern Missouri [Springfield]	South Central / Southwest	Barry Carter Cedar Christian Dade Dallas Douglas Greene Howell	Laclede Lawrence Oregon Ozark Polk Shannon Stone Taney Webster Wright
Michael Spillane Staff Attorney	Legal Services of Southern Missouri [based in Rolla]	South Central/ East South Central	Crawford Dent Gasconade Iron Madison Maries Phelps	Pulaski Reynolds St. Francois Ste. Genevieve Texas Washington Wayne
Lew Polivick Deputy Director	Legal Services of Southern Missouri [based in Charleston]	Southeast/Bootheel	Bollinger Cape Girardeau Carter Dunklin	New Madrid Pemiscot Ripley Scott Stoddard

Name and Title	Affiliation	Agency Coverage Area	Counties Served	
John Althauser Managing Attorney	Legal Services of Eastern Missouri [based in Union]	East Central	Franklin Warren Washington	
Chauncy Buchheit Executive Director	Southeast Missouri Regional Planning and Economic Development Commission	East/Southeast	Bollinger Cape Girardeau Iron	Madison Perry St. Francois Ste. Genevieve
Bill Tucker Housing Director	East Missouri Action Agency	East/Southeast	Bollinger Cape Girardeau Dunklin Iron Madison Mississippi	Pemiscot Perry St. Francois Ste. Genevieve Stoddard Washington?
Vanessa Crawford Aragon Executive Director	Missouri Immigrant and Refugee Advocates	***Statewide***		
David Nehrt Flores Community Organizer				
Don Love Task Force Co-chair	Missouri Human Rights Task Force			
Wayne Crawford Executive Director	Missouri Inclusive Housing Development Corporation			
Dolores Sparks Program Specialist	Missouri Developmental Disabilities Council			
Kimberly McKinney Former Board President	Missouri Workforce Housing Association (also: CEO, Habitat for Humanity, St. Louis)			

Individuals Providing Written Responses

Name	Affiliation	Coverage Area	Counties
Linda Hollandsworth Executive Director	Meramec Regional Planning Commission	East/South Central	Crawford Dent Gasconade Maries Osage Phelps Pulaski Washington
Penny Miles Executive Director	Northeast Missouri Community Action Agency	Northeast	Adair Clark Knox Scotland Schuyler

APPENDIX C: INTERVIEW PROTOCOL

Impediments to Fair Housing Interview

You are scheduled for an interview regarding fair housing in Missouri. Here are some FAQs that you may want to review:

Q: Who's doing the fair housing study?

A: The project was commissioned by the Missouri Community Development Block Grant office in the State Department of Economic Development.

Q: What is the purpose of the project?

A: The federal government (specifically, the Department of Housing and Urban Development, or HUD) requires that a fair housing study be done periodically to measure whether the State is making progress in eliminating impediments to the Fair Housing Law. The study focuses on housing discrimination, problems in administering public housing, and anything that could be considered an impediment in getting access to housing in Missouri today.

Q: Is it just about government housing?

A: No, it covers any kind of housing in Missouri, except military housing, of course.

Q: I'm not that familiar with the Fair Housing Law. Do you think I can be of much help?

A: We don't expect you to be an expert in the Fair Housing Law, but we know that you are familiar with housing and real estate issues in Missouri. We're interested in talking with you about any insights that you may have regarding conditions in your region, or statewide, which you believe impact access to housing. We hope to obtain various perspectives on the state of fair housing in Missouri. In this respect, information that capitalizes on your area of expertise will be crucial.

If you have additional questions, please contact:
Mark Tranel (314-516-6594; email: mtranel@umsl.edu)
or
Jeanne Ortega (314-516-6594; email: ortegaj@umsl.edu)
Public Policy Research Center
University of Missouri-St. Louis
SSB 362
St. Louis, Missouri 63121

A LIST OF INTERVIEW QUESTIONS AND TOPICS FOLLOWS ON THE NEXT PAGE.

Question Listing for Winter 2014 Interviews

1) Please describe your main job function at your agency.

2) How long have you been involved with housing in Missouri?

3) How familiar are you with the Fair Housing Law in Missouri?

4) Do you believe there are impediments to fair housing at work in Missouri today?

5) What geographic areas in Missouri seem to you to have problems with fair housing?

6) What should be done right now to alleviate the most pressing impediments?

7) Do you think that training and education are needed? Do you think that enforcement is needed? Which one is more important, if either?

8) Do we have enough of the right kind of training for Fair Housing in Missouri today?

9) If you wanted to find out how well Missouri is doing in terms of removing barriers to Fair Housing in Missouri, who would you ask? Where would you look?

10) If you had a client or friend who thought they were experiencing housing discrimination, where would you go for help for that person?

11) What types of fair housing activities are most needed in your community?

12) In the last 12 months, have you seen or heard any advertising for Fair Housing in Missouri?

13) Since 2011, Missouri Housing Development Commission has implemented a Special Needs Housing priority for affordable housing.

- Have you seen an increase in available housing for persons with special needs?
- Are you aware of any fair housing issues as it relates to Special Needs Housing?

Please share any additional comments you may have regarding fair housing.

Thank you for your participation

APPENDIX D: Prospects Who Were Not Interviewed

Name	Affiliation	Coverage Area	Response
Shawn de Loyola Executive Director	Missouri Protection & Advocacy Services 925 South Country Club Dr. Jefferson City MO 65109	Statewide	Declined to be interviewed
Robin Simpson	Mark Twain Regional Council of Governments	East/Northeast	Scheduling conflicts
Oleva Frederick Housing Director	Northeast Missouri Regional Planning Commission	Northeast	Contacted her by email; no response
Becky Steele Interim Executive Director	Community Action Partnership of Greater St. Joseph	Northwest	Contacted her by email; no response
Doug Evenson Housing & Business Development Officer	Community Action Partnership of Greater St. Joseph	Northwest	Contacted him by phone; left voice mail. Followed up with email. No response.
David Miller Executive Director	Missouri Ozarks Community Action	Central	Contacted the office number. Routed to Pulaski Public Housing. Left voice mail. No response
Judy Young Executive Director	South Central Missouri Community Action Agency	Southeast	Spoke to her and she agreed to participate. Sent email with questions. Did not hear back from her about scheduling.
Bonnie Patterson Executive Director	Community Services, Inc. of Northwest Missouri	Northwest	She responded to initial email with some scheduling options. Responded with suggested date/time, but didn't hear back from her
Glenn Miller Weatherization/HUD Director	Community Services, Inc. of Northwest Missouri	Northwest	Sent email; called to follow-up and left a voice mail. Did not hear from him. Subsequently called twice, but he was out of the office.
Jeremy Brady	USDA – Rural Development Northwest Missouri	Northwest	Sent email; no response
Neal Miller	USDA – Rural Development Northern Missouri Multi-Family	Northern part of the state	Sent email; no response
J.C. Dollar Chief Executive Officer	Midland Empire Resources for Independent Living (MERIL)	Northwest	Sent email; no response
Theresa Myers Executive Director	Rural Advocates for Independent Living	Northeast	Sent email; she responded by email, giving me a range of dates when she could complete an interview. I responded with a recommended day, but I didn't hear back from her.
Reza Abadi Mortgage Banker	DAS Acquisition Co./USA Mortgage		Email contact; no response. Called and spoke to him; we set a time to talk about

Name	Affiliation	Coverage Area	Response
			scheduling. I followed up by sending him the interview protocol, but when I called to discuss a date and time for the interview, I couldn't reach him. Left voice mail. No response.
Susan Alverson Managing Attorney	Legal Services of Eastern Missouri Housing Unit	St. Louis; supervises staff in other eastern counties	Called and left voice mail. No response, but called again the following week. She requested I send the questions, but did not think she could help rural Missouri.
Julie Levin Managing Attorney Housing Unit	Legal Aid of Western Missouri Housing Unit	Kansas City; has consulted on fair housing cases in other parts of the state	Spoke to her, but she didn't believe she could be helpful with rural Missouri
Kevin Suffern Managing Attorney	Legal Services of Eastern Missouri	Northeast	Called & was told he had a back injury
Kurt Wallace Current Board President	Missouri Workforce Housing Alliance	Statewide	Called & spoke to his assistant. Forwarded background information by email. She called a week later to say he would be interested in participating. Sent interview protocol. Have not heard anything further.

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MISSOURI HOUSING
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MHDC HOUSING NEEDS ASSESSMENT REPORT

PUBLIC POLICY RESEARCH CENTER
UNIVERSITY OF MISSOURI - ST. LOUIS

CARES
CENTER FOR APPLIED RESEARCH AND ENVIRONMENTAL SYSTEMS

Institute *of* Public Policy
Harry S Truman School of Public Affairs
University of Missouri

MHDC Housing Needs Assessment Report

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MHDC Housing Needs Assessment Report: *I. Executive Summary*

The Missouri Housing Development Commission (MHDC) contracted the University of Missouri (Center for Applied Research and Environmental Systems, Institute for Public Policy, and the Public Policy Research Center) to conduct a state-wide housing needs assessment. The University researchers applied a multi-method approach to collecting both primary and secondary data to describe the population of Missouri, quantify housing needs and document perceptions of housing needs and issues in the State of Missouri.

KEY FINDINGS: DEMOGRAPHIC AND SOCIOECONOMIC

Housing affordability is a significant issue in Missouri. The income level of a substantial portion of Missouri's households limits the resources they have for housing. Over 25 percent of Missouri household's annual income is less than $25,000.
Although the dominant land development classification in Missouri is rural, most of Missouri's residents live in metropolitan areas (72.8 percent).

While there are low income households in every county in the State, as is true of the general population, low income households are highly clustered in urban areas.

Low income households are disproportionately represented in subpopulations, particularly African Americans.

Missouri is a slow growth state and there are no significant demographic trends that will change the composition of its subpopulations in the next several years. The population growth that does occur will be clustered around the larger metropolitan areas.

Housing tenure directly correlates to income, the lower the income the greater the percentage of renters, the higher the income the greater the percentage of owners.
The areas of highest need based on special needs (veterans, people with disabilities and the elderly) and disadvantage (people in poverty, households with area median incomes in the 41-60 percent range, and unemployment) are in the southern part of the State, and the needs are particularly high in the Bolivar, South Central, and Southwest Regions.

KEY FINDINGS: HOUSING CHARACTERISTICS

Housing Characteristics: Housing Need

Currently, one third of households in Missouri are cost burdened at the 30 percent criterion, meaning they spend 30 percent or more of their income on housing costs.

Renter households are more cost burdened at the 30 percent criterion—51 percent--and owner households are less cost burdened—22 percent.

Renter cost burden status is found across all parts of the state of Missouri, but the most renter cost burden counties are rural counties in the Bolivar, Popular Bluff and South Central regions. The urban county that has the highest renter cost burden status is St. Louis City (55 percent).

In terms of counts, St. Louis County has the most renter cost burdened households (53,382), followed by Jackson County (50,389), St. Louis City (39,437) and Greene County (22,191).

While cost burden status for owners declined from 2010 to 2012, cost burden status for renters marginally increased.

The largest change in percent renter cost burden from 2008 to 2012 occurred in suburban regions around Kansas City—Platte, Clay and Warrensburg—the St. Joseph region and Jefferson County in the St. Louis area.

Renter cost burden status and Area Median Income (AMI) income levels are negatively related. Both as a percentage of households within the AMI levels, households at the lowest AMI levels are most cost burdened: 91 percent of renter households less than 40 percent AMI are cost burdened and make up 60 percent of all cost burdened renter households.

Cost burden status varies across the state's subpopulations. African Americans and Hispanics have higher renter cost burden rates (57 and 56 percent) than white households (45 percent); single parent and single person households have higher cost burden rates (56 and 50 percent) than married couples (32 percent). Households with a disabled member have a renter cost burden rate of 59 percent.

Most of the subpopulations with high renter cost burden rates in 2012 have seen increases in their cost burden rates since 2008. For African American households, renter cost burden went from 51 to 57 percent. For households with a disabled householder, the rate increased from 50 to 58 percent. For renter households less than 40 percent AMI, the rate went from 78 to 91 percent.

Housing Market Dynamics

Housing new construction generally outpaced household formation on an annual basis since 2000. From 2000 to 2010, Missouri added 272,000 units and only 156,000 households (74 percent more housing units than households). Only in the last two years—with the state adding no new net units—has household formation outpaced new units.

Private residential development in Missouri increased markedly in the 1990s and the first part of the 2000s, both in number of permitted units and value of the units, and fell sharply after 2005 to levels seen in the early 1980s. Permit valuation in 2013 was 47 percent of the state's high mark in 2005.

Of the metropolitan counties that together have the largest portion of the state's housing units, most have shown a pattern of activity over time that resembles the statewide pattern—an increase in permit activity throughout the 1990s through 2005 and a decline in activity since then. Only St. Louis County bucks this trend with a long decline in construction activity since the 1990s.

Only 14 percent of the state's housing units date from 1990, and relatively few units have been added since 2010.

Areas such as St. Charles County, St. Louis County and Jefferson County in the St. Louis region added a significant number of units since 2000; for St. Charles County, new construction is 30 percent of the total units. Rural areas in the north and south have seen little addition of new units since 2000.

In 2013, the highest value and unit count of permits are within the urban counties of St. Louis County, Jackson County, Boone County and Greene County and the exurban county of St. Charles. These five counties constituted 58 percent of the total permitted unit count in Missouri in 2013 and 64 percent of total permit valuation.

A significant number of counties reported very few permits, particularly in the South Central, Popular Bluff and Northwest and Northeast region.

Housing Occupancy Profile:

Housing vacancy is increasing—from 10.1 percent of units in 2000 to 13.1 percent in 2013, with a high point of 14.0 percent in 2011. From 2008 to 2012, vacancy increased the most in Lake Ozark and Southwest regions and decreased the most in the Nevada and Bolivar regions.

While rental vacancy is higher than the vacancy rate for owner occupied units, the rental vacancy is falling—from 8.3 percent in 2010 to 6.2 percent in 2012—suggesting a tightening of the rental market. Rental vacancy rates are lowest in the exurban counties around the state's metropolitan areas and in rural areas of the state.

Across the state, renter tenure has been modestly increasing, from 29.7 percent in 2000 to 32.5 percent in 2012, with the largest increases in renter units occurring after the economic downturn in 2008. Most of the state has seen increasing rental rents, with the largest percent increases in St. Louis City, the Rolla region, and many of the regions surrounding Jackson County.

Regionally data indicate that the incidence of vacancy is higher in rural areas, particularly in the Bolivar, Lake Ozark and Popular Bluff regions; among urban counties, St. Louis City has the highest vacancy rate at 12 percent.

By contrast, rental tenure is a phenomenon of both urban and suburban counties; among urban counties, St. Louis City has a rental rate of 54.4 percent, followed by Boone County at 42.4 percent. By contrast, exurban counties such as St. Charles, Jefferson, and Lincoln have the lowest renter rates (19.3 percent, 19.0 percent and 17.0 percent)

There are marked disparities in renter rates based on subpopulations. African American households are twice as likely to be renters as white households; single parent households are more than four times and single person households are more than three times as likely to renter compared to married couples.

African American households, single parent households and single person households saw large shifts from owner occupied households to renter households from 2000 to 2012. For African Americans, this shift was from 53 percent renter to 60 percent; for single parent households, the renter rate jumped from 45 percent to 59 percent.

Households within incomes below area median incomes are also more likely to be renters; 47 percent of household at 40 to 60 percent of AMI and 62 percent of households below 40 percent of AMI are renters.

Both housing values and median gross rents increased markedly from 2000 to 2010 (55 percent and 41 percent); however, housing values declined from 2010 to 2012 (-3 percent) while gross rents continued to rise modestly (4 percent).

On the owner occupied side, there was a shift in owner units from the lowest housing values to the highest from 2000 to 2010. Units valued less than $100,000 accounted for 60 percent of units in 2000 and only 33 percent of units in 2010. By contrast, units valued above $200,000 made up 10 percent of units in 2000 and 27 percent of units in 2010. There has been little change in these percentages since 2010.

On the renter side, there have been similar shifts in the proportions of lower and higher rent units. In 2000, units with a rent less than $500 comprised 53 percent of all units, but only 25 percent in 2010 and 20 percent in 2012. The greatest change in percent comes for units between $750 and $1,000; they comprised 9 percent of units in 2000 and 26 percent in 2012.

Areas with the highest median housing values are the suburban and exurban counties around the major metropolitan areas; St. Charles had the highest median housing value in 2012 ($193,600). The lowest median housing values are within the Popular Bluff and Bootheel regions in the south of the state and the Northeast and Northwest regions.

KEY FINDINGS: AFFORDABLE HOUSING CHARACTERISTICS

There were 149,000 units of subsidized housing in Missouri in 2013. The largest proportion of these units—and the group that has grown substantially since 2000—are low income tax credit units.

As the percentage of all subsidized units in Missouri, the largest groups are in Jackson County (23 percent), St. Louis County (16 percent) and St. Louis City (15 percent). At the county level, no other counties have more than 3 percent of total subsidized units. In terms of geographic distribution, LIHTC units are more geographically spread across the state than traditional public housing units or other types of subsidized units.

In four counties—the City of St. Louis and Jackson County and Pemiscott and Mississippi County in the southeast corner of the state—subsidized units make up more than 10 percent of the total units in the county. By contrast, affordable units are much lower percentages of total units in the central/south part of the state, including the Jefferson City/Columbia MSA and in the Springfield MSA.

Within metropolitan regions, there are significant differences between the percentages of subsidized units in urban counties and exurban counties. For example, in the St. Louis MSA, affordable housing constitutes 14 percent of all units in the City, 4 percent in St. Louis County and 3 percent in St. Charles County and Jefferson County. Within the Kansas City, MO, portion of the Kansas City MSA, affordable housing makes up 11 percent of all units in Jackson County, 5 percent in Clay County, 4 percent in Cass County and 3 percent in Bates County.

Subsidized units are also geographically concentrated in counties when taken as a function of the low-moderate population within counties. Those counties with the highest percentages are St. Louis City and Jackson County, with rural counties rounding out the top of the list. Counties with percentages below the state average include urban and exurban counties outside St. Louis and Kansas City and metropolitan regions elsewhere in the state.

Data on the characteristics of subsidized housing suggests that these publicly sponsored units have significantly fewer bedrooms than Missouri's housing stock as a whole. Whereas 40 percent of subsidized units have just one bedroom, only 9 percent of Missouri housing units have just one. Only 28 percent of Missouri units have two bedrooms, compared to 40 percent of the subsidized units. 61.2 percent of Missouri units have three or more bedrooms, compared to just 17 percent of the subsidized units.

KEY FINDINGS: THE INTERVIEWS

Nearly 50 percent of the interviewees pointed to a failure on the part of policymakers to fully comprehend the cost of housing. The outlay for rent is just one cost. Landlords can demand sizeable payments upfront before a tenant takes possession of a unit. These include:

- application fees, typically around $35, which are not recouped if the application is rejected
- security deposits, which may be equivalent to a month's rent or -- for applicants with poor credit histories -- up to 2 times the cost of the rent.
- in many cases, last month's rent in addition to the first month's rent

For an apartment with a $700 per month rent, the total initial costs could be in the range of $2,800. This does not include moving expenses, nor does it begin to address utilities. If not included in the rent, utilities can represent another significant cost-burden, both for start-up and ongoing services, as well as for charges in arrears for past services. For a person living on disability income of roughly $750 per month or for a minimum wage worker earning roughly $300 per week, accumulating sums of this size may be an impossibility.

Individuals grappling with a mental health condition or co-occurring disorders face significant challenges in maintaining housing without support services that can assist with medication management, resolution of crises and negotiations with landlords.

While the cost factor is even more dire for people with physical disabilities that limit mobility, the greater challenge may be simply finding an accessible unit. Ones that will accommodate large wheelchairs can take up to 6 months to find.

Interviewees stressed the importance of preserving the low income housing tax credit program as one of the sole means of introducing low income housing where it is needed.

The difficulty that ex-offenders face in locating housing was repeatedly emphasized. Background checks, credit checks and other screening mechanisms enable landlords to employ non-discriminatory methods of declining applications. Coupled with difficulties finding employment, for many ex-offenders re-entry into society comes with the certainty of failure.

An equally intractable problem is the lack of adequate transportation in rural communities and outlying areas in urban centers. To anyone without the means of owning a car, this is a significant hindrance in finding better quality or more affordable housing, along with employment. For veterans and the disabled, it also complicates access to services required for treatment. While opting to live in metropolitan areas is an obvious solution, the distance to services may be shorter, but the cost of housing can also be much higher. All interviewees who raised this issue were well-aware that small communities lack the resources and a supply of riders to justify efforts to implement transportation services beyond OATES.

KEY FINDINGS: ANALYSIS OF IMPEDIMENTS

There were more than 2,800 fair housing complaints filed in Missouri between 2009 and 2014.

Nearly half (47 percent) of the complaints were dismissed as having no cause. The majority of the fair housing complains filed with the state were on the basis of racial discrimination but filings with HUD were more frequently on the basis of disability (37 percent) and then race (29 percent).

Fair housing public policy issues in Missouri:

- Statutes favor tenant rights over landlord rights
- Housing assistance is limited to the cost of rent and not the total cost of housing for low-income households
- The issues of discrimination that lead to the definition of specific fair housing protected classes more broadly applies to low-income persons, although they do not have the same statutory protections
- Member of protected classes often live in substandard housing due to the neglect of property maintenance by landlords
- There are distinct regional differences in conditions affecting fair housing

CONCLUSIONS

Conclusions

The Commission must develop its strategy for meeting Missouri's affordable housing needs responding to the dual challenges of a large percentage of Missouri households with low incomes and extreme variations in the level of need in various areas of the State.

Depending on how the need is specifically defined, there are between approximately 130,000 and 470,000 additional units of affordable housing to provide affordable housing for the households in need. If the definition of need is focused on renter households with income of less than 60% AMI that are paying more than 30% of their income for housing, the need is 130,000 units. If the definition of need more comprehensively includes all households with income less than 60% AMI, the need is 470,000. In either case, the unmet need is substantial, particularly given the resources available.

Addressing the level of need is made more complex by the variation in need in different areas of Missouri. Households with low income and households that are cost burdened are present in every county in the State of Missouri. The counties in the metropolitan areas in Missouri have large numbers of households in need and in general the need is greater in the rural counties in southern Missouri than in northern Missouri. There are some rural counties where one or two housing developments would technically provide an adequate number of units for the number of households in need in that county. There are counties, however, in the two largest metropolitan areas in the State that need between 15,000 and 38,000 units to address the need in that county.

The full report that follows details these issues and describes the need among subpopulation groups as well as sub-geographies of the State of Missouri.

MHDC Needs Assessment Report:
II. Demographic and Socioeconomic Profile

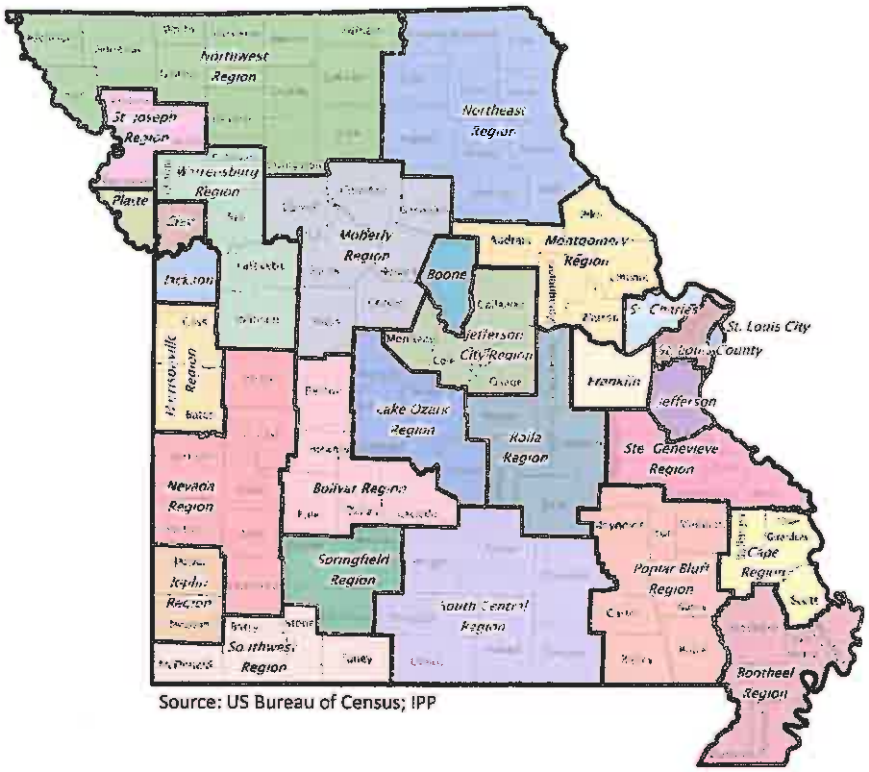
Introduction

This profile provides a demographic and socioeconomic context for the assessment of housing needs in the state of Missouri. Data is presented on population characteristics, including those of specific groups, population projections, household income and poverty, and other indicators of socio-economic conditions.

The analysis relies primarily on data from the American Community Survey for the five-year period 2008-2012. The Community Commons provides access to substantial amounts of data for counties and census tracts across the state to provide the opportunity for highly detailed analyses on the demographic and socioeconomic characteristics, but this profile focuses on a more limited set of indicators[1]. In addition, to capture the important geographic differences in Missouri, the analysis has grouped county data into regions based on the U.S. Census Bureau's *Public Use Microdata Areas* (PUMAs). This use of PUMAs allows for regional comparisons and more accurate estimations of current data. PUMAs contain at least 100,000 people and are built using existing county and census tract boundaries, but for the purposes of this profile, certain large cities have been combined with their surrounding counties to improve access to data that would not be otherwise available at the city level. Thus Missouri's 114 counties have been grouped into 29 modified PUMA regions as shown in Map 1.

1 The American Community Survey issued data for 2009-2013 in December 2014 and these will be incorporated into the Community Commons during the spring of 2015.

Map 1:
Missouri Modified Public Use Microdata Areas (PUMAs)

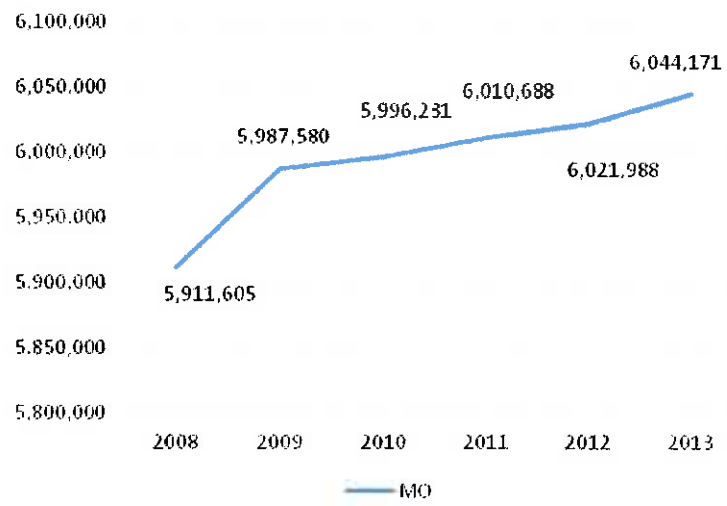


Source: US Bureau of Census; IPP

CURRENT POPULATION

Figure 1 shows the growth of Missouri's population over the period 2008-2013. The 2013 population was 6,044,171 based on the America Community Survey one-year estimates. The population growth over the period was 2.2 percent compared with 4.0 percent for the United States.

Figure 1: Missouri Total Population by Year 2008-2013



Source: American Community Survey 2008-2013 One-Year Estimates

The U.S. Census and Office of Management & Budget classifies counties based on their population size, density, and economic ties, into metropolitan and nonmetropolitan. Metropolitan areas comprise urbanized areas with over 50,000 people, with a density of over 1,000 persons per sq. mile at the core plus their outlying counties with strong commuting ties. Nonmetropolitan counties are often described as rural; certain nonmetropolitan counties which are centered on small cities with populations of 10,000-49,999 are classified as micropolitan. Table 1 provides an analysis of Missouri's counties by this classification, showing that almost three-quarters (72.8 percent) of the population live in metropolitan counties.

Table 1: Missouri Population by Census Classification

Census Classification	Number of Counties	Population (2013)	Percent of Population
Metropolitan	29	4,401,934	72.8
Micropolitan	22	719,766	11.9
Nonmetropolitan	63	922,471	15.3
Missouri	114	6,044,171	100.0

Source: U.S. Census

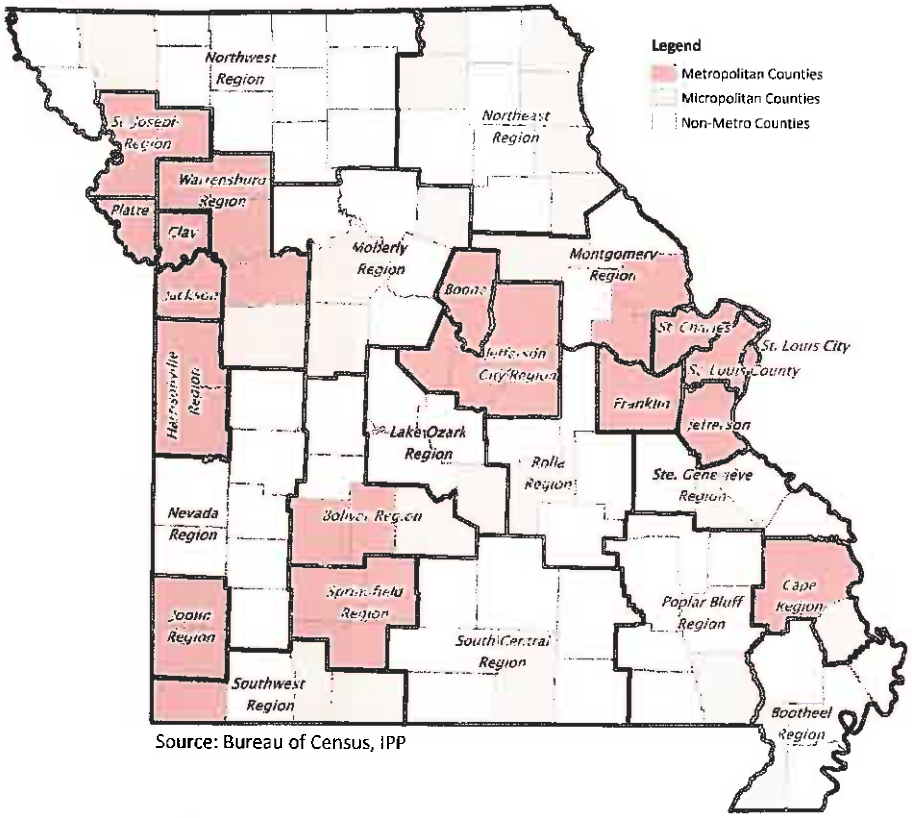
Table 2 and Map 2 extend this analysis by showing how the classification relates to the modified PUMAs.

Table 2: Missouri Population by Census Classification and PUMAs

Census Classification	Number of PUMA Regions	Population (2013)	Percent of Population	PUMAs
Metropolitan only	14	4,155,198	68.7	Boone, Clay, Franklin, Harrisonville, Jackson, Jefferson City, Jefferson, Joplin, Platte, Springfield, St. Charles, St. Joseph, St. Louis City, St. Louis County.
Mixed	4	526,669	8.7	Bolivar, Cape, Montgomery, Southwest
Micropolitan and Non-metro	10	1,237,858	20.5	Bootheel, Lake Ozark, Moberly, Northeast, Northwest, Polar Bluff, Rolla, South Central, St. Genevieve, Warrensburg
Non-metro only	1	124,446	2.1	Nevada
Missouri	29	6,044,171	100.0	

Source: U.S. Census

Map 2:
Census Classification
and PUMAs



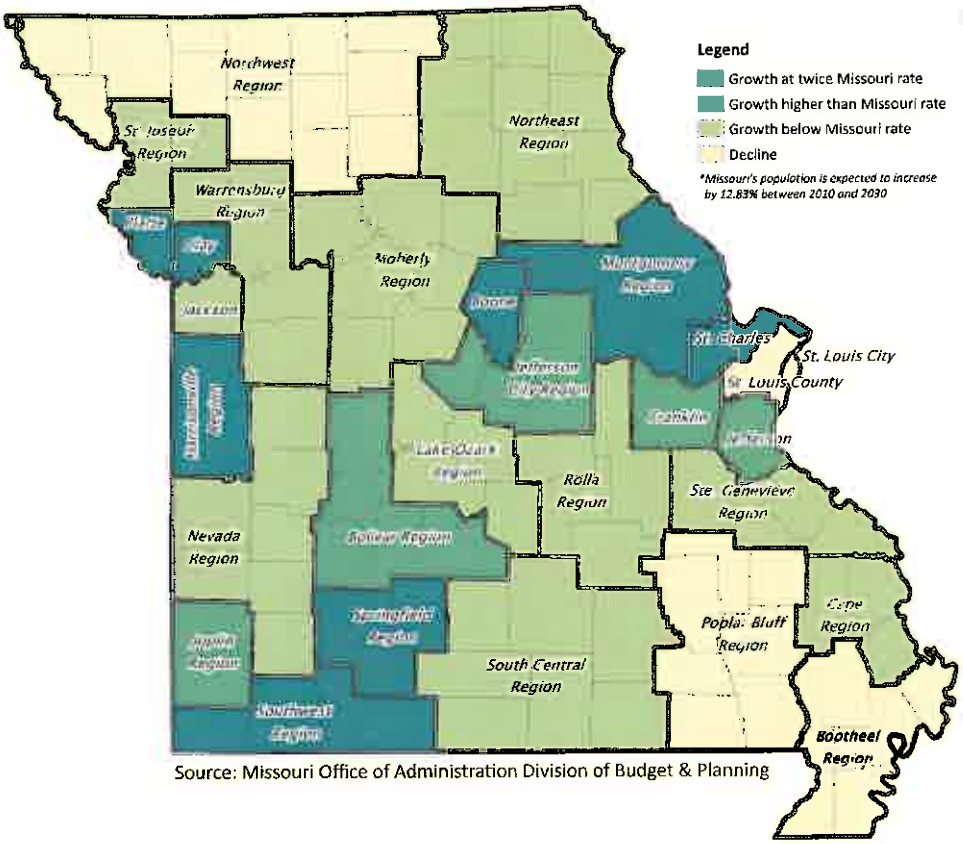
Source: Bureau of Census, IPP

POPULATION PROJECTIONS

Projections by the Missouri Office of Administration Division of Budget & Planning based on a set of fertility, mortality, and migration assumptions applied to 2000 Census data, show that the state's population will grow by 12.8 percent over the period 2010-2030 to a total of 6,746,762.

Map 3 shows the distribution of projected population growth and decline. Regions expected to experience growth rate over twice the Missouri rate are Platte and Clay in the Kansas City Metropolitan Area, as well as Harrisonville to the south; St. Charles and Montgomery in the St. Louis Metropolitan Area; Boone; and Springfield and Southwest.

Map 3:
Projected Population Change
by Region 2010-2030



Source: Missouri Office of Administration Division of Budget & Planning

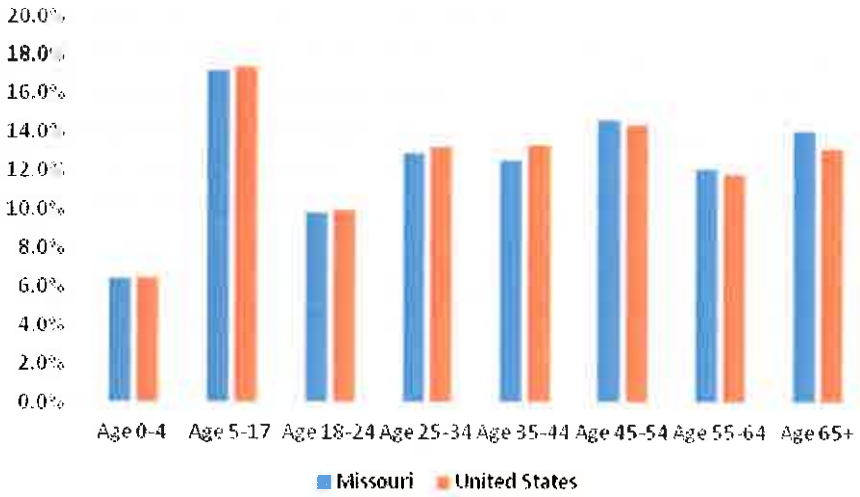
Other regions projected to have growth rates higher than the Missouri rate are Joplin and Bolivar, Jefferson and Franklin in the St. Louis area, and Jefferson City. Regions facing decline are St. Louis County and City, Poplar Bluff and Bootheel, and Northwest.

The additional population 2010-2030 will total 767,418, of which the largest concentrations will be in St. Charles at 17.5 percent (134,519), Springfield at 16.2 percent (123,968), and Clay at 10.3 percent (79,386). St. Louis County is projected to lose 30,982, equivalent to 4 percent of the Missouri total population.

POPULATION STRUCTURE

Figure 2 provides a comparison of Missouri's age structure with that of the United States. For most age groups, Missouri closely tracks the national structure with a small difference in the proportion of the older population.

Figure 2: Population Age Structure: Missouri and United States

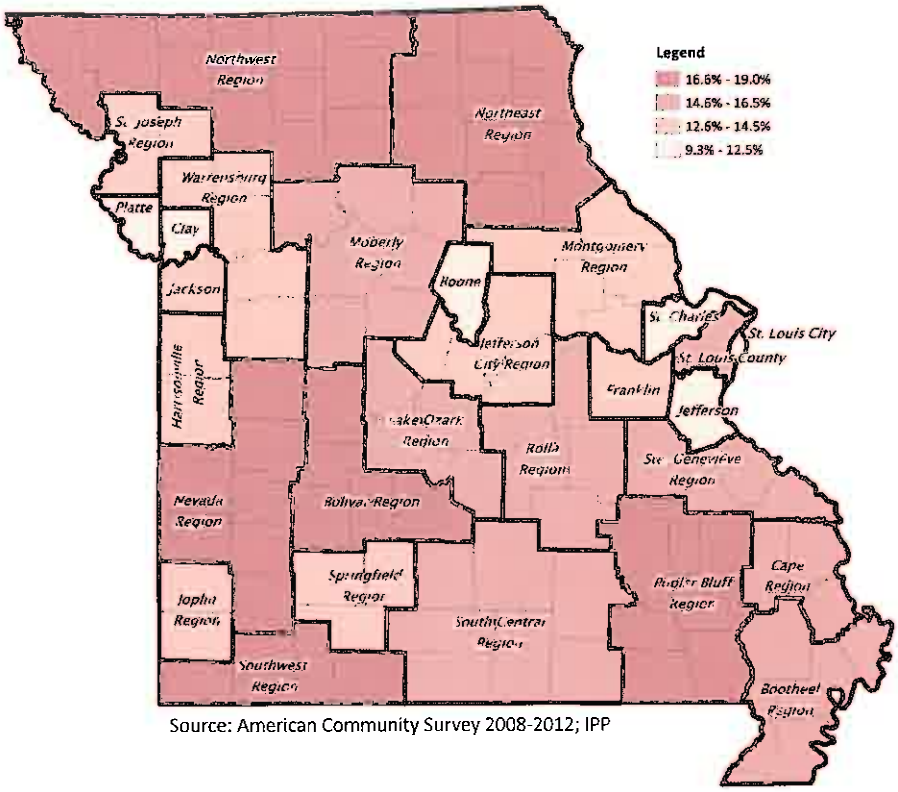


Source: American Community Survey 2008-2012 Five-Year Estimates

Population Aged 65 and Over

Map 4 provides an analysis of the distribution of the population aged 65 and over. The upper quartile with the proportion of elderly between 16.6 and 19.0 percent shows the highest concentrations in Bolivar, Southwest, Northwest, Nevada, Poplar Bluff, and Northeast.

Map 4:
Distribution of Population Aged 65 and Over by Region



Source: American Community Survey 2008-2012; IPP

Population Structure by Race

Missouri's population is somewhat less diverse than the United States as a whole, with 83.1 percent white and 11.5 percent black/African American in Missouri and 74.2 percent white and 12.6 percent black/African American nationally.

Seven counties have higher proportions of black/African American populations than the Missouri average. Their population structure by race is shown in Table 3.

Table 3: Population Structure by Race for Counties with Highest Percentage of Black Population

County	PUMA Region	White	Black	Asian	Other/ Multiple
St. Louis City	St. Louis City	44.5	48.9	2.7	3.9
Pemiscot Co.	Bootheel	71.1	27.7	0.1	1.1
Mississippi Co.	Bootheel	74.5	23.9	0.1	1.5
Jackson Co.	Jackson	67.4	23.8	1.6	7.1
St. Louis Co.	St. Louis Co.	70.6	23.1	3.4	2.8
New Madrid Co.	Bootheel	81.9	15.7	0.2	2.2
Pulaski Co.	Lake Ozark	77.2	11.5	2.9	8.3
Missouri		83.1	11.5	1.6	3.8
United States		74.2	12.6	4.8	8.5

Source: American Community Survey 2008-2012 Five-Year Estimates

Almost 80 percent of Missouri's Black or African American population totaling 689,683 live in three counties – St. Louis County (231,255), Jackson County (160,256), and St. Louis City (155,916).

Hispanic Population

The Hispanic population in Missouri is 212, 152 representing 3.6 percent of the total, compared with 16.4 percent for the nation as a whole. In terms of proportion of the total population, two counties have more than 10 percent of the population who are Hispanic – Sullivan County (Northwest) and McDonald County (Southwest). However, in total numbers, over a quarter (26.1 percent or 55,470) are located in Jackson County, and half (49.3 percent) are in four counties: Jackson County, St. Louis County (25,016), Clay County (13,118), and St. Louis City (11,005).

