



**Home Investment Partnerships American Rescue Plan Program
(HOME-ARP)**

ALLOCATION PLAN
for
AMERICAN SAMOA

September 3, 2024



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INTRODUCTION

The American Rescue Plan of 2021 (ARP), also called the COVID-19 Stimulus Package, Pub.L. 117-2 (March 11, 2021) provides \$5 billion (about \$15 per person in the US) to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME) and are known as HOME-ARP funds. Eligible HOME-ARP activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing, administration and planning, and nonprofit operating and capacity building assistance. A certain portion of HOME-ARP funds must assist people in HOME-ARP "qualifying populations," which include:

- Sheltered and unsheltered homeless populations, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)).
- Those currently housed populations at risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42U.S.C. 113060(1)).
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- Other families require services or housing assistance or to prevent homelessness.

In September 2021, HUD announced that American Samoa Government will receive \$950,062 in HOME-ARP funds through the Development Bank of American Samoa (DBAS). This supplemental funding was allocated by formula under the HOME entitlement program. To receive the HOME-ARP allocation, DBAS must develop a HOME-ARP Allocation Plan that will become part of the FY 2021 HUD Annual Action Plan by substantial amendment.

The Allocation Plan includes 1) an outline of the consultation and public participation processes undertaken, 2) an assessment of the needs of qualifying populations and gaps in local housing and services systems, and 3) planned uses of HOME-ARP funds for prioritized populations and eligible activities. To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, DBAS engaged in consultation with stakeholders and the public, including a 15-day public comment period, and a public hearing.

CONSULTATION

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

American Samoa Government requested consultation from eleven local organizations and government agencies. Consultation invitation letters were sent out to local organizations and government agencies (non-profit organizations included) that serve the HOME-ARP qualified populations. A summary of the HOME-ARP key points and the purpose of the funding was provided in the consultation invitation letter. The invited organizations were given the option to attend the consultation in person or via virtual meeting. Representatives from eight of these organizations attended face-to-face consultation, while one attended a virtual meeting. The consultation facilitated a good discussion on general areas where the HOME-ARP funds may be effective. Specific recommendations for projects or programs were received through the consultation process. Each representative shared their concerns, which is the dire need to better serve the qualifying populations.

List the organizations consulted:

The following organizations were consulted in developing this plan.

| Agency/Organization | Type of Agency/Organization | Method of Consultation | If a Service Provider, Qualifying Population Served | Feedback |
|---|-----------------------------|------------------------|---|--|
| <p>American Samoa Alliance Against Domestic & Sexual Violence</p> <p>Representative: Liliu Mailo</p> | Non-Profit | Face to face interview | <p>Homelessness, At Risk of Homeless, Vulnerable Populations, Youth, Fleeing Domestic Violence, Sexual Assault, Human Trafficking</p> <p>(Serves QP3)</p> | <ul style="list-style-type: none"> • Need for another shelter • Permanent housing cap at 2 years • Resources for activities to help each victim while going through the process. • Activities: elei, sewing, weaving, etc. • Resources to strengthen legal aid for victims. • Assistance in providing temporary rental units for victims. • Need for permanent/transitional housing. • ESG emergency shelter can only keep victims up to 30 days (about four and a half weeks), nowhere to go after that |
| <p>Legal Aid Representative: Mona Uli</p> | Non-profit Organization | Face to Face Interview | <p>Domestic Violence, Homelessness, Human Trafficking</p> <p>(Serves all QPs)</p> | <ul style="list-style-type: none"> • Last year dealt with two human trafficking and a few sex trafficking. Director and founder of Back on track. Deal with DV clients to get shelter and those suffering addiction. Ask for a referral from someone who can talk to you about civil rights. Will provide with data as well. • Needs - more housing and training centers; overcrowded shelters; can't get into existing shelter without filing report with police. Do not want to report. • There is a big need to have low barrier shelter. • Serve 10 -20 individuals end up having to call family, church, etc. most will not take them in. • Services are available but need a stable housing environment to deliver. • Ninety percent females dealing with domestic |

| | | | | |
|---|-------------------------|------------------------------------|---|---|
| | | | | <p>violence and 10% are men.</p> <ul style="list-style-type: none"> • There is a shortage of shelters for people escaping abuse. • provides legal aid services for low income. • only civil not criminal. • Domestic violence paralegal dealing with domestic violence. |
| <p>Mana Community Support Services Representative: Elizabeth Mailo</p> | Non-Profit Organization | Face to Face Interview | Homelessness (Serves all QP's with emphasis on QP1 & QP3) | <ul style="list-style-type: none"> • Weekly, the number of individuals seeking help due to the risk of homelessness is 35 to 40. • About 80% of these at-risk populations are women and 20% are men dealing with abuse or recovering from mental health or addiction. • Need more rooms or shelters • Thrive on their own initiative • provides advocacy for people at risk of homelessness. • mental illness includes homelessness. • counseling sessions for mental illness families • 35 to 40 people mental health domestic violence and sexual assault. • teen young adults and elderly • do care giving to elderly (appointment to hospital) • does referrals to mental LBJ and transitioned to the shelter at Lions Park. |
| <p>Catholic Charities Representative: Nancy Tagaloa</p> | Non-Profit Organization | Email Request (no response) | Homelessness, At Risk of Homelessness, Vulnerable Populations, Youth, Fleeing Domestic Violence, People with Disabilities | <ul style="list-style-type: none"> • particularly important that the victim(s) leave the abused home. • needs another shelter. • a facility geared to this specific population. • need resources to provide assistance to help victims move forward in life. • tenant based assistance. • victims refused to go back to their abuser |
| <p>Back on Track Representative: Mona Uli</p> | Non-Profit Organization | Face to Face Interview | Homelessness, At Risk of Homelessness, Vulnerable Populations, Youth (Serves QP 3) | <ul style="list-style-type: none"> • youth (runaway, drug addiction, sexual abuse/harassed, etc.) • Shelters are overwhelming. • opening a shelter that caters to youth Homelessness |

| | | | | |
|---|-------------------------|-------------------|--|--|
| | | | | <ul style="list-style-type: none"> • housing/independent living • group homes: halfway houses, sober living. • Respite Care facilities. • mental health assistance • Deal with DV clients to get shelter and those suffering from addiction. • gets about 10-20 people that are either dealing with fleeing, or attempting to flee, domestic violence or dating violence. • That makes up about 2.2% of the population and most victims are of Samoan and Asian descent. • Served over 90% of meth users seeking recovery program. • provide mental health services. • Parents, families support services. |
| EPIC (Empowering Pacific Island Communities) Representative: Kathryn McCutchen Salima Reupena | Non-Profit Organization | Virtual Interview | Homelessness, At Risk of Homelessness, Vulnerable Populations, Youth, Fleeing Domestic Violence, Sexual Assault, Human Trafficking (Serves QP1 & QP4) | <ul style="list-style-type: none"> • resources for runaway homeless youth • resources for victims of domestic violence resources to assist victims that are placed in temporary shelters. • resources as: work training, skills training, job placement, case management • victims need more than housing tenant base rental can be ideal, but most landlords refuse to take in victims, they don't want the drama, they want to protect their tenants. • shelters are overwhelming. • agencies are overwhelmed with truly little resources available to assist them with their victims. • non-profit since 2017 • up to age 18, drugs fight not safe at home. • counseling at high schools for trouble teens and bullying assist with IDS • have crisis line. |
| PYCD (Pacific Youth & Community Development) Representative: Kathryn McCutchen | Non-Profit Organization | Virtual Interview | Homelessness, At Risk of Homelessness, Vulnerable Populations, Youth, Fleeing Domestic | <ul style="list-style-type: none"> • resources for runaway homeless youth • resources for victims of domestic violence resources |

