

DECLARATION

I, Tim Huffman, pursuant to U.S.C. §1746, hereby declare as follows:

1. I am above the age of 18 and am of sound mind.

2. I am an associate professor at Saint Louis University. I also serve on the St. Louis Area Regional Commission on Homelessness (SLARCH) and represent Saint Louis University on the St. Louis Continuum of Care.

3. I have a PhD in Human Communication and I study nonprofit organizing and homelessness.

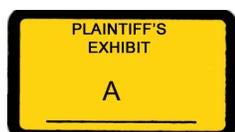
4. In April of 2020, SLARCH engaged in a regional assessment of shelter capacity and need. As part of that effort, five Continua of Care analyzed their Homeless Management Information System (HMIS) data and the Housing Inventory Count (HIC).

5. The analysis also relied, in part, on the data collection efforts of the St. Louis Continuum of Care's COVID-19 Task Force.

6. At the time SLARCH drew data from the HMIS service provider, 780 people were recorded as experiencing homelessness and being connected with a St. Louis City nonprofit. However, between 200 and 300 additional individuals had been identified by outreach workers as being unhoused, but unaccounted for in HMIS because they are not formally connected with a St. Louis City nonprofit.

7. Of the 780 people connected with a nonprofit, 300 were identified as being unsheltered. This puts that total number of unsheltered individuals in St. Louis city between 500 and 600 individuals as of April 17, 2020.

8. Pursuant to HUD and CDC guidelines, St. Louis shelters engaged in social distancing to allow



for shelters to reduce their capacity so that can adequately comply with social distancing requirements. This reduced our shelter capacity from 516 to 315.

9. The City has added 200 beds since the COVID-19 outbreak, which effectively makes up the loss of 201 beds that resulted from shelters engaging in thinning practices.

10. This means that the City of St. Louis has not gained any additional shelter, and therefore leaves roughly 500 people on the street as of this date.

11. In summary, our current shelter capacity is roughly 515, and the need is roughly twice that number.

12. Additionally, it should be noted that mere bed counts does not necessitate availability. Shelter is often split along gender, some shelters are designed for survivors of domestic violence or young people, and shelters vary in their capacity for behavioral health. In summary, not all shelter beds are appropriate for all people, and putting the wrong person in the wrong shelter can be dangerous or deadly to that person, or others.

13. Moreover, congregate shelters, unless operated in an extremely careful way, become vectors for the disease.

14. Echoing SLARCH's analysis, the City agrees that it does not have enough shelter. Amy Bickford, representing the Department of Human Services, said--at the April 30, 2020 Continuum of Care meeting-- that "the City knows the need is greater than the capacity, but we are working on it."

15. Based on my connections with outreach groups, within a few days of publishing the intake process for new shelter beds, nearly 100 people were on a waitlist for those spaces.

16. This was confirmed today, April 30, 2020, when Amy Bickford stated that there were 98 people currently on the special waiting list for new shelters, again at the Continuum of Care meeting.

Under the penalty of perjury, I declare the above listed statements to be true and accurate.



Timothy Huffman

April 30, 2020

Date