Special Populations

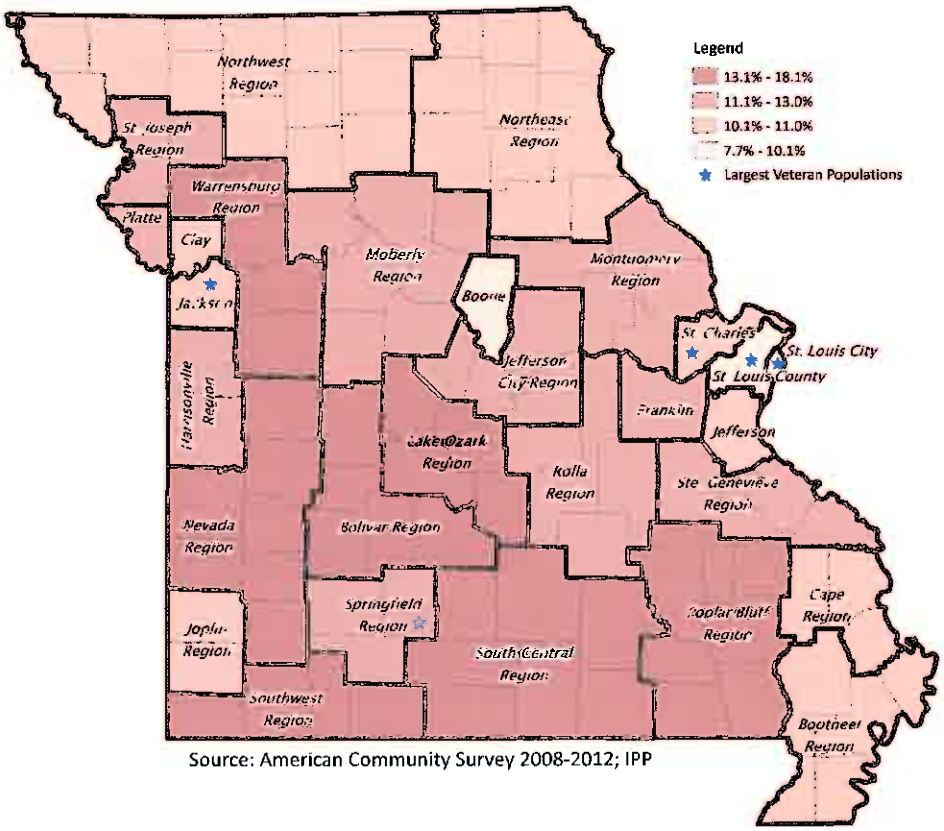
Veterans

There are 494,876 veterans in Missouri, representing 10.9 percent of the total population, compared with 9.3 percent for the United States. 94 percent of Missouri veterans are male, 41.8 percent are aged 65 years and older, and 32.4 percent are aged 18-54 years.

One-quarter of Missouri's veteran population, 124,596, live in just two regions, St. Louis County and Jackson, but regions with the highest proportions of veterans in their population are Lake Ozark (18.1 percent), with Warrensburg, South Central, Southwest, Bolivar, Nevada, and Polar Bluff all with more than 13 percent.

Map 5 shows the distribution of the veteran population both by percentage of regional population and by largest concentrations over 20,000 people.

Map 5:
Distribution of Veteran Population by Region



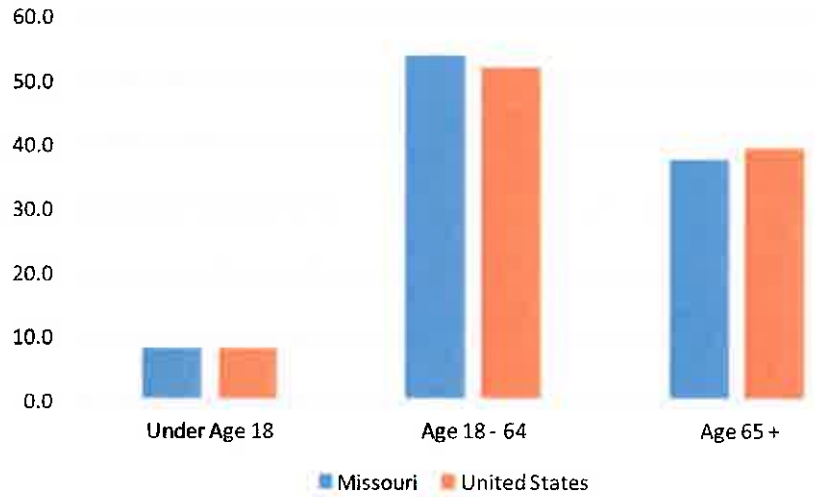
Source: American Community Survey 2008-2012; IPP

People with Disabilities

There are 819,802 Missouri residents with some form of physical or mental disability, 13.9 percent of the total population, compared with 12.0 percent for the United States.

As Figure 3 shows, the age structure of people with disabilities in Missouri is broadly similar to that of the United States with 54.1 percent aged 18-64 and 37.9 percent aged 65 years and above.

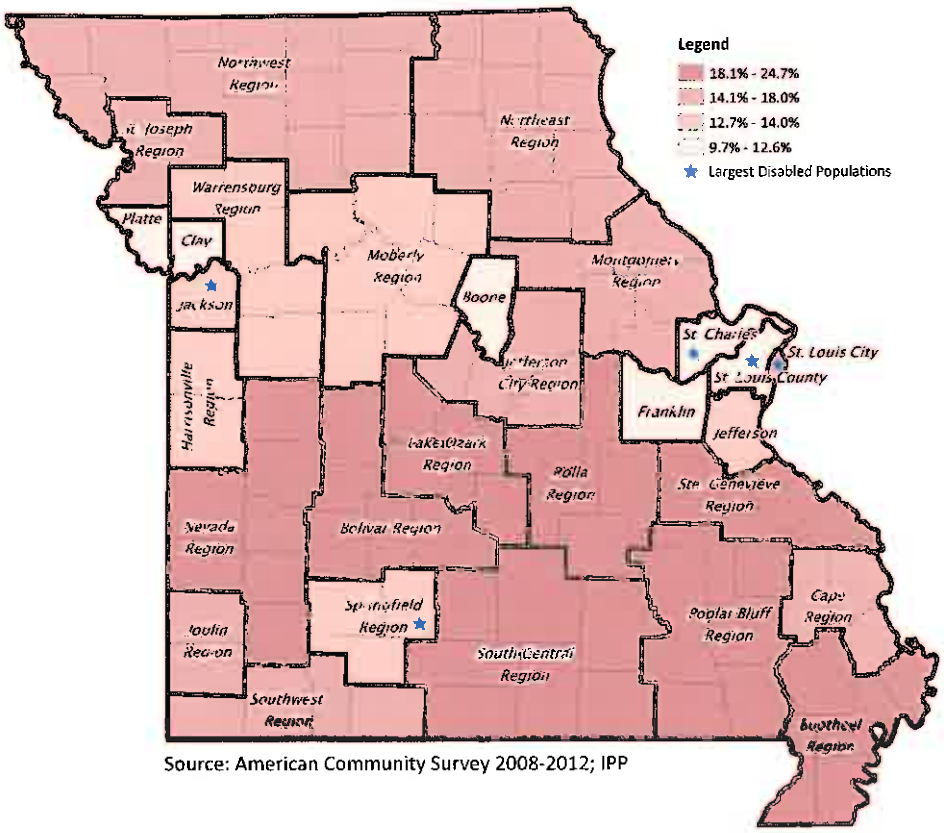
Figure 3: Age Structure of People with Disabilities



Source: American Community Survey 2008-2012

195,142 or 23.8 percent of Missouri's total population with disabilities live in St. Louis County and Jackson. The regions with the highest proportion of people with disabilities are in the more rural parts of the state with three regions with rates of 20 percent or more – Poplar Bluff (24.7 percent), Bootheel (23.2 percent), and South Central (20.0 percent). Map 6 shows the distribution of populations with disabilities both by percentage of regional population and by largest concentrations over 30,000 people.

Map 6:
Distribution of People with Disabilities by Region



Source: American Community Survey 2008-2012; IPP

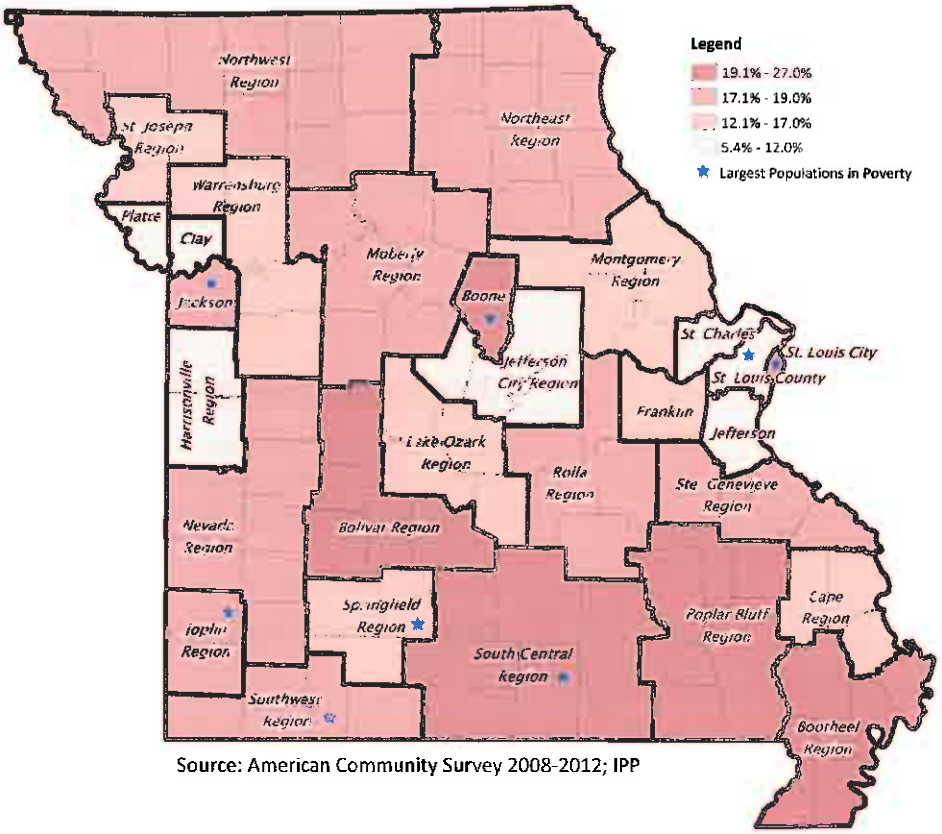
SOCIOECONOMIC INDICATORS

Poverty

According to the American Community Survey 2008-2012, the poverty rate in Missouri was 14.98 percent, representing 869,036 people in poverty. Half of these are located in seven regions – Jackson, St. Louis County, St. Louis City, Springfield, Joplin, Boone and South Central, with one-quarter of the total in Jackson and St. Louis County alone.

Regions ranked according to their proportion of their populations in poverty with two exceptions show the extent of poverty in rural Missouri. St. Louis City (27 percent), Poplar Bluff, Bootheel, South Central, Bolivar, Boone, and Nevada all have a poverty rate of 19 percent or above. Map 7 shows the distribution of populations in poverty by percentage of regional population and by largest concentrations over 25,000 people.

Map 7: Distribution of People in Poverty by Region

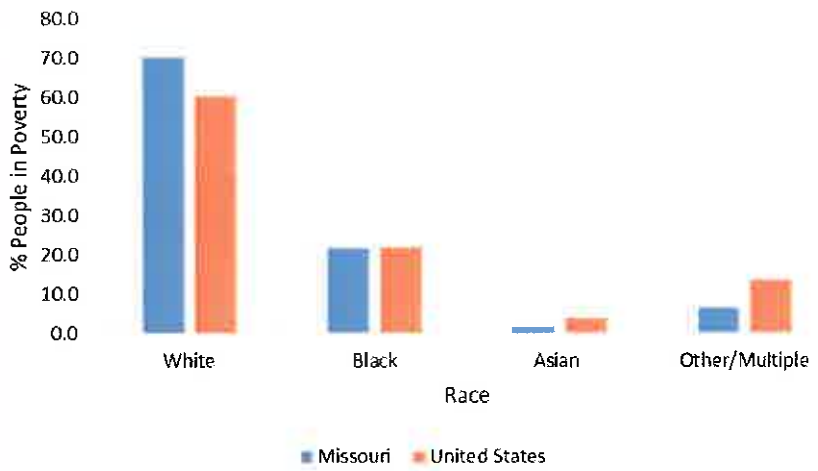


Source: American Community Survey 2008-2012; IPP

Poverty and Race

Poverty in Missouri by race generally reflects the overall population structure by race, with the white population accounting for 70 percent of all people in poverty compared with 60 percent in the United States (see Figure 4).

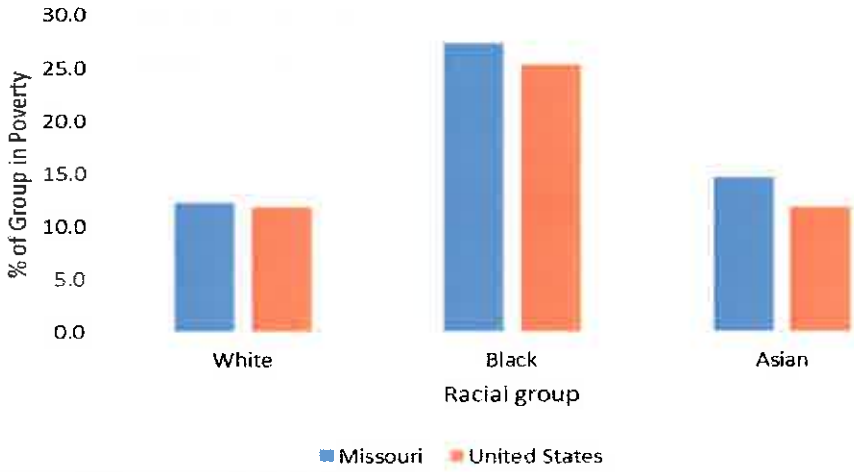
Figure 4: Structure of Missouri Poverty by Race



Source: American Community Survey 2008-2012

However, as shown in Figure 5, the poverty level for the black or African American population is over twice that of white population, and that Missouri rates for white, black, and Asian are higher than for the United States.

Figure 5: Poverty Rates by Racial Group



Source: American Community Survey 2008-2012

Household Income

According to the American Community Survey 2008-2012, there were 2,358,270 households in Missouri. The median household income was $47,333 and the mean $40,939. Households in owner-occupied properties accounted for 69 percent of the total (1,626,389) and those in rental properties 31 percent (731,881). Table 1 shows the breakdown of households by income categories and by owner-occupied and rental properties.

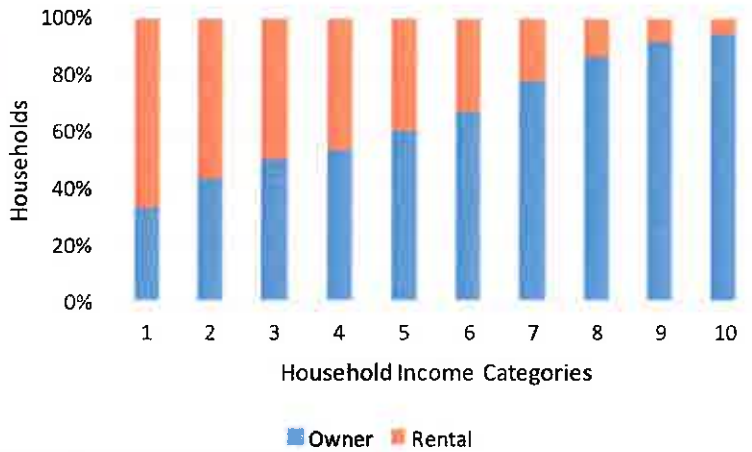
Table 4: Household by Income Categories and by Owner-Occupied and Rental Properties

Household Income Categories	Households in Owner-Occupied Properties		Households in Rental Properties		Total Households Owner + Rental		Proportion of Owner and Rental Properties	
	Number	%	Number	%	Number	%	Owner %	Rental %
1: $0-9.9K	60,119	3.7	122,841	16.8	182,960	7.8	32.9	67.1
2: $10-14.9K	60,541	3.7	80,682	11.0	141,133	6.0	42.8	57.2
3: $15-19.9K	69,490	4.3	69,093	9.4	138,583	5.9	50.1	49.9
4: $20-24.9K	75,710	4.7	65,913	9.0	141,623	6.0	53.5	46.5
5: $25-34.9K	164,547	10.1	109,426	15.0	273,973	11.6	60.1	39.9
6: $35-49.9K	238,165	14.6	117,005	16.0	355,170	15.1	67.1	32.9
7: $50-74.9K	347,076	21.3	98,276	13.4	445,352	18.9	77.9	22.1
8: $75-99.9K	240,412	14.8	38,226	5.2	278,638	11.8	86.3	13.7
9: $100-149.9K	233,163	14.3	22,230	3.0	255,393	10.8	91.3	8.7
10: $150K and above	137,256	8.4	8,189	1.1	145,445	6.2	94.4	5.6
Total	**1,626,389**	**100.0**	**731,881**	**100.0**	**2,358,270**	**100.0**	**69.0**	**31.0**

Source: American Community Survey 2008-2012

Figure 6 shows graphically the relationship between owner and rental households by the household income categories.

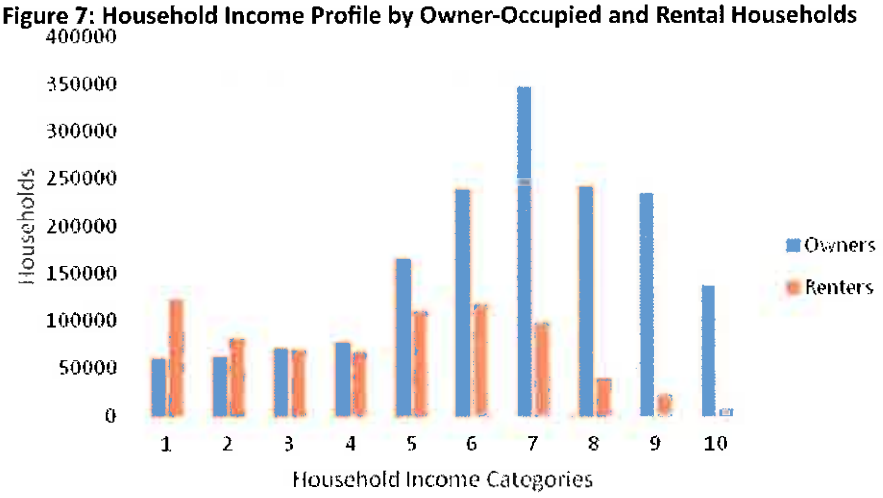
Figure 6: Household by Income Categories and by Owner-Occupied and Rental Properties



Source: American Community Survey 2008-2012

Figure 7 shows the number of owner-occupied and rental households in each of the income categories.

Figure 7: Household Income Profile by Owner-Occupied and Rental Households



Source: American Community Survey 2008-2012

As might be expected, 73.4 percent of owner-occupied households are in income categories at or above the state median income level, whereas 77.2 percent of rental households are in income categories at or below the state median income level.

Area Median Income

Area Median Income (AMI) is the measure used by the US Department of Housing & Urban Development to calculate income limits for eligibility in a variety of housing programs in a given geographical area. The Missouri Housing Development Commission has a particular interest in households in the 41-60 percent of AMI range. An analysis of these households shows that:

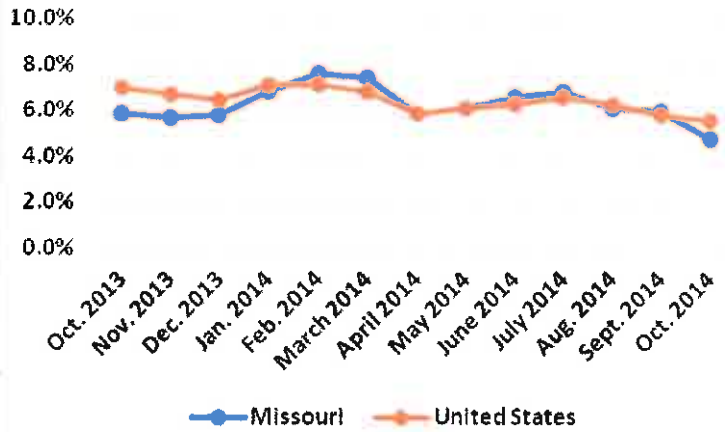
- 268,336 households have area median incomes in the range 41-60 percent- 52.5 percent in owner-occupied property and 47.5 percent in rental properties.
- 40 percent of owner households with incomes in the 41-60 percent AMI range are located in St. Louis County, Jackson, St. Charles, and Springfield regions, with 18.8 percent in St. Louis region alone. Two regions, Lake Ozark and Nevada, have 10 percent of owner households in the AMI range.
- 47 percent of renter households with incomes in the 41-60 percent AMI range are located in St. Louis County, Jackson, St. Louis City and Springfield regions. Five regions – St. Louis City, Boone, Bootheel, Platte, and Springfield – have over 10 percent of renter households in the AMI range.

Households in 31-40 percent AMI range total 155,619, of which 43.9 percent are in owner-occupied properties and 56.1 percent in rental properties. 40 percent of rental households with incomes in the 31-40 percent range are located in St. Louis County and Jackson regions, and over 18 percent of owner households in the same range are located in Bolivar region.

Unemployment

The most recent data available from the Bureau of Labor Statistics shows that Missouri's currently has 3,056,557 people in its workforce. [2] From October 2013 through October 2014, an annual average of 6.3 percent of those workers were unemployed (Figure 8). During this same period, an annual average of 6.5 percent of the workforce in the United States was unemployed.[3]

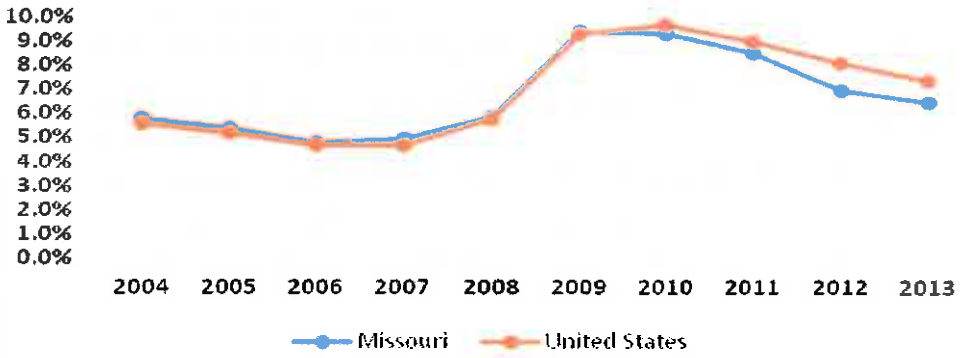
Figure 8: Monthly Unemployment Rates October 2013 – October 2014



Source: Bureau of Labor Statistics

Likewise, over the past decade Missouri's unemployment rate has kept pace with national unemployment rates, peaking during the Great Recession in 2009 and declining slowly since (Figure 9).

Figure 9: Annual Unemployment Rates 2004-2013

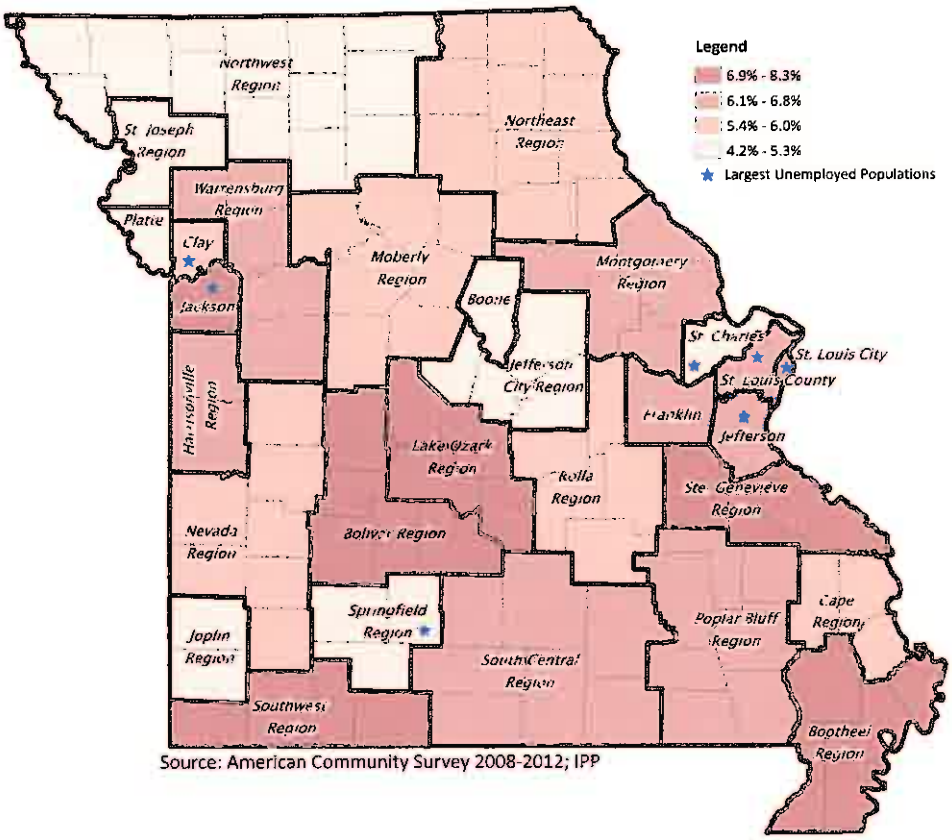


Source: Bureau of Labor Statistics

2 Bureau of Labor Statistics, Unemployment Rate by County, 2014-October.
3 Annual average was calculated from Bureau of Labor Statistics, Average Monthly Unemployment Rate, October 2013 – October 2014.

The unemployed are concentrated in the main metropolitan areas, with 29.3 percent in the two regions of St. Louis County and Jackson. Another quarter (25.6 percent) is located in St. Louis City, St. Charles, Springfield, Jefferson and Clay. As with other indicators, an analysis by unemployment rates by region shows St. Louis City with the highest level at 8.3 percent, and Jackson (7.0 percent), and also brings in more rural regions with Southwest and Lake Ozark (7.5 percent), Bootheel (7.0 percent), and Bolivar (6.9 percent). Map 8 shows the distribution of unemployed persons by percentage of regional labor force and by largest concentrations over 10,000 people.

Map 8:
Distribution of Unemployed persons by Region



Source: American Community Survey 2008-2012; IPP

OTHER INDICATORS

Public Assistance

According to the American Community Survey 2008-2012, 13.1 percent of households in Missouri received benefits under the Supplemental Nutrition Assistance Program (SNAP), often referred to as Food Stamps. This compares with 11.4 percent of U.S. households. Other public assistance programs provide cash payments to poor families, including General Assistance and Temporary Assistance to Needy Families (TANF), but these are used by only 2.4 percent of Missouri households.

The highest regional rates of SNAP usage are in the Bootheel (25.8 percent), St. Louis City (25.0 percent) and Poplar Bluff (22.1 percent).

Education

Education is an important indicator of social and economic wellbeing, and people without a high school diploma represent an especially disadvantaged population. There are 508,960 people over the age of 25 years without a high school diploma. Regions with the highest proportion are the Bootheel (26.2 percent), Polar Bluff (23.9 percent), Ste. Genevieve (21.6 percent).

Access to a Vehicle

Households that do not have access to vehicle, especially in areas where there is no or adequate public transport, are severely constrained in their opportunities for employment, health care, and education. There are 171,138 households, 7.3 percent of the Missouri total, that have no vehicle. However, there are regions where the proportion is much higher: two major city regions, St. Louis County (21.4 percent) and Jackson (9.8 percent) which have substantial public transport systems, and the Bootheel, where 10.3 percent have no access to a car and no public transport.

REGIONAL ANALYSIS

For all the indicators used in this profile, the main concentrations of special needs populations and of populations with significant socio-economic disadvantages are to be found in four of the five major centers of population: St. Louis County (1,001,444), Jackson (679,996), Springfield (401,235), and St. Louis City (318,416).

This regional analysis looks at Missouri from three perspectives: whether the regions are projected to be growing or in decline; which regions have relatively high proportions of special needs populations, specifically veterans, people with disabilities, and the elderly; and whether the regions experience one or more indicators of disadvantage in the form of poverty, low area median income, or unemployment. Looked at in this way, there are marked regional variances across the state, and this can be illustrated well by the ranking of regions across multiple indicators.

Population Growth or Decline

Regions forecast to be the fastest growing through 2030 are St. Charles and Montgomery, reflecting the westward expansion of the St. Louis metropolitan region; Clay, Jackson and Harrisonville with the continuing growth of the Kansas City metropolitan area, and

the Springfield region. Here can be expected growing demand for housing of all types. Jackson, Springfield, and St. Charles also have high concentrations of households in the 31-60 percent of area median income categories. None of these high growth regions have high proportions of special needs populations.

The regions forecast to experience the highest levels of decline are the rural regions of the Bootheel and Polar Bluff in the southeast of the state and the Northwest, as well as the core of the St. Louis metropolitan area – St. Louis City and St. Louis County. As might be expected, these declining regions are also highly ranked on special needs and disadvantage indicators. The Bootheel has a high proportion of its population with disabilities together with high rates of poverty and unemployment; Polar Bluff has high proportions of disabled and elderly people, as well as a high poverty rate. The Northwest region has a high percentage of elderly, whereas St. Louis City has high rates of poverty, unemployment and area median household income in the 31-60 percent range.

Special Needs

There are nine regions where there are particularly high proportions of veteran, disabled, and/or elderly populations. Regions with substantial special needs across the three categories are Bolivar, Lake Ozark, Nevada, Polar Bluff, and Southwest, with Bootheel being notable for having high proportions of people with disabilities, Northwest for elderly, Warrensburg for veterans, and South Central for both veterans and the disabled. It should be noted that for the most part these are mainly the most rural regions of the state, suggesting challenges in access to essential services.

Disadvantage Indicators

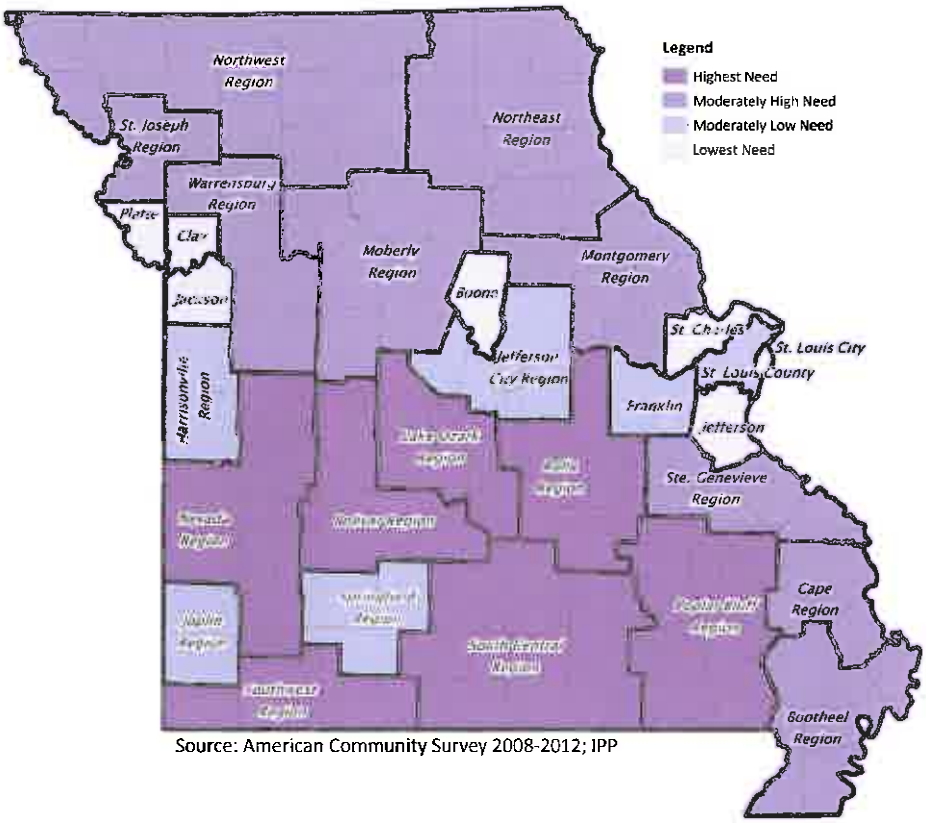
The regions with the highest rates of poverty are St. Louis City, and four regions that are mixed urban-rural or mainly rural – Poplar Bluff, Bootheel, South Central, and Bolivar. A similar pattern is evident for regions with the highest rates of unemployment – St. Louis City and Jackson, together with Southwest, Lake Ozark, and Bootheel.

Regions with the highest levels of households with area median income of 41-60 percent are all within the main metropolitan areas – St. Louis County, St. Charles, and St. Louis County; Jackson; and Springfield. For the next lower category of 31-40 percent, the same regions again have the highest levels.

Areas of Highest Need

Two indexes provide a way of identifying regions that exhibit high levels of special needs and disadvantage. The **Special Needs Index** sums the ranking of regions according to their proportions of veterans, people with disabilities, and the elderly (aged 65 years and above). Map 9 shows the scores by quartiles (the lower the score the high the need) and identifies Bolivar, Polar Bluff, Nevada, Southwest, Lake Ozark, South Central and Rolla as regions for particular attention – primarily most of the southern half of the state.

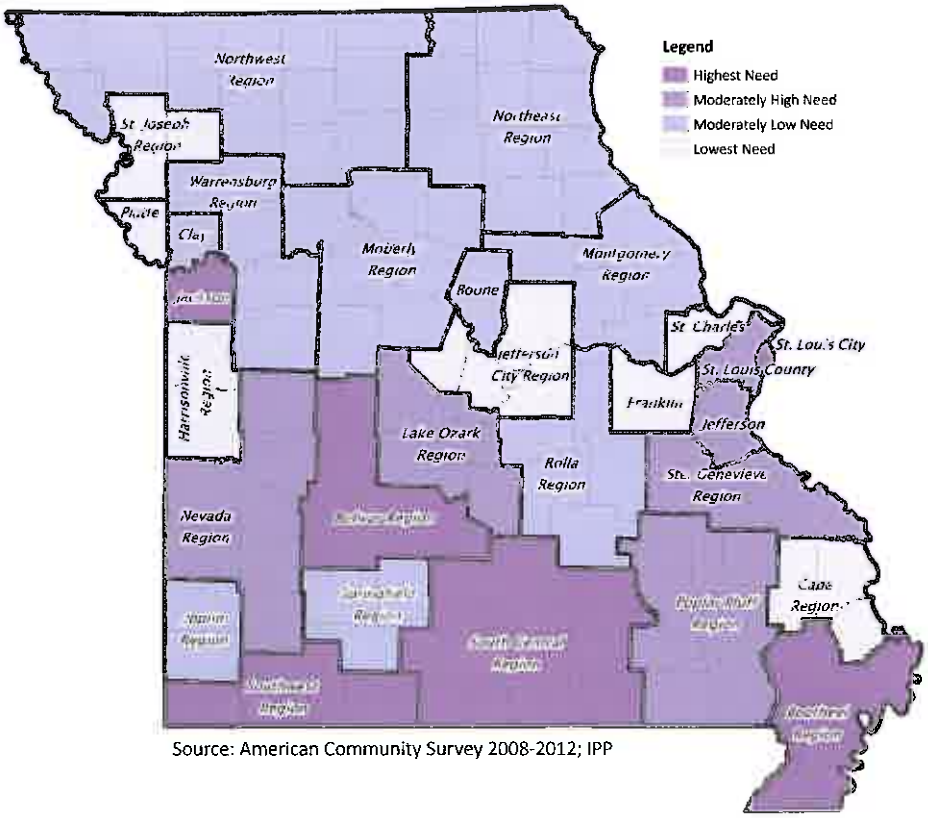
Map 9:
Special Needs Index



Source: American Community Survey 2008-2012; IPP

The **Index of Disadvantage** sums the ranking of regions for proportions of people in poverty, households with area median incomes in the 41-60 percent range, and unemployment. Map 10 shows the index by quartiles (the lower the score the high the need) and identifies **St. Louis City, Jackson, Southwest, Bootheel, South Central, and Bolivar** as regions for special attention.

Map 10:
Index of Disadvantage



Source: American Community Survey 2008-2012; IPP

MHDC Housing Needs Assessment Report:
III. Housing Data and Analysis

This section of the report provides data and analysis of the state of housing in Missouri, by county and by region. While MHDC funding is allocated specifically for families making less than the median household income, the need for affordable housing is shaped by dynamics within broader regional and local housing markets. Additionally, most housing occupied by low and moderate income families is found within the private housing market—i.e., not housing provided through investments by either MHDC or other public or private actors utilizing local, state or federal housing resources. Thus, a broader understanding of Missouri's housing market is essentially for understanding the role that MHDC and other public entities play in providing affordable housing.

This section will provide an overview of housing markets through focus on three interrelated themes:

- **Housing Profile:** What are basic data on housing across the state and within counties, including counts, occupancy, tenure and physical and economic characteristics, both currently and over time?
- **Housing Need:** What is the current need for housing, including for affordable housing, and for what geographies and subpopulations is this need greatest?
- **Housing Dynamics:** What have been the patterns of investment in housing, both overall and for publicly assisted affordable housing, and how has this pattern shaped the supply of housing?

Findings from these three themes will carry directly over into the next section of the report, which summarizes the data on affordable housing in Missouri and analyzes the gaps in affordable housing based upon findings from the demographic analysis of Missouri's housing and the need for affordable housing.

The report proceeds sequentially, utilizing narrative discussion, tables and maps to identify key themes relating to housing conditions in the state or the whole, for counties and, for a selected range of data, change in condition at the MHDC regional. Maps, tables and charts are included in the text of the report. More detail concerning sources and methodology of analysis is included in the Methodology Appendix.

HOUSING DATA & ANALYSIS: HOUSING PROFILE

The first part of the Housing and Data Analysis section of the report lays out basic characteristics of housing across the state and within counties and regions, including significant shifts in housing characteristics over time.

Housing Counts, Occupancy and Tenure

Table 3.1-1 shows the annual data on housing for Missouri—housing counts, occupancy/vacancy and tenure—from 2000 to 2012.

Table 3.1-1: Annual Housing Counts, State of Missouri

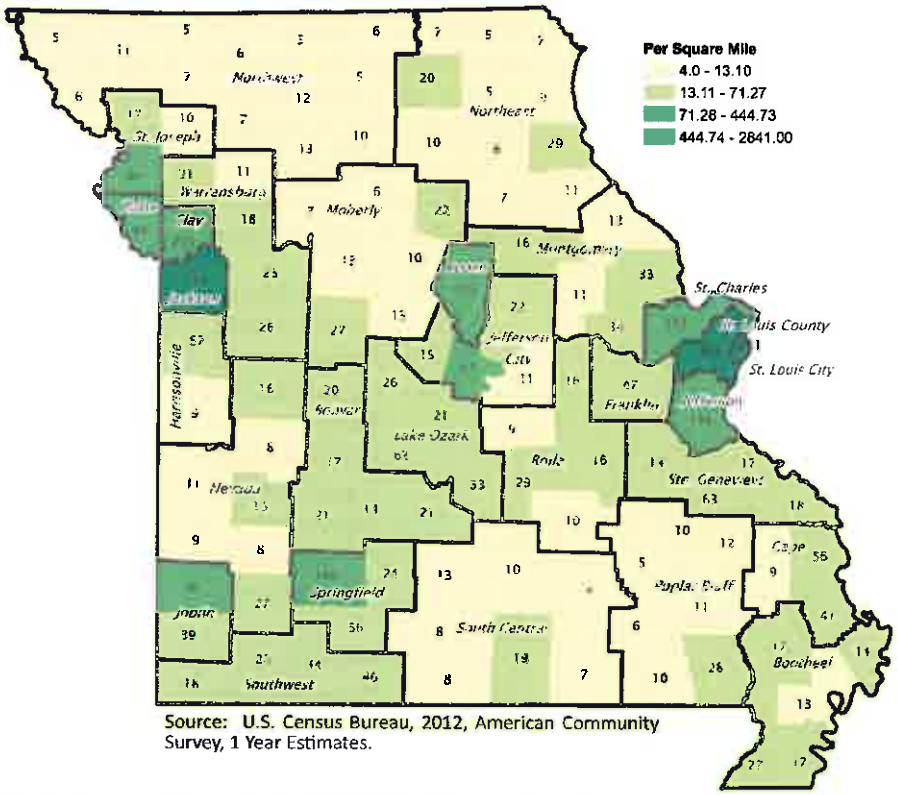
	2012	2011	2010	2009	2008	2007	2006	2005	2000
Count	2,720,087	2,723,449	2,714,017	2,682,015	2,664,062	2,647,379	2,622,995	2,592,809	2,442,017
% Annual Change			1%						
% Annualized Change	-0.1%	0.3%	1.2%	0.7%	0.6%	0.9%	1.2%	1.2%	
Occupied	2,359,135	2,341,074	2,350,628	2,339,684	2,331,054	2,308,514	2,305,613	2,285,280	2,194,594
Vacant	360,952	382,375	363,389	342,331	333,008	338,865	317,382	307,529	247,423
% Vacant	13.3%	14.0%	13.4%	12.8%	12.5%	12.8%	12.1%	11.9%	10.1%
Owner	1,591,686	1,593,031	1,621,371	1,616,365	1,634,069	1,632,120	1,630,068	1,614,217	1,542,149
Renter	767,449	748,043	729,257	723,319	696,985	676,395	675,544	671,063	652,445
% Renter	32.5%	32.0%	31.0%	30.9%	29.9%	29.3%	29.3%	29.4%	29.7%

Source: U.S. Census, American Community Survey 1 Year Estimates, 2008, 2009, 2010, 2011, 2012; U.S. Census, 2000, Summary File 1 and Summary File 3.

The data show the impact of the national economic recession on the state's housing market. There has been very little growth in the number of units since 2010—0.2%—and a modest trend in growth from 2000 to 2010—12.3%. There has also been a modest shift in occupancy patterns over this period. Vacancy has gradually increased—overall from 10.1% of units in 2000 to 13.1-% in 2013, with a high point of 14.0% in 2011. Similarly, the percentage of renter units has increased from 29.7% in 2000 to 32.5% in 2012, with the largest increases in renter units occurring between 2008 to 2009 and 2010 to 2011.

Data at the county level show the regional and local patterns of housing, housing occupancy and housing tenure. The highest geographic concentration of housing (Map 3.1-1) occurs within the MSAs and the urban counties of Jackson County and St. Louis County/St. Louis City, and the sparsest grouping within the counties along the northern border of Missouri.