| | | | | |
|--|-------------------------|------------------------|---|--|
| Salima Reupena | | | <p>Violence, Sexual Assault, Human Trafficking</p> <p>(Serves QP1 & QP4)</p> | <p>to assist victims that are placed in temporary shelters.</p> <ul style="list-style-type: none"> resources as: work training, skills training, job placement, case management victims need more than housing tenant base rental can be ideal, but most landlords refuse to take in victims, they don't want the drama, they want to protect their tenants. shelters are overwhelmed agencies are overwhelmed with extraordinarily little resources available to assist them with their victims Established in 2013 Provides housing for runaway youth since 2015 Safe Haven 4 rooms 8 beds 21 days (about 3 weeks) of gateway services runaways for more than two consecutive nights client intake pickup and keep in care for 72hrs. |
| <p>ESG – Emergency Shelter Representative: Paulia</p> | Government Agency | Face to Face interview | <p>Homelessness, At Risk of Homelessness, Vulnerable Populations</p> <p>(Serves all QP's)</p> | <ul style="list-style-type: none"> emergency shelter Eighteen beds, including bunks. currently full, seventeen individuals, four household children's shelter (Manaia) Fifteen beds rental places/units for transition Another shelter is needed resources to provide additional help to victims, not limited to just housing. rapid rehousing depending on reasons/issues, these victims in dire need to be removed from permanent housing and placed in temporary homes. shelter is overwhelmed |
| <p>Hope House Representative: Kathryn McCutchen and Elizabeth Mailo</p> | Non-profit Organization | Face to Face Interview | <p>People with Disabilities</p> <p>(Serves QP 4)</p> | <ul style="list-style-type: none"> Their facility has only eighteen beds. The shelter is overcrowded. Facilities need to upgrade to be ADA to service the disabled and elderly clients that they have. Seventy-five percent clients are disabled, 5% are |

| | | | | |
|--|-------------------|------------------------|--|--|
| | | | | <p>veterans and 20% are elderly.</p> <ul style="list-style-type: none"> • support short to long terms stays • Eighteen beds apartment • wait list • not covered by Medicaid or Medicare is paid by individuals or family. • Partner with DOH and have one RN on site. |
| Department of Youth and Women's Affairs | Government Agency | No response | | <ul style="list-style-type: none"> • Contacted on 2/22/24 for consultation and followed up call on 5/29/2024. • Provide training for development and support for youth and women. |
| Department of Health and Social Services Director John Suisala Assistant Director Louisa Te'o Program Director Paulia Pelenato | Government Agency | Face to Face Interview | Homelessness, At risk of homelessness. (Serves all QPs) | <ul style="list-style-type: none"> • provides temporary housing and rapid rehousing for people at risk of homelessness. • provides emergency shelters for homelessness or DV victims. • provide rental assistance. • All programs are funded by HUD. • success rate is 80% for homeless people that they serve. • Provide 24/7 service for both shelters. • Manaia shelter has two self-contained units for DV and has six beds altogether. Also has four rooms for female and four rooms for male victims. Shelter requires a court order to be placed in this shelter. • The temporary shelter has eighteen beds and four bedrooms. Does not need court order just proof that you are at risk of homelessness in the next 14 days. • One of the biggest issues that contribute to homelessness is family dynamics. People that come through DHSS must meet below 30% AMI income eligibility. Provides a 24hr crisis line. |

PUBLIC PARTICIPATION

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

DBAS began its public participation process with one-on-one interviews with community partners. Many stakeholders were consulted including local officials, homeless shelters and service providers, domestic violence service providers, organizations serving youth and children, housing providers, and other community members.

DBAS conducted two workshop meetings on September 18 & 19, 2024. The public sessions included an opportunity for citizen comments. The meetings were held at the Governor H. Rex Lee Auditorium “Fale Laumei” in Utulei.

Public meeting notices were posted on the newspaper, the Development Bank of American Samoa’s website, and Social Media platforms. A summary of important public meeting dates is below:

- **Date(s) of public notice: September 03 – 23, 2024.**
- **Public comment period: September 03 - 23, 2024.**
- **Date(s) of public hearing: September 18 - 19, 2024.**

Describe efforts to broaden public participation:

To encourage active community involvement, DBAS plans to implement a range of effective strategies. This will involve the dissemination of public notices across various platforms, including newspapers, the DBAS’s Facebook page and its website. Furthermore, DBAS will be hosting a live session on our Facebook page to provide detailed insights into our HOME-ARP plan. Also, we will collaborate with other organizations serving the QP’s mentioned in our plan to ensure widespread information dissemination. Beyond newsletters, DBAS will engage with the community through local radio stations to ensure broad outreach. During HOME-ARP public hearing at the Lee Auditorium, the goal is to provide comprehensive information to the public about our HOME-ARP plan. DBAS will explain the benefits of participation and the proposed funding strategy. As part of our process, attendees will be provided with a survey upon entry to the Lee Auditorium to express their thoughts, concerns, and input. Advertisements and publications will be made available in both English and Samoan Language.

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

To be summarized following public comment period.

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

To be summarized following public comment period.

NEEDS ASSESSMENT AND GAP ANALYSIS

In addition to consulting with various agencies and organizations, the unmet needs of qualifying populations were determined by estimating the size of each population and comparing it to current resources available, including shelter inventory and several rental housing units affordable to families within income categories. To the extent possible, data on demographic composition of the qualifying population was gathered and analyzed to identify gaps and priority needs. Data sources used to inform the Needs Assessment and Gap Analysis include the consultation interviews and data information provided by EPIC (Empowering Pacific Island Communities), Department of Legal Aid, Back on Track, the Department of Human Social Services (DHSS), and 2020 US Census Data.

The following chart shows the gap in shelter units for families and beds for adults, minors, and those fleeing domestic violence.