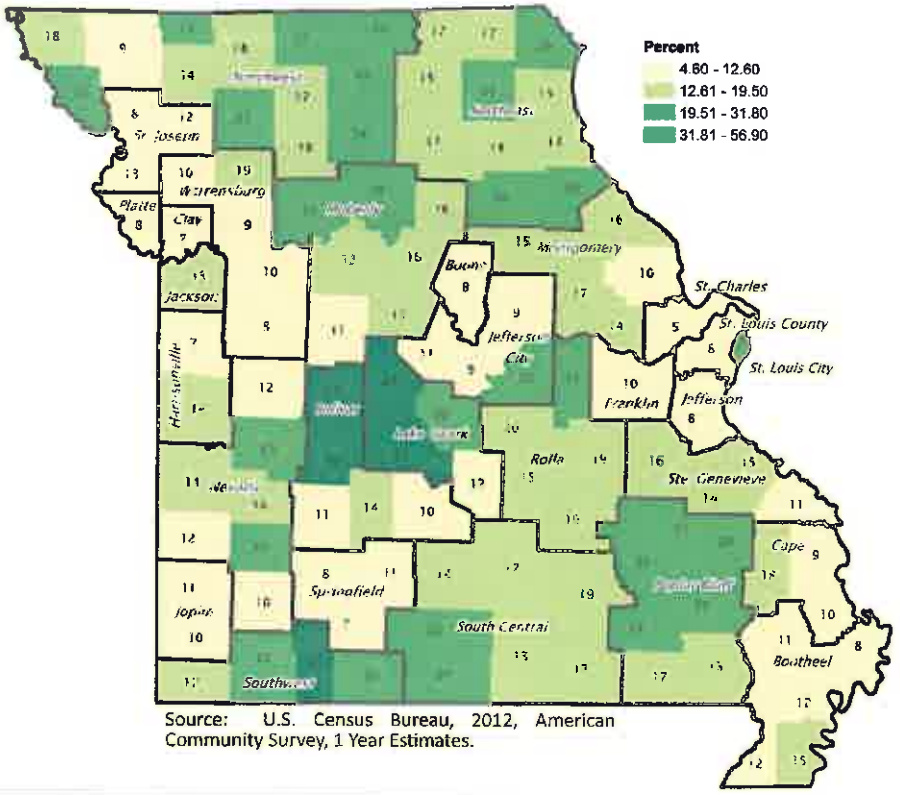
Map 3.1-1:
Unit Density, Per Square Mile, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Similarly, counties vary in their housing vacancy; Map 3.1-2 shows the percent of vacant units in counties (2013).

Map 3.1-2:
Percent Vacant Units, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Unit vacancy is largely a rural pattern, with a high cluster of rental vacancy in the central state region between Springfield and Jefferson City; by contrast, few urban counties, with the exception of the St. Louis City rank high in unit vacancy. (Table 3.1-2 shows the top five and bottom five of counties based on their vacancy percentages.)

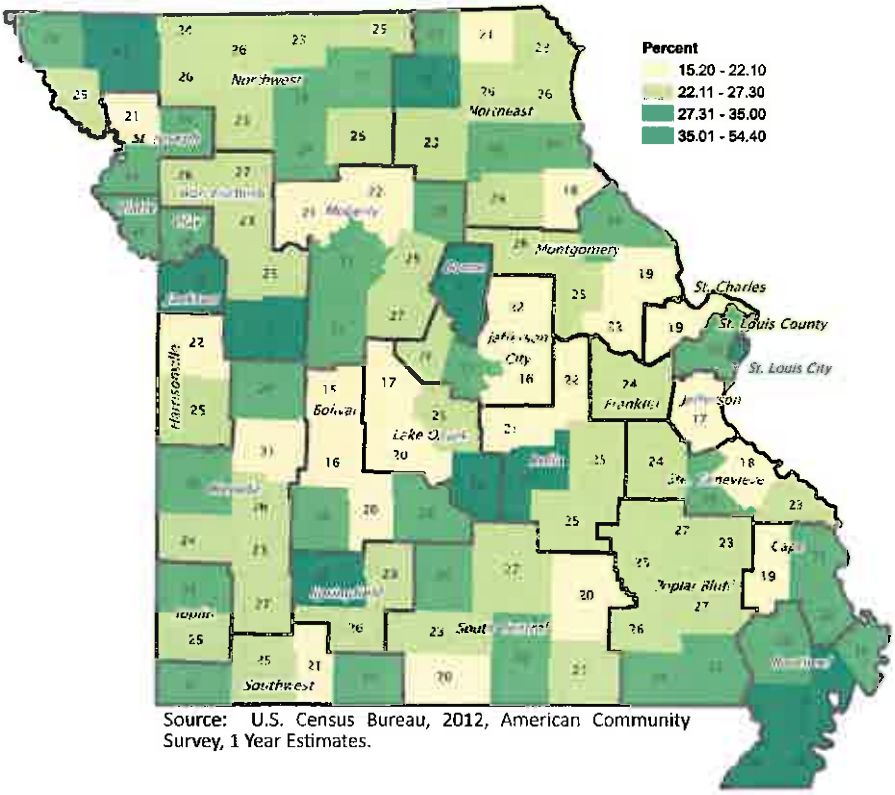
Table 3.1-2: Counties with Largest and Smallest Unit Vacancy,

Camden County	56.9%
Morgan County	46.7%
Benton County	42.6%
Hickory County	37.4%
Stone County	34.8%
Reynolds County	31.8%
Wayne County	29.8%
Taney County	29.5%
Chariton County	27.7%
Daviess County	26.6%
Andrew County	8.1%
Mississippi County	8.0%
Platte County	7.7%
St. Louis County	7.7%
Boone County	7.6%
Jefferson County	7.5%
Clay County	7.2%
Christian County	7.1%
Cass County	6.9%
St. Charles County	4.6%

Source: U.S Census, 2012, American Community Survey 5 Year Estimates

By contrast, the county pattern of rental tenure (Map 3.1-3) shows more clearly an urban pattern, with the counties with the highest rental percentages in 2012 urban counties and the lowest exurban and rural communities, as shown in Table 3.1-3.

Map 3.1-3:
Percent Renter Units, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

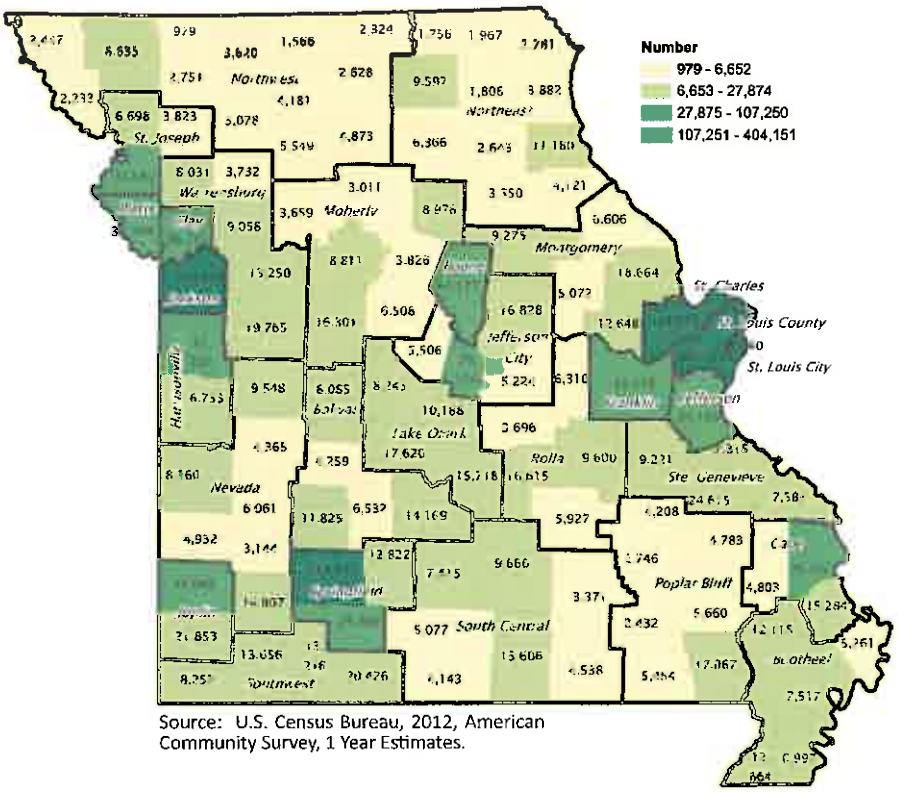
Table 3.1-3: Counties with Largest and Smallest Rental Tenure, 2012

St. Louis city	54.4%
Pulaski County	45.7%
Pemiscot County	43.4%
Nodaway County	42.9%
Boone County	42.4%
Greene County	40.1%
Dunklin County	38.9%
Jackson County	38.2%
Adair County	38.1%
Johnson County	37.3%
Lincoln County	19.3%
St. Charles County	19.1%
Bollinger County	18.8%
Ralls County	18.0%
Ste. Genevieve County	17.7%
Morgan County	17.4%
Jefferson County	17.0%
Osage County	16.4%
Hickory County	16.3%
Benton County	15.2%

Source: U.S.Census, 2012, American Community Survey 5 Year Estimates

Another view of housing data is the absolute number of occupied, vacant, renter and owner-occupied units. Map 3.1-4 shows the number of occupied units within Missouri counties and Map 3.1-5 the number of vacant units. Map 3.1-6 shows the number of owner occupied units within counties and Map 3.1-7 the number of renter units.

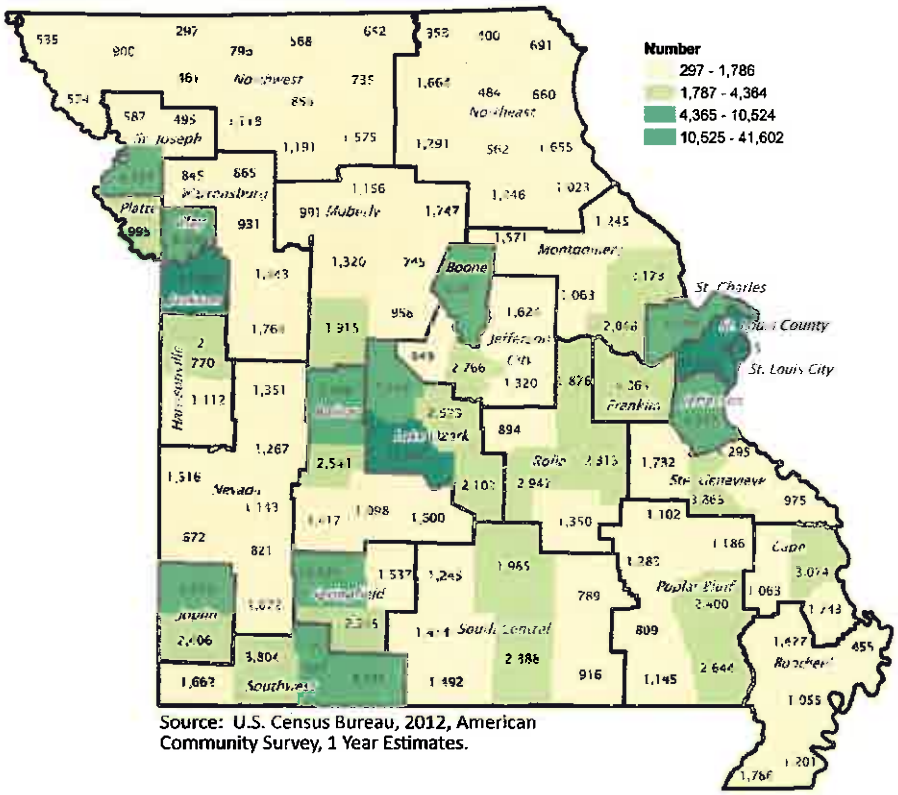
Map 3.1-4:
Number of Occupied Units, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

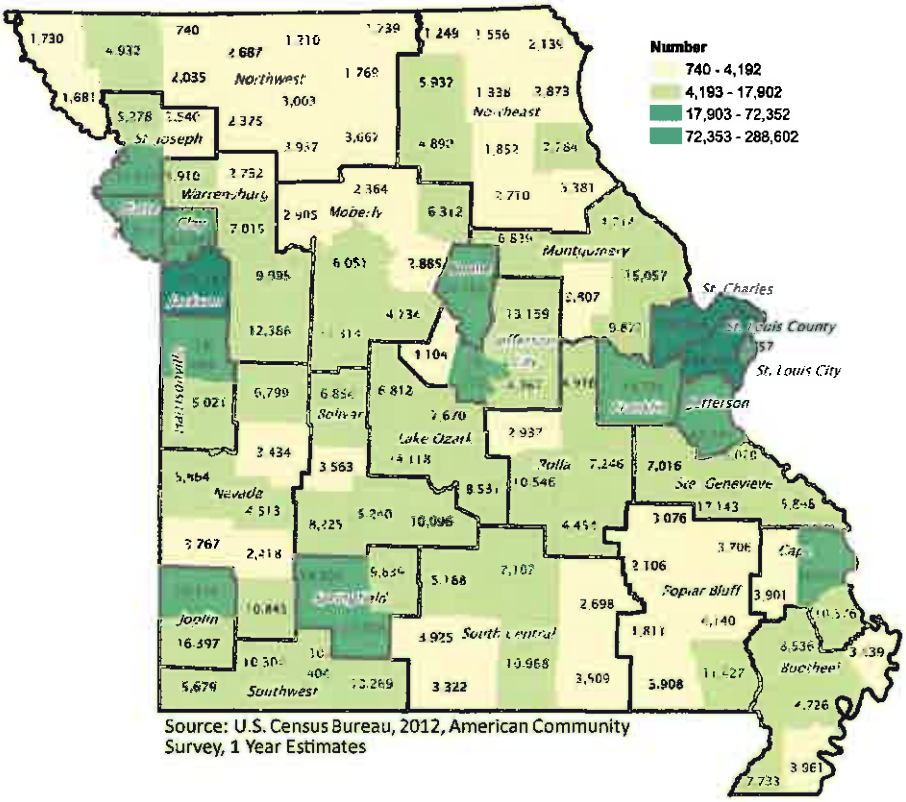
Another data point relating to both occupancy and tenure are the differential vacancy rates based on tenure. Lower vacancy rates represent a tighter housing market—one in which supply might be more limited. In 2013, Missouri's owner vacancy rate was 2.2%, compared to 6.2% for rental units, suggesting a tighter supply for owner occupied housing. While there was a little change in the owner vacancy rate from 2010 to 2013 (2.8%), the rental vacancy rate fell from 8.3%, suggesting that the supply of renter units is decreasing as the renter population is increasing. Map 3.1-8 shows the 2013 owner vacancy rate for Missouri Counties and Map 3.1-9 the 2013 rental vacancy rate.

Map 3.1-5:
Number of Vacant Units, 2012



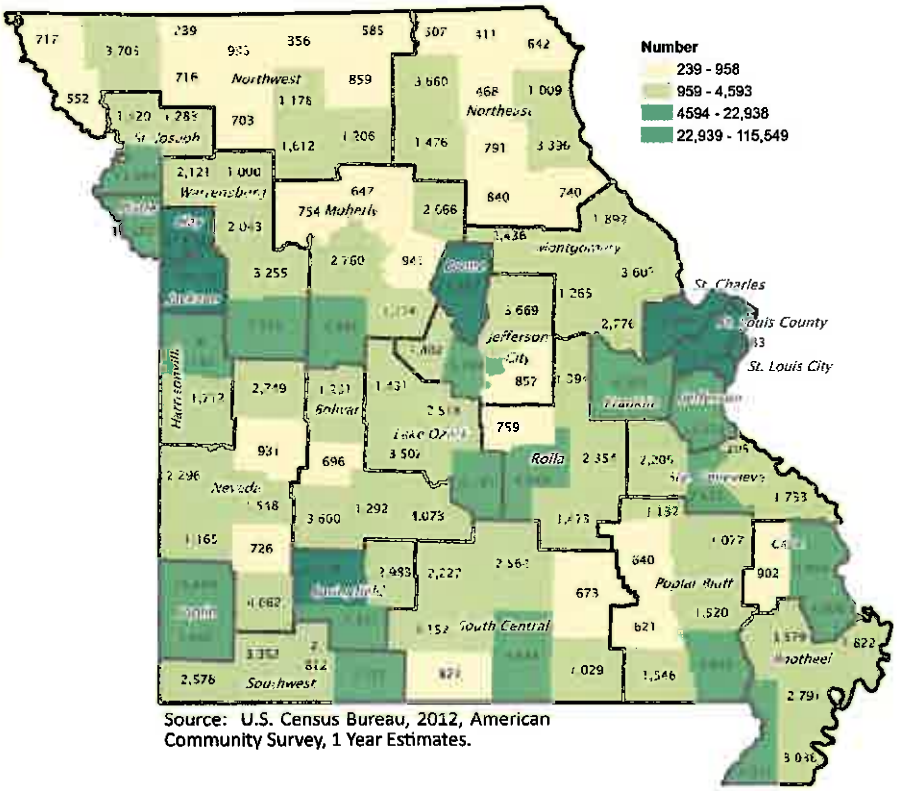
Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Map 3.1-6: Number of Owner Occupied Units, 2012



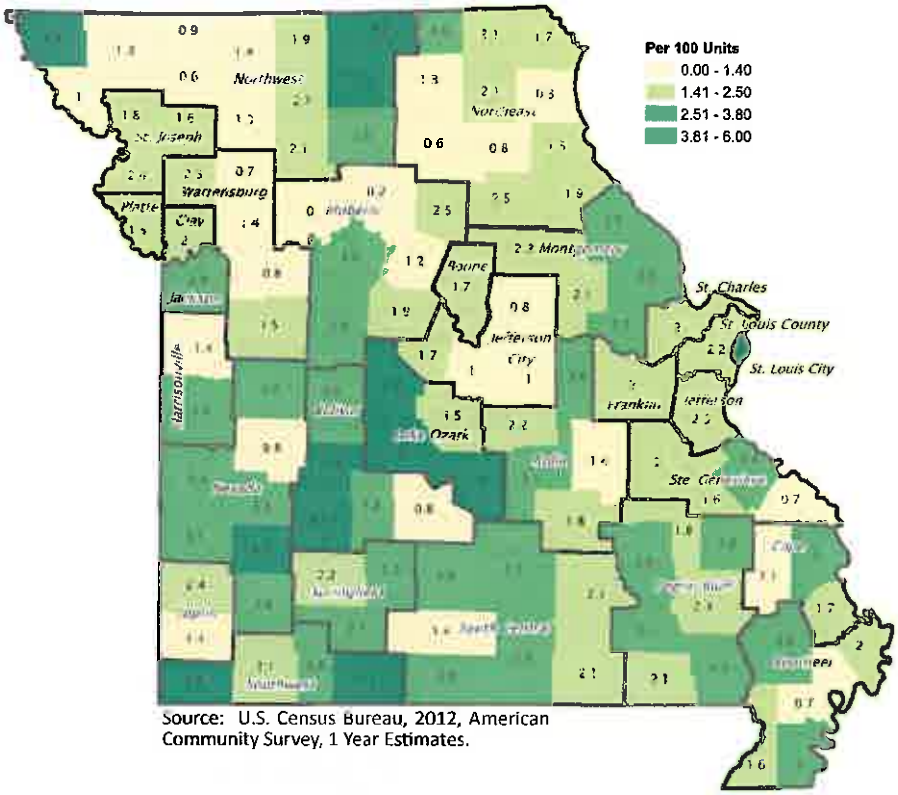
Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates

Map 3.1-7:
Number of Renter Occupied Units, 2012



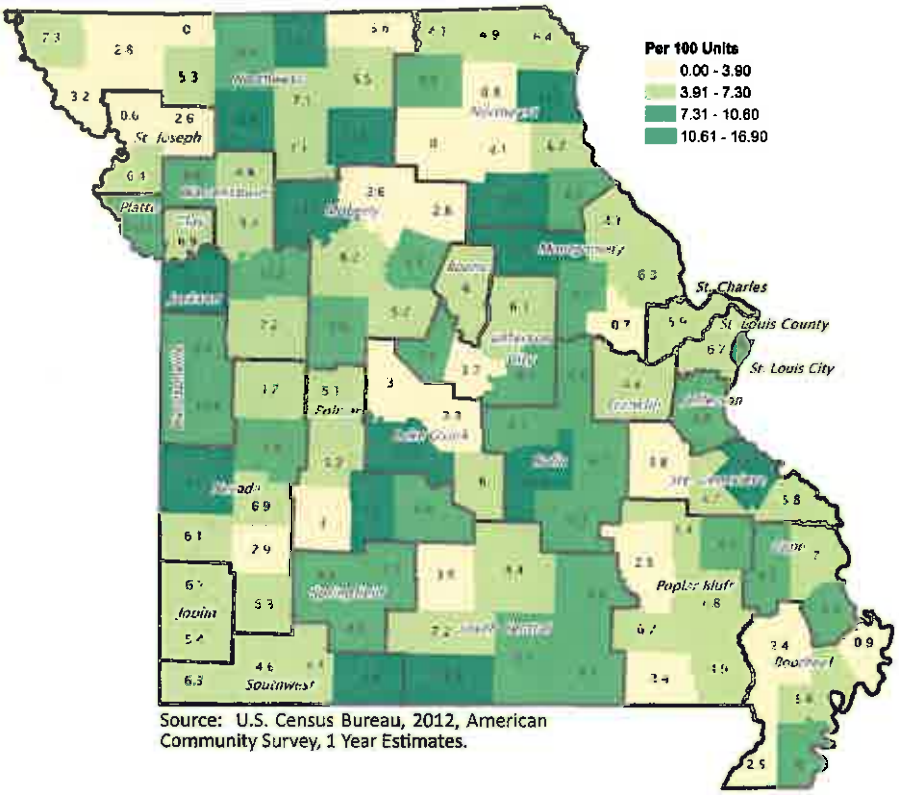
Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Map 3.1-8:
Owner Vacancy Rate, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Map 3.1-9: Renter Vacancy Rate, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

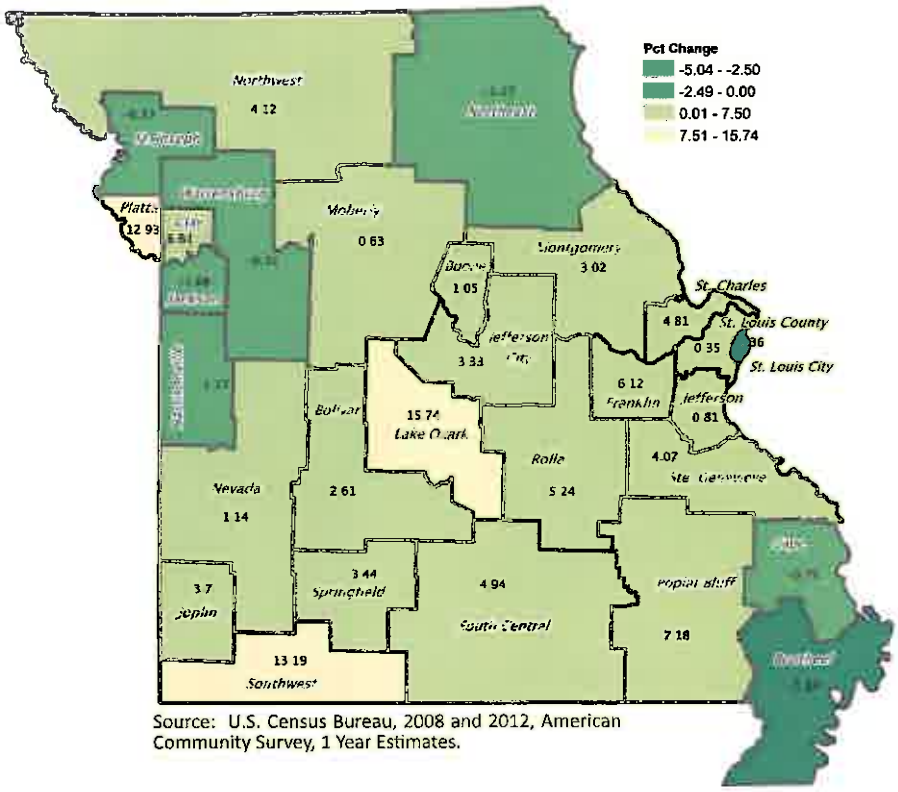
Owner vacancy rates are lower than the state average in most of the eastern part of the state (with the exception of St. Louis City), the I-70 corridor through the Columbia/ Jefferson City area and most of the Kansas City MSA. By contrast, the rental vacancy rate is lower than the state average in exurban areas of metropolitan areas and other rural counties.

A final set of analyses on these basic data points show patterns of change over the three time periods—from 2000 to 2010 and from 2010 to 2013. At the most basic level, change from 2000 to 2010 illustrate the impact on housing before and during the period of the national economic recession (from 2007 onward); conversely, change from 2010 to 2013 shows the linger impacts of the recession in more recent years.

Change in Housing Units, Vacancy and Tenure over Time

In a similar fashion as the demographic analysis, the housing section of the report uses data at the MHDC region to track changes in data points over time. Table 3.1-4 shows changes in unit counts, percent vacancy and percent renter from 2008 to 2010. Map 3.1-10 shows the percent change in units from 2008 to 2012.

Map 3.1-10:
Percent Change Units, 2008-2012



Source: U.S. Census Bureau, 2008 and 2012, American Community Survey, 1 Year Estimates.

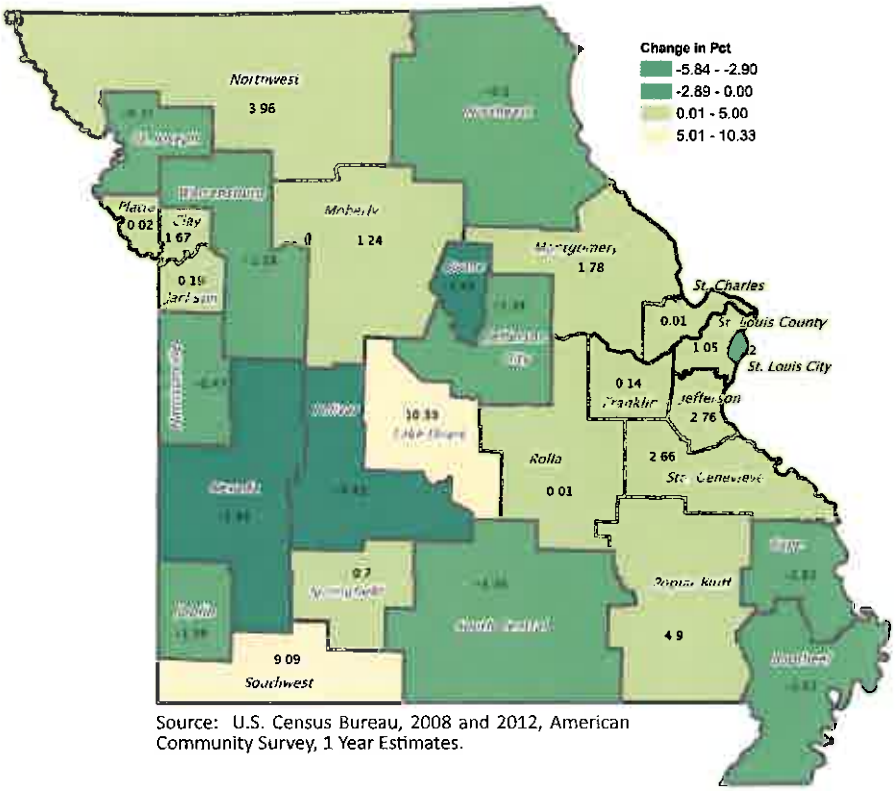
Table 3.1-4: Unit, Vacancy and Tenure Change, MHDC Regions, 2008 to 2012

Region Name	Units 2012	Vacancy 2012	Rental 2012	Pct Change Units 2008-2012	Change in Pct Vacancy	Change in Pct Renter
Bolivar	56,539	21%	27%	2.6%	-4.4%	0.0%
Boone	70,980	7%	44%	1.1%	-3.5%	-0.5%
Bootheel	50,323	14%	36%	-5.0%	-0.5%	1.8%
Cape	55,289	9%	32%	-0.8%	-2.8%	2.4%
Clay	93,554	9%	29%	6.6%	1.7%	0.3%
Franklin	43,610	11%	27%	6.1%	0.1%	4.8%
Harrisonville	48,050	8%	26%	-1.4%	-0.5%	-0.2%
Jackson	312,166	13%	41%	-1.7%	0.2%	4.8%
Jefferson City	64,307	10%	28%	3.3%	-1.3%	1.0%
Jefferson	88,279	9%	18%	0.8%	2.8%	2.1%
Joplin	75,134	9%	34%	3.7%	-1.6%	1.6%
Lake Ozark	88,092	43%	29%	15.7%	10.3%	1.2%
Moberly	59,469	15%	32%	0.6%	1.2%	3.7%
Montgomery	60,769	14%	24%	3.0%	1.8%	-0.1%
Nevada	60,302	15%	28%	1.1%	-5.8%	1.7%
Northeast	59,821	17%	28%	-1.2%	-0.1%	0.4%
Northwest	55,401	19%	29%	4.1%	4.0%	-1.5%
Platte	39,942	7%	35%	12.9%	0.0%	6.3%
Poplar Bluff	53,203	22%	27%	7.2%	4.9%	-0.6%
Rolla	51,085	18%	33%	5.2%	0.0%	6.7%
South Central	59,918	15%	26%	4.9%	-1.4%	-2.2%
Southwest	77,090	30%	30%	13.2%	9.1%	3.3%
Springfield	173,439	8%	37%	3.4%	0.7%	2.9%
St. Charles	143,721	4%	21%	4.8%	0.0%	3.5%
St. Joseph	49,990	11%	36%	-0.3%	-0.3%	4.8%
St. Louis City	174,897	20%	56%	-3.4%	-1.2%	6.9%
St. Louis County	437,402	8%	30%	0.3%	1.1%	2.6%
Ste. Genevieve	57,125	16%	28%	4.1%	2.7%	2.2%
Warrensburg	59,449	9%	31%	-0.3%	-1.2%	4.6%

Source: U.S. Census, 2012 and 2008, American Community Survey, 1 Year Estimates

The largest decreases in units occurred in the City of St. Louis and the Bootheel, with other decreases occurring in areas around Jackson County and within the Northeast area of the state. While unit increases occurred in the Springfield and Jefferson City/ Boone County areas, the areas of largest unit increase are the Lake Ozark region and the Southwest region, Map 3.1-11 shows the change in percent vacant units from 2008 to 2012, again using the MHDC regions as the geographic unit.

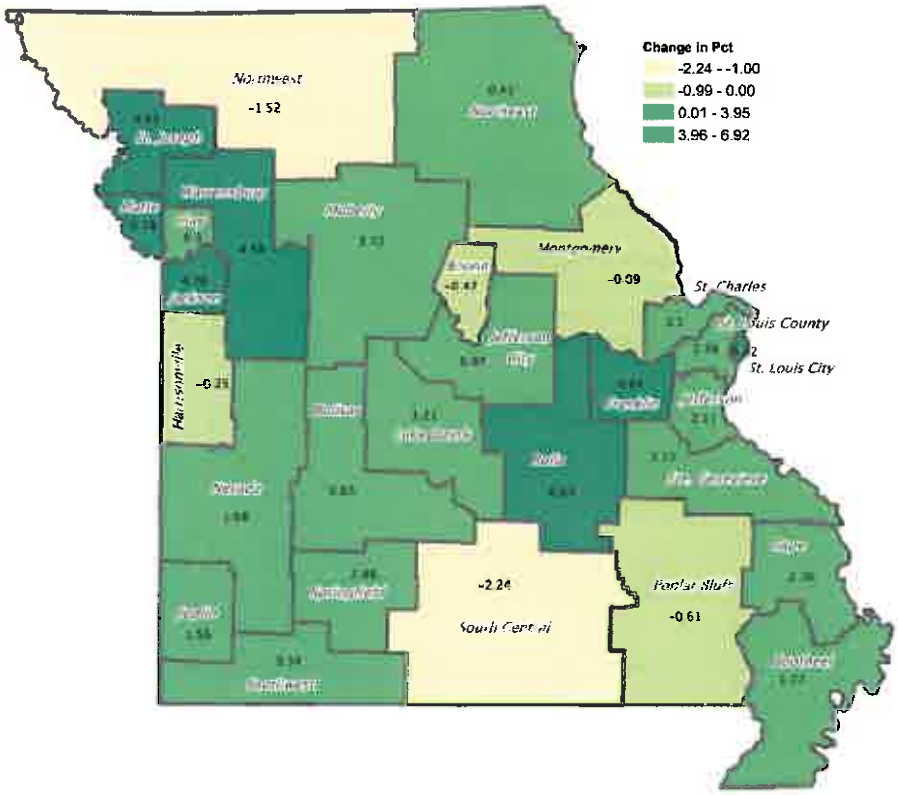
Map 3.1-11:
Change in Percent of Vacant Units, 2008-2012



Source: U.S. Census Bureau, 2008 and 2012, American Community Survey, 1 Year Estimates.

The map indicates that the corollary to high unit growth in the Lake Ozark and Southwest region is increasing vacancy; elsewhere, vacancy is marginally increasing in the Popular Bluff region and the Northwest region, and in suburban parts of the St. Louis area. In terms of increased occupancy, the largest increases occurred in the Nevada, Bolivar and Boone area, with more modest increases in occupancy in areas around the Warrensburg area, regions in the southeast part of the state, and other rural areas to the east and south of the state. Map 3.1-12 shows the change in percent renter tenure from 2008-2012.

Map 3.1-12:
Change in Percent of Rental Units, 2008-2012



Most of the state has seen increasing rental rents, with the largest percent increases in St. Louis City, Rolla, and many of the regions surrounding Jackson County. In terms of areas that showed a decline in renter rates, the Southwest and Northwest regions saw the largest declines, followed by Popular Bluff and Boone.

Owner and Renter Characteristics

Another important aspect of the housing market is ownership and renter rates by population characteristics such as race/ethnicity, household type, age group, education level, and income. As discussed above, Missouri renter rate has gradually been increasing since 2000, reaching about 33% in 2013. Table 3.1-5 shows the variation in the renter rate across various household characteristics for 2012, with the equivalent percentages for 2010 and 2000.

Table 3.1-5: Percent Renter by Householder Characteristics, Missouri

	2012 Count	Percent	2010	2000
White	563,103	28.7%	26.7%	26.1%
Black/African American	159,734	60.1%	57.9%	52.8%
Hispanic	30,978	52.6%	52.8%	50.9%
Married Couples	166,448	14.4%	14.3%	14.3%
Married Couples with Children	88,134	18.5%	18.8%	17.8%
Single Parent with Children	152,472	58.7%	48.3%	44.8%
Single Person	316,472	45.5%	45.0%	45.3%
Householder Under 25	96,221	85.1%	83.4%	79.1%
Householder 25 to 35	200,515	54.9%	50.8%	47.8%
Householder 35 to 45	136,165	35.7%	32.4%	28.7%
Householder 45 to 64	224,590	24.8%	22.2%	19.0%
Householder 65 and older	86,213	19.8%	20.0%	20.3%
Veteran Householder	68,177	19.5%	19.7%	na
Disabled Householder	171,851	35.8%	33.0%	na

Source: U.S. Census, 2012 and 2010, American Community Survey, 1 Year Estimates; U. S. Census, 2000, Summary File 1 and Summary File 3

African American households are more than twice as likely to be renters as white households. Single parent households are more than four times and single person households are more than three times as likely to renters as married couples. Additionally, rental rates for households decline as the age of the householder increases; for example, 85% of householders under the age of 25 and 55% of householders from 25 to 35 are renters, compared to just 20% of householder from 45 to 64 and 20% of householders over 65.

Similarly disparate patterns in tenure are shown when broken out by income, both household income and household income as a function of the median household income for the area (Table 3.1-6).

Table 3.1-6: Percent Renter by Householder Income, Missouri, 2012

	Count	Percent
Household Income		
Less than $5,000	28,869	66.1%
$5,000 to $9,999	33,962	69.8%
$10,000 to $14,999	64,300	58.5%
$15,000 to $19,999	68,390	51.6%
$20,000 to $24,999	77,284	47.8%
$25,000 to $34,999	167,589	40.3%
$35,000 to $49,999	237,097	32.6%
$50,000 to $74,999	341,950	22.1%
$75,000 to $99,999	226,993	15.6%
$100,000 to $149,999	213,491	10.1%
$150,000 or more	131,761	5.2%
Household Income		
Below 40% MHI	260,274	61.9%
40-60% MHI	129,985	47.2%
60-80% MHI	104,726	39.1%
80-100% MHI	81,809	32.6%
More than 100% MHI	202,960	17.7%

Source: U. S. Census, 2012, American Community Survey, 1 Year Estimates

There is a direct relationship between renter status and income, both within categories as a percentage of median household income. In terms of the latter, only households above the median household income have a renter rate lower than the state as a whole (17.7 compared to 32.5% for all households); households below 40% of the median household income have a renter rate almost twice that of the state.

Comparing the 2012 data with the percentages for 2010 and 2000 shows how Missouri's renter population is shifting. While the relative order of demographic groups in renter rates is consistent across the three periods—those groups that are higher in 2000 are generally higher in 2013—and the overall trend of an increase in renter rates is true for almost all demographic groups, there is difference in the degree of change over the three periods. For example, African Americans had a 7 percentage point increase in renter rates from 2000 to 2013 and the rate of change quickened over the last three years. By contrast, white householders saw largely no increase in renter rates from 2000 to 2010 and only a margin increase since 2010. Similarly, single parents saw a 5 percentage point increase in their rental rate, whereas the rental rate of married couples was flat. In terms of the age of householders, most age groups saw an increase in their rental rate, with householders in their 20s and 30s seeing the largest increase in renter rates.

Unit Characteristics

Other unit characteristics of housing include the type by number of units, when they were built and financial characteristics such as value and gross rent. In terms of type, Table 3.1-7 shows the distribution of unit size across Missouri for 2012, 2010 and 2000.

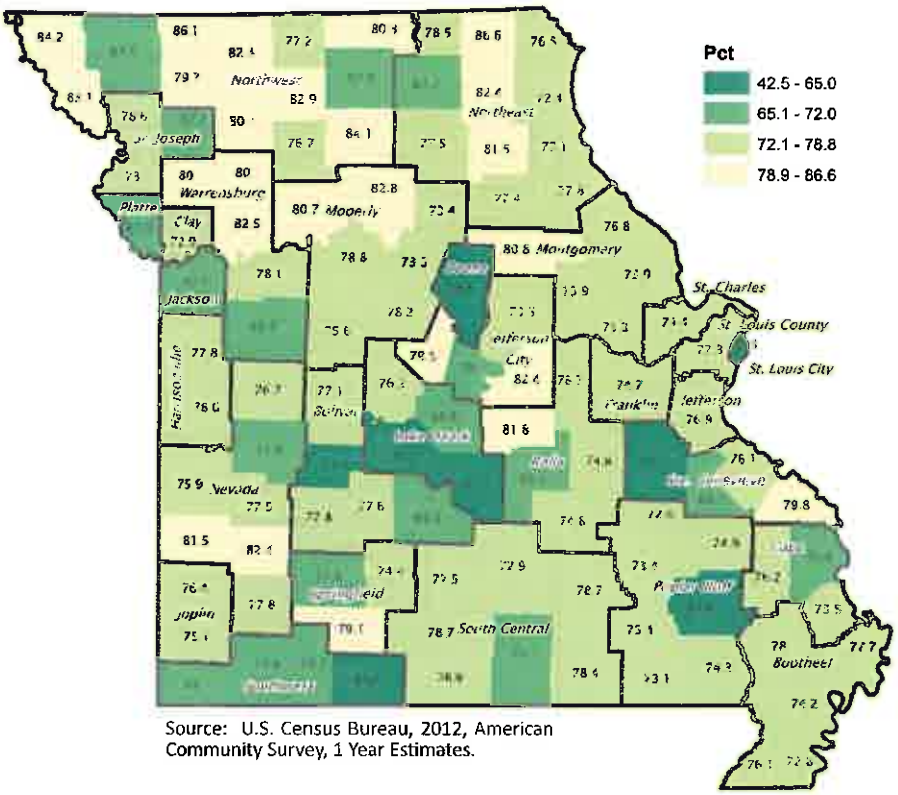
Table 3.1-7: Number and Percent by Unit Count, Missouri

	2012	%	2010	%	2000	%
Total Units	2,710,506		2,011		2,001	
1 Unit, detatched	1,902,338	70.0%	1,891,143	69.7%	1,679,585	68.8%
1 Unit, attached	93,132	3.4%	97,957	3.6%	67,120	2.7%
2 Units	96420	3.5%	94,554	3.5%	95,630	3.9%
3 or 4 Units	124888	4.6%	121,033	4.5%	124,049	5.1%
5 to 9 Units	102359	3.8%	100,578	3.7%	92,267	3.8%
10 to 19 Units	92766	3.4%	95,242	3.5%	76,929	3.2%
20 to 49 Units	53422	2.0%	55,203	2.0%	42,839	1.8%
50 Units or More	63137	2.3%	67,974	2.5%	56,633	2.3%
Mobile home	180,477	6.6%	188,481	6.9%	199,826	8.2%

Source: U. S. Census, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 1 and Summary File 3.