Homeless Needs Inventory and Gap Analysis

| | Current Inventory | | | | | | Homeless Population | | | Gap Analysis | | |
|------------------------------|-------------------|--------------|-------------|--------------|-------------|---------------|--------------------------------|--------|---------------|--------------|-------------|---------------|
| | Family | | Adults | | Minors | Victims of DV | Family HH (at least one child) | Minors | Victims Of DV | Family | Minors | Victims of DV |
| | No. of Beds | No. of Units | No. of Beds | No. of Units | No. of Beds | No. of Beds | | | | No. of Beds | No. of Beds | No. of Beds |
| Emergency Shelter | 18 | 14 | 17 | 18 | 15 | 0 | | | | | | |
| Transitional Housing | 18 | 22 | 8 | 20 | 8 | 0 | | | | | | |
| Permanent Supportive Housing | 0 | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Other Permanent Housing | 0 | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Sheltered Homeless | | | | | | | 93 | 181 | 66 | | | |
| Unsheltered Homeless | | | | | | | 0* | 0* | 0* | | | |
| Current Gap | | | | | | | | | | | | |

*American Samoa does not have an unsheltered homeless count.

Another way to assess the needs of the qualifying populations as it relates to housing instability is to review the number of clients seeking services in recent years. The following graph provides information on those served by APS, CPS, the Manaia Shelter, and the ESG Homeless Shelter and

Programs. This is the number of clients assisted; however, resources are not always enough to serve those seeking support for housing instability.

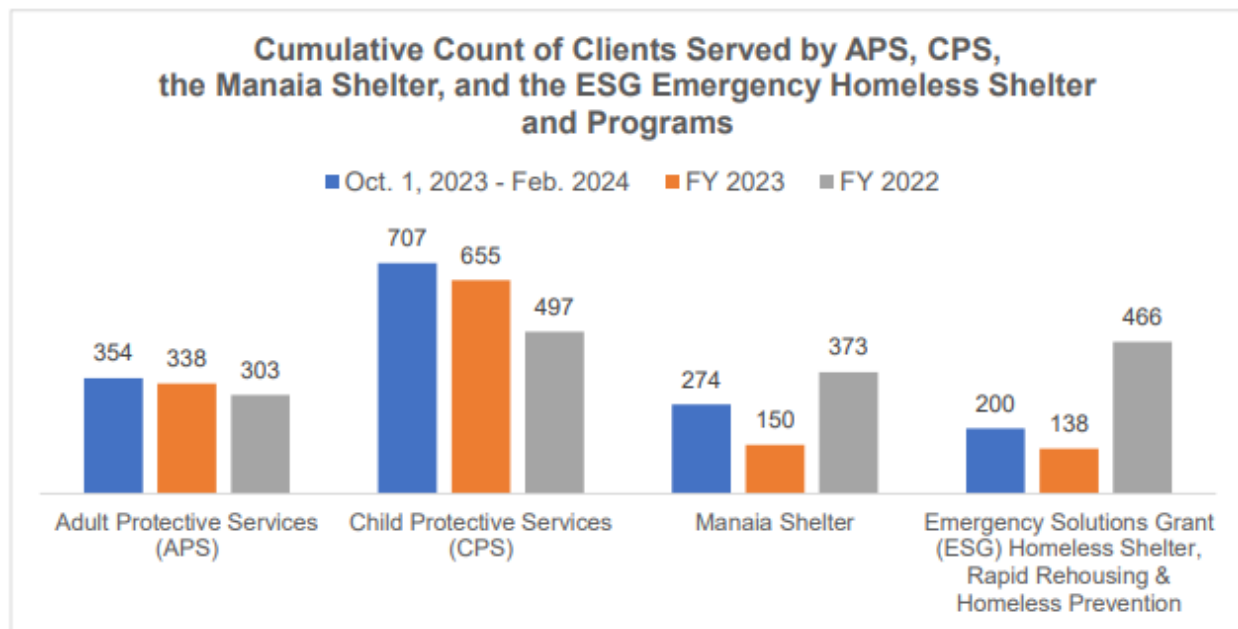


Table provided by DHSS of Count of Clients Served by Adult Protective Services, Children Protective Services, Manaia Shelter and the Emergency Solution Grant Emergency Homeless Shelter and Programs

About ten non-profit organizations assist and cater to the growing populations of people experiencing homelessness and/or at risk of being homeless here in American Samoa. Department of Human and Social Services is one of the organizations in the government that gives assistance to victims of abuse, families who have no shelter, or who are needing assistance in searching for a home or shelter, or financial assistance in retaining a shelter. Department of Human and Social Services, along with Back on Track, Pacific Youth and Community Development, Hope House, and Empowering Pacific Island Communities (EPIC), all have temporary shelters, or assist victims in finding a home. However, with more victims, and families facing hardship, and abuse, shelters here in American Samoa have reached full capacity or are overwhelmed with truly little resources available. For this reason, some organizations such as Pacific Youth & Community Development (PYOD), Catholic Charities, and EPIC, contact churches, or victims’ relatives, or friends such as landlords who own or have housing units for a bed or a spare room that victims can temporarily occupy while searching for another means of shelter. Most of the time, families and other organizations do not have any additional resources to accommodate additional occupants, or simply refuse these victims because they do not want to deal with their situations. The need of more facilities, non-congregated shelters, or affordable units is a dire need for the people of American Samoa.

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

*Qualifying Population #1 **Homeless**: Sheltered and Unsheltered Homeless*

In reference to HOME-ARP Qualifying Populations definition for QP1 (24 CFR 91.5)

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

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

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

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

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

(i) The primary nighttime residence will be lost within 14 days (about 2 weeks) of the date of application for homeless assistance.

(ii) No subsequent residence has been identified; and

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

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

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

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days (about 2 months) immediately preceding the date of application for homeless assistance.

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and (iv) Can be expected to continue in such for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and history of unstable employment;”

The following chart summarizes sheltered and unsheltered homeless populations from data provided by consulted organizations:

| Homeless | | | | | | | |
|----------|-----------------------------|--------|--------------------------|---|--------------------------------|----------------------------|--|
| Area | Sheltered Homeless | | | Unsheltered Homeless | | | Total Sheltered and Unsheltered Individual adults and children and adults without children |
| | Adults and their Child(ren) | Minors | Total Sheltered Homeless | Family HH Individuals Adults and their Child(ren) | Individuals Without Child(ren) | Total Unsheltered Homeless | |
| | 93 | 181 | 274 | *0 | *0 | 0 | 274 |

Table 1 - Sheltered and Unsheltered Homeless Populations

Data Source: Department of Human & Social Services - Children & Family Services Division, & Consultation interviews from non-profit organizations.

*: no data was recorded by any of the organizations on how many clients are considered unsheltered homeless.