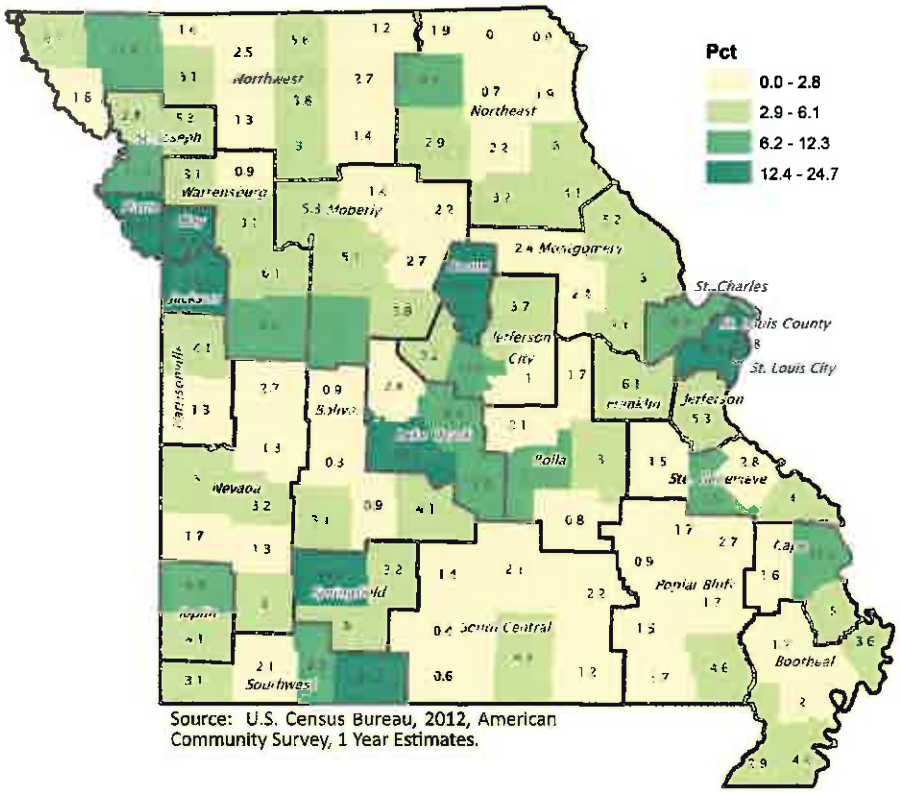
There has been very little change in the proportion of unit size over this period; most units (70%) are single family detached homes, with only 16% of the units in 2013 3 units or more. However, there is spatial variation in the distribution of single family units (detached) and in multi-family units (5 units or more) are found, as shown in Map 3.1-13 and 3.1-14.

Map 3.1-13:
Percent 1 Unit Detached, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Map 3.1-14:
Percent Multi Family Units (5 Units or More), 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

St. Louis City has the lowest percentage of single family detached units (42.5%), with Taney County in the Southwest Region and Boone County also low. Higher single family detached rates are in rural areas and in exurban areas of most of the metropolitan areas. Taney County also ranks high in multi-family units (24.7%), with St. Louis City at 23%. Other counties with high percentages of multi-family units include Camden County in the Lake Ozark region, urban and suburban areas around Kansas City and Boone County. Rural areas in the north and south of the state have relatively few multi-family units. Table 3.1-8 shows the year ranges when Missouri units were built.

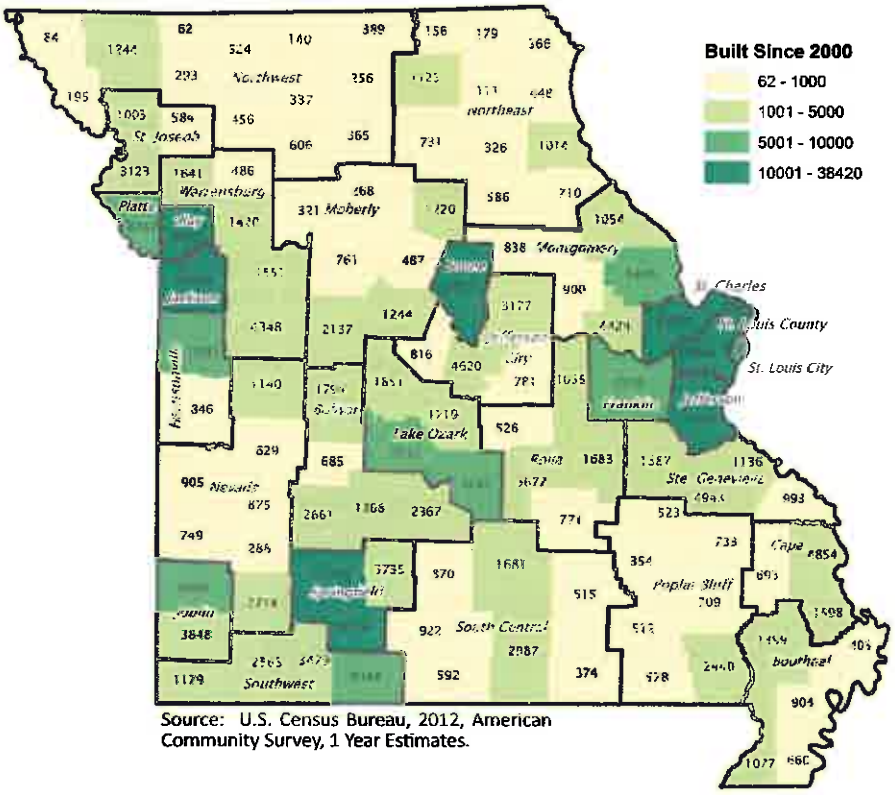
Table 3.1-8: Years Units Built, State of Missouri. 2012

	Number	Pct
Total Units	2,710,506	
2010 or Later	7,282	0.3%
2000 to 2009	365,564	13.5%
1990 to 1999	394,148	14.5%
1980 to 1989	338,146	12.5%
1970 to 1979	431,907	15.9%
1960 to 1969	320,598	11.8%
1950 to 1959	298,916	11.0%
1940 to 1949	147,879	5.5%
1939 or Earlier	406,066	15.0%

Source: U.S. Census, 2012, American Community Survey, 1 Year Estimates

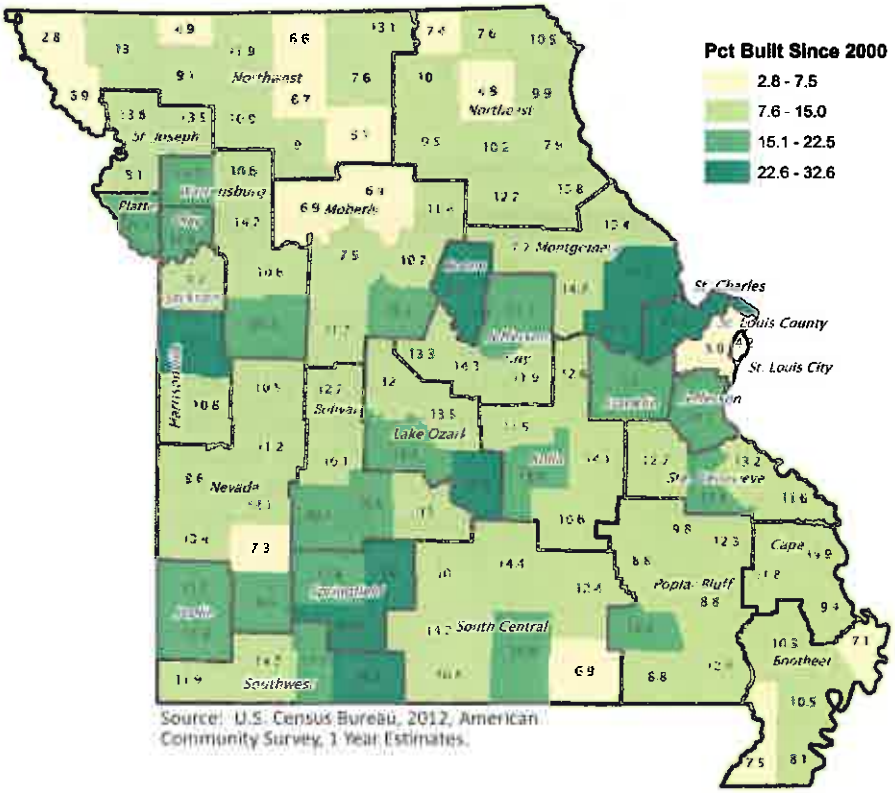
Approximately 28% of the state's housing stock dates from since 1990, with roughly half from the 1990's and the 2000's. By contrast, relatively few units have been added since 2010—an annualized rate approximately one third of that for the previous two decades. In geographic terms, some areas of the state have added a large number of units and others relatively few. Map 3.1-15 shows the counts of units built since 2000 and Map 3.1-16 shows the percent of units.

Map 3.1-15:
Count of Units Built Since 2000



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Map 3.1-16:
Percent Units Built Since 2000



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Areas such as St. Charles County, St. Louis County and Jefferson County in the St. Louis region added significant number of units since 2000; for St. Charles County, this accounts for 30% of the total units. Other metropolitan regions saw similar large additions to their units; Jackson County added 30,000 units and Springfield 22,000 units. By contrast, relatively few units were added in the northern and southern part of the state, either as a count or a percent of the total units.

Financial Characteristics

A final set of data relates to the financial characteristics of housing, including their mortgage status, median value and gross rent. Table 3.1-9 show the financial characteristics for all Missouri units for 2012, with a comparison to 2010 and 2000.

Table 3.1-9: Financial Characteristics of Missouri Housing

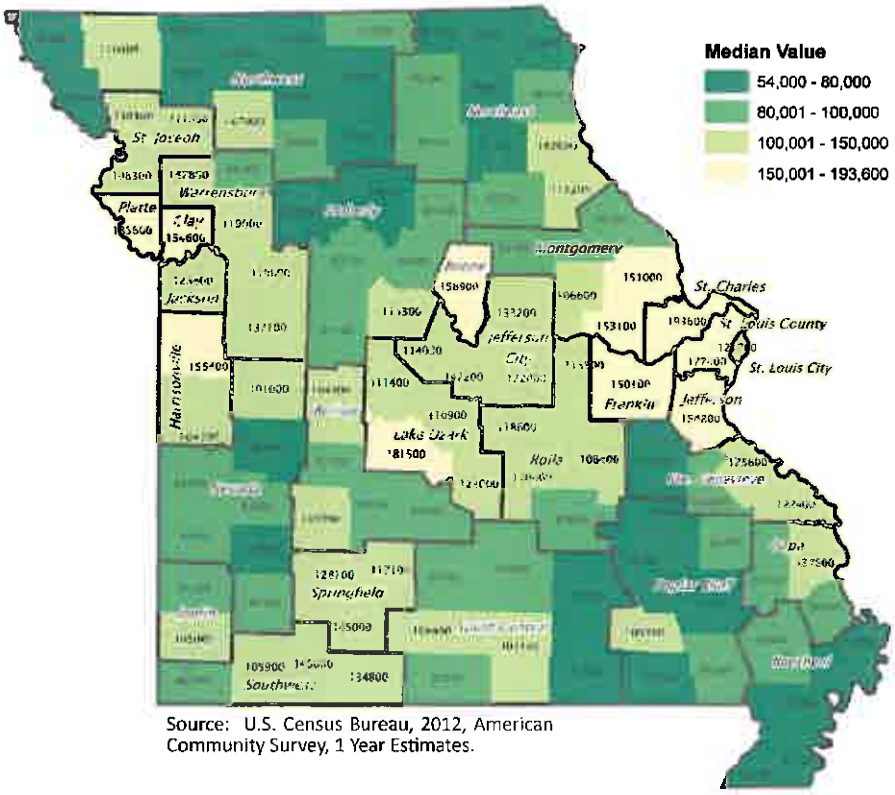
	2012		2010		2000	
	#	Pct	#	Pct	#	Pct
Total Units	2,720,087		2,714,017		2,442,017	
Owner Units	1,591,686		1,621,371		1,542,149	
Units with a Mortgage	1,021,044	64%	1,067,865	66%	1,042,493	68%
Median Housing Value	$135,000		$139,000		$89,900	
Renter Units	767,449		729,257		652,445	
Units Paying Rent	715,241	93%	680,686	93%	612,183	94%
Median Gross Rent	$706		$682		$484	

Source: U.S. Census, 2012 and 2010, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 3

The data shows a marginal decrease in the percent of units with a mortgage, with the percent of rental units paying rent more or less the same over the three periods. More significant is the change in housing value (for owner occupied units only) and monthly gross rent (for rental units only).[1] At the state level, median housing values increased 55% and median monthly gross rent 41% from 2000 to 2010. By contrast, median housing value declined 3% from 2010 to 2012, and median monthly gross rent increased just 4%. Map 3.1-17 shows median housing values for Missouri counties in 2012.

1 The values are not adjusted for inflation.

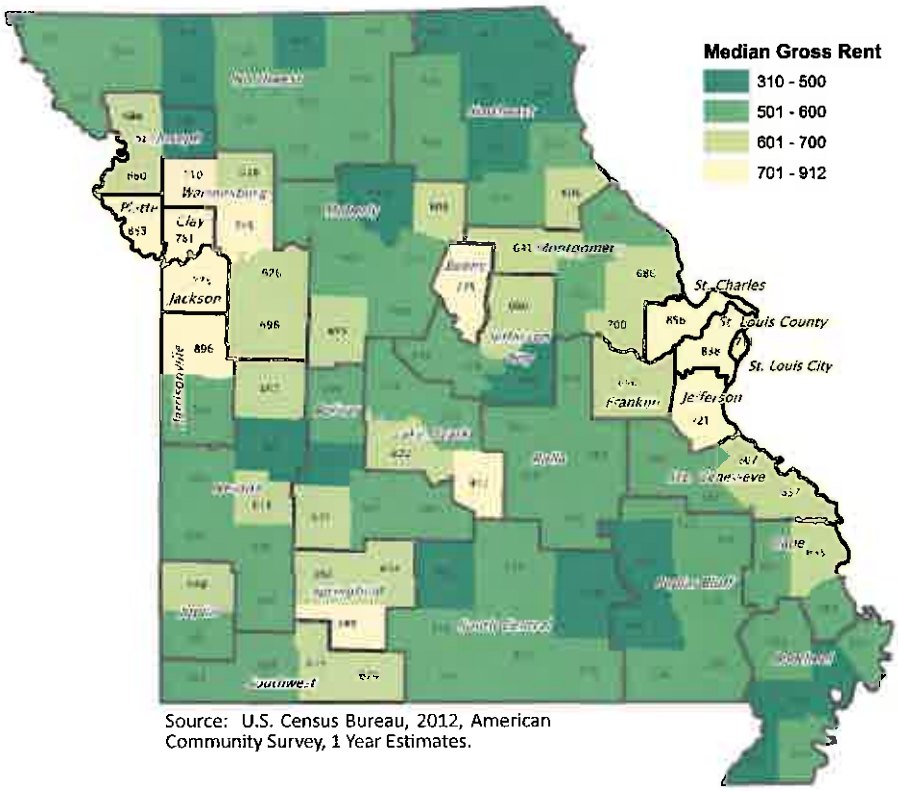
Map 3.1-17:
Median Housing Value, Missouri Counties, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

The highest median housing value are in the suburban counties of St. Louis—St. Charles and St. Louis County—Boone County and Camden County in the Lake Ozark region. The outlier in the St. Louis region is St. Louis City, whose median housing value is much less than the surrounding counties. The lowest median housing values are within rural counties in the north and south of the state. Map 3.1-18 shows the median monthly gross rent for Missouri counties in 2012.

Map 3.1-18:
Median Gross Rent, Missouri Counties, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Median gross rents break out geographically along the urban/rural divide. Counties with urban and metropolitan regions are higher than counties and regions in the rural parts of the state. The exception is Pulaski County, which has the highest median gross rent in the state and is also home to Fort Leonard. Significantly lower gross rents are in the Popular Bluff region, in the Bootheel and in the Northeast region of the state.

One final analysis concerning the financial characteristics of Missouri housing is the shift in the proportion of units at the various housing value/gross rent levels. Table 3.1-10 shows the percent of owner occupied units at various value levels for 2012, 2010 and 2000.

Table 3.1-10: Value of Units, Missouri

	2012		2010		2000	
	#	%	#	%	#	%
Total	1,626,389		1,645,022		1,542,310	
Under $50,000	187,096	12%	182,659	11%	328,862	21%
$50,000 to $100,000	347,781	21%	355,999	22%	595,484	39%
$100,000 to $150,000	355,292	22%	372,319	23%	315,263	20%
$150,000 to $200,000	291,155	18%	292,392	18%	146,270	9%
$200,000 to $300,000	260,349	16%	255,553	16%	97,731	6%
$300,000 to $500,000	128,721	8%	130,967	8%	40,085	3%
$500,000 to $1 million	44,575	3%	44,015	3%	14,580	1%
Over $1 million	11,420	1%	11,118	1%	4,035	0%

Note: Counts for 2000 are estimated for all owner units for consistency with 2010 and 2012.

Source: U.S. Census, 2012 and 2010, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 3

While the values are not adjusted for inflation, they do show the decrease in units at the lowest gross rents and an increase of units at the high gross rents. Units valued less than $100,000 comprised 60% of units in 2000 and only 33% of units in 2010. By contrast, units valued above $200,000 made up 10% of units in 2000 and 27% of units in 2010. There has been a marginal reversal in this trend since 2010. Table 3.1-11 displays the percent of renter units at various rent levels of 2012, 2010 and 2000.

Table 3.1-11: Gross Monthly Rent of Units, Missouri

	2012		2010		2000	
	#	%	#	%	#	%
Total	681,723		655,072		593,360	
Less than $200	12,917	2%	18,533	3%	41,625	7%
$200 to $300	29,605	4%	31,408	5%	54,058	9%
$300 to $500	97,114	14%	112,790	17%	220,781	37%
$500 to $750	239,393	35%	244,450	37%	201,199	34%
$750 to $1,000	177,492	26%	153,263	23%	54,654	9%
$1,000 to $1,500	101,478	15%	77,655	12%	16,014	3%
More than $1,500	23,724	3%	16,973	3%	5,029	1%

Note: Counts for 2000 are estimated for all rent paying units for consistency with 2010 and 2012.

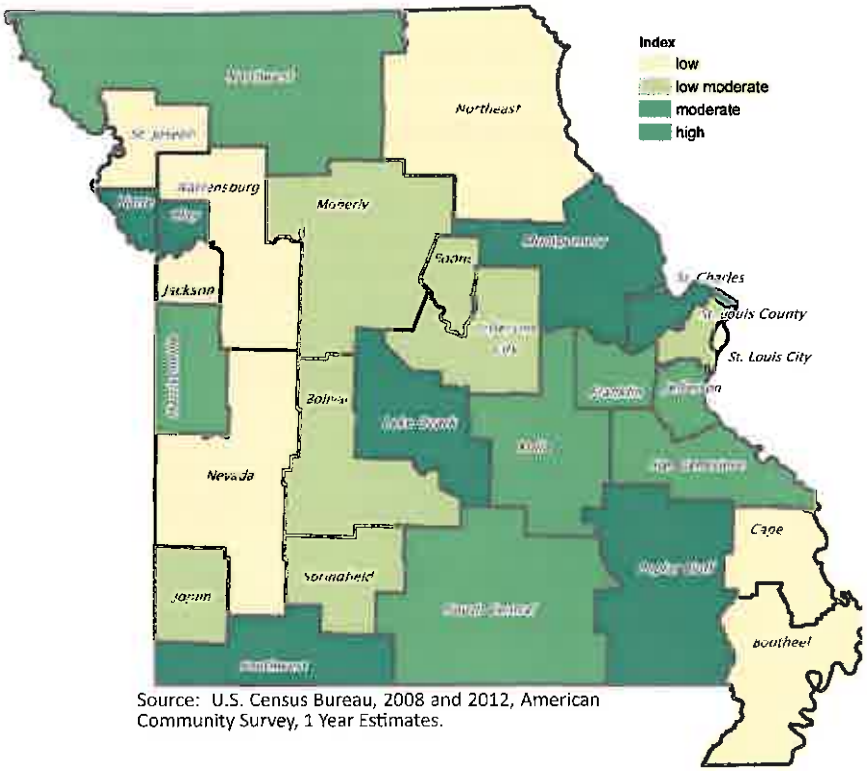
Source: U.S. Census, 2012 and 2010, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 3

As in the case of housing values, there have been shifts over this period in the proportion of low rent and high rent units. In 2000, units with a rent less than $500 comprised 53% of all units, but only 25% in 2010 and 20% in 2012. The greatest change in percent comes for units between $750 and $1,000; they comprised 9% of units in 2000 and 26% in 2012.

Housing Market Index

As a way of visualizing housing market strength across MHDC regions, an index or housing market strength was constructed using the percent occupied units (2012), percent renter units (2012), the percent units built after 2000 (2012), the change in percent occupied units (2008-2012) and the change in percent the rental units (2008-2012). Map 3.1-19 shows four groups of regions based on this index value.

Map 3.1-19: Housing Market Strength Index Value



Source: U.S. Census Bureau, 2008 and 2012, American Community Survey, 1 Year Estimates.

The strongest housing markets in the state are in outlying parts of metropolitan regions—St. Charles, Clay County and Platte County—and in Popular Bluff, Lake Ozark, Montgomery and Southwest regions. The weakest housing markets in the state are in the urban counties of Jackson and St. Louis City, other counties in the Kansas City metropolitan area and rural regions such as the Bootheel, Nevada and Northeast.

HOUSING DATA & ANALYSIS: HOUSING AFFORDABILITY NEED

A second factor relating to housing in Missouri is the need for housing, particularly housing available for low-moderate households. As detailed below, this primarily means how much of their income renter and owner households pay for housing, including low and moderate populations and other sub-populations of interest. More limited data is available on the quality of housing; for this portion of the analysis, age of housing serves a general proxy for quality. Finally, the value of house in combination with household income can be used to develop an overall affordability index for both renters and owners, suggesting the general ability of households to secure housing.

Cost-Burden Status

Most affordable housing assessments use a 30% criterion as a test of affordability. In others, a unit is considered affordable if the household spends less than 30% of their income on housing costs, including utilities, rent for renter households and mortgage costs, taxes and insurance for owner households. Table 3.2-1 shows the 30% cost burden status for households in Missouri in 2000, 2010 and 2012.

Table 3.21: 30% Cost Burden for Missouri Households

	2012			2010			2000		
		30%			30%			30%	
	Total Units	# CB	% Total	Total Units	# CB	% Total	Total Units	# CB	% Total
Renters	699,981	356,290	50.9	665,971	333,657	50.1	579,893	209,617	36.1
Owners	1,581,295	352,488	22.3	1,612,198	388,808	24.1	1,179,285	194,205	16.5
With a Mortgage	1,016,448	283,012	27.8	1,064,937	321,859	30.2	799,461	164,406	20.6
Without a Mortgage	564,847	69,476	12.3	547,261	66,949	12.2	379,824	29,799	7.85
All Households	2,281,276	708,779	31.1	2,278,169	722,465	31.7	1,759,178	403,822	23.0

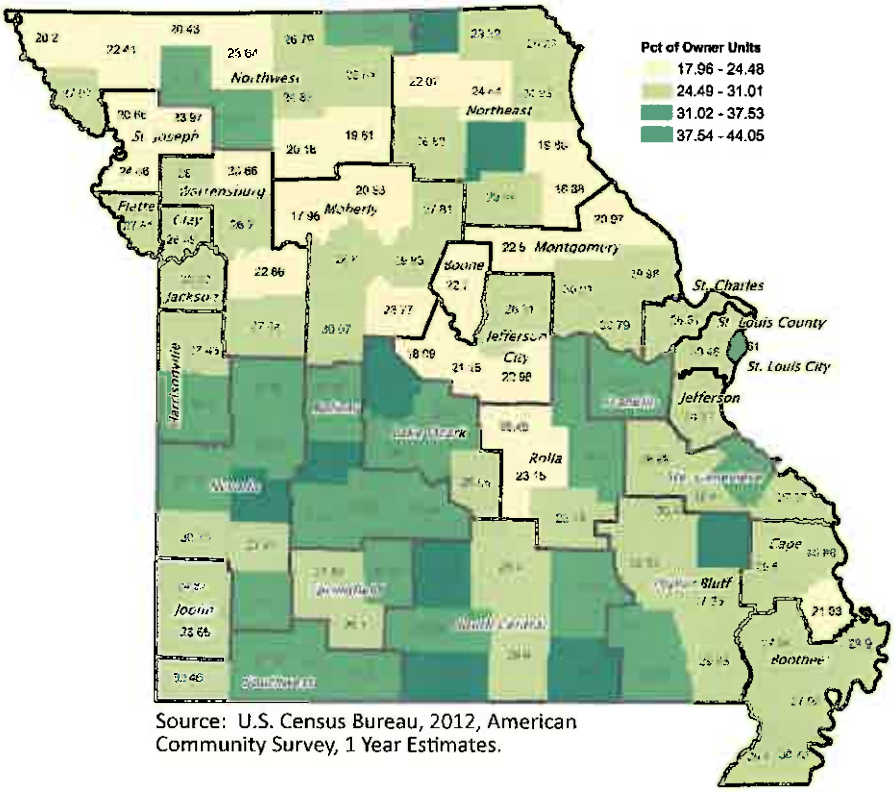
Data is for households where renter or owner costs can be computed.

Source: U.S. Census, 2012 and 2010, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 3

Currently, approximately one third of Missouri households are cost burdened at the 30% criterion. The percentage is highest for renter households (50.9%) and significantly lower for owner households (22.3%). Cost burden increased significantly from 2000 to 2010 for all households, reflecting growth in the housing market and housing prices; however, the largest percentage increase was for renter households. Additionally, while cost burden declined for most types of households since 2010, renter households continued to see a small increase.

Beyond the 30% criterion, a 50% threshold can be used to define extremely cost-burdened households—those households paying 50% or more of their income on housing costs. In 2012, 8.2% of renter households (approximately 57,700 households) and 0.8% of owner households (12,600) paid more than 50% of their income on housing costs. Map 3.2-1 shows the distribution of cost burden owner households using the 30% criterion for counties in Missouri.

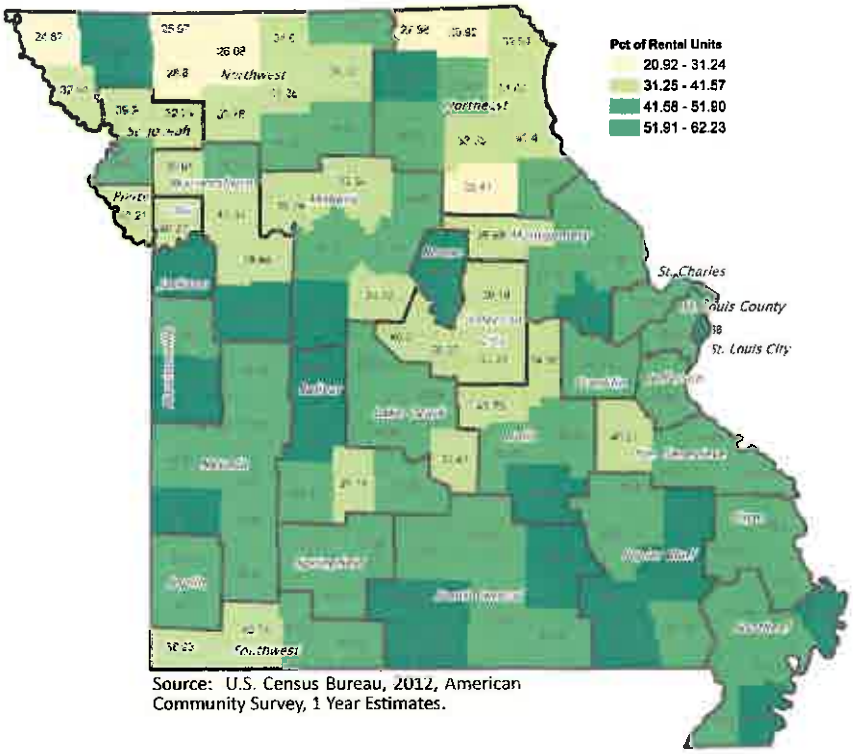
Map 3:2-1:
Cost Burden Owner Households, 30% Criterion, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Areas with large percentages of cost burden households include urban counties and rural counties in the central/south part of the state. By contrast, Map 3.2-2 shows the distribution of percent cost burden for renter households.

Map 3:2-2:
Cost Burden Renter Households,
30% Criterion, 2012



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

The renter map shows a broader distribution of cost burden among renter households, including urban areas and rural counties. Table 3.2-2 lists the counties with the highest and lowest percentages in both data points.

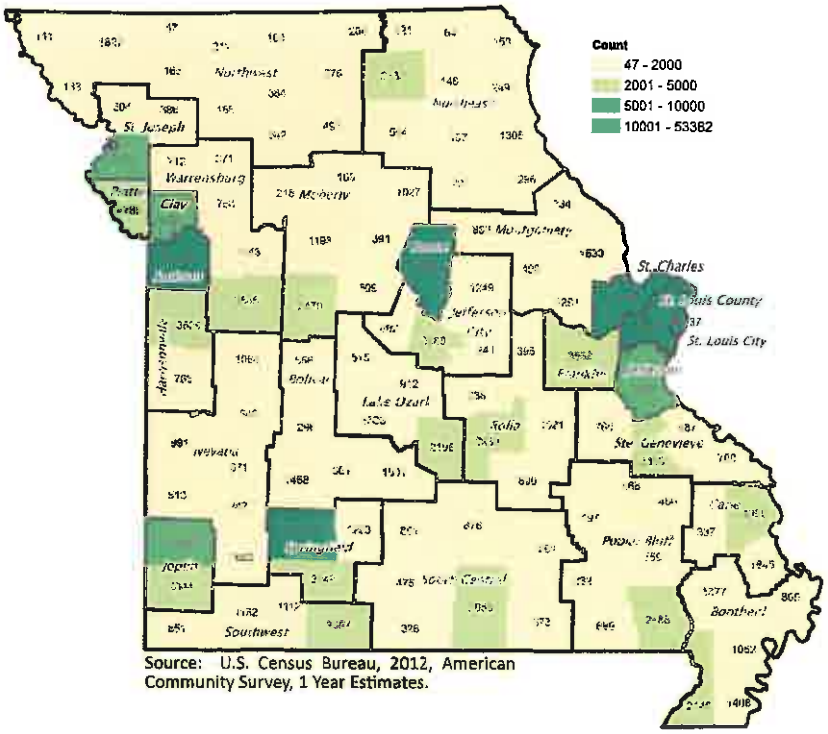
Table 3.2-2: Counties with Largest and Smallest Percent 30% Cost Burden, 2012

All Households		Renter Households	
St. Louis City	43%	Adair County	62%
Jackson County	35%	Wayne County	62%
Pemiscot County	35%	Benton County	60%
Adair County	33%	Dent County	59%
Boone County	33%	Ripley County	58%
Greene County	33%	Shannon County	58%
Taney County	33%	Barton County	57%
Johnson County	33%	Mississippi County	56%
Madison County	33%	St. Louis city	55%
Hickory County	33%	Johnson County	55%
Holt County	21%	Clark County	33%
Andrew County	21%	Holt County	32%
Moniteau County	21%	Lewis County	32%
Chariton County	20%	Monroe County	29%
Ralls County	19%	Gentry County	29%
Atchison County	19%	Schuyler County	28%
Maries County	19%	Harrison County	26%
Worth County	18%	Worth County	26%
Carroll County	18%	Atchison County	25%
Osage County	17%	Scotland County	21%

Source: U.S.Census, 2012, American Community Survey 5 Year Estimates

The general point to be made is how renter cost burden status is a shared problem in both urban counties, as well as rural and exurban counties. However, most cost burdened renters are found in metropolitan regions, as shown in Map 3.2-3.
St. Louis County has the most cost burden renter households (53,382), followed by Jackson County (50,389), St. Louis City (39,437) and Greene County (22,191).
There have also been regional shifts in cost burden status over the last five years. Table 3.2-3 focuses renter cost burden status for the MHDC regions for 2012, 2010 and 2008.

Map 3.2-3:
Count of Cost Burdened Renters,
30% Criterion



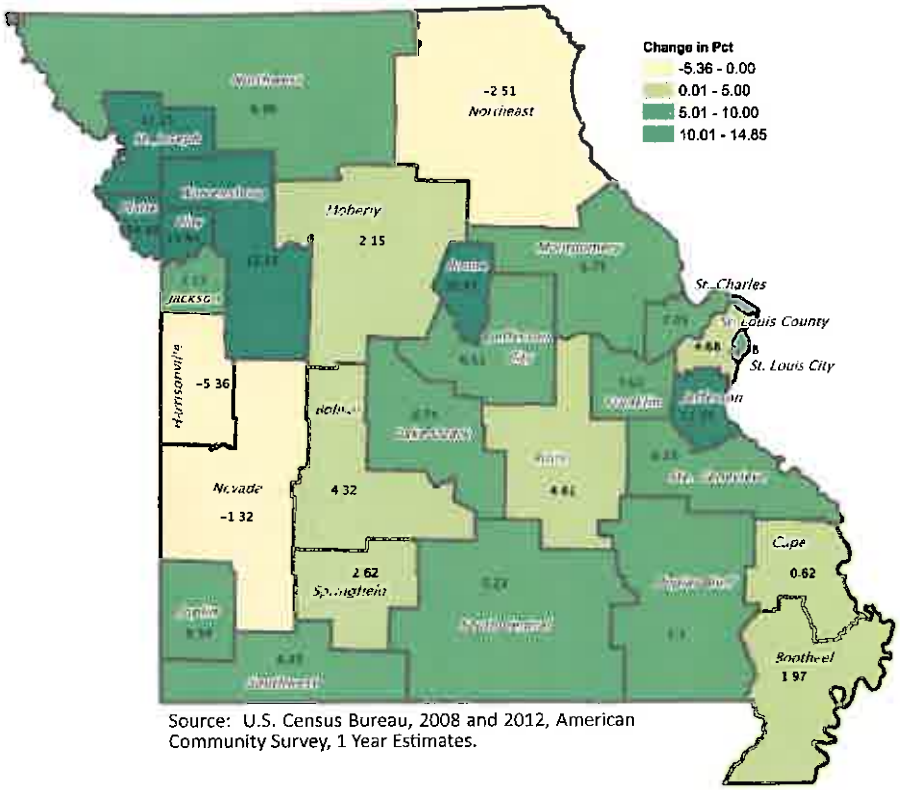
Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Table 3.2-3: Renter Cost Burden Status, 30% Criterion, for MHDC Regions 2008, 2010 and 2012

Name	Pct, 2008	Pct, 2010	Pct, 2012	Change in Pct, 2008 to 2012
Platte County	32%	42%	46%	15%
Clay County	32%	42%	46%	14%
Warrensburg	41%	47%	54%	13%
St. Joseph Region	40%	46%	52%	12%
Jefferson County	35%	53%	47%	11%
Boone County	49%	55%	60%	10%
Jefferson City	28%	42%	37%	10%
Joplin	47%	45%	57%	9%
Lake Ozark	42%	36%	51%	9%
Jackson County	47%	54%	54%	7%
St. Charles County	39%	50%	46%	7%
Northwest	41%	42%	48%	7%
Montgomery	39%	45%	46%	7%
Southwest Region	42%	49%	49%	6%
Ste. Genevieve	43%	51%	49%	6%
Franklin County	45%	48%	50%	6%
St. Louis City	53%	57%	58%	5%
South Central	43%	51%	48%	5%
Poplar Bluff	52%	53%	57%	5%
St. Louis County	46%	48%	51%	5%
Rolla Region	42%	50%	47%	5%
Bolivar	45%	43%	50%	4%
Springfield Region	48%	54%	51%	3%
Moberly	42%	52%	44%	2%
Bootheel	50%	53%	52%	2%
Cape	45%	51%	46%	1%
Nevada	45%	48%	44%	-1%
Northeast	44%	44%	42%	-3%
Harrisonville	43%	49%	38%	-5%

Source: U.S. Census, 3008, 2010 and 2012, American Community Survey, 1 Year Estimates

Map 3.2-4:
Change in Percent Renter Cost Burden Status, 30% Criterion, MHDC Regions



Source: U.S. Census Bureau, 2008 and 2012, American Community Survey, 1 Year Estimates.

The shift from 2008 to 2012 is shown graphically in Map 3.2-4.
The largest shifts in percent occurred in exurban areas of St. Louis and Kansas City and in and around Columbia and Jefferson City.

Beyond the 30% criterion, housing need can also be expressed more generally as the cost of housing a percentage of household income. Table 3.2-4 shows the percent of owner housing costs at various percentages of household income.

Table 3.2-4: Selected Owner Costs as a Percent of Household In-

	2012 %	2010 %	2000 %
Total Owner Units			
Less than 10%	19%	18%	24%
10% to 15%	19%	17%	20%
15% to 20%	18%	17%	19%
20 to 25%	13%	13%	13%
25 to 30%	9%	9%	8%
30% and more	22%	24%	16%

Note: Includes only owner units whose owner costs were computed. 2000 counts were estimated to compare to 2010 and 2012.
Source: U.S. Census, 3008, 2010 and 2012, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 3

The data shows a shift of owner households from the lowest percentages of household income to the highest. For example, owner households paying less than 20% of their household income on housing costs constituted 62% of owner households in 2000 and 56% in 2012. The percentage of households paying over 30% of their household income rose from 24% in 2000 to 31% in 2012. Table 3.2-5 shows the equivalent percentages for renter units.

Table 3.2-5: Selected Renter Costs as a Percent of Household Income

	2012	2010	2000
	%	%	%
Selected Renter Units			
Less than 15%	13%	12%	22%
15% to 20%	12%	13%	17%
20 to 25%	12%	12%	14%
25 to 30%	12%	12%	11%
30% and more	51%	50%	36%

Note: Includes only renter units whose owner costs were computed. 2000 counts were estimated to compare to 2010 and 2012.
Source: U.S. Census, 3008, 2010 and 2012, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 3

The shift that renter household have seen is even more pronounced than as for owner households. In 2000, those paying 30% or more of their household income represented 47% of renter households; in 2012, that had risen to 63% of households.
Cost Burden Status for AMI Levels

Similar to the fact that cost burden status is not uniformly distributed across Missouri, cost burden status varies across the state's subpopulations. Table 3.2-6 shows the cost burden status by AMI level, including the estimated number of cost-burdened households.

Table 3.2-6: 30% Cost Burden Status by AMI Level, 2012

	All Households			Renters			Owner		
	Total	% CB	# CB	Subtotal	CB %	CB #	SubTotal	CB %	CB #
Less than 40% MFI	349,433	86%	300,259	214,693	91%	195,440	134,740	78%	104,819
40 to 60% MFI	268,336	58%	155,542	127,402	65%	83,011	140,934	51%	72,530
60 to 80% MFI	195,199	35%	68,360	78,582	35%	27,566	116,617	35%	40,794
80 to 100% MFI	243,346	20%	48,106	84,014	18%	15,288	159,332	21%	32,818
More than 100% MFI	1,301,956	6%	78,157	227,190	5%	12,351	1,074,766	6%	65,806
Total	2,358,270			731,881			1,626,389		

Source: U.S. Census, 2012, American Community Survey, 1 Year Estimates

In general, the data shows that as the income of household increases, their cost burden status decreases. Both as a count and as a percentage of households within the AMI levels, households at the lowest AMI levels (less than 40% AMI) are most cost burdened. At the 40% AMI level, 91% of renter households are cost burdened and 78% of owner households; at the 40 to 60% AMI level, 65% of renter households are cost burdened and 51% of owner households. Cost burdened households at the 40% AMI level make up 59% of all cost burdened renter households and 33% of all cost burdened owner households; cost burdened households at the 60% AMI level make up 25% of cost burdened renter households and 23% of cost burdened owner households.

One way that the cost burden status of households at lower AMI levels has impacted housing need can be showed by comparing what these households can afford over time. The previous analysis relating to gross monthly rents showed the shift in median gross rent from 2000 to 2012 and the shift over this period from lower to higher rent units. Table 3.2-7 compares median gross rent data to median household income data for 2012, 2010 and 2000 to show the affordability of median units at the various AMI levels.[2]

Table 3.2-7: Gross Rent/Household Income Comparison

	2012 \#	2010 \#	2000 \#
Median Gross Rent	$706	$682	$484
Median Household Income	$45,321	$44,301	$37,934
40% AMI Limit	$18,128	$17,720	$15,174
Maximum Monthly Rent	$453	$443	$379
Median Gross Rent Gap	-$253	-$239	-$105
60% AMI Limit	$27,193	$26,581	$22,760
Maximum Monthly Rent	$680	$665	$569
Median Gross Rent Gap	-$26	-$17	$85
80% AMI Limit	$36,257	$35,441	$30,347
Maximum Monthly Rent	$906	$886	$759
Median Gross Rent Gap	$200	$204	$275

Source: U.S. Census, 3008, 2010 and 2012, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 3

The data uses the 30% criterion to compute the maximum rent levels for the AMI groups. It should be noted that the data does not show that the lack of affordability of all units for all households at 40% AMI, or, conversely, the affordability of units for households at 80%. However, the data does suggest an increasing rent gap for all AMI groups, with significant gaps for the 40% and 60% groups. Overall, median monthly gross rent increased 46% between 2000 and 2012, while median household income increased just 19%.

2 Median household income for Missouri is used to identify the AMI levels.

Cost Burden Status for Other Subpopulations

There is also significant variation in the cost burden status of other subpopulation groups in Missouri. Table 3.2-8 shows the cost burden status based on the ethnicity/ racial group of the householder, household type, veteran or disability status and householder age.

Table 3.2-8: Cost Burden Status for Sub-populations, 2012

	Renter		Owner		Total
	Count	Percent	Count	Percent	Count
Race/Ethnicity					
White	259,265	45%	280,717	20%	539,982
Black	88,446	57%	35,285	34%	123,731
Hispanic	17,137	56%	6,407	23%	23,544
Household Type					
Married Couples	31,190	32%	138,296	14%	169,486
Married Couples with Children	31,190	32%	58,135	16%	89,325
Single Parents with Children	86,118	56%	37,515	36%	123,633
Single Persons	162,174	50%	130,671	35%	292,845
Veteran Status					
Householder is Veteran	40,003	39%	39,751	14%	79,753
Household includes Veteran	1,956	39%	2,296	15%	4,252
Either	34,899	34%	47,792	15%	82,691
Disabled					
Householder is Disabled	127,927	58%	86,084	24%	214,010
Household includes Disabled	14,503	59%	39,561	25%	54,065
Either	113,614	46%	98,490	19%	212,103
Householder Age					
Householder Less than 25	44,132	56%	3,762	26%	47,893
25 to 34	81,617	44%	28,994	19%	110,611
34 to 44	50,491	40%	41,951	19%	92,442
45 to 54	60,638	46%	62,286	19%	122,924
55 to 64	53,260	49%	73,051	20%	126,311
65 to 75	35,745	49%	59,382	21%	95,127
75 and More	44,236	58%	56,065	25%	100,301
Total					

Source: U.S. Census, 2012, American Community Survey, 1 Year Estimates

The table shows both the sub-populations that are disproportionately impacted by cost burden as well as the largest subpopulations of cost burdened households. In terms of ethnicity, African Americans and Hispanics have higher renter and owner cost burden rates than the state average, but whites make up the largest group of cost burdened households. In terms of household types, single parent households and single person households have the highest cost burden rates among renters and

owners, but single person households are the most numerous group of cost burdened households for both renters and owners. Disabled households-both those were the householder is disabled and where the household includes a disabled person—have higher rates of cost burden than the state average and, as group, make up one of the largest groups of cost burdened households among all the subpopulations. Finally, both the youngest householders and the oldest householders are more likely to be cost burdened, although they make up relatively small groups of households across the state.