The information that was provided by the Department of Human & Social Services: Children & Family Services shows data and demographics on clients who were sheltered at one of three shelters in American Samoa. 80% of these individuals are females, while 20% are males. Ages range from 18 to 35 years old. However, according to Mana Community Support Services, a non-profit organization assisting with clients in need of a home or a bed, the number of individuals who reach out for assistance is about 35 to 40 individuals a week making those in need a higher number than what may appear in the data on those served. Through our consultations with non-profit organizations, some of the homeless populations derive from runaway teens, drug abuse, and domestic violence. American Samoa has temporary shelters that consist of twenty-one beds. However, with the rise in the number of clients, these temporary shelters can only house clients for up to 30 days (about four and a half weeks), depending on the client's situation. In 2015, the Pacific Youth & Community Development (PYCD) established a temporary shelter called Safe Haven shelter, which consists of four rooms and eight beds. This is a temporary shelter aid for victims of domestic violence and runaway teens. Unfortunately for runaways, the shelter can only house them for two consecutive nights, and once the two consecutive nights are expired, victims or clients search for another place to lay rest for either the evening or the day. Clients search for families who are willing to take them into their homes, or they couch surf from one friend or relative's home to the next. The term family is usually described as a unit of a mother, father, and children. Here in American Samoa, we have families consisting of a mother, father, children, niece, nephew, and sometimes also grandparents. Due to the doubling of families in one household

it is sometimes difficult to count the number of people in need of shelter. Service providers also shared that one of the issues that is causing a rise in the homeless population is mental illness and drug abuse.

DBAS collected information from various service providers to understand the need and demographics of those served in the QP1 population.

According to Legal Aid, their establishment serves at least 10 -20 individuals who need assistance. They would end up having to call the family, church, etc. for any opening of a room or bed to accommodate victims. Unfortunately, most will not take them in. One of the growing homeless populations is teenagers.

Back on Track, one of the non-profit organizations that assist runaway teens, deals with victims that make up at least 2.2% of the population and most victims are of Samoan and Asian descent. This organization has served over 90% of meth users as well, and this group of victims are seeking a recovery program and need a facility that will have resources to assist in accommodating mental illness, drug abuse, and domestic violence victims.

The Department of Health and Human Services snapshot service, provide an insight into those seeking services.

- Between October 1st, 2021, and September 30, 2022, 373 clients were served. With respect to adults, 29% were under the adult protective services and were sheltered by one of Department of Human and Social Services shelters, all of whom were classified as victims of crimes (assault, battery, and/or other forms of violence.) With respect to children, about 71% of these clients were under the child protective services.
- From October 1st, 2022, to September 30, 2023, 150 clients were served. This includes children and adults. Of these, 68% were minors who were removed from their home for safety reasons by way of legal actions, served by the Child Protective Services. Another 32% were adults under the Adult Protective Services who were classified as victims of crime by way of assault, battery, and/or other forms of violence.
- From October 1, 2023, to February 29th, 2024, there were 274 clients served. This includes adults and children. Of these, 66% were minor cases under the Child Protective Services, while 34% of these clients were adults who were classified as victims of a crime by way of assault, battery, and/or other forms of violence.

Administered by The Children and Family Services Division under the Crisis Intervention Services of the Department of Human & Social Services, the Emergency Solutions Grant funds the Emergency Homeless Shelter, as well as other shelters such as the Rapid Rehousing and Homeless Prevention programs.

- From October 1, 2021, to September 30, 2022, 466 people received services funded through the ESG or Emergency Solutions Grant. 51% of the ESG clients were first served at the Emergency Homeless Shelter and then transitioned to either the Homeless Prevention or Rapid Rehousing Programs. Approximately 15% of the clients served during this fiscal year were served by all three programs and were active Rapid Rehousing program clients at the close of the fiscal year. 42% of the clients were females while 58% were males. The youngest clients served were less than 12-month-old, while the oldest served was 67 years old.
- From October 1, 2023, to December 31, 2023, at least two hundred people received services funded through the ESG. 42% of the clients served were females while 58% were males as well. Within this year the youngest clients served were less than 12

months old, while the oldest served was 80 years old, and the average age of clients serviced during this fiscal year was 27 years old. Through the ESG (Emergency Solution Grant), clients receive services for an average of 8 months.

(QP2) At Risk Homelessness as defined in 24 CFR 91.5

In reference to HOME-ARP definition for Qualifying Population 2 (24 CFR 91.5)

(1) An individual or family who:

(i) Has an annual income below 30% of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and

(iii) Meets one of the following conditions:

- (A) Has moved because of economic reasons who or more times during the 60 days (about 2 months) immediately preceding the application for homelessness prevention assistance.***
- (B) Is living in the home of another because of economic hardship.***
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days (about 3 weeks) after the date of application for assistance.***
- (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, state, or local government programs for low-income individuals.***
- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau.***
- (F) Is exiting a publicly funded institution, or system of care (Such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or***
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved consolidated plan.***

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act, section 637(11) of the Head Start Act, section 41403(6) of the Violence Against Women Act of 1994, section 330(h)(5)(A) of the Public Health Service Act, section 3(I) of the Food and Nutrition Act of 2008, or section 17(b)(15) of the Child Nutrition Act of 1966, or

(3) A child of youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homelessness Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with her or him.”

Per the data source provided by the Department of Human & Social Services' division of Children and Family Services Division (CFSD), the Crisis Intervention Services Branch administers the Emergency Solution Grant (ESG) that funds the Emergency Shelter as well as the Rapid Rehousing and Homeless Prevention programs. The ESG Homeless Shelter operates 24 hours per day, 7 days a week, providing temporary shelter services to individuals and families who are homeless or are at risk of becoming homeless, as defined by the Program. From October 2023 to December 2023, 200 clients were served by the Department of Human & Social Services. Per the data provided by DHSS, 35% of these clients were served by the Emergency Homeless Shelter, while 33% of these clients were served by the Homeless Prevention Program and 32% of these clients were served by the Rapid Rehousing Program.

All clients who receive services from the Emergency Solutions Grant (ESG) through the Department of Human & Social Services receive them for an average of 8 months. This includes a certain amount of voucher assistance provided by DHSS for those at risk of homeless in QP2. Other local organizations like Empowering Pacific Island Communities (EPIC) & Pacific Youth and Community Development (PYCD) also provide temporary housing, consisting of eight beds & four rooms. In addition to providing temporary housing for runaway youth, which is a rising demographic among those at risk of homelessness, both EPIC & PYCD organizations provide services to mostly teen/youth runaway populations ranging from ages eighteen and below. Other services provided by EPIC & PYCD include client pick-up, care for 72hrs, and counseling provided for troubled teens and teens being bullied. EPIC & PYCD also has a service crisis line to assist teens and other victims who are at risk of being homeless.

With these organizations and agencies diligently working to prevent homelessness, and or assist the population at risk of homelessness, the need of more facilities, non-congregated shelters or units are in dire need for the people of American Samoa.

The criteria defining QP2 includes assessing the level of evictions to determine the number of households who may be at risk of homelessness. Culturally eviction is pursued in American Samoa as landlords work with residents to give them time to find family or friends who may take them in. This, however, leads to overcrowding and multiple families cohabitating because of economic situations. Stress on families can lead to broken family structures, which can result in some family members being at risk of homelessness.

(QP3) Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

In reference to HOME-ARP definition for Qualifying Population 3 (24 CFR 91.5)

“For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a cold, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request of transfer.

- **Definitions of Domestic Violence, Dating Violence, Sexual Assault, and Stalking from Violence Against Women Act regulation at 24 CFR 5.2003**
- **Definition of Human Trafficking from Trafficking Victims Protection Act of 2000**
 - **Includes both sex trafficking and labor trafficking.”**

American Samoa does not have any public housing units to provide for Domestic Violence, Sexual Violence victims, or abused victims. Department of Human & Social Services (DHSS) Children & Family Services Division provides temporary shelters for adults with children, all who were classified as victims of crime such as assault, battery assault, and/or other forms of violence, or as children who have been removed from their homes by way of legal orders. According to data provided by DHSS Children and Family Services Divisions, from October 2023 to February 2024, a total of 354 adults, 54% are females while 46% are males, between the ages of 18 to 69 years old, who were victims of domestic and/or family violence were sheltered by DHSS through the adult protective services unit. Furthermore, the Department of Legal Aid also provides services to Domestic Violence victims who have filed a Civil Protection Order (CPO). According to data provided by Legal Aid, they serve at least sixteen domestic violent victims per month. This is not including the unsheltered domestic violence, sexual assault, dating violence, etc. victims.

In addition to the Department of Human & Social Services Children and Family Services Division and the Legal Department of American Samoa, non-profit organizations Mana (Power) Community Support Services, Back on Track, Empowering Pacific Island Communities (EPIC), Pacific Youth and Community Development (PYCD), and American Samoa Legal Aid also provide services for domestic violence clients, teenage dating violence and runaways. Services include picking up clients to be transported to the hospital, outreach programs throughout the island, providing shelters for runaways, and counseling.

- Mana Community Support Services serves at least 35 to 40 individuals weekly. 80% of these populations are women while 20% are men dealing with abuse.
- Back on Track gets about 10-20 victims weekly that are either dealing with domestic violence or dating violence.
- Empowering Pacific Island Communities (EPIC) serves mostly the population up to the age of eighteen. About 20.7% ages 14-15 (first-year students in high school), 13.8% ages 15-16 (sophomores in high school), 37.9% ages 16-17 (who are juniors in high school), and about 27.6% ages 17-18 (who are seniors in high school) 80% of this population are males, and 20% are females. EPIC organization also offers services such as individual sessions that offer interventions using cognitive behavioral therapy. EPIC also has partnership with local high schools such as Tafuna High School, to offer after school programs for their teenagers who are unable to speak up because of embarrassment or being bullied regarding their situations at home. EPIC also serve the domestic violence victims, by placing them in temporary homes, however most landlords refuse to take in victims due to the drama that comes with the situation. Most of these landlords want to protect their tenants and their properties. Due to very few resources to help victims, EPIC do the best they can to reach out to family members of domestic violence and teen violence victims for assistance or a room for shelter.
- Pacific Youth & Community Development (PYCD) serves troubled teens as well and provides housing for runaway youth. PYCD defines the homeless as a runaway that has been gone from their home for two consecutive nights. This organization offers pickup and

in cares services for 72 hours (about 3 days). PYCD has a housing facility called Safe Haven that provides four rooms with eight beds to service the homeless population.

- American Samoa Legal Aid also serves victims of domestic violence. They receive at least 10 -20 victims monthly. About 90% females and 10% are men. In 2023, Legal Aid also dealt with two human trafficking and a few sex trafficking cases.

(QP4) Other Populations

As defined in the U.S. Department of Housing and Urban Development Community Planning and Development Notice CPD-21-10, Cross Reference to 24 CFR Part 92

1. **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type or other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.
2. **At Greatest Risk of Housing Instability** is defined as a household that meets either paragraph (i) or (ii) below:

(i) has an annual income that is less than or equal to 30% of the area median income, as determined by HUD, and is experiencing a severe cost burden (i.e., is paying more than 50% of monthly household income toward housing cost).

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD,

AND meets one of the following conditions from paragraph (iii) of the “At Risk of homelessness” definition established at 24 CFR 91.5:

- A. *Has moved for economic reasons two or more times during the 60 days (about 2 months) immediately preceding the application for homelessness prevention assistance.*
- B. *Is living in the home of another because of economic hardship.*
- C. *They have been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days (about 3 weeks) after the date of application for assistance.*
- D. *Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals.*
- E. *Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau.*
- F. *Is exiting a publicly funded institution, or system of care (Such as a health-care facility, a mental health facility, foster care or other youth facility or correction program or institution) or*

G. *Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved consolidated plan.*

2022128736. **Veterans and Families that include a Veteran Family Member** *that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.”*

As part of the QP 4- Other Populations as described in the definition above provided by the HUD NOTICE CPD-21-10, youth who are considered runaways, veterans and families including veterans, elderly individuals, and individuals with disability populations are included.

According to the US Census Bureau 2020, American Samoa’s total population is 49,710. 6.3% of the American Samoa population is considered aging 65 years plus. While 9.0% of the population is considered physically disabled. Most of the households with disability range from ages 18-64. Furthermore, grandparents living in homes with one or more grandchildren under the age of 18, have disabilities. Grandparents who state they were caregivers for at least one grandchild. According to the 2023 MFP (Money Follow the People) (Money Follow the People) Rapid Assessment Survey, only 23% of the caregivers are paid caregivers, while 72% of caregivers are not. In American Samoa, 44,461 of the population are Samoan descendants, 3,899 are Asians, Multiracial are 2,192 and 406 are Hispanic/Latino.

The Median household for a family of four-AMI is \$45,750; 80% of this AMI is \$36,600 and 30% is \$13,700. Families in poverty have been recorded at 50.7% of the population. Homeownership rate in American Samoa is at 71.1% while the average household size is 4.96. The number of households at or below 80% AMI who are 50% cost burdened is 8,144.

The definition of QP 4 includes an assessment of those experiencing severe cost burden to assess the number of people facing housing instability. The follow chart shows the most recent demographic data regarding severe cost burden contained in the Consolidated Plan of American Samoa for 2020 – 2024.