A final set of data relating to cost-burden tracks the shifting renter cost burden state of subpopulations over time. Table 3.2-9 shows cost-burden status for a smaller subset of subpopulations—African Americans, married couples with children, single parent and single persons households, disabled households, the youngest and oldest households and households at the lowest AMI levels.

Table 3.2-9: Renter Cost Burden Status for Subpopulations, 2012, 2010 and 2008

	2012		2010	2008
	# CB	% CB	% CB	% CB
Race/Ethnicity				
Black	88,446	57%	60%	51%
Household Type				
Married Couples with Children	31,190	32%	32%	29%
Single Parents with Children	86,118	56%	56%	55%
Single Persons	162,174	50%	51%	45%
Disabled				
Householder is Disabled	127,927	58%	55%	50%
Householder Age				
Householder Less than 25	44,132	56%	57%	52%
75 and More	44,236	58%	53%	49%
Household Income				
Less than 40% AMI	195,440	91%	80%	78%
40 to 60% AMI	83,011	65%	63%	59%

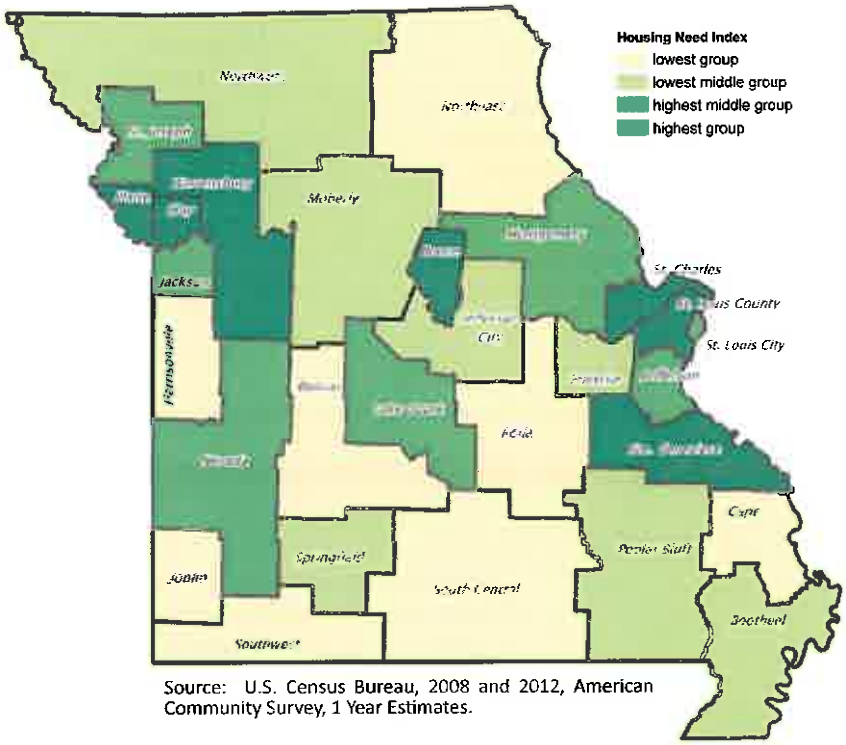
Source: U.S. Census, 2008, 2010 and 2012, American Community Survey, 1 Year Estimates

Most of the subpopulations show an increasing renter cost burden status over this period. Subpopulations that have the largest change in percent cost burden status include African American households (an increase in 6 percentage points), disabled households (7 percentage points), the oldest households (9 percentage points) and households below 40% of AMI (13 percentage points). The latter subpopulation represents the most renter cost burdened household across all three years.

Housing Affordability Need Index

As a way of visualizing regions with high and low housing affordability needs, an index was constructed using regional percentages of renter cost burden and owner cost burden at the 30% criterion and the change in percent of renter cost burden from 2008 to 20123. Map 3.2-5 shows four groups of regions based on this index value.

Map 3.2-5:
Housing Affordability Need Index



Source: U.S. Census Bureau, 2008 and 2012, American Community Survey, 1 Year Estimates.

The map shows how housing affordability needs are highest in areas in and around metropolitan areas, including St. Louis County, St. Charles County, Boone County, regions around Kansas City and Ste. Genevieve County. Housing affordability needs are lowest in rural areas of the state, including Bolivar, Northeast and South Central regions, and around the Rolla area and Joplin area.

Unit Characteristics

Besides cost burden data, a second set of data relates to the condition of housing units. This includes the presence or absence of certain unit facilities and the number of occupants within the unit per room. Table 3.2-10 shows this data for 2012, 2010 and 2000 for the state as a whole.

3 Regions were ranked on the three values, and the ranks were added together resulting in a cumulative ranking.

Table 3.2-10: Unit Condition Data, Missouri

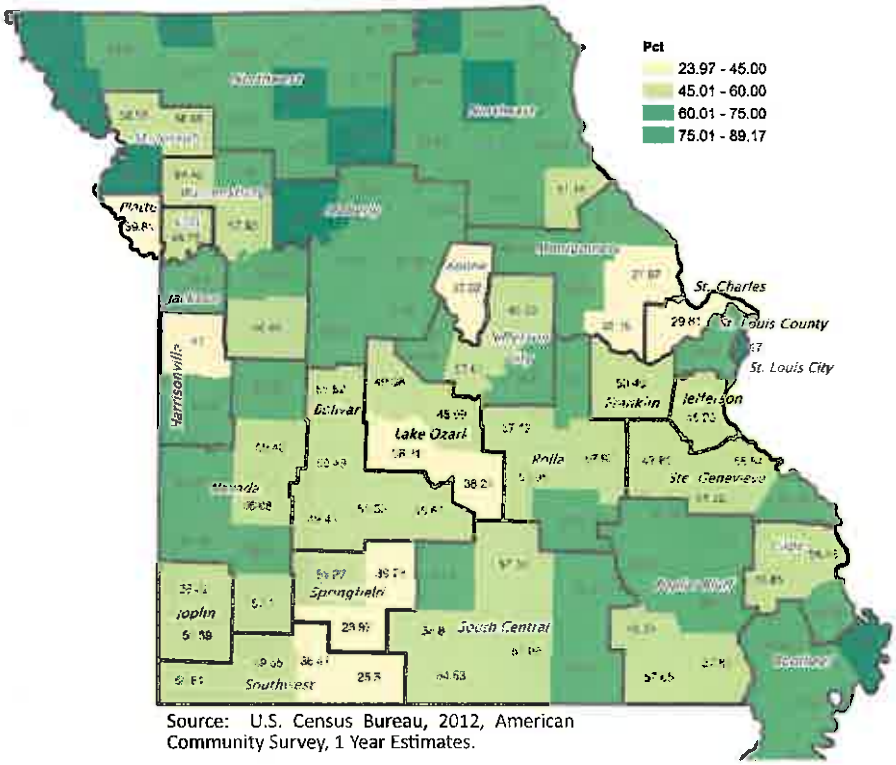
	2012		2010		2000	
	#	%	#	%	#	%
Total Occupied Units	2,358,270		2,349,955		2,194,594	
No Fuel	3,947	0%	4,223	0%	3,539	0%
Lacking complete plumbing facilities	11,217	0%	10,783	0%	11,923	1%
Lacking complete kitchen facilities	18,183	1%	15,203	1%	12,787	1%
No telephone service available	62,262	3%	91,256	4%	64,114	3%
1 Occupent or Less per Room	2,319,647	98%	2,312,631	98%	2,141,331	98%
1 to 1.5 Occupent per Room	29,097	1%	29,515	1%	38,171	2%
1.5 or More Occupent Per Room	9,526	0%	7,809	0%	15,092	1%

Source: U.S. Census, 2010 and 2012, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 3

The data shows very few formal condition issues with Missouri's housing and the limitations of uniform public data that is available on unit condition. For example, using the standard definition of over-crowding as more than one person per room, fewere than 2% of households are overcrowded.

One proxy for unit condition is the age of housing; in this case, the fact that housing is more than 30 years old might indicate the presence of condition issues. Using 1980 as a cutoff data, 59% of Missouri's housing units were built prior to that data. Map 3.2-6 shows the percent of unit built prior to 1980 for Missouri's counties.

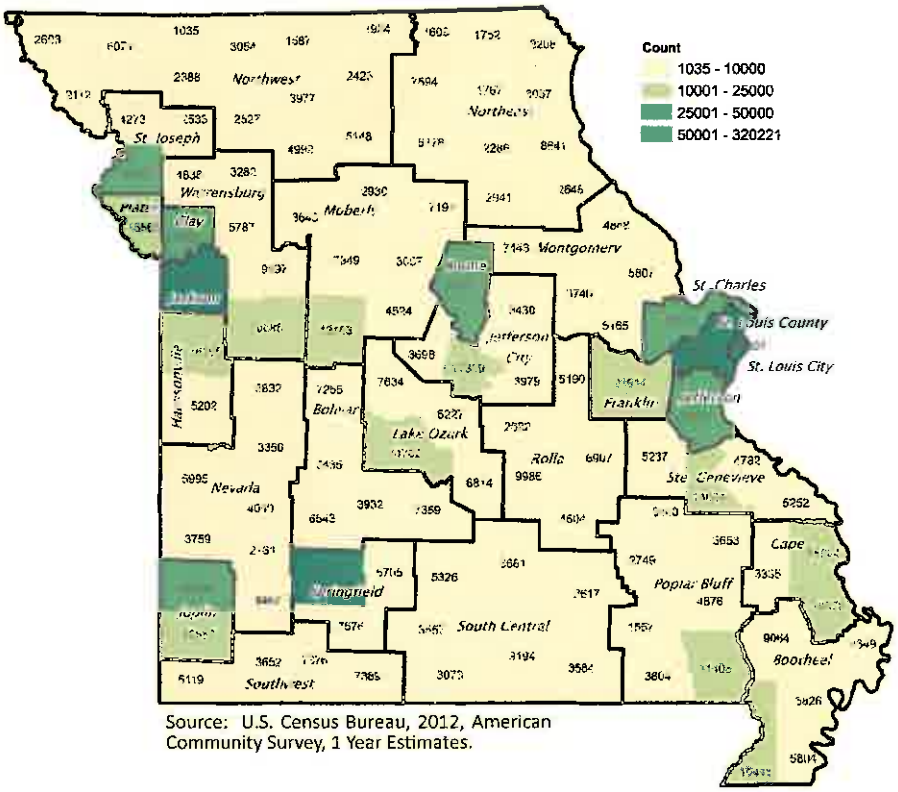
Map 3.2-6:
Percent of Units Built Prior to 1980, Missouri Counties



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

St. Louis City leads the list in percent of units built before 1980 (89%); high percentages are also in rural counties scattered around the state and in the St. Joseph region. conversely, the smallest percentages of units from prior to 1980 are in the exurban counties of St. Charles, Lincoln and Warren County, Boone County, Springfield, Lake Ozark and Southwest region. Map 3.2-7 shows the count of units built prior to 1980.

Map 3.2-7:
Count of Units Built Prior to 1980, Missouri Counties



Source: U.S. Census Bureau, 2012, American Community Survey, 1 Year Estimates.

Most of these older units are within urban counties like St. Louis County, Jackson County and St. Louis City and within urban areas elsewhere in the state.

HOUSING DATA & ANALYSIS: HOUSING DYNAMICS

Beyond the general trends and conditions in Missouri's housing market and the needs for housing that households face, a third set of factors related to investments in housing. As noted above, the majority of low-moderate households in the state live not in public-financed or subsidized housing, but affordable housing on the private market. Strong as well as weak housing markets pose both opportunities and challenges for low and moderate income households seeking affordable housing, as well as for developers and public officials seeking to ensure an adequate supply of affordable. Even with the presence of publicly subsidized housing, a strong housing market can price households out of housing; by contrast, a weak housing market can reduce the incentive for property owners to invest in housing, reducing housing condition and leading to vacancy and housing loss.

This section of the report summarizes data on how Missouri's housing market has changed, particularly since the national, housing-related, economic recession in 2008 and 2009. The data is admittedly limited, given that publicly available federal data is limited. These data points include housing related data from the Census Bureau's annual surveys, annual construction permit data collected by the U.S. Census Bureau and other data on housing market dynamics, including foreclosures and lending.

Housing Starts

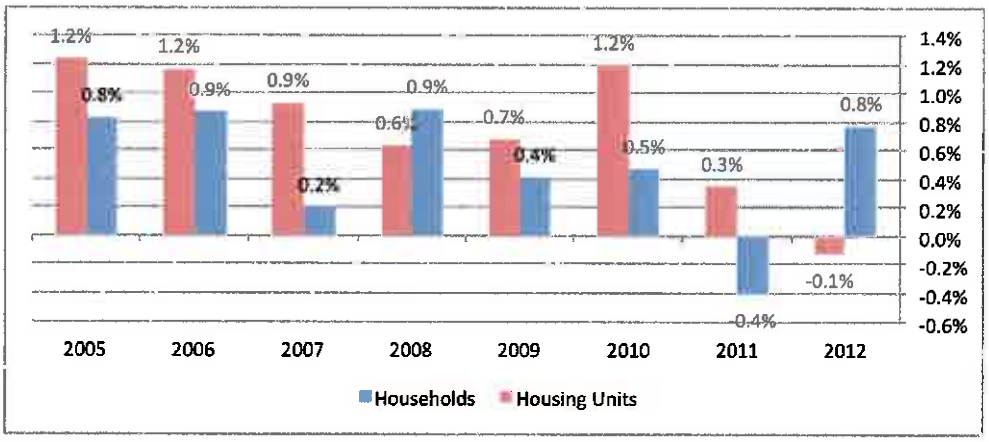
One first view of Missouri's housing dynamics revolves around the general scale of new housing additions, particularly in relationship to changes in statewide household formation. Table 3.3-1 shows annual data for housing units and households from 2000 to 2012; Graph 3.3-1 compares the annualized percent change for the two over this period.

Table 3.3-1: Annualized Change in Households and Housing Units, 2000 through 2012

	2012	2011	2010	2009	2008	2007	2006	2005	2000
Population	6,021,988	6,010,688	5,996,231	5,987,580	5,911,605	5,878,415	5,842,713	5,631,910	5,595,211
% Annualized Change								0.1%	
Households	2,359,135	2,341,074	2,350,628	2,339,684	2,330,040	2,309,626	2,305,027	2,285,280	2,194,594
% Annualized Change	0.8%	-0.4%	0.5%	0.4%	0.9%	0.2%	0.9%	0.8%	
			156,034						
Units	2,720,087	2,723,449	2,714,017	2,682,015	2,664,062	2,647,379	2,622,995	2,592,809	2,442,017
% Annualized Change	-0.1%	0.3%	1.2%	0.7%	0.6%	0.9%	1.2%	1.2%	
			272,000						

Source: U.S. Census, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, American Community Survey, 1 Year Estimates; U.S. Census, 2000, Summary File 1

Graph 3.3-1: Annualized Percent Change, Missouri



Source: U.S. Census, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, American Community Survey, 1 Year Estimates

Housing additions have generally outpaced household formation on an annual basis since 2000. From 2000 to 2010, Missouri added 272,000 units and only 156,000 households. Only in the last two years—with the state adding no new net units—has household formation significantly outpaced change in the number of units.

Another measure of housing market activity is annual construction permit data collected by the U.S. Census Bureau. Derived from the Census' annual Building Permits Survey, the data details the number of units permitted and the value of privately issued construction permits for states, counties, and places for units from one family through five or more. Table 3.3-2 summarizes permit counts and value at the state level for a variety of unit types.

Table 3.3-2: Count and Value Building Permits, Missouri

	All Permits		Single Family		Multifamily		5 or More Units	
Year	Count	Value	Count	Value	Count	Value	Count	Value
1990	15,294	$1,089,493	12,337	$983,698	2,957	$980,741	1,493	$54,862
1991	16,675	$1,122,313	13,573	$1,020,360	3,102	$1,017,258	1,444	$44,789
1992	21,288	$1,525,889	17,589	$1,404,675	3,699	$1,400,976	1,810	$57,077
1993	23,220	$1,749,829	19,489	$1,626,393	3,731	$1,622,662	1,452	$45,695
1994	26,390	$2,149,314	20,885	$1,944,991	5,505	$1,939,486	3,099	$97,022
1995	24,291	$2,032,503	18,984	$1,817,618	5,307	$1,812,311	3,025	$110,006
1996	26,303	$2,275,667	20,112	$2,008,419	6,191	$2,002,228	2,729	$110,557
1997	25,177	$2,265,005	18,832	$1,966,818	6,345	$1,960,473	3,256	$131,291
1998	25,673	$2,424,875	20,013	$2,145,241	5,660	$2,139,581	3,324	$147,392
1999	26,881	$2,739,418	20,699	$2,426,376	6,182	$2,420,194	3,835	$175,323
2000	24,358	$2,569,405	17,966	$2,234,407	6,392	$2,228,015	4,324	$210,899
2001	24,739	$2,750,047	18,792	$2,386,729	5,947	$2,380,782	3,774	$231,482
2002	28,816	$3,186,632	21,234	$2,702,752	7,582	$2,695,170	4,829	$267,065
2003	30,330	$3,596,524	23,636	$3,147,765	6,694	$3,141,071	3,902	$258,849
2004	32,791	$4,286,161	26,269	$3,808,510	6,522	$3,801,988	3,980	$283,567
2005	33,149	$4,702,016	25,984	$4,136,744	7,165	$4,129,579	4,273	$327,878
2006	29,226	$4,086,728	19,980	$3,426,943	9,246	$3,417,697	6,381	$429,702
2007	21,648	$3,128,424	15,024	$2,678,600	6,624	$2,671,976	4,606	$285,928
2008	13,278	$1,889,739	7,782	$1,454,593	5,496	$1,449,097	3,988	$315,366
2009	10,057	$725,098	6,553	$677,770	3,504	$674,266	2,704	$33,512
2010	9,700	$1,430,224	6,902	$1,221,535	2,798	$1,218,737	1,906	$142,402
2011	9,244	$1,425,673	6,061	$1,181,381	3,183	$1,178,198	2,037	$147,259
2012	12,298	$1,878,836	7,999	$1,576,312	4,299	$1,572,013	3,483	$233,450
2013	13,708	$2,234,221	9,366	$1,949,186	4,342	$1,944,844	3,572	$218,528

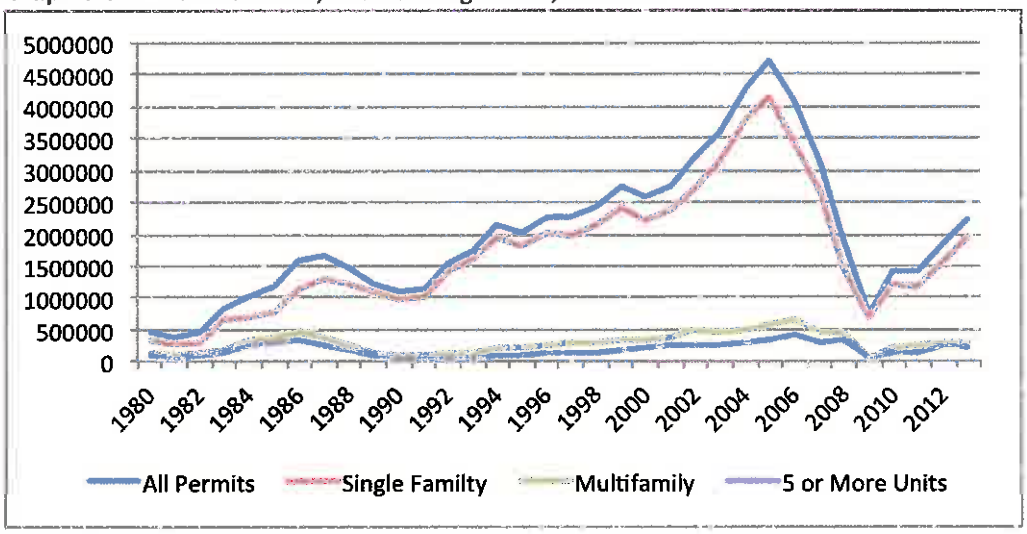
Note: Value is in thousands of dollars

Source: U.S. Census Bureau, 1990 through 2013, Building Permit Survey

Permits for single family buildings are the majority of the state's permits, both in counts of units permitted and in value; however, both for both, values have been decreasing. Permits for single family buildings represented 81% of all units permitted and 90% of their value in 1990, compared to 68% and 87% in 2013. The decline in single family permits over this period means that multifamily permits became a larger percentage of the unit count and value; of these, permits for buildings with 5 or more units are the largest category. In 1980, permits of 5 or more units represented just 10% of all permits and 5% of their value; this increased to 30% of all permits and 17% of their value in 2008 and stood at 26% of the total number and 10% of the total value in 2013.

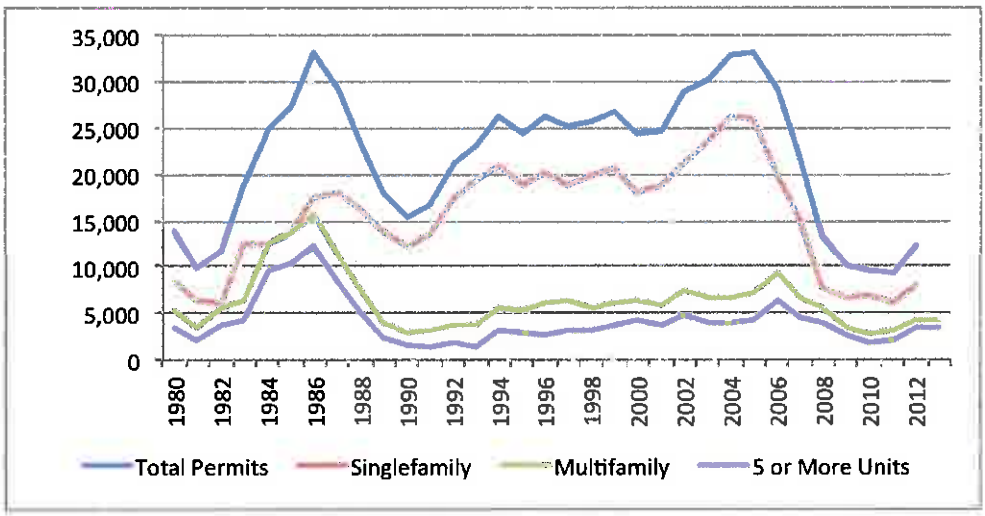
Graph 3.3-2 and 3.3-3 charts the total number of units permitted and value of permits over time, with separate lines for all buildings, single family buildings, multifamily buildings and permits for buildings with 5 or more units.

Graph 3.3-2: Permit Count, 1990 through 2013, Missouri



Source: U.S. Census Bureau, 1990 through 2013, Building Permit Survey

Graph 3.3-3: Value of Permits, 1990 through 2013, Missouri

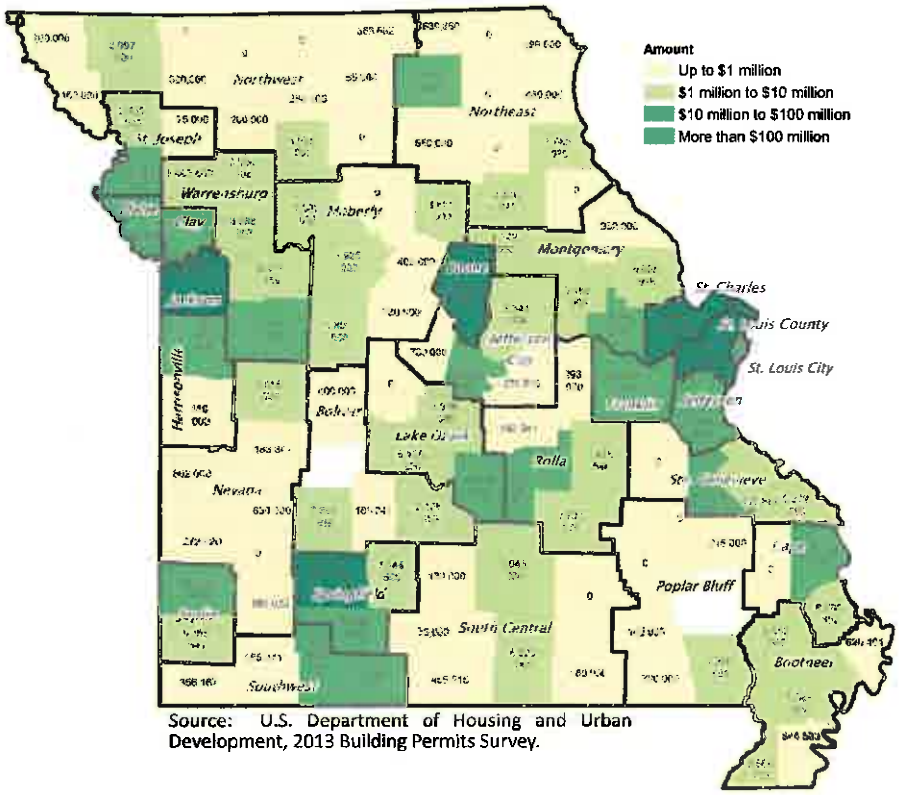


Source: U.S. Census Bureau, 1990 through 2013, Building Permit Survey

In general, the trend for all the different types of permits is similar, with single family buildings as the largest category. For permit valuation, the data show the gradual increase in permit value throughout the 1990s and first part of the 2005, a rapid decline in value after 2005, and the more recent increases in value since 2009. The count of permits is more variable, showing a sharp increase in the number of permits in the 1980s through 1986, a decline until 1990, a gradual increase to a high point in 2005, and a decline until 2011.

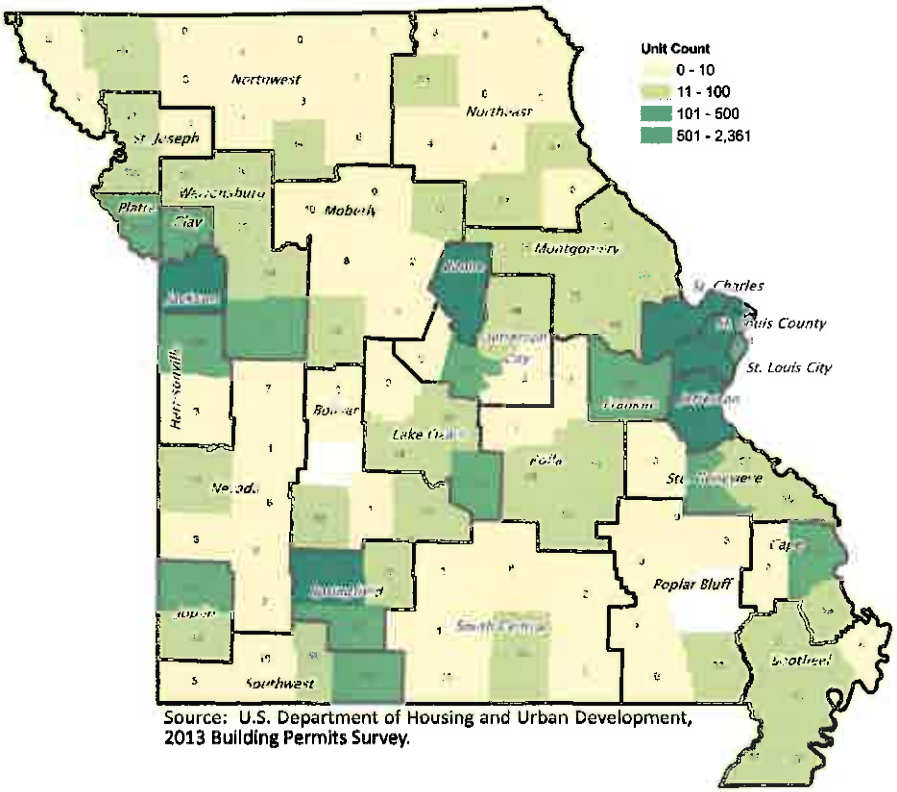
County level data details the counties that have been had the most permits and the high permit valuation. Map 3.3-1 shows the value of permits in 2013 for each of Missouri's counties; Map 3.3-2 shows the unit count for all 2013 permits.

Map 3.3-1:
Value of Permits, 2013, Missouri Counties



Source: U.S. Department of Housing and Urban Development, 2013 Building Permits Survey.

Map 3.3-2:
Unit Count of Permits, 2013,
Missouri Counties



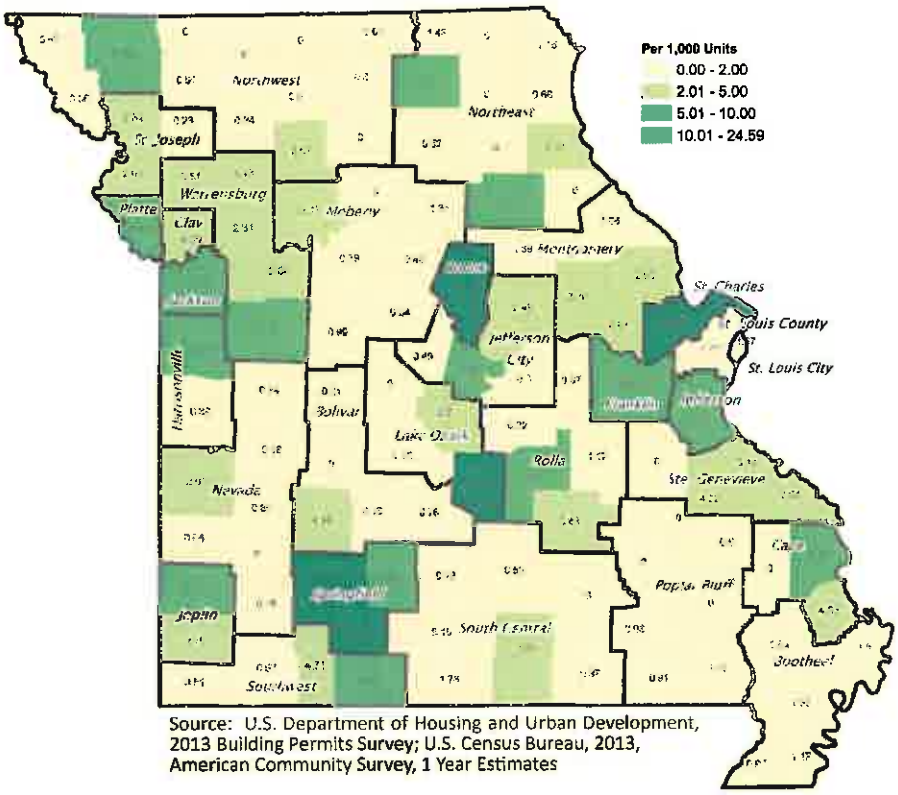
Source: U.S. Department of Housing and Urban Development, 2013 Building Permits Survey.

The highest value and unit count of permits are within the urban counties of St. Louis County, Jackson County, Boone County and Greene County and the exurban county of St. Charles[4]. These five counties constituted 58% of the total permitted unit count in Missouri in 2013 and 64% of total permit valuation. Leading the list in is St. Charles County, whose permit value in 2013 was $408 million and unit count was 2,122; Jackson County led the list in unit count (2,361) and was second in permit value ($360 million). A significant number of counties reported very few permits, particularly in the South Central, Popular Bluff and Northwest and Northeast region.

4 Adding St. Louis City to St. Louis County to create a combined St. Louis urban county does not significantly change the ranking.

For some counties, the large permit unit counts reflect the fact that the county is adding a large number of new units. Map 3.3-3 shows the differences in county-level permit activity based on the number of permitted units in 2013 per 1,000 housing units.

Map 3.3-3:
Count of Permits per 1,000 Housing Units, 2013, Missouri Counties



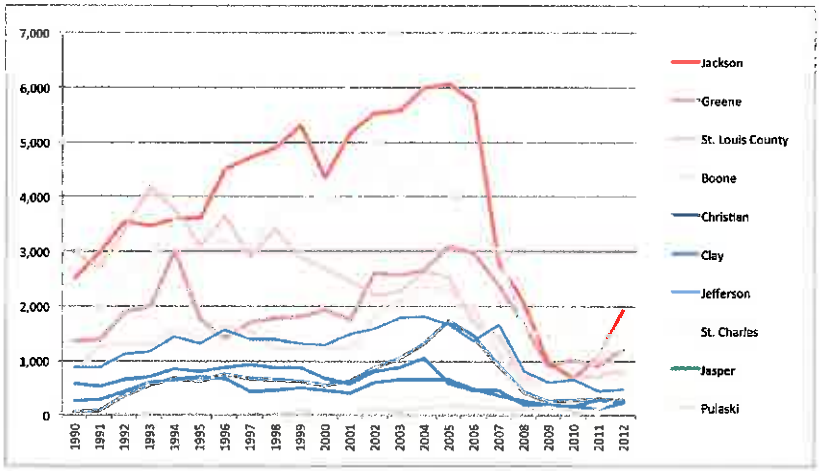
Source: U.S. Department of Housing and Urban Development, 2013 Building Permits Survey; U.S. Census Bureau, 2013, American Community Survey, 1 Year Estimates

The state rate in 2013 was 5.0 and the map is symbolized to show counties below and above that rate. One feature that is noticeable is the relatively low rates associated with the states' two largest urban counties—St. Louis County and Jackson County; in both counties, there are large numbers of permits and high permit values, but these counts represent relatively low rates based upon their existing housing stock. By contrast, St. Charles County and other exurban counties have rates much higher than the state average. Also ranking high are Boone County, Greene and Christian County in the Springfield region and Pulaski County in the Lake Ozark region. Pulaski County has the highest rate of permits, at 24, reflecting construction related to Fort Leonard. Besides the urban counties, those counties ranking lower include counties in the Northwest and Northeast regions and regions to the south of the state, including the South Central, Popular Bluff and Bootheel regions.

One way to visualize county level changes in permitted unit counts over time is to focus upon the handful of counties that make up the majority of the state's permits. In 2013, this would include the five top counties noted above—St. Louis County, Jackson, Greene, Boone and St. Charles—and five additional counties: three that represent exurban counties outside of urban counties—Jefferson in the St. Louis area,

Clay in the Kansas City area, Christian in the Springfield area—and two counties that represent fast growing urban counties—Pulaski County in the Lake Ozark area and Jasper in the Joplin area. Graph 3.3-4 shows the number of permitted units from each of these counties from 1990 to 2012.

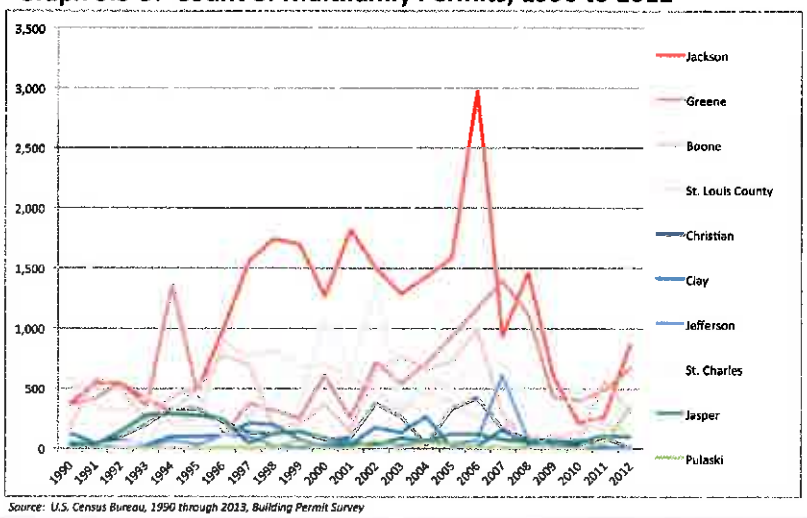
Graph 3.3-4: Count of Permits, 1990 to 2012



Source: U.S. Census Bureau, 1990 through 2013, Building Permit Survey

The patterns of county permit activity can be compared to the state pattern in Graph 3.3-1 and to each other. Only St. Louis County shows a trend that countervails the statewide trend—with a steady decline in permits from 1993 onward. Most of the counties with higher permit activity—Jackson, St. Charles, Greene, Boone and Christian—are very similar to the state pattern, with an increase in permit activity throughout the 1990s and 2000s and a fall in permits after 2005. Of the exurban counties, Jefferson County's increase is the most modest and Clay County's show no real growth during the 1990s and 2000s—a time when other exurban counties were growing rapidly. Graph 3.3-5 replicates the previous graph looking just at unit counts for multifamily buildings.

Graph 3.3-5: Count of Multifamiy Permits, 1990 to 2012



Source: U.S. Census Bureau, 1990 through 2013, Building Permit Survey

Jackson County dominates as the site of multifamily permits over this period and particularly during the peak of activity during the 2000s. Among urban counties, Greene County and Boone County fall behind Jackson, with Greene during the housing buildup prior to the 2008 recession. By contrast, multifamily permit activity in St. Louis County declines throughout most of this period. Among exurban counties, St. Charles reaches a high point of multifamily permit activity through 2002 and declines after.

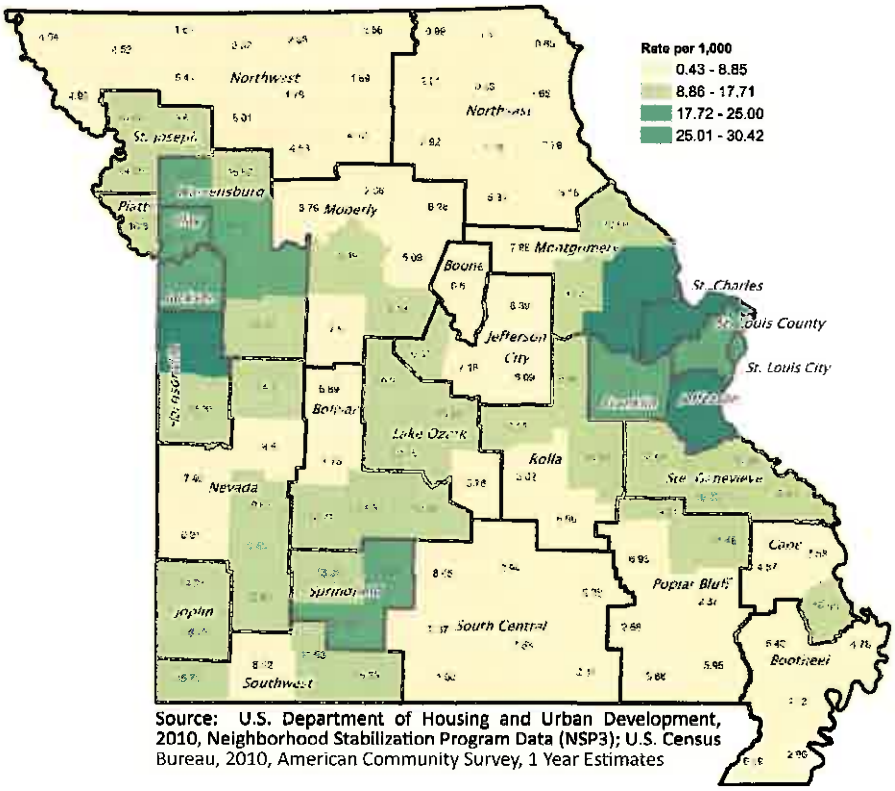
Foreclosures and Delinquencies

Another aspect of housing market dynamics relates to the role that foreclosures have played in shaping local housing markets. Research on the impact of foreclosures (see Urban Institute, 2009 for a summary) indicates that in certain types of weak housing markets, foreclosures following the housing-related economic recession had led to an increase in vacancy of housing and decreased local housing values; research has also demonstrated that lower income, African American and other demographic groups largely new to the home ownership prior to the 1990s were disproportionally impacted by foreclosures, leading a precipitous decline in wealth among these families and return of many to local housing markets.

As state, Missouri fared better than most states and recent reports on foreclosure levels report foreclosure and delinquency rates dropping in Missouri at rates higher than the nation as a whole (see for example, Newell, 2014). At the metropolitan level, Missouri MSAs have foreclosure rates below the national average for MSAs and do not show up lists of metropolitan regions that continue to face high levels of foreclosures (Pitingolo, 2014).

One aspect of foreclosures relevant to the study is how county level foreclosure trends impacting local housing markets in a manner that might indicate an increased need for affordable housing. However, county level foreclosure data is not generally available, up to date or accurate. One proxy is National Stabilization Project (NSP) data produced by the Department of Housing and Urban Affairs (HUD) as a part of its federal NSP grant program. This data shows an estimated number of foreclosure starts (the portion of the foreclosure process where banks initiate foreclosure) and REO sales (real estate owned sales by a bank or lender) and the respective rates per 1,000 units in the county. Map 3.3-4 shows a combined delinquency/REO rate for Missouri counties from 2010, the last year of available data.