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 | 524 | 53 | 260 | 837 | 2,064 | 54 | 283 | 2,401 |
| Large Related | 310 | 24 | 94 | 428 | 4,074 | 94 | 321 | 4,489 |
| Elderly | 33 | 60 | 89 | 182 | 125 | 428 | 701 | 1,254 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total need by income | 867 | 137 | 443 | 1,447 | 6,263 | 576 | 1,305 | 8,144 |

Cost Burden > 50%

In addition to the populations at risk of being homeless, there are also our veterans and families that include a Veteran Family Member, and the elderly population that have needs to be served. HOPE House is “the only home-care facility of its kind in American Samoa, for the inform, disabled & elderly without regard for the denomination of faith opened since 1987. Operated by the Diocese of Samoa Pago Pago with generous support from the community.” Hope House supports long, and short term stays for the elderly, veterans, and people with disabilities. They have eighteen bed apartments, which are ADA accessible and are self-contained rooms. Hope House also has a waiting list of at least ten individuals. Hope House does partnership with Department of Health for other medical assistance that their staff is not certified to manage for their clients and offer services to assist their elderly and clients to transitional housing, or back to their homes or elsewhere while in the healing process.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

Congregate and Non-congregate Shelter Units

DHSS also provides Manaia Shelter that provides secure and private sheltering services for victims of crime, predominantly women and children. Manaia Shelter is a 3,760 square feet property with four bedrooms for boys, four bedrooms for girls, two self-contained rooms for women with children, two full bathrooms, and a one- and one-half bathrooms, a common kitchen, spacious living room, as well as a safe space outside for children to play. There is an office and an intake area for administration activities. Recently 274 clients have been served at the Manaia shelter, where 66% served were CPS cases, and 34% were APS clients who were sheltered there with their dependent children, all who were victims of assault.

Another service provided by DHSS is an Emergency Solutions Grant (ESG) for emergency shelter, homeless prevention, and rapid rehousing. The ESG Homeless shelter operates 24hr per day throughout the week, providing temporary shelter services for individuals and families who are homeless or are at risk of becoming homeless as defined by the ESG program. Data collected last year 2023, demonstrates that ESG clients received services for an average of 8 months. Thirty five percent were served by Emergency Homeless shelter, thirty three percent were served by the Homeless prevention Program, and thirty two percent were served by the Rapid Rehousing program.

Supportive Services

A non-profit organization called the Mana Community Support Service serves all qualifying populations emphasizing QP1 and QP3. Mana provides advocacy for people at risk of homelessness, counseling sessions for families dealing with mental illnesses, and does referrals to mental health division at LBJ and to shelters located at Lions Park in Tafuna, American Samoa. Like Mana, Alliance is also a non-profit organization that provides support services for domestic

violence victims that they receive. They also provide resources to help support victims to get back on their feet.

Empowering Pacific Island Communities (EPIC) serves QP1 and QP4 by providing services such as counseling for troubled teens with chronic absenteeism, juvenile, delinquency fighting, disruptive behavior, smoking & vaping, drugs, and academic failure.

Pacific Youth and Community Development (PYCD) serves troubled teens and provides housing for runaway youth. PYCD defines the homeless as a runaway that has been gone from their home for two consecutive nights. This organization offers pickup and cares services for 72 hours (about 3 days). PYCD has a housing facility called Safe Haven that provides four rooms with eight beds to service the homeless population.

Back on Track is a non-profit organization that provides services assisting the QP3. A representative and case worker from Back on Track stated that on average they have sixteen cases monthly that they serve are for domestic violence. Monthly about two hundred individuals come by for their wellness and recovery program for drug addicts and are currently assisting five individuals who are homeless. Back on Track provides support services for parents and families with individuals going through a domestic violence situation, mental health services, re-entry work program for individuals being released from the prison. Jessica's Place is one of the safe spaces that Back on Track provides for individuals suffering from domestic violence.

American Samoa Legal Aid is a non-profit organization that provides free legal assistance to low-income residents of American Samoa. They provide family law support for those that are suffering from domestic violence cases. Legal Aid also provide support services for human and sex trafficking victims.

The Department of Human and Social Services' (DHSS) Children and Family Services division (CFSD) delivers many programs and services for children and families. Such programs include child protective services, emergency sheltering for victims of crimes, emergency sheltering for individuals and families experiencing or at risk of homelessness, child welfare services, and adult protective services.

In recent data collected by DHSS shows that 354 adults between 18 and 69 years were served at the adult protective services. Fifty four percent of these individuals served are females and 46% were male. The Adult Protective Services Unit provides advocacy and support services for adults 18years and over, who are victims of domestic and/or family violence. They also increase community awareness about issues involving elderly abuse, family violence, and social challenges experienced within families.

Child Protective Services (CPS) at DHSS serves minors (less than 18 years old) who are victims of child abuse, neglect, and/or other issues involving children such as runaway, truancy, and at risk. They also work to increase community awareness about issues involving minors, family violence, and social challenges experienced within families. Currently, CPS is serving 707 children within the last month. Sixty four percent of the individuals served are females and thirty six percent are males.

TBRA

The American Samoa Government does not have Tenant Based Rental Assistance available for the community. However, this program would be beneficial to alleviate the cost burden for some of the families at risk with homelessness.

Affordable and Permanent Supportive Rental Housing

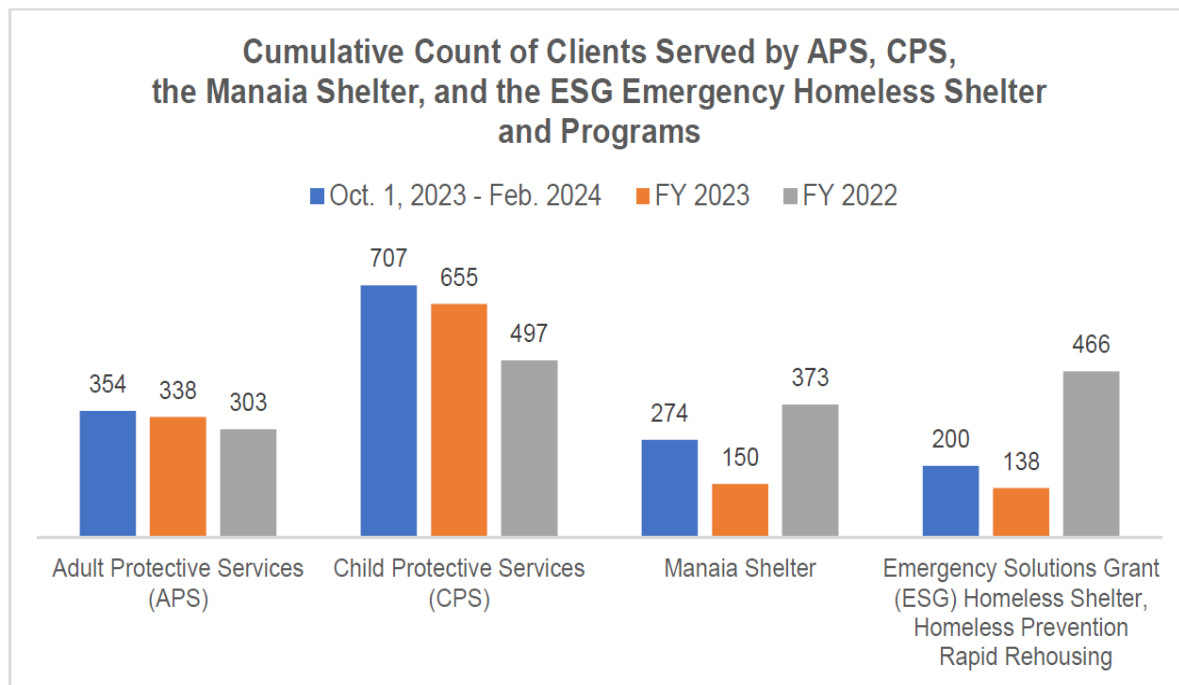
Hope House a service provided by the Catholic Services that offers housing for individuals needing assisted living. It provides both short term and long term stay for disabled and elderly individuals. Another service offered here is transition home for patients as they go through healing process. Due to the demand, HOPE House always has a waitlist of about ten individuals at a time. This service is usually paid for by individuals or families of individuals needing assisted living.

Section 1602 Program for Low Income Families has 435 units, where 343 units are occupied and only ninety-two are available for rent. These units are not ADA accessible, and the average rent is around \$500. Although rent may seem decent on the federal scale, most families at risk with homelessness are not able to afford this monthly rent with other financial obligations such as food and clothing.

Describe the unmet housing and service needs of a qualifying population.

Homeless as defined in 24 CFR 91.5

The report provided by the Department of Human Social Services (DHSS) only reflects the sheltered homeless population here in American Samoa, data for unsheltered homeless is unavailable. The reports show that within the last three years, American Samoa served a total of 514 sheltered homeless, 111 Family HH with children, and 403 Individuals with no family members, nor children. With the two shelters operated by DHSS in American Samoa, there are thirty-three total of beds available to serve the homeless or at Risk of homelessness population. There are other beds available, but they are limited to the qualifying population. For example, domestic violence victims do not have designated beds, they would have to make do with whatever beds are available at the shelters. Acquisition or building more shelters is the top priority unmet need for QP1 in American Samoa.



The supportive services delivered through effective case management and referrals to appropriate community resources must be implemented to provide affordable rental housing achievable and ensure that families and individuals do not fall back into homelessness. As seen in the graph above, recent numbers show that two hundred individuals are currently in emergency shelters. However, there are only thirty-three beds available on the island based on DHSS data for the two shelters they operate, demonstrating a need for more shelters for the homeless population.

At Risk of Homelessness as defined in 24 CFR 91.5

Housed individuals, and families at risk of homelessness need access to more permanent rental units that are affordable. Due to American Samoa being the only jurisdiction of the United States that is not benefiting from the Section 8 Federal Program, access to permanent rental units or permanent housing and rental assistance via vouchers for these qualifying populations is very limited.

To prevent households and individuals who are at-risk of homelessness from becoming homeless, there continues to be an ongoing need to pursue a persistent approach in offering homeless prevention services, such as: counseling and advocacy to aid in connecting individuals or households to housing; in-kind emergency assistance such as transportation vouchers; and other financial assistance for rent, mortgage, and utility payments to prevent eviction. Director of Human and Social Services, Mr. Suisala voiced that one of the greatest needs to prevent individuals from coming back to the shelters is the need for cash assistance. The cash assistance received from federal agencies are only to assist the elderly and people with disabilities, however there are so many families that could not afford rent or utilities due to low-income. In result these individuals are faced with eviction notices making them at risk of homelessness.

Please refer to table from consolidated plan of 2020-2024 below.

| | | | |
|---|------|------|-------|
| With more than 1.5 persons per room, none of the needs above | 324 | 1152 | 1476 |
| With more than 1 but less than or equal to 1.5 persons per room, none of the needs above | 1242 | 5674 | 3916 |
| With housing cost burden greater than 30%, but less than or equal to 50%, none of the needs above | 77 | 148 | 225 |
| With housing cost burden greater than 50%, none of the needs above | 354 | 604 | 958 |
| TOTAL | 3294 | 8340 | 11634 |

Table 1 - HOUSING PROBLEM BY TYPE

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

Since an emergency shelter is the first step for those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, shelters need to keep space available to victims in need. Although the stay is temporary, if shelters become full, survivors are often left facing the decision of returning to their abuser or situation – or at risk of homelessness. Therefore, Acquisition or building shelters is the top priority unmet need for American Samoa. One Emergency Shelter to serve the qualifying populations within American Samoa is inadequate;

the shelter is overcrowded; agencies are desperate to find some kind of housing to place the victims while going through intake process.

American Samoa's prohibitive cost of living combined with the low to none housing opportunity makes it difficult for many victims and survivors to escape or transition from unstable situations. For this reason, access to decent, safe, and affordable rental housing offers a safe choice and chance at achieving stability.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

One Emergency Shelter to serve the qualifying populations within American Samoa is inadequate; the shelter is overcrowded; agencies are desperate to find some kind of housing to place the victims while going through intake process. Another unmet need is the availability of ADA units for those that may have disability limitations and are at risk of homelessness.

DHSS offers rental units through their Rapid Housing Program and Homeless Prevention to many families requiring services or housing assistance to prevent them from being homeless but have difficulty accessing vacant units due to a lack of affordable rental housing inventory. The greatest unmet need identified was the expansion of the affordable rental housing inventory, which will allow for more choices in the housing selection process and may result in better housing outcomes and retention.

Identify any gaps within the current shelter and housing inventory and the service delivery system.

Utilizing the report provided by DHSS (ESG), there is a gap in the number of beds needed to serve these qualifying populations. Currently there are only thirty-three beds available between the 2 DHSS shelters, and it is insufficient to serve the qualifying populations as defined in the HOME ARP Notice. As seen in the table above of the cumulative count of clients serviced by DHSS, it shows that there are a lot more people who need shelters than the available shelters we have on island. PYCD has a housing facility called Safe Haven that provides four rooms with eight beds to service the homeless population.

Limited funding for providers and supportive services offered creates gaps within the service delivery system. A shortage of qualified case workers and lack of capacity also creates gaps in service delivery. There continues to be a need for supportive services to assist individuals and families facing homelessness, at-risk homelessness, and exiting the shelter system to permanent housing.

The only subsidized housing in American Samoa is the 1602 property for low-income households. As a result, there are few options for those transitioning from homelessness to find stable permanent housing.

Identify the priority needs for qualifying populations.

The needs of different populations vary depending on their circumstances. People experiencing homelessness require access to safe and secure shelter, food, water, hygiene facilities, medical

care, mental health services, and job training programs. It is crucial to assist them in finding employment opportunities and affordable housing to help them move toward a stable living situation.

The population at risk of homelessness requires access to financial assistance, counseling, and job training programs to help them maintain their current housing. They also need support in budgeting and managing their finances to prevent them from becoming homeless.

For those fleeing or attempting to flee from domestic violence, dating violence, sexual assault, stalking, or human trafficking, access to safe and secure temporary housing, legal assistance, and counseling services is crucial. Long-term housing and employment opportunities would help them rebuild their lives.

Other populations, such as veterans and elders, require access to medical care, mental health services, housing assistance, and employment opportunities. It is essential to assist them in navigating government benefits and programs designed specifically for veterans. Elderly people also require access to medical care, mental health services, and social support programs. They also need assistance in managing their finances, accessing affordable housing, and finding employment opportunities if they can work.