Map 3.3-4:
Rate of Foreclosure Starts and REO sales per 1,000 Units, Missouri Counties, 2010

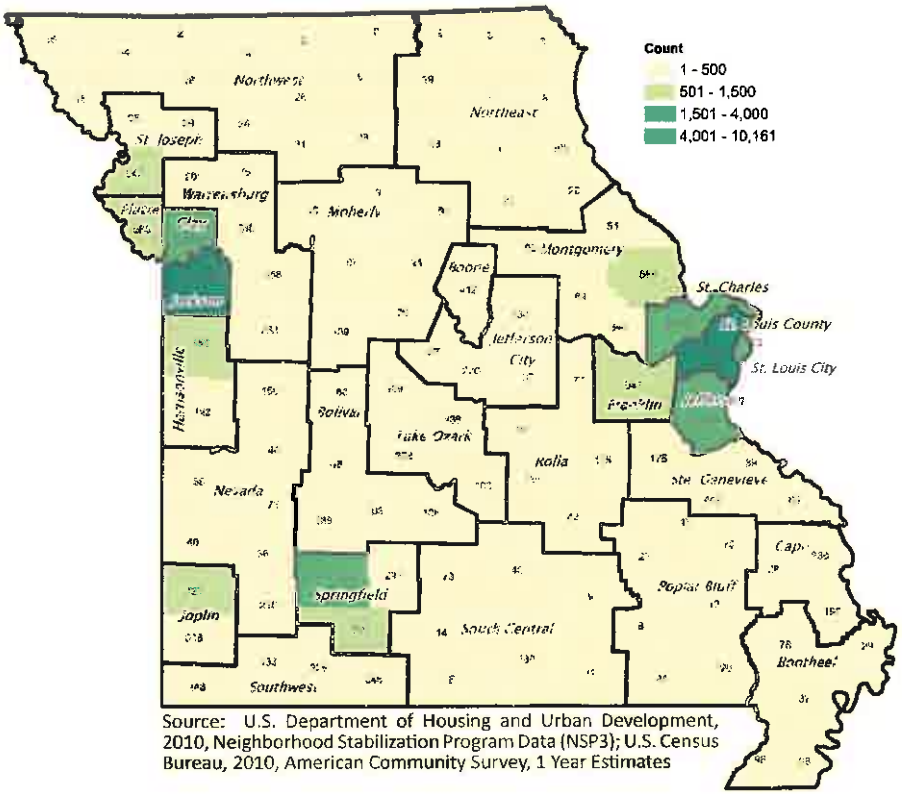


Source: U.S. Department of Housing and Urban Development, 2010, Neighborhood Stabilization Program Data (NSP3); U.S. Census Bureau, 2010, American Community Survey, 1 Year Estimates

The map shows a high start/REO rate not just in urban counties, but also in exurban areas. The top four counties on the list include Lincoln County (30.4), Jefferson County (29.8), St. Charles County (27.6) and Warren County (27.5). The data also suggests that foreclosure have largely not been an issue in rural areas of Missouri—the South Central, Popular Bluff or Bootheel in the South and Northwest, Northeast and Moberly regions in the north.

It is expected that these county level trends obscure sub-county trends in the distribution of foreclosures. For example, within the St. Louis area on the neighborhood level, foreclosure rates are significantly higher for minority, lower income areas in St. Louis County and St. Louis City than for other parts of the region. Additionally, while proportionally not as large, in terms of count foreclosures the urban counties dominate (Map 3.3-5).

Map 3.3-5:
Count of Foreclosure Starts and REO sales per 1,000 Units, Missouri Counties, 2010



Source: U.S. Department of Housing and Urban Development, 2010, Neighborhood Stabilization Program Data (NSP3); U.S. Census Bureau, 2010, American Community Survey, 1 Year Estimates

This data estimates a total of approximately 10,100 starts and REO sales in 2007 and Jackson County 7,200, with 3,900 for St. Louis City and 3,200 for St. Charles.

Lending

The final set of data used to analyze housing market dynamics is mortgage lending (HMDA data) supplied by lender to FFIEC as a part of regulatory oversight. The data directly identifies lending trends and opportunities to Missouri homeowners and differences in opportunities available to different types of Missouri residents, including differences based on race and income.

Application, Originations and Denials

Table 3.3-3 aggregates the lending data shows permit for the entire state for the years 2008 and 2013 (the most recent year available) to show the total loan applications made, originations, denials[5] and relevant rates, including breakouts based upon race/ ethnicity[6].

The data shows the decline in loan applications for all racial/ethnic groups across

Table 3.3-3: Applications, Application Rates, Denials and Denial Rates, Missouri Borrowers, 2008 and 2013

	All Borrowers	White	African American	Hispanic
2013				
# of Applications	347,186	253,713	14,207	5,346
Rate	147	126	55	92
# of Originations	178486	151164	6278	2695
Rate	76	75	24	46
# of Denials	47,685	35,233	3,648	1,117
Rate	14	14	26	21
2008				
# of Applications	379,587	269,990	28,198	6,136
Rate	163	135	115	122
# of Originations	169405	138118	8478	2570
Rate	72	69	33	44
# of Denials	79,706	55,823	11,630	1,787
Rate	21	21	41	29
Change, 2008 to 2012				
Pct Change in Applications	-9	-6	-50	-13
Pct Change Application Rate	-10	-6	-52	-25
Pct Change Origination Rate	5	9	-26	5
Pct Change Denial Rate	-35	-33	-38	-28

Rates are per 1,000 households

Source: FFEIC, 2008 and 2013, Home Mortgage Disclosure Act, LAR; U. S. Census, 2013 and 2008, American Community Survey, 1 Year Estimates

the years—9% for all borrowers—reflecting the tightening of the credit market following the housing related recession of the 2000s. African American borrowers had the largest percent decline in loan applications from 2008 to 2012 (50%) while white borrowers only had a 6% decline. However, white borrowers had increase in their origination rate (9%) whereas the denial rate of African American borrowers decreased 26%.

In terms of current lending data (in Table 3.3-3), the data show that African Americans have the lowest applicate rate (per 1,000 households) at 55, more than half the rate for white borrowers. African Americans also have the highest denial rates—26% compared to 14% for white borrowers and 21% for Hispanic borrowers.

5 Denial were defined as applications that were denied by the institution only.
6 Racial/ethnic designation of the borrowers was determined on the basis of applicant information only.

Beyond differences in application and denial rates, there are differences between borrowers of different races in both their applications and denials for various loan types. Table 3.3-4 shows 2013 data relating to application, denials and equivalent rates for all borrowers, white borrowers, African American borrowers and Hispanic borrowers.

Table 3.3-4: Loan Counts & Rate, By Loan Type, Use and Race/Ethnicity, 2013

	All Borrowers	White	African American	Hispanic	Ratio African Americans to White
All Applications					
#	347,186	253,713	14,207	5,346	
Rate	147	126	55	92	0.4
Denials	47,685	35,233	3,648	1,117	
Denial Rate	14	14	26	21	1.8
Purchase					
#	122,154	90,341	4,392	2,127	
Rate	52	45	17	37	0.4
Denials	12,264	9,698	757	308	
Denial Rate	10	11	17	14	1.6
Improvements					
#	15,145	11,667	1,026	269	
Rate	6	6	4	5	0.7
Denials	4,855	3,244	641	123	
Denial Rate	32	28	62	46	2.2
Refinancing					
#	209,887	151,705	8,789	2,950	
Rate	89	75	34	51	0.5
Denials	30,566	22,291	2,550	686	
Denial Rate	15	15	29	23	2.0
Owner Purchse					
#	108,961	81,971	4,207	1,997	
Rate	46	41	16	34	0.4
Denials	11,301	8,971	724	283	
Denial Rate	10	11	17	14	1.6
Owner Improvements					
#	13,438	10,547	941	252	
Rate	6	5	4	4	0.7
Denials	4,456	2,997	584	117	
Denial Rate	33	28	62	46	2.2

Rates are per 1,000 households

Source: FFEIC, 2013, Home Mortgage Disclosure Act, LAR

African American borrowers have the lowest application rate (per 1,000 households) and highest denial rates compared to all borrowers and borrowers of other races/ethnicities across all loan types and purchases. The highest denial rates for African Americans—both in terms of the rate and in comparison to white borrowers—are for loans for improvements and improvements for owner occupied properties specifically; for improvement loans, African Americans have a denial rate of 62% that is more than twice the rate for white borrowers.

Originated Loan Characteristics

Basic descriptive statistics on originated loans provides an overview of the types of investments that Missouri borrowers are making in housing. Table 3.3-5 shows some of the basic loan characteristics from 2008 and 2013.

Table 3.3-5: Originated Loan Characteristics, 2013 and 2008

	2013		2008	
	#	%	#	%
Total Originated Loans	178,486		169,405	
Conventional	137,753	77.2	126,761	74.8
Federal Housing Administration	25,539	14.3	36,817	21.7
Veteran's Administration	9,925	5.6	3,589	2.1
Farm Service Agency	5,269	3	2,238	1.3
Home purchase	63,729	35.7	67,032	39.6
Home improvement	8,201	4.6	11,072	6.5
Refinance	106,556	59.7	91,301	53.9
Owner	154,654	86.6	146,334	86.4
Not Owner	22,888	12.8	21,858	12.9
1 to 4 Family	174,933	98	164,967	97.4
Manufactured housing	2,857	1.6	3,741	2.2
Multifamily	696	0.4	697	0.4

Source: FFEIC, 2008 and 2013, Home Mortgage Disclosure Act, LAR

The data shows no real change in loan characteristics over this period. Conventional loans dominate the originations (77% in 2013), most borrowers are owner-occupants (86% in 2013) and most loans are for 1 to 4 family units (98% in 2013). Additionally, while the number of applications has decreased and denial rates have increased, the number of originations has more or less stayed the same. One exception is the changing percentage of FHA originations, down to 14% in 2013 from 22% in 2008.

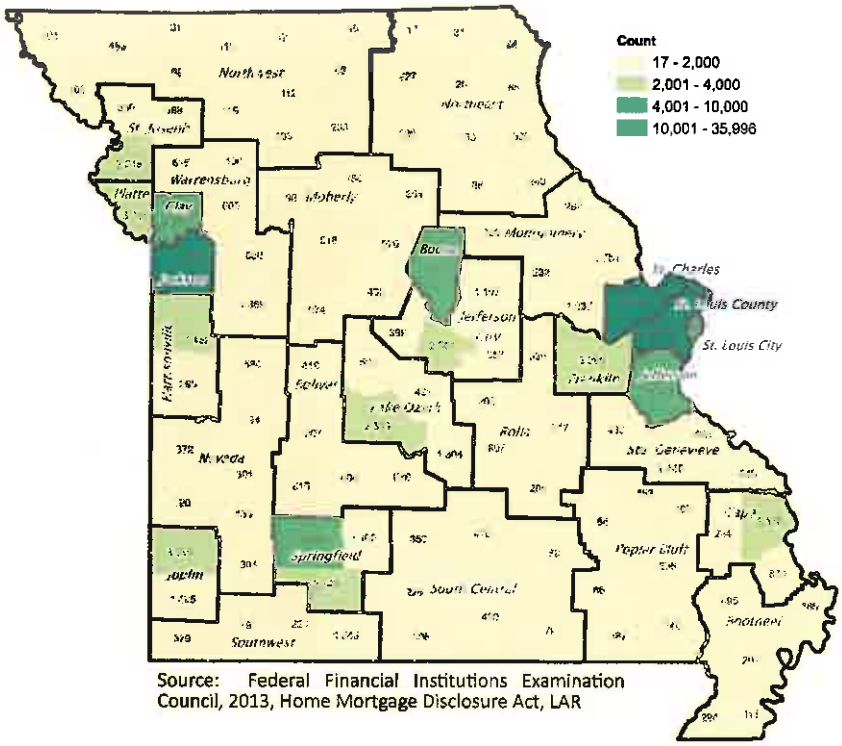
Table 3.3-6: Originations by AMI Levels, 2013

	#	%	% of Households in MO (2012)
Total Originated Loans	178,486		
Less than 40% MFI	9,105	5%	15%
40 to 60% MFI	20,403	11%	11%
60 to 80% MFI	23,572	13%	8%
80 to 100% MFI	21,599	12%	10%
More than 100% MFI	103,807	58%	55%

Source: FFIEC, 2013, Home Mortgage Disclosure Act, LAR; U.S. Census, 2012, American Community Survey, 1 Year Estimates

Loan origination data includes location information—the county in which the origination occurred. Map 3.3-6 shows the count of loan originations with counties in 2013.

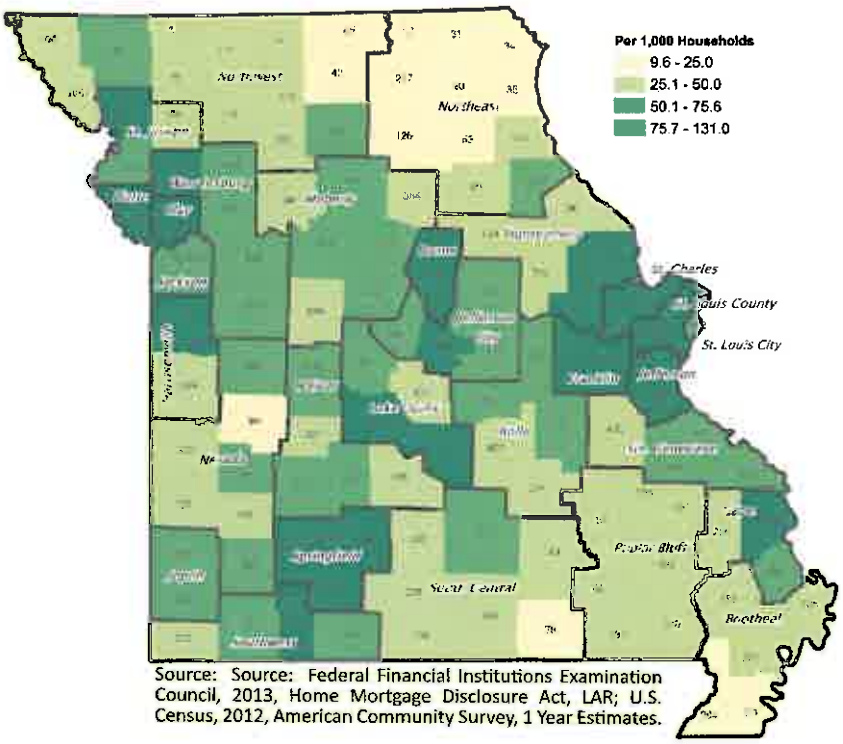
Map 3.3-6:
Count of Loan Originations, 2013, Missouri Counties



Source: Federal Financial Institutions Examination Council, 2013, Home Mortgage Disclosure Act, LAR

Loans origination occur most in urban counties, reflecting the distribution of the state's population. The largest counts are in St. Louis County (35,996), Jackson County (18,434) and St. Charles County (17,810). Map 3.3-7 shows the rate of loan originations per 1,000 households.

Map 3.3-7:
Rate of Loan Originations per 1,000 Households, 2013, Missouri Counties



Source: Source: Federal Financial Institutions Examination Council, 2013, Home Mortgage Disclosure Act, LAR; U.S. Census, 2012, American Community Survey, 1 Year Estimates.

The Missouri rate is 75.6 and the map is symbolized to show rates above and below the state rate. The map reflects the urban-rural that the counts also show; however, it also reflects counties that have grown, both in terms of population and housing investment. This includes urban counties at the edge of urban areas—St. Charles County (131), Christian County (106), Jefferson County (101) and Platte County (101)—and other fast growing areas, such as Camden County and Pulaski County in the Lake Ozark region.

AFFORDABLE HOUSING IN MISSOURI

This final housing-related section of the report presents and analyzed information related to the supply of public financed, affordable housing in Missouri, its and counties and the MHDC's regions. To do so, the report utilizes two sources of information are used: the federal Housing and Urban Development's Picture of Subsidized Households Public Housing Units (from 2000 through 2013) and data from MHDC at the unit and development level (current year only). The analysis includes the location of units, their characteristics, including incomplete data on the characteristics of occupants of subsidized units, and an estimate of the concentration and supply of subsidized units relative to the population of low-moderate renter households.

Publicly Subsidized Housing and Affordable Housing in Missouri

Missouri's publicly subsidized affordable housing includes a wide range of types of units produced under a wide range of public-private partnerships, including publicly owned housing units, units owned by non-profit or for profit entities built or maintained using public subsidy, or private market units with rental subsidy through public funds (including traditional federal voucher programs). Table 4.1 shows the aggregate number of these units in the State of Missouri using the Picture of Subsidized Households.

Table 4.1: Picture of Subsidized Households, Various Years, Missouri

	2013	%	2010	%	2000	%	1996	%
Total Units	149,567		146,061		122,524		103,122	
Public Housing	17,538	12%	17,720	12%	20,071	16%	21,910	21%
Housing Choice Vouchers	43,441	29%	42,676	29%	38,625	32%	28,916	28%
Mod Rehab	42	0%	107	0%	2,498	2%	3,285	3%
Section 8 NC/SR	20,412	14%	18,474	13%	20,890	17%	21,204	21%
Section 236	1,784	1%	2,838	2%	6,348	5%	8,277	8%
Multi-Family Other	13,981	9%	11,877	8%	8,433	7%	7,146	7%
LIHTC	52,369	35%	52,369	36%	25,659	21%	12,384	12%

Source: U.S. Department of Housing and Urban Development, 1996, 2000, 2010, and 2013, Picture of Subsidized Households

HUD reports a 22% increase in the number of units since 2000, and a shift in the type of units. Low Income Tax Credit Units constituted just 12% of the units in 1996, but have increased to 35% of the units by 2013. By contrast, traditional public housing units (owned and managed by public housing authorities declined from 21% of the units in 1996 to just 12% in 2013.

Even with the shift of type of units, there has been little change in the distributior of the units within Missouri counties. Table 4.2 shows the top 10 counties in their proportion of the state's total subsidized units.

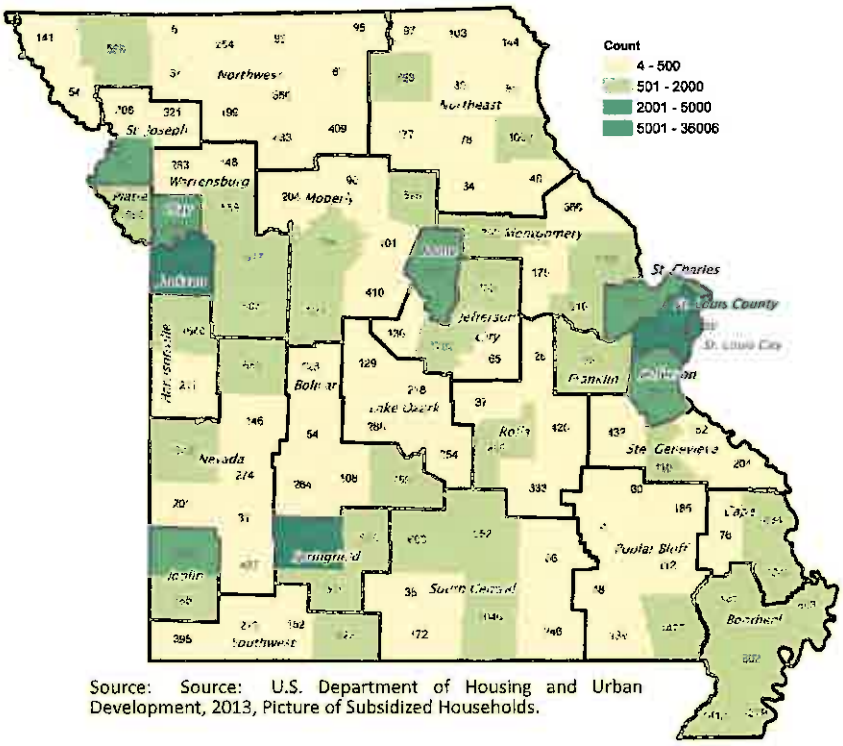
Table 4.2: Top 10 Counties in Proportional Share of Subsidized Units

1996	%	Rank	2000	%	Rank	2010	%	Rank	2013	%	Rank
Jackson County	20.1	1	Jackson County	19.5	1	Jackson County	21.7	1	Jackson County	22.7	1
St. Louis city	16.9	2	St. Louis city	15.1	2	St. Louis County	15.5	2	St. Louis County	15.8	2
St. Louis County	12.7	3	St. Louis County	13.6	3	St. Louis city	15.2	3	St. Louis city	14.9	3
	29.6			28.7			30.6			30.7	
Greene County	4.3	4	Greene County	3.1	4	Greene County	2.7	4	Clay County	2.7	4
Clay County	3.2	5	Boone County	3.0	5	Clay County	2.6	5	Greene County	2.6	5
Buchanan County	2.9	6	Jasper County	2.3	6	Boone County	2.4	6	Boone County	2.4	6
Boone County	2.8	7	St. Charles County	2.2	7	Buchanan County	2.2	7	Buchanan County	2.2	7
St. Charles County	2.4	8	Buchanan County	2.2	8	St. Charles County	2.1	8	St. Charles County	2.0	8
Jasper County	2.0	9	Clay County	2.0	9	Jasper County	2.0	9	Jasper County	1.9	9
Scott County	1.9	10	Jefferson County	1.7	10	Cape Girardeau County	1.6	10	Cape Girardeau County	1.6	10

Source: U.S. Department of Housing and Urban Development, 1996, 2000, 2010, and 2013, Picture of Subsidized Households

Jackson County leads the list across all four periods[7]. Additionally, over the period, St. Louis County and St. Louis City switch their rank, illustrating the proportional decline of subsidized units in the City and the increase in the County. These three counties—Jackson County, St. Louis County and St. Louis City—have 53% of the subsidized units statewide in 2013. While the number of units declines after these top three, the other counties with proportional high percentages of subsidized units are also urban or suburban counties within metropolitan areas. Map 4.1 shows the spatial distribution of the units in 2013 by county.

Map 4.1:
Count of Subsidized Units, Missouri Counties, 2013

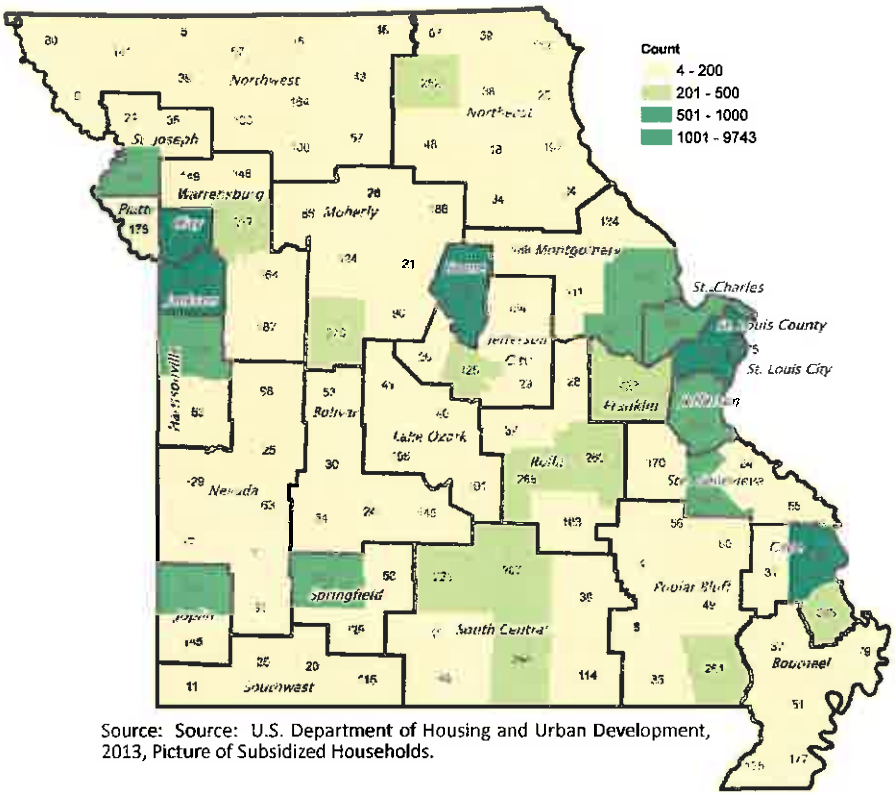


Source: Source: U.S. Department of Housing and Urban Development, 2013, Picture of Subsidized Households.

7 If the St. Louis County and the St. Louis City were combined, they would have a subsidized unit total approximately 70% higher than Jackson County.

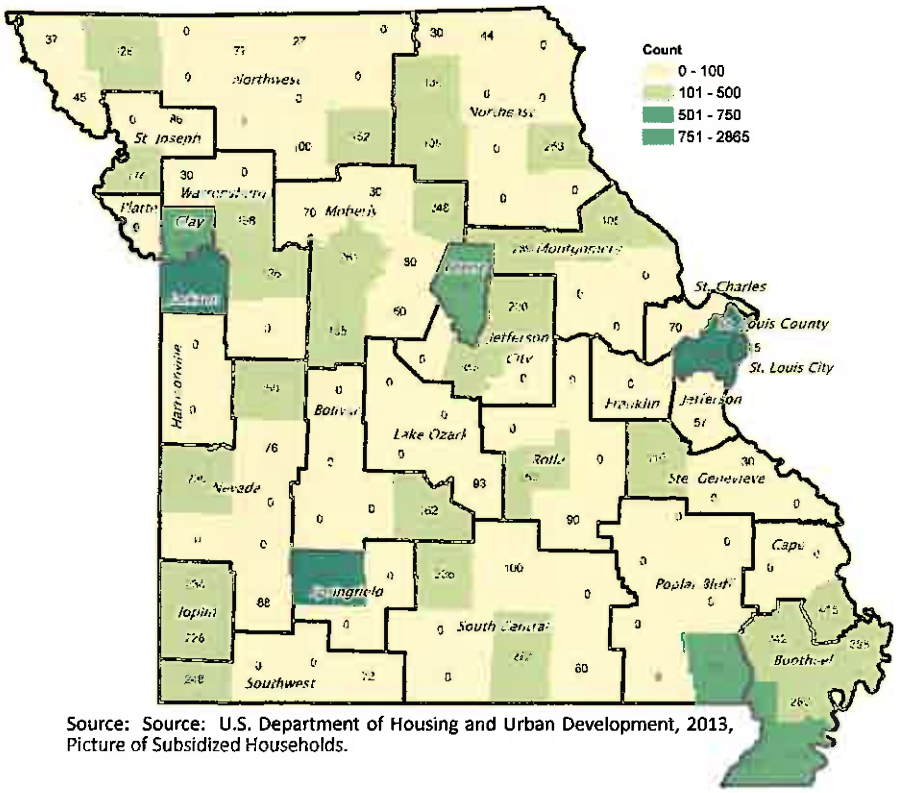
The data shows how subsidized units are clustered in urban counties such as St. Louis City and St. Louis County, Jackson County and the Springfield area and, in non-urban areas, the Bootheel. Maps 4.2 through 4.4 show the county distributions of affordable housing by the three main housing types—vouchers, LIHTC and public housing.

Map 4.2:
Count of Housing Choice Vouchers, Missouri Counties, 2013



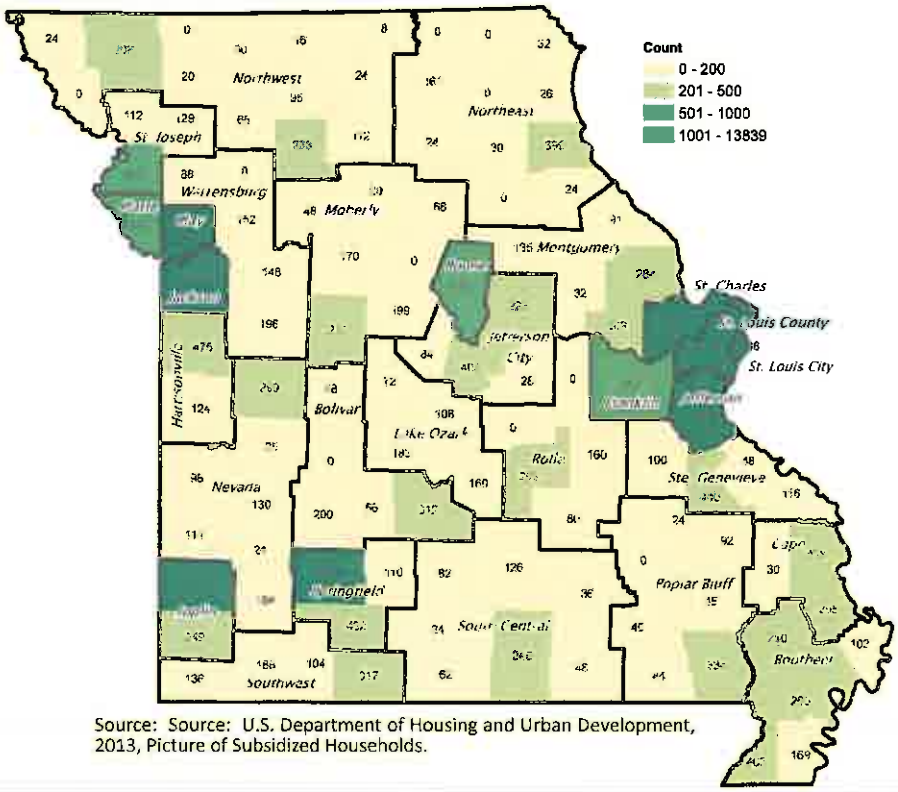
Source: Source: U.S. Department of Housing and Urban Development, 2013, Picture of Subsidized Households.

Map 4.3:
Count of Public Housing Units, Missouri Counties, 2013



Source: Source: U.S. Department of Housing and Urban Development, 2013, Picture of Subsidized Households.

Map 4.4:
Count of LIHTC Units, Missouri Counties, 2013



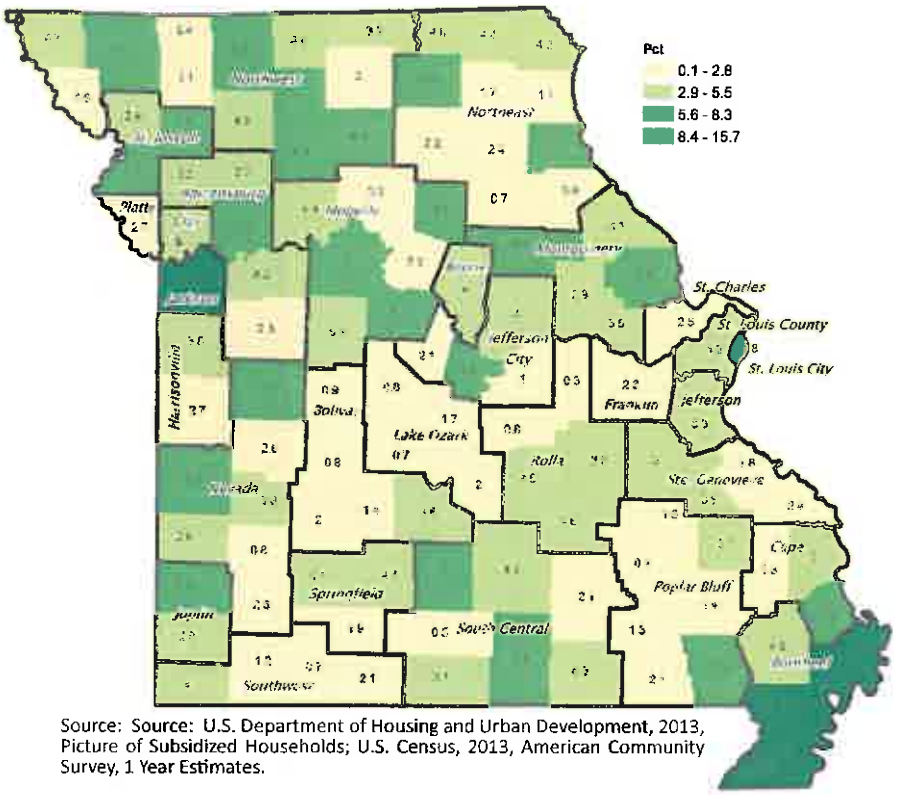
Source: Source: U.S. Department of Housing and Urban Development, 2013, Picture of Subsidized Households.

While the distribution of units by type are more less uniform at the county, there are small differences in unit distribution between public housing and LIHTC units, which are more likely to be distressed areas of counties, and voucher units, which are both more likely to widely distributed within counties and are more likely to be in counties with fewer public housing/LITHC units.

Concentration of Subsidized Units

The location maps of the units suggest concentration of the units within urban counties; however, these counties are where a large percentage of the state's household live. The analysis uses two methods to further explore this issue of concentration. First, Map 4.5 shows the number of units by county as a function of the total units within the county.

Map 4.5:
Percent Subsidized Units of All Housing Units in County, 2013



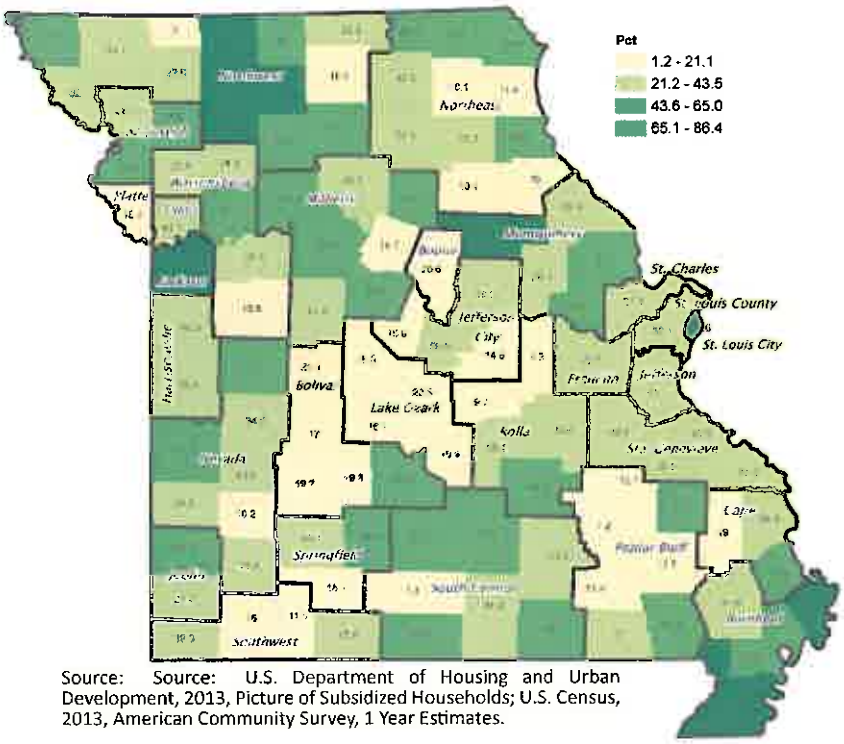
Source: Source: U.S. Department of Housing and Urban Development, 2013, Picture of Subsidized Households; U.S. Census, 2013, American Community Survey, 1 Year Estimates.

The average for the entire state is 5.5% and the map is symbolized to show percentages above and below the state average. Two factors stand out. First, in four counties affordable units represent more than 10% of the total units—the City of St. Louis and Jackson County in metropolitan areas and Pemiscott and Mississippi County in the southeast corner of the state. By contrast, affordable units are much lower percentages of total units in the central/south part of the state, including the Jefferson City/Columbia MSA and in the Springfield MSA. Secondly, with the two largest MSAs—St. Louis and Kansas City, there are sharp differences between the percentages of urban counties and some exurban counties. For example, in the St. Louis MSA, affordable housing constitutes 14% of all units in the City, 4% in St. Louis

County and 3% in St. Charles County and Jefferson County. Within the Kansas City, MO, portion of the Kansas City MSA, affordable housing makes up 11% of all units in Jackson County, 5% in Clay County, 4% in Cass County and 3% in Bates County.

A second way to view the rate of subsidized units is as a function of the low-moderate renter population that occupies them. Map 4.6 shows the percent of subsidized units of the population of renter households below 60% of the AMI.

Map 4.6:
Percent Subsidized Units of Renter Households at or below 60% AMI, 2013



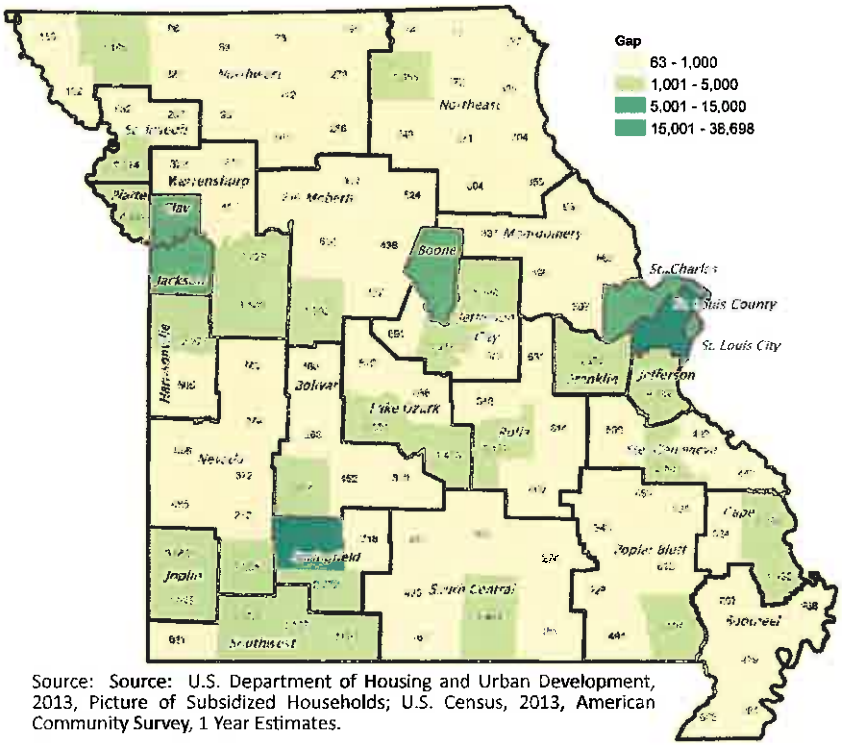
Source: Source: U.S. Department of Housing and Urban Development, 2013, Picture of Subsidized Households; U.S. Census, 2013, American Community Survey, 1 Year Estimates.

The average for the entire state is 43.6% and the map is symbolized to show percentages above and below the state average—in one sense, counties that have more subsidized units relative to their low-moderate population and counties that have fewer subsidized units relative to their low-moderate population. Those counties with the highest rate of cost burden relative to their 60% AMI population are St. Louis City and Jackson County, with rural counties rounding out the top ten. Jackson County, St. Louis County and St. Louis—the three highest counties in number of subsidized units, making up 53% of all units—comprise 41% of the state's 60% AMI households. High percentages are also clustered outside of urban areas, particularly in the South, Southeast and Northern part of the state. Counties with percentages below the state average include urban and exurban counties outside St. Louis and Kansas City and metropolitan regions elsewhere in the state.

Gaps in the Supply of Subsidized Units Relative to Demand

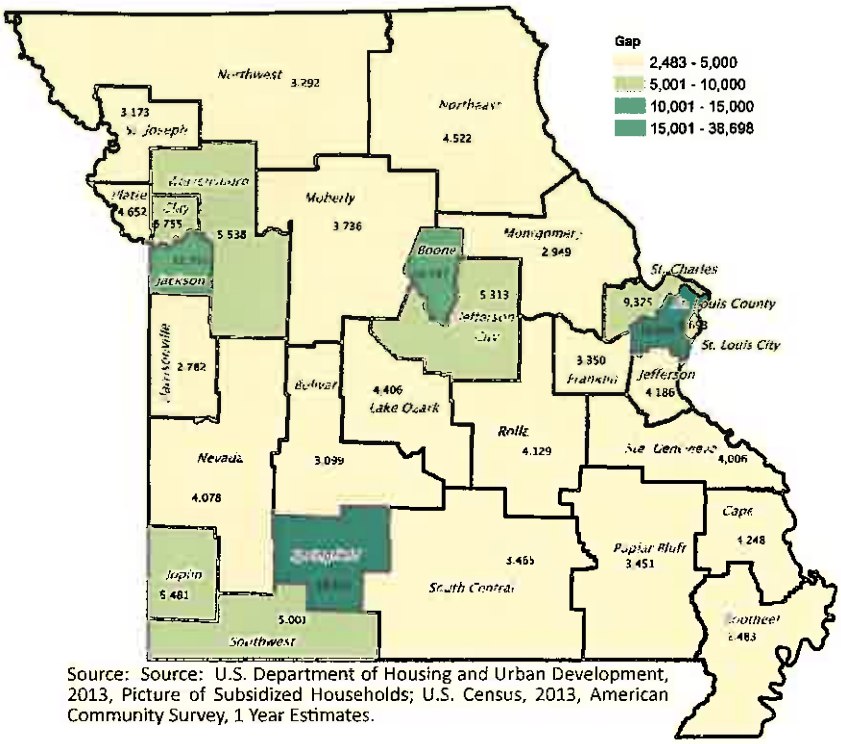
Despite the relative importance of rural areas in the distribution of subsidized units, in numerical terms the gap between the supply and demand of affordable housing is largest within urban areas. One simple way to visualize this gap is to take the difference between the number of renter populations at the AMI level and the number of subsidized units. At the state level, this represents a gap of 193,000 units. Map 4.7 shows this gap computed at the county level.

Map 4.7: Estimated Gap in Affordable Housing, County Level



Source: **Source:** U.S. Department of Housing and Urban Development, 2013, Picture of Subsidized Households; U.S. Census, 2013, American Community Survey, 1 Year Estimates.

The caveat is that not all 60% AMI renter household require publicly assisted housing nor should or could MHDC provide housing for them. However, as a rough indication of the scale required across different counties, the data suggests the largest gaps in St. Louis County (38,000 units) and Greene County (15,000 units), with large gaps in other urban counties and in counties around metropolitan areas. However, there are counties outside of metropolitan areas with relatively high gaps, including parts of the Cape region, parts of the Southwest region, Lake Ozark and Rolla. Map 4.8 repeats the gap analysis, using the MHDC regions as geographic frame.



Source: Source: U.S. Department of Housing and Urban Development, 2013, Picture of Subsidized Households; U.S. Census, 2013, American Community Survey, 1 Year Estimates.

The map shows how on a regional level large gaps in affordable housing exist in a few large metropolitan counties, with St. Louis County and Springfield leading the regions and Boone and Jackson County following them. In numerical terms, St. Charles has a larger gap in affordable housing than St. Louis City; significant gaps also exist in the Jefferson City area, Southwest and Joplin regions and regions surrounding Jackson County. All of regions in the state have a gap less than 5,000 units.

Subsidized Housing Occupant Data

The Picture of Subsidized Households dataset also includes a limited set of data on occupants of these households. Unfortunately, this data is not included for occupants of LIHTC units, which comprise 35% of all subsidized units in 2013. Although it is likely that occupants of LIHTC units might be different from residents of other types of affordable housing, this limited data does provide a snapshot of subsidized units. Moreover, these characteristics of these units can be compared to the characteristics of Missouri's population and Missouri's low/moderate income to ascertain which subpopulations are over or under-represented in subsidized housing. Table 4.3

shows summary characteristics of subsidized households, showing their proportional representation within this population compared to all Missouri households, and households within the low-moderate population of the state.