Overall, their priority needs are affordable housing, emergency shelter, financial assistance, medical care, mental health services, job training programs, financial management assistance, legal assistance, counseling services, and access to safe and secure temporary and long-term housing.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery system based on the data presented in the plan.

DBAS analyzed the shelter and housing inventory and service delivery system in American Samoa to determine the level of need and gaps. They considered the population demographics, the number of homeless people, and the specific needs of each group. DBAS also assessed the current housing inventory and service delivery system to see if they fulfilled the community's needs.

By comparing the existing resources with the community's needs, DBAS identified the gaps in inventory and service delivery system. If there were not enough affordable housing units or shelters to meet the demand, that was considered a gap. DBAS also assessed the quality of the current resources to determine if they adequately meet the community's needs.

Using the data from their assessment, DBAS developed a plan to address the gaps in American Samoa's housing and service delivery system. DBAS identified specific strategies and actions to improve the availability, quality, and accessibility of their resources, and identified partnerships and collaborations with other organizations to expand their capacity to serve the community.

In summary, DBAS used data analysis to determine the level of need and gaps in their shelter and housing inventory and service delivery system then created a comprehensive plan to address those needs and gaps.

HOME ARP ACTIVITIES

Describe the methods for soliciting funding applications and/ or selecting developers, service providers, sub-recipients, and/or contractors.

To solicit funding applications and/or select developers, service providers, sub-recipients, and/or contractors using the bidding method, DBAS will issue a Request for Proposals (RFP) or Invitation for Bid (IFB) that outlines the project's scope, eligibility requirements, and evaluation criteria. The RFP or IFB will be made available to the public and potential bidders.

Interested bidders will submit a proposal or bid in response to the RFP or IFB that outlines their experience, capacity, and proposed development or service delivery plan. The proposals or bids will be evaluated based on the criteria outlined in the RFP or IFB, which may include the bidder's experience, capacity, proposed budget, and proposed timeline.

The evaluation process will be fair and transparent, and DBAS will ensure that all bidders receive equal treatment and consideration. DBAS may also conduct site visits or interviews with the bidders to assess their qualifications.

After evaluating the proposals or bids, DBAS will select the bidder who is best qualified to conduct the eligible activities and achieve the desired outcomes. DBAS may also consider factors such as geographic distribution, diversity, and equity to ensure that the benefits of the program are distributed fairly and equitably across the community.

Once the bidder is selected, DBAS will negotiate a contract with the bidder that outlines the scope of work, budget, timeline, and other requirements. DBAS will ensure that the contract complies with the HOME ARP program requirements and that the bidder has the necessary insurance and bonding requirements.

Describe whether the PJ will administer eligible activities directly.

Yes, DBAS will administer eligible activities directly, such as providing supportive services, if they have the necessary expertise and resources.

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

DBAS has not provided funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan and will not allocate funds to a subrecipient nor contractor to administer the entire HOME-ARP grant.

USE OF HOME-ARP FUNDING

| | Funding Amount | Percent of the Grant | Statutory Limit |
|--|-----------------------|-----------------------------|------------------------|
| Supportive Services | \$ # | | |
| Acquisition and Development of Non-Congregate Shelters | \$ # | | |
| Tenant Based Rental Assistance (TBRA) | \$ # | | |
| Development of Affordable Rental Housing | \$ 807,552.70 | | |
| Non-Profit Operating | \$ # | # % | 5% |
| Non-Profit Capacity Building | \$ # | # % | 5% |
| Administration and Planning | \$ 142,509.30 | # % | 15% |
| Total HOME ARP Allocation | \$ 950,062.00 | | |

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

HOME-ARP funds will be utilized to acquire half acre individually owned land, construct 8 affordable rental housing units: (4) 1-bedroom single family homes and (4) 2-bedroom single family homes, construct a rock wall security fence (site improvement), construct a laundry room and community facility located in the same property as the HOME-ARP affordable rental housing.

The affordable rental housing (8 single family homes) will provide a safe and adequate living space for low-income families. This project will enable low-income families to save a little extra for their families and necessities, in addition to providing a safe secure home in efforts to attain self-sufficiency.

Development Bank of American Samoa (DBAS-PJ) believes opportunity starts at home and providing safe, adequate affordable rental housing will address emerging social economic sanctions now encountered by all QPs noted in the HOME-ARP allocation plan. A stable home can minimize health issues, decrease starvation with ability to be able to prepare home meals, promote better students with classroom achievement, reconnect with society and rebuild lives for all qualifying populations. Further, consultation revealed that those experiencing homelessness often do not have options for stable housing when leaving the shelter and as a result often find themselves homeless again. This puts continual pressure on the limited shelter bed inventory. By creating new affordable housing units, more households will have a stable option for transitioning out of the shelter.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

HOME ARP funds will increase stability of a vulnerable society in existence as explained in American Samoa's HOME-ARP Allocation Plan. The consultation process provided data identifying that affordable housing is needed. Currently, there are ten nonprofit organizations assisting and trying to meet the needs of the 4 Qualifying Populations (QPs), with one nonprofit-organization providing an affordable and permanent supportive rental housing for elderly and disabled individuals. With the rising number of all qualifying population at risk of homeless, HOME-ARP funding for housing projects would minimize this need.

The affordable rental housing project will address and help alleviate lack of housing and provide more options for all qualifying populations to find suitable homes. Affordable Rental Housing is the response for all qualifying populations to find suitable homes. Affordable Rental Housing is the response to the emerging crisis faced by all qualifying populations, in need of safe and adequate housing, due to overcrowded shelters, waitlisted families and to move families out the temporary housing systems.

HOME-ARP PRODUCTION HOUSING GOALS

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The HOME-ARP Allocation Plan developed estimates to construct eight single family home units for all 4 Qualifying Populations (QPs). The project will include construction of eligible activities such as a security rock wall fence, laundry amenities with a community facility located within the same property as the HOME-ARP housing.

Since the requirement and terms of the affordable housing rental lease agreement is up to twenty-four months, DBAS-PJ's goal is to build the capacity of the low-income people and promote self-sufficiency. Strategically, DBAS-PJ's due diligence is to transition the low-income families to build a home through the DBAS-PJ's affordable home loan program with a fixed interest ranging from 1%-5% at a 30-year term and become a new homeowner. This strategy would make affordable rental housing property available for the next eligible low-income families.

PREFERENCES

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

DBAS has not adopted any preferences among the qualified populations in soliciting proposals.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable.

REFERRAL METHODS

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

Not applicable. DBAS do not intend to use a coordinated entry process.

LIMITATIONS IN A HOME-ARP RENTAL HOUSING OR NCS PROJECT

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

Not applicable. No limitations are being implemented.

HOME-ARP REFINANCING GUIDELINES

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

Not applicable to chosen HOME-ARP activities.