Table 4.3: Percent Population Characteristics, Subsidized Households Compared to State Averages

	Subsidized Households	All Households	Households 100% AMI	Households 60% AMI
Household Income				
Less than $5,000	19	4	7	11.9
$5,000 to $10,000	33	4	9	16.3
$10,000 to $15,000	24	6	12	22
$15,000 to $20,000	13	6	10	17
More than $20,000	11	80	62	33
Household Type				
One Adult with Children	37	6	10	10
Two + Adults with Children	4	25	20	16
Female Headed	78	12	45	18
Female Headed with Children	38	15	13	13
Disability Status				
For Householders less than 61	36	11	14	17
For Householders 62 or More	34	12	15	21
Householder Age				
Less than 25 Years	7	5	7	7
25 to 50	46	41	39	31
50 to 61	19	24	20	19
62 or More	29	29	34	42
85 or More	4	3	5	7
Race/Ethnicity				
African American Household	50	11	16	16

Note: This data does not include occupancy data on LIHTC units, which comprise 35% of all subsidized units.
Source: U.S. Department of Housing and Urban Development, 2013, Picture of Subsidized Households; U.S. Census,2016, American Community Survey, 1 Year Estimates

Again, the caveat with this data is again that it does not include data on occupants of LIHTC units, which comprise 35% of all units and which, as shown in the maps above, are distributed more broadly across the state than other unit types. In terms of income level, occupants of subsidized units skew lower income than even the 60% AMI population, with more than ½ of the occupants making less than $15,000 a year. Occupants of subsidized units include many more househols with one adult, female headed households and female headed households with children than the state population as a whole and the low-moderate income population. Additionally, occupants of subsidized households include approximately 1/3 households with a disabled householders, more than twice the rate for the state and low-moderate households. Finally, subsidized units are more likely to be African American households, at roughly 3.5 to 4.5 times the comparable rates for the low-moderate population and Missouri's household population as a whole.

MHDC Needs Assessment Report

IV. Interview Perspectives

COMPARISON DATA

Frequency of Needs Cited by Identified Groups

This summary presents an overview of the results of 38 interviews that staff at the Public Policy Research Center conducted in the Fall of 2014.[1]

While the participants had varied affiliations, analysis of their responses indicated a consensus around one crucial point: across the State of Missouri there is an inadequate supply of safe, decent, affordable housing for those with limited means. Over two-thirds of the interviewees expressed this opinion. The points below add further details:

- The population of those with "limited means" includes individuals living on SSI, SSDI or other types of fixed income. It also, however, encompasses the working poor – workers who receive minimum wage – as well as, in some areas, middle income families. Some interviewees pointed out that many developers opt to build bigger, more expensive homes because their return on investment is greater. This profit incentive reduces the interest in production of affordable housing, with the result that individuals at lower income levels can be severely cost-burdened with respect to housing.
- Individuals grappling with a mental health condition or co-occurring disorders face significant challenges in maintaining housing without support services that can assist with medication management, resolution of crises and negotiations with landlords. Among the interviewees, 46 percent raised this issue.
- Nearly 50 percent of the interviewees pointed to a failure on the part of policymakers to fully comprehend the cost of housing. The outlay for rent is just one cost. Landlords can demand sizeable payments upfront before a tenant takes possession of a unit. These include:
  - application fees, typically around $35, which are not recouped if the application is rejected
  - security deposits, which may be equivalent to a month's rent or -- for applicants with poor credit histories -- up to 2 times the cost of the rent.
  - In many cases, last month's rent in addition to the first month's rent

  For an apartment with a $700 per month rent, the total initial costs could be in the range of $2,800. This does not include moving expenses, nor does it begin to address utilities. If not included in the rent, utilities can

1 Staff at the Public Policy Research Center conducted interviews with, or collected interview responses from, 38 professionals with a perspective on housing needs in the State of Missouri. Among those interviewed were community development personnel; housing developers and providers; non-profit personnel with property management responsibilities; human services professionals providing supportive services to the hardest to house; and advocates for the homeless and the disabled. One interviewee – an expert in rural development initiatives – felt he was too unfamiliar with conditions in the State to comment on housing needs, so his remarks were not included in the analysis.

represent another significant cost-burden, both for start-up and ongoing services, as well as for charges in arrears for past services. For a person living on disability income of roughly $750 per month or for a minimum wage worker earning roughly $300 per week, accumulating sums of this size may be an impossibility.

- While the cost factor is even more dire for people with physical disabilities that limit mobility, the greater challenge may be simply finding an accessible unit. Ones that will accommodate large wheelchairs can take up to 6 months to find.
- A number of other themes were prevalent:
  - » Interviewees stressed the importance of preserving the low income housing tax credit program as one of the sole means of introducing low income housing where it is needed.
  - » Over 55 percent of the interviewees, and an even higher percentage of housing and service providers, emphasized the difficulties that ex-offenders face in locating housing. Background checks, credit checks and other screening mechanisms enable landlords to employ non-discriminatory methods of declining applications. Coupled with difficulties finding employment, for many ex-offenders re-entry into society comes with the certainty of failure.
  - » An equally intractable problem, also cited by over 55 percent of the respondents, is the lack of adequate transportation in rural communities and outlying areas in urban centers. To anyone without the means of owning a car, this is a significant hindrance in finding better quality or more affordable housing, along with employment. For veterans and the disabled, it also complicates access to services required for treatment. While opting to live in metropolitan areas is an obvious solution, the distance to services may be shorter, but the cost of housing can also be much higher. All interviewees who raised this issue were well-aware that small communities lack the resources and a supply of riders to justify efforts to implement transportation services beyond OATES.

The interviewees raised many important concerns, too numerous to mention here, but a full tally showing the results of the analysis is available in Table 1.

Although the group interviewed represents only a small sample, the research team made an effort to aggregate statistics for 2 sets of sub-groupings.

- Chart 1 below summarizes a comparison among groups of interviewees defined by their geographic perspective. The categories include "Urban," "Rural," and "Statewide." It's noteworthy that among the 3 groups, roughly the same number of interviewees cited a need for improved transportation. This was not exclusively an urban or rural problem, or a problem that impacts only housing. Limited access to public transportation also limits employment opportunities as well as services that may be needed by veterans or others requiring transportation to

doctors' appointments. This level of agreement stands in sharp contrast to the strong interest in housing equipped with supportive services that is evident among urban representatives as compared to the comparative silence on this issue among those with a rural perspective. Most significantly, nearly 80 percent of rural interviewees indicated a need for a greater supply of safe, decent, affordable housing.

- Chart 2 that follows Chart 1 compares the type of issues emphasized by 2 sub-groups distinguished by their professional involvement with meeting the needs of housing consumers. The "Developers" category includes both housing providers (all non-profit) as well as non-profit and for-profit housing developers, several of whom are responsible for community development in regional planning commissions or councils of government. The "Service Providers" group is made up of human services personnel who provide support or advocacy beyond housing, although location and placement in housing may be integral to the services they offer. This is particularly true for those who work with clients in supportive housing. The developers that responded to requests for interviews were all associated with tax credit financing for affordable housing development.

The point of greatest agreement appears to be the importance of continued support for the low income tax credit program, with over 60 percent of individuals in each group emphasizing this issue. The greatest divergence appears in relation to special needs housing with supportive services, with service providers dwelling much more frequently on this topic. Not surprisingly, housing professionals were most focused on the need for more affordable housing, with nearly 80 percent making reference to Missouri's lack of safe, decent homes within reach of those with most limited means.

The research team made an effort to get representation from all counties in Missouri, particularly rural areas. Urban blight deserves the attention it receives, and the need for resources is obvious. Many of the interviewees suggest that there are also pockets of rural blight, where low-income individuals with limited alternatives find themselves having to accept housing that is not fit for human habitation, despite demands for high rents. These are serious allegations that should compel attention from policymakers, as are references that some interviewees made to the increased attention that Missouri should give to adherence to the Olmsted Act.

Chart 1: Comparison of Issues Cited by Sub-Groups Based on Geographic Perspective

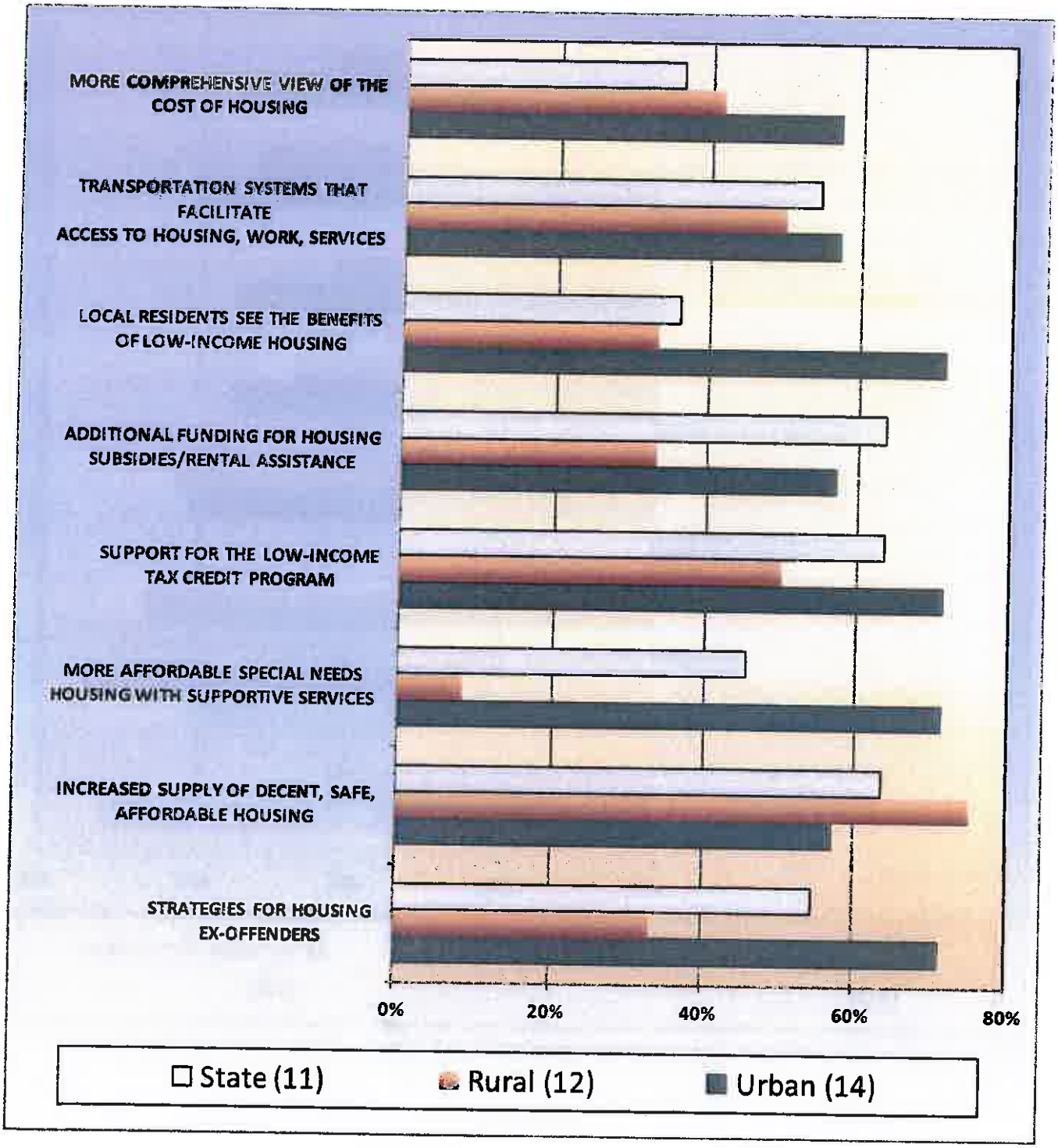


Chart 2: Comparison of Issues Cited by Sub-Groups Based on Professional Role

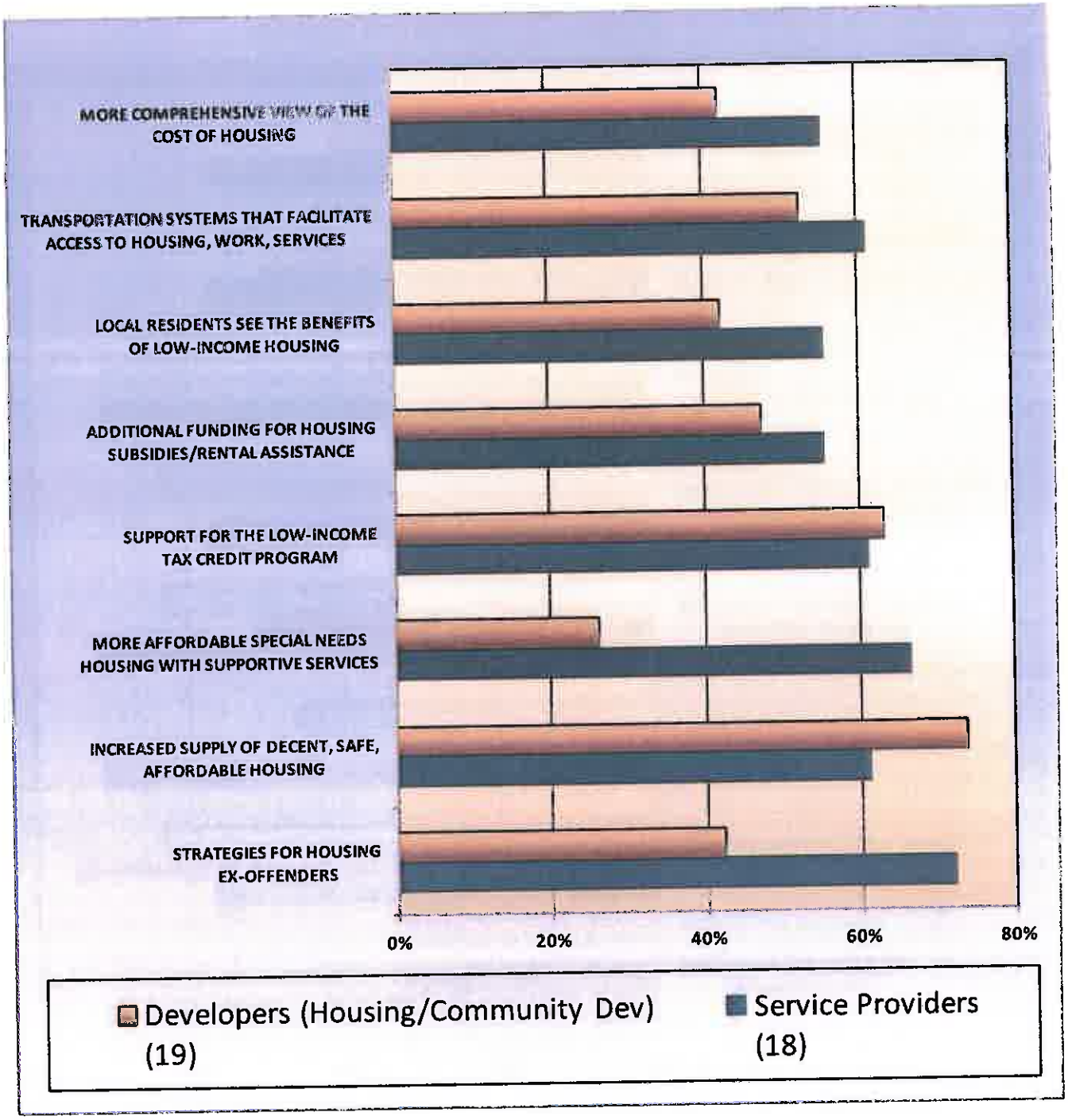


Table 1: Summary of Most Frequently Cited Comments Regarding Housing Needs

DESCRIPTION OF ISSUE	Total	Percent
Need to **INCREASE THE SUPPLY OF SAFE, DECENT, AFFORDABLE RENTAL PROPERTY** so that it is easier for the disabled – particularly disabled persons suffering from mental illness -- seniors and low-income to find suitable housing.	25	67.6%
Need to **MAINTAIN SUPPORT FOR THE LOW INCOME HOUSING TAX CREDIT** and historical tax credit programs, as well as the qualified allocation plan (33 percent set-aside).	23	62.2%
Need **STRATEGIES FOR HOUSING EX-OFFENDERS** excluded from subsidized housing as well as market-rate housing due to results of background checks.	21	56.8%
Need for **BETTER PUBLIC TRANSPORTATION IN RURAL & SOME URBAN AREAS** that facilitates access between affordable housing, employment opportunities and services.	21	56.8%
Need for **ADDITIONAL FUNDING FOR HOUSING SUBSIDIES, RENTAL ASSISTANCE** for the disabled, the mentally ill, homeless and others with low or no income.	19	51.4%
Need a **MORE COMPREHENSIVE VIEW OF THE TRUE COST OF HOUSING**, which goes beyond rent or mortgage payments to include utilities, security deposits, application and occupancy fees, as well as pet deposits for service animals. Late fees: $35 per day	18	48.6%
Need to educate, and/or demonstrate to, local residents that **LOW-INCOME HOUSING CAN BENEFIT COMMUNITIES**; for example, in terms of economic development. At the same time, tenants of subsidized housing need guidance in how to care for properties, be accountable to landlords, etc.	18	48.6%
Need **MORE AFFORDABLE SPECIAL NEEDS HOUSING EQUIPPED WITH "SUPPORTIVE SERVICES."** The "hardest to house" -- mentally ill, chronically homeless, ex-offenders, disabled veterans -- frequently cannot live independently without supportive housing. Supportive services may be a more affordable option than nursing home or other types of care that are the alternatives to independent living.	17	45.9%
Need to **ADOPT ACCESSIBILITY STANDARDS** that will position Missouri to address demographic changes, such as the aging of the population, support aging in place will make housing units suitable for all sectors of the population. Often what is marketed as "accessible" is not adequate to meet the needs of persons with physical disabilities.	16	43.2%
Need to continue and preferably **INCREASE SUPPORT FOR HOMELESSNESS PREVENTION**, along with "housing first", "rapid re-housing" and harm reduction models. Many housing options that were formerly used for homeless services have been eliminated or availability curtailed -- e.g., SROs -- which increases the need for more shelter beds. More emergency housing for persons who are homeless, especially for those who have co-occurring disorders, is also needed.	16	43.2%
Need incentives that will **ENCOURAGE RURAL AND URBAN LANDLORDS TO REPAIR SUB-STANDARD PROPERTIES**, particularly focusing on energy efficiency and/or work with developers to increase the supply of affordable, accessible housing through demolition and new construction.	15	40.5%
Need to **IMPROVE OR MAINTAIN COMMUNICATIONS BETWEEN ALL PARTIES INVOLVED IN THE LOW-INCOME HOUSING TAX CREDIT APPLICATION PROCESS** and encourage more collaboration among parties who could assist in addressing the State's needs: developers, service providers, advocates, regional planning commissions and councils of governments, community action agencies, HUD, USDA Rural Development, state government and MHDC.	14	37.8%
Need for more accessible, affordable **multi-family** units (1- 2 or 3-bedroom), with a scattered-site strategy that **AVOIDS CONCENTRATIONS OF POVERTY AND CRIME**, as well as negative perceptions of local residents	12	32.4%
Need **INVESTMENT IN HOUSING PRESERVATION**, such as home repair funds for fixed-income homeowners to foster aging in place, continued accessibility and protection of housing stock; funds to rehab aging developments; funding to improve energy efficiency; etc. Funds should especially be targeted at roof repair to avoid the extensive structural damage caused by water leakage. A "healthy homes" strategy is another viable approach to rehab.	12	32.4%

DESCRIPTION OF ISSUE	Total	Percent
Need INCENTIVES FOR LANDLORDS to encourage them to provide affordable housing to Section 8 voucher holders and others with low income, disabilities or others who are among the "hardest to house"	11	29.7%
Need to RELAX STANDARDS THAT PREVENT PERSONS WHO ARE HOMELESS FROM RECEIVING A FULL ARRAY OF SERVICES. Criteria for who is or is not served range from the definition of homelessness established by HUD to local restrictions barring ex-offenders or substance abusers from obtaining shelter. Such restrictions have been problematic for individuals without a fixed home who find themselves "couch-surfing." Because they can't afford or are otherwise unable to get their own housing, advocates consider them "precariously housed" and equally in need of services	11	29.7%
Need for accessible smaller (1- 2 or 3-bedroom) single family homes or units that are affordable for entry level workers and individuals on fixed incomes, as well as single individuals or small families	9	24.3%
Need diversity in the housing stock which TAKES INTO ACCOUNT REGIONAL DEMANDS for accessible, permanent, transitional, market rate, affordable, congregate, and supportive housing.	8	21.6%
Need to encourage/provide INCENTIVES TO DEVELOPERS TO PRODUCE LOW-INCOME HOUSING that will be suitable for the workforce and low-income individuals.	8	21.6%
Need to recognize the RELATIONSHIP BETWEEN STABLE HOUSING AND SUCCESS IN FINDING AND KEEPING A JOB or completing recovery as a step to employment..	8	21.6%
Need mid-level housing with RENT OR MORTGAGE AFFORDABLE FOR MIDDLE-INCOME, those who don't qualify for low-income programs	8	21.6%
Need affordable 1-bedroom or studio apartments FOR SINGLE INDIVIDUALS TRANSITIONING OUT OF HOMELESSNESS, vets looking for housing stability, etc.	7	18.9%
Missouri needs to consider ADDITIONAL MECHANISMS FOR IMPLEMENTING THE OLMSTEAD ACT to address situations where the disabled are inappropriately housed in nursing homes or residential placement facilities when they could be in a less restrictive setting and receiving less expensive care.	7	18.9%
Need a means of codifying and enforcing tenant rights and enlisting the assistance of landlords in ensuring those rights are respected. For example, there are instances where veterans in vocational programs are charged late fees of $35 per day if rent is not paid on the date it is due. Eviction abuses are also prevalent.	6	16.2%
Need to assess cost-benefit of cost-per-unit strategy in contrast to production of quality construction with greater longevity and estimate value of social benefits of housing provided	6	16.2%
Need for affordable, accessible veteran housing.	6	16.2%
Need to adjust income limits to increase the eligibility for housing assistance and extend assistance to moderate income individuals who are priced out of the market.	6	16.2%
Need more widespread, consistently applied and enforced building codes and housing standards, in small towns and rural areas as well as to address accessibility limitations and energy efficiency (both urban and rural)	4	10.8%
Need to revisit policies regarding the timing of the reduction in housing subsidies for those who attempt to work. Cutting subsidies (increasing the proportion of rent that individuals are required to pay) as soon as income increases can be a disincentive to working.	4	10.8%
Need a means by which housing development can support economic development opportunities.	4	10.8%

DESCRIPTION OF ISSUE	Total	Percent
Need for more education that will enable vulnerable populations to know their rights & protect their own interests	4	10.8%
Need more funding for accessibility features in public housing, homeless shelters and other facilities where those with disabilities may seek housing.	4	10.8%
Need to recognize the strong correlation between housing and health care: e.g., interest in proximity to hospital, using "healthy homes" approach to rehabilitation of existing structures	3	8.1%
Need to recognize that despite efforts to address housing for the chronically homeless, there continue to be many mentally ill among the homeless population.	3	8.1%
Seniors and domestic violence survivors may have experienced economic abuse that limits the resources they can bring to housing.	2	5.4%
Need to remain aware of the restrictions on services to the undocumented imposed by terms of funding. Meeting needs for this group requires finding money which can be used with more flexibility.	2	5.4%
Need to consider implications of policies implemented at the state level that have increased developer costs and reduced the number of units that can be produced (e.g., requirement that developers pay the prevailing wage).	1	2.7%
Domestic violence survivors are not covered under the special needs set-aside, although this group would meet the criteria for eligibility.	1	2.7%
Need to recognize that housing must meet different safety needs of domestic violence survivors who are in flight from their abusers; those who are chronically homeless, but who originally became homeless because of a DV situation; and sexual assault victims.	1	2.7%

Summary of Interviews on Statewide Housing Needs

I. AVAILABILITY OF AFFORDABLE, ACCESSIBLE HOUSING		
A. WITHOUT A HOUSING SUBSIDY, FIXED INCOMES (SOCIAL SECURITY, DISABILITY, ETC.) ARE UNABLE TO AFFORD VERY LOW-INCOME HOUSING.		
ISSUE	Num	COMMENT
1) Need to increase the supply of decent, safe, affordable housing so that it is easier for the disabled – particularly disabled persons suffering from mental illness -- seniors and low-income to find suitable housing.	23	In both urban and rural markets, there are long waiting lists for Section 8 housing. Interviewees reported that for larger metropolitan areas there can be as many as 12,000 people on a waiting list.
2) Need for additional funding for housing subsidies, rental assistance for the disabled, the mentally ill, homeless and others with low or no income.	17	Many interviewees emphasized that even LIHTC properties are not affordable for fixed- and low-income individuals. Citing amounts for SSI/SSDI at $650 to $750 per month, interviewees indicated that in most markets 65 to 75 percent of an individual's income would go for housing. Since the $500 amount does not account for utilities, this illustrates the extent to which a person on disability income would be cost-burdened.
3) Need a more comprehensive view of the true cost of housing, which goes beyond rent or mortgage payments to include utilities, security deposits, application and occupancy fees, as well as pet deposits for service animals.	17	Many interviewees emphasized that over and above the cost of rent, related costs put housing out of reach. • Security deposits can be equal to the first month's rent. If a landlord has concerns about an applicant's credit history or other background, they may ask for first and last month's rent in advance. This requires a renter to have a substantial amount of cash on hand to secure housing. • Equally, if not more onerous are utility costs. If a renter has had previous problems in paying utility bills, he/she may be required to make a sizeable deposit to have the utilities put in his/her name. They may be asked for amounts as high as $1,000. In addition, if there are past unpaid bills, those have to be settled before any new service starts. A renter may owe the utility company several thousand dollars with no means to pay. • Application fees are small by comparison, but the applicant is not reimbursed if an application is denied. • Many municipalities require occupancy permits – another cost assumed by the renter. In St. Louis, the cost can range from $15 to $150, depending on the city. It is rare, however, to find occupancy permits required in more rural areas. • Many landlords require deposits against any damage a pet may do. These deposits can be required even for service animals.
B. MORE DIVERSITY IS NEEDED IN THE TYPE OF HOUSING AVAILABLE FOR LOW-INCOME AND FIXED-INCOME INDIVIDUALS.		
1) Need for more accessible, affordable multi-family units, with a scattered-site strategy that avoids concentrations of poverty and crime, as well as negative perceptions of local residents	10	Both urban and rural representatives referred to this issue in relation to Section 8 housing. While interviewees advocate for scattered-site, mixed-income approaches, achieving this objective frequently meets with challenges from local residents in more affluent communities. In the case of single individuals or families, fair housing law protects applicants for rental units from overt discrimination, but credit and background checks offer a more subtle way of screening out tenants that may seem undesirable.
2) Need for more accessible senior housing arising from demographic changes	8	Interviewees acknowledge that in some areas, the effort to develop a supply of senior housing has received significant attention, especially in contrast to similar efforts for persons with disabilities. In advocating for further expansion of senior housing, most point to the aging of the Baby Boomer population and a need to prepare for increased demand, particularly for housing equipped with adequate accessibility features.
3) Need for accessible smaller (1- 2 or 3-bedroom) single family homes or units that are affordable for entry level workers and individuals on fixed incomes, as well as single individuals or small families	8	Interviewees cited the tendency for new developments to feature construction of larger, more lucrative multi-family units or houses. In some communities, this preference has been so pronounced that it has resulted in a shortage of housing for entry-level or blue collar workers with small families. In some areas, those seeking housing are interested in purchasing a home, but may have credit problems or face other obstacles in getting a loan. In other areas, there's a greater demand for single-family rentals.
4) Need affordable 1-bedroom or studio apartments for single individuals	7	
5) Need diversity in the housing stock to meet regional demands for accessible, permanent, transitional, market rate, affordable, congregate, and supportive.	7	A comparison of impressions expressed by interviewees from various parts of Missouri suggests that there is considerable variation in housing needs across the State. In some areas – for example, in the vicinity of Branson – housing development has been fostered by economic development. In other parts of the state, the opposite appears to be true. Assessment of housing demands within each region is crucial.
C. SUB-STANDARD OR INAPPROPRIATE HOUSING MAY BE THE ONLY AFFORDABLE OPTION AVAILABLE TO SOME LOW INCOME OR FIXED INCOME INDIVIDUALS.		
1) Need incentives that will encourage rural and urban landlords to repair	13	Although not the case in all rural areas, in some locations a portion of the housing stock has significantly deterio-

I. AVAILABILITY OF AFFORDABLE, ACCESSIBLE HOUSING		
sub-standard properties, particularly focusing on energy efficiency and/or work with developers to increase the supply of affordable, accessible housing through demolition and new construction.		rated to the point where interviewees judged the units unlikely to pass a Section 8 HQS inspection. These properties are not always occupied, but in some areas individuals live in them. If the shortage of housing is extreme enough, landlords are able to rent these properties despite the conditions of the structures, in the most noteworthy instances, at rents more appropriate for good quality housing. According to interviewees, there are areas of rural Missouri where the high demand for public housing or Section 8 is due to the fact that low-income HUD housing is the best the area has to offer. This appears to be due to the fact that, unlike privately-owned properties, HUD housing is subject to routine inspections.
2) Need investment in housing preservation.	10	Interviewees stressed that new developments are not always appropriate, and retaining what exists should not be ignored. They suggested a variety of programs: • funds to rehab aging developments • funding to improve energy efficiency, as well as add a "healthy homes" approach that would support minor repairs aimed at increasing a home's health and safety (for example, addressing radon, pruning shrubbery to improve visibility, etc.) • home repair funds for fixed-income homeowners to foster aging in place, continued accessibility and protection of housing stock. Most vital is roof repair, since water leakage can accelerate structural deterioration. One interviewee pointed out that the cost of a new roof is roughly equivalent to the cost to demolish a house.
3) Need more emergency housing for persons who are homeless, especially for those who have co-occurring disorders; former facilities serving this group are no longer available, leaving them to seek assistance in facilities that don't have the capacity to serve them.	8	The shortage of shelter space was cited by interviewees most involved in working with the homeless. While efforts are underway to address homelessness among veterans and the chronically homeless, as well as to provide more shelter space for domestic violence survivors, finding shelter when it's needed can still be a challenge – for example, in rural areas where the nearest shelter may be 20 miles from the person who needs it.
4) Need more widespread, consistently applied and enforced building codes and housing standards, in small towns and rural areas as well as to address accessibility limitations and energy efficiency (both urban and rural)	4	Interviewees that were most aware of deteriorated housing structures in their communities favored dissemination of building codes and housing standards. They indicated that in some areas codes are lacking at all jurisdictional levels: smaller cities don't have them, nor does the county. Interviewees indicate there are also none at the state level.

II. OTHER IMPEDIMENTS TO HOUSING

A. AFFORDABLE HOUSING IS NOT LOCATED NEAR WHERE MANY LOW-INCOME INDIVIDUALS MIGHT BE ABLE TO FIND EMPLOYMENT OR SERVICES.		
1) Need transportation systems that facilitate access between affordable housing, employment opportunities and services.	16	According to interviewees, inadequate transportation is a statewide problem with a variety of nuances, depending on the location and the population affected: • In rural areas: o There is minimal public transportation. Towns with a higher population may have established OATES transportation for seniors and the disabled, but this is primarily for transport to doctors' appointments or shopping. Anyone else lacking a personal vehicle is at a disadvantage in obtaining these sort of services. o A lack of public transportation creates even more difficulties for those who work or wish to work. Distances between affordable housing and employers may be prohibitively large. o Lack of population, lack of demand and the distances a bus system has to cover make establishment of public transportation unfeasible. • In urban areas: o Public transportation systems may not provide extensive service to affluent areas where jobs are more plentiful. Services may be limited by the hours when it is available, as well as the locations served. o Even to travel in areas where service is adequate, low income individuals may not have the means to buy bus tickets or bus passes.
2) Need to encourage/provide incentives to developers to produce low-income housing that will be suitable for the workforce.	6	This is related to Item 3) in section I.B. In this context, interviewee comments referred to what they perceive as developers' interest in producing larger and more lucrative housing units, instead of smaller scale housing that entry-level workers might find suitable.
B. HOUSING SUBSIDIES SHOULD BE PROTECTED FROM INCREASES IN INCOME RESULTING FROM THE EFFORTS OF LOW INCOME OR PEOPLE ON FIXED INCOMES TO WORK TO SUPPLEMENT BENEFITS.		
1) Need to revisit policies regarding the timing of the reduction in housing subsidies for those who attempt to work. Cutting subsidies (increasing the proportion of rent that individuals are required to pay) as soon as income increases can be a disincentive to working.	4	Some of the interviewees expressed concern about the difficulty that arises from the delicate balance between benefits provided to the disabled and any income they may obtain from working. They see the immediate increase in rents – i.e., the share of rent that the tenant must pay in response to an increase in income -- as a disincentive to working. In their opinion, the tenant should assume greater responsibility for his/her rent more gradually as an opportunity to accumulate savings.
C. POTENTIAL EMPLOYERS MAY NOT REGARD THE HOUSING STOCK IN A REGION AS ADEQUATE.		
1) Need a means by which housing development can support economic development opportunities.	4	Some interviewees indicated that their community had forfeited economic development opportunities because of a lack of housing for a potential workforce. They reported concerns raised by companies interested in locating in areas of Missouri that would have significantly benefited from a large-scale employer.

III. VULNERABLE POPULATIONS		
A. VULNERABLE POPULATIONS HAVE SPECIFIC HOUSING NEEDS, OVER AND ABOVE THE LACK OF AFFORDABLE HOUSING.		
1) Need more affordable housing equipped with "supportive services."	17	The "hardest to house" -- mentally ill, chronically homeless, ex-offenders, disabled veterans -- frequently cannot live independently without supportive housing. This was a prevalent theme for service and housing providers, as well as developers among the interviewees. Those who advocate this approach have looked for strategies by which these sort of facilities can be established in a competitive environment for funding to support low-income housing. They argue that supportive services may be a more affordable option than nursing home or other types of care that are the most frequent alternatives to independent living.
2) Need for more education that will enable vulnerable populations to know their rights & protect their own interests	4	
3) Seniors and domestic violence survivors may have experienced economic abuse that limits the resources they can bring to housing.	2	
• EX-OFFENDERS		
1) Need strategies for housing ex-offenders excluded from subsidized housing as well as market-rate housing due to results of background checks.	20	Interviewees acknowledge that ex-offenders are a difficult population to serve. The extent of challenges they face with regard to employment and regaining a position in the communities where they find housing can be significant. Many of the interviewees indicate that they are unable provide services due to funding restrictions. Those that offer alternatives for ex-offenders stress that the best option they have found is to identify landlords willing to work with them, but the sympathy that motivates assistance to other groups may be absent, especially in the case of sex offenders. Where programming excludes them, ex-offenders may have no alternative but to fall back on market-rate housing.
• DISABLED		
• Need to adopt accessibility standards that will make housing units suitable for all sectors of the population. Often what is marketed as "accessible" is not adequate to meet the needs of persons with physical disabilities.	8	The emphasis in interviewee comments tended to fall on affordable housing, but those who require accessible housing indicate the need is not being met. Interviewees cited instances of wheelchairs not fitting through doorways, as well as lengthy searches for suitable, ground floor units.
• Missouri needs to consider additional mechanisms for implementing the Olmstead Act to address situations where the disabled are inappropriately housed in nursing homes or residential placement facilities.	7	While Missouri has provided support for Money Follows the Person, interviewees indicate that more could be done, particularly in developing a plan for further action in identifying individuals in nursing homes and residential care facilities that wish to live independently and have that capacity.
• Need more funding for accessibility features in public housing, homeless shelters and other facilities where those with disabilities may seek housing.	4	Interviewees involved with public housing expressed support for implementation of universal design or other accessibility standards. Those working with older developments indicated they are upgrading accessibility features as they do renovation, but progress is limited by the amount of funding available. The physically disabled face particularly difficult situations if they become homeless. Most homeless shelters are not equipped with accessibility features. Some will not house individuals in wheelchairs, citing a lack of staff to provide assistance and adequate facilities.
LOW-INCOME		
1) Need incentives for landlords to encourage them to provide affordable housing to Section 8 voucher holders and others with low income, disabilities or others who are among the "hardest to house"	10	Although to a lesser degree, low-income individuals face some of the same obstacles that ex-offenders confront in dealing with landlords. Background checks, as well as credit checks, may disqualify them in the eyes of some landlords. Service and housing providers working with various low-income populations stress the importance of building relationships with landlords who are willing to relax some of the constraints that they would otherwise impose on potential tenants with more resources at their disposal. In some cases, landlords find the association with a service provider more reassuring than dealing solely with the tenant.
HOMELESS		
2) Need to continue support for "housing first" and "rapid re-housing".	9	Homeless advocates and service providers among the interviewees reported that many housing options formerly used for homeless services have been eliminated or their availability has been curtailed. SROs are one exam-

		ple. Some interviewees advocate providing cheaper alternatives for quick housing that will provide more stable housing than a shelter can offer, at the same time that it enables an individual without a permanent home to do what is necessary to prepare themselves for job-seeking. Others recognized the value of "rapid re-housing," but emphasized that it should not be applied without some accountability for following through on progress toward self-sufficiency.
3) Need to broaden the definition of homelessness to encompass groups that HUD excludes: e.g., those who are "couch-surfing" because they can't afford or are otherwise unable to get their own housing	8	While interviewees see the logic in HUD's definition for homelessness, they are also clear on its limitations. For example, those who are "couch-surfing" without the "homeless" designation – however precariously housed they may be – are excluded from any sort of programming that would enable them to get more permanent housing, employment services and other benefits that might lead to greater stability. Interviewees indicated that such a transient life-style takes a toll on children. In recognition of this fact, schools maintain a count of children it deems homeless – a count which includes families that are staying with relatives or friends without a place of their own. The variation in approaches creates a discrepancy in the numbers of homeless reported.
4) Need to recognize that despite efforts to address housing for the chronically homeless, there continue to be many mentally ill among the homeless population.	3	This is another argument that interviewees offer in citing the need for supportive housing.
VETERANS		
• Need for affordable, accessible veterans housing.	3	While most interviewees were well-aware of the need of veterans for stable housing and were fully supportive of the efforts being made in this area, the majority of service providers in the interviewee pool indicated that they were not focused on services to this population. They indicated that few veterans sought out their programming. This is a testimony to the extent to which the Veterans Administration has assumed this responsibility. The initiative intended to end veteran homelessness is in its final year. While there has been significant success in this area, there are still challenges. One highlighted by interviewees is the lack of suitable permanent housing – in particularly, affordable 1-bedroom units -- in markets where veterans will also have ready access to supportive services.

IV. HOUSING POLICIES STATEWIDE

A. Areas of MHDC Leadership		
1) Need to maintain support for the low income housing tax credit and historical tax credit programs, as well as the qualified allocation plan (33 percent set-aside).	22	While not all interviewees made a point of mentioning this in relation to state policies, their comments implied that MHDC plays a vital role in the provision of affordable housing. In the opinion of efforts to eliminate the tax credit programs (both low income and historic) jeopardizes one of the few resources available for developing housing to meet the needs of the low-income.
2) Need to improve or maintain communications between all parties involved in low-income housing	11	Interviewees expressed an interest in MHDC taking on a leadership role in bringing together those involved in housing or in provision of services to those needing housing. This would include, in addition to MHDC itself: • Developers, both for-profit and non-profit • service providers and advocates • regional planning commissions and councils of governments, community action agencies • HUD • USDA Rural Development • state government agencies.
3) Need to adopt accessibility standards that will position Missouri to address demographic changes, such as the aging of the population and increases in the number of disabled (for example, veterans).	7	This expands on the accessibility issue mentioned above with respect to seniors.
B. Areas where the Low Income Housing Tax Credit Program Could Be Enhanced		
4) Need to educate, and/or demonstrate to, local residents that low-income housing can benefit communities; for example, in terms of economic development. At the same time, tenants of subsidized housing need guidance in how to care for properties, be accountable to landlords, etc.	17	Interviewees involved in work on or planning for low-income housing developments cited the influence of NIMBYism on the location of affordable housing. Some emphasized the success they had had in adequate preparation of communities for the introduction of multi-family housing, whether senior, low-income or supportive housing. Other interviewees emphasized that local residents or landlords reluctant to rent to Section 8 voucher-holders may have some justification for concern if tenants are not provided orientation to their responsibilities as renters and the expectations of other residents.
5) As part of the LIHTC application review process: • Provide more transparency in decision - making • Conduct site visits to evaluate context, better understand local demand	9	Issues related to MHDC awards of support were raised by those most familiar with application for tax credits. Item 5) is closely linked to Item 2) above. Developers and others likely to submit applications are interested in a better understanding of the criteria that MHDC uses for the decision-making leading to award of tax credits. They also expressed an interest in MHDC's taking an opportunity to view sites where potential projects might be located, to assess first-hand the extent of the need that would be addressed. In relation to cost-per-unit – portrayed as an important criteria in MHDC's decision-making regarding proposals submitted for funding -- Interviewees recommended a greater focus on quality construction, quality they believe may be jeopardized by a cost-per-unit approach. They argue that higher quality construction, despite its expense, results in a more durable product that is less likely to need repair as quickly as developments where costs are minimized through use of less expensive materials, less experienced workers, etc.
6) Need to assess cost-benefit of cost-per-unit strategy as balanced against production of quality construction with greater longevity and estimated value of social benefits of housing provided	6	
7) Need to adjust income limits to increase the eligibility for housing assistance and extend assistance to moderate income individuals who are priced out of the market.	4	Although not a prevalent theme in interviewee comments, some advocated modification of income limits that exclude people whose income slightly exceeds the amounts that make individuals/families eligible for many programs. Interviewees indicated that people in this income category occupy a "gray area" where they may not make enough money to afford decent, safe housing, but they earn too much to be eligible for the sort of help that those with slightly lower income can access.

MHDC Housing Needs Assessment Report:
V. Analysis of Impediments to Fair Housing

The Missouri Commission on Human Rights and the U.S. Department of Housing and Urban Development provided data on fair housing complaints for the period 2009 to 2014. The data in Tables 4.1 and 4.2 summarize the number of cases for each protected class and the disposition of complaints.

Table 4.1 Missouri Commission on Human Rights
Fair Housing Complaints and Disposition 2009-2014

	Total	Administrative Closure	No Cause	Settlement with Benefits	Withdrawals with Benefits	Pending
Ancestry	1		1			
Color	2		2			
Familial Status	18	2	10	3	2	1
Disability	66	11	28	10	13	4
National Origin	14	2	7	2	1	2
Race						
American Indian/Alaska Native	4	1	3			
Asian/Pacific Islander	4			4		
Black/African American	362	62	216	41	13	30
White	10	2	6	1		1
Religion	15	4	7	2		2
	496	**84**	**284**	**59**	**29**	**40**

Table 4.2 U.S. Department of Housing and Urban Development
Fair Housing Complaints and Disposition 2009-2014

Field		Completed	
Race	667	Administrative Closure	273
Color	4	Cause (FHAP)	64
National Origin	150	Charged (HUD)	6
Religion	50	Conciliated	404
Sex	256	DOJ Closure	17
Disability	864	No Cause	818
Familial Status	163	Withdrawn with Resolution	269
Retaliation	151	Pending	464
	2315		**2315**

The record shows the most frequently filed complaints at both the state and federal level are on the basis of disability and race. At the state level Black/African American on the basis of racial discrimination is the predominant filing category (72.9 percent) followed by disability (13.3 percent) while at the federal level the most common basis is disability (37.3 percent) and then race (29.2 percent). At both the state and federal level the most frequent disposition is a finding of no cause (62.2 percent for state and 44.2 percent for federal). While the state data allow for examination of the category of disposition by the basis of the complaint, the federal data do not. The state data show that the rate of settlement or withdrawal with benefits is higher for disability cases (34.8 percent) than for cases on the basis of race (14.9 percent).

The Public Policy Research Center submitted an Analysis of Impediments to Fair Housing report to the Missouri Department of Economic Development in April 2014. That analysis conducted interviews with staff members of community action agencies, legal aid agencies, regional planning commissions/councils of government and statewide agencies focusing on non-CDBG entitlement areas of Missouri. The interviews supplied information related to a variety of discriminatory actions that would justify attention in the State's future housing and economic development planning.

Landlord/Tenant Laws Favor Landlords

It is very easy, under the Missouri statutes governing landlord/tenant interactions, for a landlord to evict an unwanted tenant. This compounds the difficulties faced by low-income individuals and protected class members at lower income levels. Prior evictions remain on a tenant's record and may be grounds for denial of future housing. Evictions are also difficult to fight. Interviewees indicate that tenants who reach this point in their relationships with landlords frequently are in arrears on their rent payments. This alone is grounds for eviction and courts will rule in favor of the landlord, unless the tenant can demonstrate that he/she has retained the rent money, and can pay if a settlement is reached.

The challenge of finding other living arrangements and relocating is augmented by the cost incurred in doing so. For the low-income population, accumulating the money for the security deposits as well as the first and last month's rent required to obtain a lease may be out of reach financially. For persons with disabilities, particularly those with mobility issues or mental impairments, the prospect of relocating is even more daunting.

The fact that tenants have limited recourse to fight evictions has multiple repercussions:

- Tenants are afraid to complain about discriminatory behavior or lack of repairs.
- Tenants will accept substandard housing, often at rents that interviewees consider higher than warranted, given the condition of the property.

Housing shortages in many regions of the State give landlords an additional advantage. They can reject potential tenants with reasonable certainty that they will get further applications from more desirable applicants.

Lack of Affordable, Accessible Housing That Is Decent and Safe

Whether or not they belong to a protected class, low-income populations do not appear to have equal access to decent, safe, affordable housing, particularly where availability of housing is limited. Interviewee comments indicate that in many of Missouri's non-entitlement counties, affordable housing is at a premium. This is also true of accessible housing, despite the efforts of the Missouri Housing Development Corporation (MHDC) and USDA Rural Development to increase the available stock. This finding and the sentiments of most interviewees are consistent with the position of the National Rural Housing Coalition regarding accessibility of affordable housing.[1] The problem lies in the fact that low-income residents of rural Missouri face a rental housing market that is largely characterized by shortages and substandard conditions. Properties of better quality are beyond what low-income individuals can afford. Even housing of very poor quality can claim a rent amount that is more than 50 percent of the tenant's income, well beyond the federal standard of 30 percent for a total of rent and utilities.

As for homeownership, interviewees indicate that restrictions implemented since the 2008 financial crisis have curtailed home buying among those without resources for the 20 percent down-payment required for mortgage approval. This obstacle is so significant that interviewees had virtually no knowledge of problems arising from home purchase or areas of potential abuse related to that process: this would include home appraisals, home insurance and of course lending.

Under these conditions, the most vulnerable among Missouri's rural populations cannot afford the housing they might otherwise choose.

Reliance on Sub-Standard Properties for Housing

One of the more frequent interviewee observations relates to landlord neglect of properties. Interviewees stressed that there are both good landlords and bad, and what is true of some is not true of all. But it appears that those landlords who are more negligent have had a significant impact on the housing stock in rural Missouri.
In many areas of Missouri, there is minimal regulation of privately held properties and the extent to which they are kept in habitable condition. Non-entitlement counties may not have building codes in place – either at the city or county level. Even where codes are in place, lack of staff to make inspections or pressure from local interests may nullify their effect.

As a result, privately held rental housing stock in many areas of the State is in a deteriorated condition. Interviewees described instances where furnaces were out of service during the coldest part of the winter – in one case, for as long as 6 weeks; where sewer lines under a house backed up; where roofs leaked and ceilings deteriorated to such an extent that squirrels coming in through the roof fell onto the first floor.
Some landlords – particularly those who are more small-scale – may lack the resources to make needed repairs. Other landlords are either slow to act on repairs or simply will not make the necessary investments in the properties they own.

1 http://ruralhousingcoalition.org/overcoming-barriers-to-affordable-rural-housing. Accessed March 14, 2014.

Interviewees point out that from the perspective of many landlords, bringing their properties up to code will simply prompt rent increases. Among them, a small number understand the implications this can have for low-income individuals: i.e., if properties are better quality, but rents are higher, those units will no longer be affordable for those most in need of affordable rental housing. According to one landlord, his properties may be substandard, but without them many of the low-income would be homeless. In some cases increases to rents are justified to cover the cost of repairs; in other cases, landlords simply view improved quality as an opportunity for rent increases.

Even properties with what would be considered code violations are leased at rents that many interviewees describe as exorbitant. Housing shortages and lack of financial resources may prompt low-income individuals to accept these sorts of conditions.

Negative Perceptions of Low-Income Populations

Although nation-wide the low-income population includes many protected class members, income itself is not one of the factors that defines a protected class under the fair housing provisions. Based on interviewee comments, low-income individuals face some of the same prejudices that the fair housing law was intended to eradicate.

At both the neighborhood and the city level, there is often evident resistance to developments that would bring low-income or multi-family housing to a rural area or municipality. The reasons may be strictly economic: for example, a city council's decision not to rezone a commercial district for a multi-family development or a community's fear of how proximity to low-income housing may affect property values. Nevertheless, according to the interviewees, the sentiments that have traditionally been associated with fair housing violations – i.e., "We don't want those people living in our area" – are in many Missouri communities most frequently directed at the low-income population.

The fair housing complaint record and the perspectives provided in the fair housing interviews provide a more nuanced understanding of the housing challenges experienced by Missouri households at low income levels. While not legally a protected class under the Fair Housing Act, low income households experience many instances of housing practices that would be considered discriminatory.

REGION	CONDITIONS IMPACTING FAIR HOUSING
Southeast	Interviewees noted that there is limited public housing. The entire area is served by only one housing authority. Although municipalities have discussed introducing more low-income housing, community leaders have not moved forward. Section 8 waiting lists are opened once a year and fill up within a matter of hours. Most of the municipalities have building codes that are strictly enforced. Occupancy permits are also routinely used in municipalities. Despite code enforcement, there are problems with private landlords not repairing properties. Tenants who complain risk eviction. Interviewees indicated that fair housing issues are not prevalent, but suggest this may be more related to a lack of familiarity with, and understanding of, the law, as well as an absence of recent investigation, such as paired testing, in this area.
South Central	Interviewees described this area as one with a need for low-to-moderate income housing. Unlike the Southeast, this region has limited communities with building codes and few building inspectors. Existing housing stock, specifically that dating from the 1950s and 1960s, lacks up-to-date wiring and plumbing which would not meet typical code requirements. Interviewees indicate that across the region, there are waiting lists for subsidized housing. Low-to-moderate income households rely on trailer homes rather than pursue homeownership. In the opinion of interviewees, the region is not attractive to developers due to low population density and income levels that would limit the market for home purchase. Also, interviewees indicated there have been incidents of resistance to multi-family housing developments.
Southwest	Southwest Missouri includes areas with distinctly different housing characteristics. The far southwest tends to be more rural and, according to the interviewees, encompasses some counties where there are high rates of poverty, as well as deteriorated properties. Joplin, one of the larger municipalities in the area, lost older housing stock in the 2011 tornado, which has reduced the housing available to the very low-income. In the adjacent region, however, single-family and multi-family developments have enlivened the housing market with both new construction and rehab of older properties, which now have to compete with the availability of recently built units. Although Greene County is an entitlement jurisdiction and so excluded from this study, both Springfield and Branson may serve as economic drivers in attracting developers.
Northeast	Many of the towns have occupancy standards. There are roughly 800 Section 8 units in the region, but housing professionals believe landlords are not receptive to Section 8 tenants. Individuals with vouchers may be unsuccessful in finding housing they can afford. Neglect of properties by private landlords is also prevalent here. The towns in the area have adopted occupancy standards, but this does not govern what goes on outside their jurisdiction.
North Central	This is one region where interviewees saw an adequate amount of housing. Low-incoming housing has been developed to the extent that interviewees reported one county in the region refuses to allow any further developments of this type to be built in that area. There are, however, problems with private landlords. Some ethnic populations in the region have experienced unfair treatment with regard to rents charged.
Central	Conditions in this area are influenced by the presence of the state capitol (Jefferson City) and the Missouri's most sizable land-grant university (located in Columbia). Despite the influence of these larger, more economically active municipalities, interviewees commenting on this area emphasized that the factor most impeding fair housing was the lack of affordable, accessible housing that could be considered decent and safe. Many of the towns in the region have property maintenance codes, but as in other regions private landlords can circumvent code enforcement.
West Central	This region, too, has similar problems with neglected properties and lax maintenance of rental units. As was true for the Central region, interviewees located in this area cited the lack of decent, safe, affordable housing as the biggest obstacle to fair housing. One interviewee noted that the homogeneity of the population and lack of diversity made it difficult to generalize about the sort of housing discrimination that ethnic minorities and others in protect classes might face. Interviewees stressed the need for rural development.
East Central	Interviewees reported a disparity in the availability of Section 8 vouchers from one county to the next, leading those in need of subsidized housing to move to areas where vouchers were more plentiful. While this is significant, it points to the degree that the low-income population in this region needs more affordable housing. Zoning regulations in one county have resulted in a housing stock lacking in low-to-moderate income housing, a policy that is now in the process of being reversed.

MHDC Needs Assessment Report:
VI. Methodology

The Missouri Housing Development Commission contracted with the University evaluation team to conduct a comprehensive housing needs assessment for the state of Missouri. The University evaluation team used a process of intense data gathering, mapping and analysis to produce a final report and a Community Commons hub. The Community Commons hub will serve as the data, mapping, and report repository which allows for data visualization and easy access to MHDC and the public.

Process:

The following process was used for data collection, analysis and reporting:

• Identified data source and all relevant data points related to the issue. Determined if multi-year or subpopulation data is required.
• Compiled and cleaned relevant data to prepare for analysis.
• Downloaded and input relevant data onto Community Commons platform.
• Determined parameters of analysis and identified any further research needed for completion of analysis.
• Conducted analysis and report writing.
• Upload analysis and narrative to Community Commons platform.
• Uploaded the report, with narrative and data, as a reporting tool on the Community Commons.

DATA COLLECTION AND ANALYSIS

Data for the statewide housing needs assessment was collected mainly from multiple sources. The source information, access location, and additional information is available for each indicator.

MHDC Regions (Modified PUMA Regions)

Source:
United States Census Bureau: 2010 Public Use Microdata Areas (PUMAs). Additional Analysis by CARES.

Access:
Data are acquired in Shapefile format from the US Census Bureau 2012 TIGER/Line® Shapefiles FTP site. <ftp://ftp2.census.gov/geo/tiger/TIGER2012/>

About:
MHDC Regions are created by modifying the 2010 PUMA boundaries using ArcGIS software such that the smallest unit of geography is a county.
Public Use Microdata Areas (PUMAs) are statistical geographic areas defined for the dissemination of certain Census Bureau data. MHDC regions collapse the following PUMAs into single-county (or city) MHDC Regions:
2 PUMAs in St. Louis City,
8 PUMAs in St. Louis County,
3 PUMAs in St. Charles County,
2 PUMAs in Clay County, and
5 PUMAs in Jackson County,

MHDC Regions also collapse the stand-alone Springfield city PUMA into the Greene, Webster and Christian County PUMA. The following table lists the final MHDC Regions and their constituent counties.

Demographic and Socioeconomic

(Total population, Hispanic population, disabled population, veteran population, population in poverty, and elderly population)
Source:
United States Census Bureau: 2008-12 American Community Survey.

Access:
Data are acquired from the US Census Bureau's American Community Survey via the Census FTP server. <http://www2.census.gov/> Data are estimates for the 5-year period 2008-2012.

About:
The American Community Survey (ACS) is a nationwide, continuous survey designed to provide communities with reliable and timely demographic, housing, social, and economic data. The ACS samples nearly 3 million addresses each year, resulting in nearly 2 million final interviews. The ACS replaces the long-form decennial census; however, the number of household surveys reported annually for the ACS is significantly less than the number reported in the long-form decennial census. As a result, the ACS combines

detailed population and housing data from multiple years to produce reliable estimates for small counties, neighborhoods, and other local areas. Negotiating between timeliness and accuracy, the ACS annually releases current, one-year estimates for geographic areas with large populations; three-year and five-year estimates are also released each year for additional areas based on minimum population thresholds. For more information, please see the complete American Community Survey 2012 Subject Definitions. <http://www.census.gov/acs/www/Downloads/data_documentation/SubjectDefinitions/2012_ACSSubjectDefinitions.pdf>

Source:
United States Census Bureau: 2008, 2009, 2010, 2011, 2012, and 2013 American Community Survey.

Access:
Data are acquired from the US Census Bureau's American Community Survey via the Census FTP server. <http://www2.census.gov/> Data are estimates for the single-year periods 2008 through 2013.

About:
Single-year estimates are available from the American Community Survey (ACS) feographic areas with over 65,000 total population. Most counties in Missouri do not meet this population threshold, so it was determined that census Public Use Microdata Area (PUMA) regions should be used to describe trends over time using census data. Several PUMA regions were modified so that the smallest unit for analysis would be a county. See MHDC Region methodology for more information.
Data is available for single-year ACS estimates for years 2008 through 2013. However, PUMA boundaries shifted for the last 2 years of this period. In order to use PUMA data to report trends over time for all 6 years, custom analysis was performed which separated the PUMA-level data into county-level components, and then re-aggregated the counties to the 2012-13 region boundaries. These estimates are generated using population-weighted allocations such that, if a PUMA region contains 2 counties, even though one county may consist of 50% of the PUMA's area, it may contain 90% of that PUMA's population. Population is weighted based on the total population (numerator and denominator) as reported in the 2010 Decennial Census. This method still assumes that the indicator percentages for each county are identical across a PUMA region.

Urban and Rural Population

Source:
United States Census Bureau: 2010 Metropolitan and Micropolitan Statistical Areas.

Access:
Data are acquired from the US Census Metropolitan and Micropolitan February 2013 Core based statistical areas (CBSAs) and combined statistical areas (CSAs) delineation file. <https://www.census.gov/population/metro/data/def.html>

About:
Metropolitan and micropolitan statistical areas (metro and micro areas) are geographic entities that are delineated by the Office of Management and Budget (OMB) for use by Federal statistical agencies in collecting, tabulating, and publishing Federal statistics.

The term "Core Based Statistical Area" (CBSA) is a collective term for both metro and micro areas. A metro area contains a core urban area of 50,000 or more population, and a micro area contains an urban core of at least 10,000 (but less than 50,000) population. Each metro or micro area consists of one or more counties and includes the counties containing the core urban area, as well as any adjacent counties that have a high degree of social and economic integration (as measured by commuting to work) with the urban core.

Population Projections through 2030

Source:
Missouri Office of Administration Division of Budget & Planning

Access:
http://oa.mo.gov/budget-planning/demographic-information/population-projections

About:
The website includes the complete methodology for the stated projections. The projections use the 2000 Census as the baseline and provide estimates for age and sex by county by 5-year increments to 2030.

A revised set of projections based on 2010 Census is in early stages of preparation but will not be available in the foreseeable future. A check of 2010 Census actuals against the projections for 2010 show that for Missouri the actual population exceeded the projection by 0.2%. At the PUMA level, population growth was over-estimated in Harrisonville, Bolivar, and the St. Louis Metro Area, and underestimated in the Bootheel, Poplar Bluff, South Central, Lake Ozark, Boone, and Northwest and Northeast.

These projections have been sorted by the MHDC regions and component counties at 10-year increments and by MHDC regions presented alphabetically, by rank order of population growth (2010-2030), and by rank order of percentage change (2010-2030). For mapping purposes, the rank order of percentage change table, divides the PUMAs into four categories: 2 X Missouri rate and over; Missouri rate and over; zero change up to Missouri rate; and negative change.

Unemployment

Source:
United States Bureau of Labor Statistics: 2004-2014 Local Area Unemployment Statistics

Access:
Data are acquired from the Bureau of Labor Statistics Flat Files FTP Site. <http://download.bls.gov/pub/time.series/la/>

About:
The Local Area Unemployment Statistics (LAUS) program is a Federal-State cooperative effort in which monthly estimates of total employment and unemployment are prepared for approximately 7,300 areas, including states, counties, and cities with over 25,000 population. These estimates are key indicators of local economic conditions. The Bureau of Labor Statistics (BLS) of the U.S. Department of Labor is responsible

for the concepts, definitions, technical procedures, validation, and publication of the estimates that State employment security agencies prepare under agreement with BLS.

The concepts and definitions underlying LAUS data come from the Current Population Survey (CPS), the household survey that is the official measure of the labor force for the nation. State monthly model estimates are controlled in "real time" to sum to national monthly labor force estimates from the CPS. These models combine current and historical data from the CPS, the Current Employment Statistics (CES) program, and State unemployment insurance (UI) systems. Estimates for seven large areas and their respective balances of State are also model-based. Estimates for the remainder of the sub-state labor market areas are produced through a building-block approach known as the "Handbook method." This procedure also uses data from several sources, including the CPS, the CES program, State UI systems, and the decennial census, to create estimates that are adjusted to the statewide measures of employment and unemployment. Below the labor market area level, estimates are prepared using disaggregation techniques based on inputs from the decennial census, annual population estimates, and current UI data. For more information, please see the complete Local Area Unemployment Statistics Estimation Methodology <http://www.bls.gov/lau/laumthd.htm>

Income and AMI

Source:

United States Census Bureau: 2008-12 American Community Survey. Additional Analysis by CARES.

Access:

Data are acquired from the US Census Bureau's American Community Survey via the Census FTP server <http://www2.census.gov/> Data are estimates for the 5-year period 2008-2012.

About:

This indicator reports the number of households at different income levels. Income levels are based on percentages of Area Median Income (AMI). To generate this data, AMI is acquired for each county using data from the 2008-12 American Community Survey (ACS). Income levels at set percentages of AMI are calculated for each county. For example, in an area with AMI of $55,000, a family earning 40% of AMI earns $22,000 per year. Using these thresholds, the number of households earning at-or-below each income level is estimated using ACS data on household income. In the ACS, this data is presented in the form of counts of units with income that falls in certain ranges. For example, in an area there may be 11,000 households with income between $10,000 and $15,000. To determine the number of household earning at-or-below AMI, a proportional allocation method is used. Using the example above, the total number of households earning up to $22,000 is calculated as follows:

Units with income <$22,000
[# INC $0 - $10,000] +
[# INC $10,000 - $15,000] +
[# INC $15,000 - $20,000] +
[# INC $20,000 - $25,000] * [(25000 – 22494) / 5000]

Thus all units with income (INC) in the ranges 0-10K, 10K-15K, and 15K-20K are counted, and around 50% of those units in the 20K-25K range. This method is applied to the other specified AMI levels for each county in Missouri. The full listing of variables for household income ranges used in the analysis is as follows:

Under $10,000
$10,000 - $15,000
$15,000 - $20,000
$20,000 - $25,000
$25,000 - $35,000
$35,000 - $50,000
$50,000 - $75,000
$75,000 - $100,000
$100,000 - $150,000
$150,000 or More

Values of Housing Units Based on AMI

Source:
United States Census Bureau: 2008-12 American Community Survey. Additional Analysis by CARES.

Access:
Data are acquired from the US Census Bureau's American Community Survey via the Census FTP server. <http://www2.census.gov/> Data are estimates for the 5-year period 2008-2012.

About:
This indicator reports the number of housing units available to families with different income levels. Income levels are based on various percentages of Area Median Income (AMI). To generate this data, AMI is acquired for each county using data from the 2008-12 American Community Survey (ACS). This data is then used to determine affordable monthly housing payments at various income levels relative to AMI. For this assessment, affordability assumes that a family should pay no more than 30% of their income toward mortgages or gross rent. For example, in an area with AMI of $55,000, a family earning 40% of AMI earns $22,000 per year, or $1,833 per month. For this family to live in affordable housing, total monthly housing costs should not exceed $550.

Using these assumptions, the number of units affordable at each income level is estimated using ACS data on household value (for owner-occupied households) and gross rent (for renter-occupied households). In the ACS, this data is presented in the form of counts of units that fall in certain value ranges. To determine unit counts affordable at certain income levels, a proportional allocation method is used. Using the example above, the total number of rental units affordable to a family that should spend no more than $550 on housing expenses is calculated as follows:

Units with GR under $550 =
[# GR $1.00 - $100] +
[# GR $100 - $200] +
[# GR $200 - $300] +
[# GR $300 - $400] +
[# GR $400 - $500] +
[# GR $500 -$600] * [(550 – 500) / 100]

Thus all units with gross rent (GR) in the ranges 0-100, 100-200, 200-300, 300-400, and 400-500 are counted, and 50% of those units in the 500-600 range. This method is applied to the other specified AMI levels for each county in Missouri. The full listing of variables for household value used in the analysis is as follows:

Value less than $10,000
Value $10,000 to $19,999
Value $20,000 to $29,999
Value $30,000 to $39,999
Value $40,000 to $49,999
Value $50,000 to $59,999
Value $60,000 to $69,999
Value $70,000 to $79,999
Value $80,000 to $89,999
Value $90,000 to $99,999
Value $100,000 to $199,999
Value $200,000 to $249,999
Value $250,000 to $499,999
Value $500,000 or more

The full listing of variables for gross rent ranges used in the analysis is as follows:

Less than $100
$100 to $199
$200 to $299
$300 to $399
$400 to $499
$500 to $599
$600 to $699
$700 to $799
$800 to $899
$900 to $999
$1,000 to $1,249
$1,250 to $1,499
$1,500 to $1,999
$2,000 or more

Special Needs and Index of Disadvantage

Source:
United States Census Bureau: 2008-12 American Community Survey. Additional analysis conducted by IPP.

Access:
Data are acquired from the US Census Bureau's American Community Survey via the Census FTP server. <http://www2.census.gov/> Data are estimates for the 5-year period 2008-2012.

About:
Two indices were created to provide further analysis of important demographic characteristics. The Special Needs Index examines concentrations of veterans, people with disabilities, and the elderly (aged 65 years and above). The Index of Disadvantage focuses on concentrations of people in poverty, households with area median incomes in the 41-60 percent range, and unemployment.
The method used to produce the indices began with ranking each MHDC region from 1-29 for each identified indicator based on US Census ACS data. The ranks for each region were summed to produce a regional score within each index. Finally the regions were sorted into quartiles by ranking and those with the highest proportions were identified and mapped.

Housing:

(Total units, occupied and vacant units, owner and renter units, owner and vacancy rates, subpopulation renter status, unit type, year unit built, mortgage status, median value of owner units, gross rents of renter units, cost burden status for all housing units, cost burden status for renters and owners, subpopulation cost burden status, absence of complete plumbing or kitchen facilities, presence of no fuel for heating, lack of telephone services, occupants per room)

Source:
United States Census Bureau: 2008-12 American Community Survey. United States Census Bureau: 2000, 2008. 2010 and 2012 American Community Survey. United States Census Bureau: 2000 Summary File 1 and Summary File 3. Additional analysis conducted by PPRC.

Access:
Data are acquired from the US Census Bureau's American Community Survey via the Census FTP server. <http://www2.census.gov/> Data at the state level are for single year estimates and data at the county level are for the 5-year period 2008-2012. Data used to identify change over time are at the PUMS level for single-year estimates. 2000 data include Summary File 1 "complete count" data collected under PL94 and sampled Summary File 3 data.

About:
For a discussion of ACS data, see description above under ***"Demographic and Socioeconomic"***.

For a discussion of use of PUMS areas to analyze change over time, see discussion above under ***"Demographic and Socioeconomic"***.

2000 Summary File 1 (SF 1) contains the 100-percent data, which is the information compiled from the questions asked of all people and about every housing unit. Population items include sex, age, race, Hispanic or Latino, household relationship, and group quarters. Housing items include occupancy status, vacancy status, and tenure (owner occupied or renter occupied). 2000 Summary File 3 (SF 3) contains the sample data, which is the information compiled from the questions asked of a sample of all people and housing units. Population items include basic population totals; urban and rural; households and families; marital status; grandparents as caregivers; language and ability to speak English; ancestry; place of birth, citizenship status, and year of entry; migration; place of work; journey to work (commuting); school enrollment and educational attainment; veteran status; disability; employment status; industry, occupation, and class of worker; income; and poverty status. Housing items include basic housing totals; urban and rural; number of rooms; number of bedrooms; year moved into unit; household size and occupants per room; units in structure; year structure built; heating fuel; telephone service; plumbing and kitchen facilities; vehicles available; value of home; monthly rent; and shelter costs.

For crosstabulated indicators not included in the annual ACS data (for example relating to veteran householders and disabled householders in the renter status computations or household type, householder age and veteran or disabled householder in rental cost burden analysis), counts and percents were estimated using ACS PUMS (1 year) data. The American Community Survey (ACS) Public Use Microdata Sample (PUMS) files show the full range of population and housing unit responses collected on individual ACS questionnaires. The PUMS files contain records for a subsample of ACS housing units and group quarters persons, with information on the characteristics of these housing units and group quarters persons plus the people in the selected housing units. Weights supplied with the PUMS files were used to estimate counts and percents for the state as whole.

Housing Market Index

Source:

United States Census Bureau: 2008-12 American Community Survey. Additional analysis conducted by PPRC.

Access:

Data are acquired from the US Census Bureau's American Community Survey via the Census FTP server. <http://www2.census.gov/> Data are estimates for the 5-year period 2008-2012.

About:

An index was created to provide further analysis of data related to housing market strength by MHDC region. Data used to create the index include the percent occupied units (2012), percent renter units (2012), the percent units built after 2000 (2012), the change in percent occupied units (2008-2012) and the change in percent the rental units (2008-2012).

The method used to produce the indices began with ranking each MHDC region from 1-29 for each identified indicator based on US Census ACS data. The ranks for each region were summed to produce a regional score within each index. Finally the regions

were sorted into quartiles by ranking and those with the highest proportions were identified and mapped.

Cost Burden Status for AMI Levels

Source:
United States Census Bureau: 2012 American Community Survey. Additional Analysis conducted by PPRC.

Access:
Data are acquired from the US Census Bureau's American Community Survey via the Census FTP server. <http://www2.census.gov/> Data are estimates for the 5-year period 2008-2012.

About:
PUMS data files were used to identify the AMI level of respondents and the cost burden status at the 30% criterion level. AMI levels to respondents using a methodology developed by the Center for Housing Policy (see http://www.nhc.org/publications/Housing-Landscape-2014-Methodology.html for more information). Cost burden status did not include estimation of utility costs not included in rent as produced in the methodology after initial analysis found it did not meaningfully change cost burden rates. Weights supplied with the PUMS files were used to estimate counts and percents for the state as whole.

Housing Affordability Need Index

Source:
United States Census Bureau: 2008-12 American Community Survey. Additional analysis conducted by PPRC.

Access:
Data are acquired from the US Census Bureau's American Community Survey via the Census FTP server. <http://www2.census.gov/> Data are estimates for the 5-year period 2008-2012.

About:
An index was created to provide further analysis of data related to housing affordability by MHDC region. Data used to create the index include the percentages of renter cost burden and owner cost burden at the 30% criterion (2012) and the change in percent of renter cost burden (2008 to 2012).

The method used to produce the indices began with ranking each MHDC region from 1-29 for each identified indicator based on US Census ACS data. The ranks for each region were summed to produce a regional score within each index. Finally the regions were sorted into quartiles by ranking and those with the highest proportions were identified and mapped.

Construction Permits

Source:

United States Census Bureau: 1990-2013 Building Permits Survey. Additional analysis conducted by PPRC.

Access:

Data are acquired from the US Census Bureaus' Building Permits Survey via Building Permits application and via flat file purchased from the U.S. Census Bureau.

About:

The Building Permits Survey tracks at the place, county and state level new residential and non-residential permit activity, reporting the number of permits, units and value of permits. The analysis utilizes residential permit activity for single through multifamily buildings.

Foreclosure and Delinquencies

Source:

United States Department of Housing and Urban Development: 2010 Neighborhood Stabilization Program Data (NSP3). Additional analysis conducted by PPRC.

Access:

Data are acquired from HUD via the Neighborhood Stabilization Program data site.

About:

NSP 3 Program data was created by HUD to reflect housing market conditions in the second quarter of 2010 to guide applicants seeking funding from HUD under NSP. The data includes estimated foreclosure counts, starts and delinquencies, as well as other data used to identify the risk of local areas to foreclosures and foreclosure impacts. Data are aggregated to the county level for analysis.

Lending Data

Source:

Federal Financial Institutions Examination Council: 2008 and 2012 Home Mortgage Disclosure Act Data. Additional analysis conducted by PPRC.

Access:

Data are acquired from FFIEC via HMDA LAR & TS Raw Data Windows Application.

About:

The Home Mortgage Disclosure Act (HMDA), enacted by Congress in 1975, requires lending institutions to report public loan data. Data on all lending applications includes the purpose, amount, and type of loan, data on the action taken by the lender, and racial/ethnic and income information on loan applicants.

Analysis of originated loans by AMI level utilized ACS data from 2013 to identify median family income for the county of borrowers, identify 40%, 60%, 80% and 100% income levels based on the medians, and apportion applicants into the income levels based on their reported incomes.

Publicly Subsidized Housing

Source:
United States Department of Housing and Urban Development: 1996-2013 Picture of Subsidized Households. Additional analysis conducted by PPRC.

Access:
Data are acquired from HUD via the Picture of Subsidized Households data application.

About:
The Picture of Subsidized Households includes comprehensive information on subsidized housing from HUD's major data systems, resulting in a series of reports called A Picture of Subsidized Households," For these report, household data are aggregated by program at various geographic summary levels (national, state, metropolitan area, city, county) and local public housing agency (PHA). These programs include (but are not limited to) public housing, Housing Choice Vouchers, Section 8 project based housing, New Construction and Substantial Rehabilitation, and the Section 202 and 811 Supportive Housing programs. More information about the dataset and how it is collected is at http://www.huduser.org/portal/datasets/assthsg.html. Some tenant characteristics are not reported for some types of housing units (approximately ¼ of all units in Missouri in 2013). A small percentage of the units do not have locational information and are excluded from analysis.

MHDC Unit Data

Source:
Data files provided by MHDC staff in the summer and fall of 2014. Additional analysis conducted by CARES and PPRC.

Access:
Data are acquired from MHDC staff.

About:
Data is compiled from active properties listings from the Missouri Housing Development Commission (MHDC) Asset Management Reporting System (AMRS) as of July 2014. Property locations are acquired by geocoding distinct addresses from these listings using the ESRI ArcGIS Online Geocoding Service.
Additional attribute information for each property listing includes number of bedrooms and units, current rent rates, and type of assistance. Mapped properties include those receiving Low Income Housing Tax Credits (LIHTC), Missouri Affordable Housing Assistance Program (AHAP) assistance, Federal HOME assistance, Section 8 vouchers, and more.
This data may exclude some properties with 12 units or less, RD in 1st position, and HAP contract-only properties, as all properties have not yet been fully entered into AMRS.

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of Missouri

* b. Employer/Taxpayer Identification Number (EIN/TIN): 44-60000987

* c. Organizational DUNS: 8790146860000

d. Address:

* Street1: 301 West High
Street2: P.O. Box 118
* City: Jefferson City
County/Parish: Cole
* State: MO: Missouri
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 65101-1517

e. Organizational Unit:

Department Name: Economic Development

Division Name: Business and Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Marcy
Middle Name:
* Last Name: Oerly
Suffix:

Title: CDBG Manager

Organizational Affiliation:

* Telephone Number: 573-751-5964
Fax Number: 573-526-4157

* Email: marcy.oerly@ded.mo.gov

Application for Federal Assistance SF-424

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

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.228

CFDA Title:

State Community Development Block Grant

*** 12. Funding Opportunity Number:**

* Title:

Community Development Block Grant

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:**

The above referenced funds are administered by the State of Missouri for the non-entitlement areas of the state for various housing, community and economic development projects.

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: MO-all
* b. Program/Project: MO-all

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 04/01/2018
* b. End Date: 03/31/2019

18. Estimated Funding ($):

* a. Federal	22,537,848.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	22,537,848.00

*** 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.
- [x] 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
- [x] 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 218, Section 1001)**

[X] ** 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:	Mr.
* First Name:	Robert
Middle Name:	B.
* Last Name:	Dixon
Suffix:	
* Title:	Director
* Telephone Number:	573-751-4770
Fax Number:	
* Email:	rob.dixon@ded.mo.gov
* Signature of Authorized Representative:	Robert B Dixon
* Date Signed:	5/15/18

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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 statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(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
	Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Missouri Department of Economic Development	05/21/2018

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of Missouri

* b. Employer/Taxpayer Identification Number (EIN/TIN): 44-60000987

* c. Organizational DUNS: 8790146860000

d. Address:

* Street1: 301 West High
Street2: P.O. Box 118
* City: Jefferson City
County/Parish: Cole
* State: MO: Missouri
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 65101-1517

e. Organizational Unit:

Department Name: Economic Development

Division Name: Business and Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Marcy
Middle Name:
* Last Name: Oerly
Suffix:

Title: CDBG Manager

Organizational Affiliation:

* Telephone Number: 573-751-5964
Fax Number: 573-526-4157

* Email: marcy.oerly@ded.mo.gov

Application for Federal Assistance SF-424

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

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership

*** 12. Funding Opportunity Number:**

* Title:

HOME Investment Partnership

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:**

The above referenced funds are administered by the State of Missouri for the non-entitlement areas of the state to help provide affordable housing to low-income, homeless, special needs, and seniors.

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: MO-all
* b. Program/Project: MO-all

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 04/01/2018
* b. End Date: 03/31/2019

18. Estimated Funding ($):

* a. Federal	12,514,589.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	12,514,589.00

*** 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.
- [x] 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
- [x] 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 218, Section 1001)**

[X] ** 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:	Mr.
* First Name:	Robert
Middle Name:	B.
* Last Name:	Dixon
Suffix:	
* Title:	Director
* Telephone Number:	573-751-4770
Fax Number:	
* Email:	rob.dixon@ded.mo.gov
* Signature of Authorized Representative:	Robert B Dixon
* Date Signed:	5/15/18

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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 statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(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
	Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Missouri Department of Economic Development	05/21/2018

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of Missouri

* b. Employer/Taxpayer Identification Number (EIN/TIN): 44-60000987

* c. Organizational DUNS: 8790146860000

d. Address:

* Street1: 301 West High
Street2: P.O. Box 118
* City: Jefferson City
County/Parish: Cole
* State: MO: Missouri
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 65101-1517

e. Organizational Unit:

Department Name: Economic Development

Division Name: Business and Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Marcy
Middle Name:
* Last Name: Oerly
Suffix:

Title: CDBG Manager

Organizational Affiliation:

* Telephone Number: 573-751-5964
Fax Number: 573-526-4157

* Email: marcy.oerly@ded.mo.gov

Application for Federal Assistance SF-424

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

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.275

CFDA Title:

Housing Trust Fund

*** 12. Funding Opportunity Number:**

* Title:

Housing Trust Fund

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:**

The above referenced funds are administered by the State of Missouri, for the whole state, to help provide affordable rental housing to low-income, special needs, and seniors.

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: MO-all
* b. Program/Project: MO-all

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 04/01/2018
* b. End Date: 03/31/2019

18. Estimated Funding ($):

* a. Federal	3,970,270.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	3,970,270.00

*** 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.
- [x] c. Program is not covered by E.O. 12372.

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- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

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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 218, Section 1001)**

- [x] ** 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:	Mr.
* First Name:	Robert
Middle Name:	B.
* Last Name:	Dixon
Suffix:	
* Title:	Director
* Telephone Number:	573-751-4770
Fax Number:	
* Email:	rob.dixon@ded.mo.gov
* Signature of Authorized Representative:	Robert B
* Date Signed:	5/15/18

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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.

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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
	Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Missouri Department of Economic Development	05/21/2018

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of Missouri

* b. Employer/Taxpayer Identification Number (EIN/TIN): 44-60000987

* c. Organizational DUNS: 8790146860000

d. Address:

* Street1: 301 West High
Street2: P.O. Box 118
* City: Jefferson City
County/Parish: Cole
* State: MO: Missouri
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 65101-1517

e. Organizational Unit:

Department Name: Economic Development

Division Name: Business and Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Marcy
Middle Name:
* Last Name: Oerly
Suffix:

Title: CDBG Manager

Organizational Affiliation:

* Telephone Number: 573-751-5964
Fax Number: 573-526-4157

* Email: marcy.oerly@ded.mo.gov

Application for Federal Assistance SF-424

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

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grant

*** 12. Funding Opportunity Number:**

* Title:

Emergency Solutions Grant

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:**

The above referenced funds are administered by the State of Missouri for the non-entitlement areas of the state to help provide assistance and housing to homeless individuals and families.

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: MO-all
* b. Program/Project: MO-all

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 04/01/2018
* b. End Date: 03/31/2019

18. Estimated Funding ($):

* a. Federal	2,554,390.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	2,554,390.00

*** 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.
- [x] 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
- [x] 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 218, Section 1001)**

[X] ** 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:	Mr.
* First Name:	Robert
Middle Name:	B.
* Last Name:	Dixon
Suffix:	
* Title:	Director
* Telephone Number:	573-751-4770
Fax Number:	
* Email:	rob.dixon@ded.mo.gov
* Signature of Authorized Representative:	Robert B
* Date Signed:	5/15/18

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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 statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(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
Robert B	Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Missouri Department of Economic Development	05/21/2018

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of Missouri

* b. Employer/Taxpayer Identification Number (EIN/TIN): 44-60000987

* c. Organizational DUNS: 8790146860000

d. Address:

* Street1: 301 West High
Street2: P.O. Box 118
* City: Jefferson City
County/Parish: Cole
* State: MO: Missouri
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 65101-1517

e. Organizational Unit:

Department Name: Economic Development

Division Name: Business and Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Marcy
Middle Name:
* Last Name: Oerly
Suffix:

Title: CDBG Manager

Organizational Affiliation:

* Telephone Number: 573-751-5964
Fax Number: 573-526-4157

* Email: marcy.oerly@ded.mo.gov

Application for Federal Assistance SF-424

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

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.241

CFDA Title:

Housing Opportunities for Persons with AIDS

*** 12. Funding Opportunity Number:**

* Title:

Housing Opportunities for Persons with AIDS

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:**

The above referenced funds are administered by the State of Missouri for the non-entitlement areas of the state to provide individuals and families, effected by AIDS, stable housing resources.

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: MO-all
* b. Program/Project: MO-all

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 04/01/2018
* b. End Date: 03/31/2019

18. Estimated Funding ($):

* a. Federal	701,900.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	701,900.00

*** 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.
- [x] 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
- [x] 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 218, Section 1001)**

- [x] ** 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:	Mr.
* First Name:	Robert
Middle Name:	B.
* Last Name:	Dixon
Suffix:	
* Title:	Director
* Telephone Number:	573-751-4770
Fax Number:	
* Email:	rob.dixon@ded.mo.gov
* Signature of Authorized Representative:	Robert B Dixon
* Date Signed:	5/15/18

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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 statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(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.

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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
Robert B	Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Missouri Department of Economic Development	05/21/2018

STATE CERTIFICATIONS

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

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing.

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 has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the State'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 paragraphs 1 and 2 of this 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 State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the State's consolidated plan.

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 135.

Signature of Authorized Official

5/15/18
Date

DED Director
Title

Specific Community Development Block Grant Certifications

The State certifies that:

Citizen Participation -- It is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

Consultation with Local Governments --

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;

2. It engages in or will engage in planning for community development activities;

3. It provides or will provide technical assistance to units of local government in connection with community development programs; and

4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Needs Identification – It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available.

2. Overall Benefit. In the aggregate, not less than 70 percent of the CDBG funds, including Section 108 guaranteed loans, received by the State during the following fiscal year(s) 2017 – 2019 [a period designated by the State of one, two, or three specific consecutive fiscal year(s)] will be used for activities that benefit persons of low and moderate income.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG Funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

5/15/18
Date

DED Director
Title

Specific HOME Certifications

The State certifies that:

Tenant Based Rental Assistance -- If it plans to use HOME funds for tenant-based rental assistance, tenant-based rental assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy Layering -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

Signature of Authorized Official

5/15/18
Date

DED Director
Title

Emergency Solutions Grant Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Matching Funds – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

> **Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.
>
> **Essential Services and Operating Costs** – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.
>
> **Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.
>
> **Supportive Services** – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

Signature of Authorized Official

5/15/18
Date

DED Director
Title

Housing Opportunities for Persons With AIDS Certifications

The State HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under the program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years, in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,

2. For a period of not less than 3 years, in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature of Authorized Official

5/15/18
Date

DED Director
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification
This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.