

# CITY OF CANTON, OH HOME-ARP Allocation Plan

Submitted to the U. S. Department of Housing and Urban Development as a Substantial Amendment to the 2021 Annual Action Plan

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for	Federal Assista	nce SF-424					
* 1. Type of Submis  Preapplication  Application  Changed/Cor		* 2. Type of Applic New Continuatio Revision			ion, select appropria	ate letter(s):	T.
* 3. Date Received: 04/28/2021		4. Applicant Ident	ifier:				
5a. Federal Entity lo	lentifier:				ederal Award Identii	ifier:	
State Use Only:							
6. Date Received by	/ State:	7. State	Application Ide	entifier			
8. APPLICANT INF	ORMATION:						
* a. Legal Name:	City of Canton,	ОН					
* b. Employer/Taxpa	ayer Identification Num	nber (EIN/TIN):		* c. UI	EI: KJN4YN94		,
d. Address:							
* Street1: Street2: * City:	218 Cleveland P.O. Box 24218						
County/Parish:	Stark						
* State:	OH: Ohio						
Province:							
* Country:	USA: UNITED ST	PATES					
* Zip / Postal Code:	44702-1906						
e. Organizational I	Unit:						
Department Name:				Divisio	on Name:		
Department of	Development						
f. Name and conta	ct information of pe	rson to be conta	cted on matt	ers in	olving this appli	ication:	
Prefix:		] .	* First Name:	Sh	erice		
Middle Name:							
	eeman						
Suffix:		]					
Title: Director	of Community De	velopment					
Organizational Affilia	ation:						
* Telephone Numbe	* Telephone Number: 330-489-3258 Fax Number: 330-580-2070						
* Email: sherice	.freeman@canton	ohio.gov					

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
C: City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
14.239 HOME
CFDA Title:
HOME Investment Partnerships Program
* 12. Funding Opportunity Number:
14-239
*Title:
Substantial Amendment to FY2021 Annual Action Plan for HOME-ARP Allocation
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:
Substantial Amendment FY2021AAP HOME-ARP allocation. Projects= general management, non-profit
capacity building, non-profit operating, development of affordable rental housing and supportive services.
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

16. Congressional Districts Of:  * a. Applicant	Application for Federal Assistance SF-424							
Attach an additional list of Program/Project Congressional Districts if needed.    Add Attachment	16. Congressional Districts Of:							
Add Attachment   Delete Attachment   View Atta	* a. Applicant 17	* b. Program/Project 17						
17. Proposed Project:  * a. Start Date: 09/20/2021 * b. End Date: 09/30/2030  18. Estimated Funding (\$):  * a. Federal	Attach an additional list of Program/Project Congressional Dist	ricts if needed.						
*a. Start Date:   09/20/2021   *b. End Date:   09/30/2030    18. Estimated Funding (\$):  *a. Federal		Add Attachment Delete Attachment View Attachment						
18. Estimated Funding (\$):  *a. Federal	17. Proposed Project:							
*a. Federal 2,573,468.00 *b. Applicant 0,00 *c. State 0,000 *d. Local 0,000 *e. Other 0,000 *f. Program Income 0,000 *g. TOTAL 2,573,468.00 *g. TOTAL 2,573,468.	* a. Start Date: 09/20/2021	* b. End Date: 09/30/2030						
*D. Applicant 0.00 *c. State 0.00 *d. Local 0.00 *d. Local 0.00 *e. Other 0.00 *f. Program Income 0.00 *g. TOTAL 2,573,468.00  *19. TOTAL 2,573,468.00  *19. To Application Subject to Review By State Under Executive Order 12372 Process?  a. This application was made available to the State under the Executive Order 12372 Process for review on b. Program is subject to E.O. 12372 but has not been selected by the State for review.  c. Program is not covered by E.O. 12372.  *20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)  Yes No  If "Yes", provide explanation and attach  Add Attachment Delete Attachment View Attachment  21. *By signing this application, I certify (1) to the statements contained in the list of certifications* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)  ** I AGREE  ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.  Authorized Representative:  Prefix:  ** First Name: Thomas  Middle Name:  ** Last Name: Bernabei.  Suffix:  ** Title: Sugyor, City of Canton	18. Estimated Funding (\$):							
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*e. Other	* c. State 0 . 0	0						
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Middle Name: M  * Last Name: Bernabei  Suffix:  * Title: Mayor, City of Canton	Authorized Representative:							
* Last Name: Bernabei  Suffix:  * Title: Mayor, City of Canton	Prefix: Mr. * F	First Name: Thomas						
Suffix:  * Title: Mayor, City of Canton	Middle Name: M							
* Title: Mayor, City of Canton	* Last Name: Bernabei							
Mayor/ Orey or others	Suffix:							
* Telephone Number:   220, 420, 2202   Fax Number:   220, 400, 2202	* Title: Mayor, City of Canton							
1330-438-3283	* Telephone Number: 330-438-3283	Fax Number: 330-489-3282						
* Email: thomas.bernabei@cantonohio.gov	* Email: thomas.bernabei@cantonohio.gov							
* Signature of Authorized Representative: * Date Signed: 12/12/2622	* Signature of Authorized Representative:	* Date Signed: 12//2/2622						

OMB Number: 4040-0007 Expiration Date: 02/28/2025

#### **ASSURANCES - NON-CONSTRUCTION PROGRAMS**

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

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

NOTE:

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

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

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 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.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to:

   (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352)
   which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education
   Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

- Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps: (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seg.); (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).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

- 13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
1000	Mayor
10 MMV W	
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Canton, OH	12/12/2022

Standard Form 424B (Rev. 7-97) Back

#### ASSURANCES - CONSTRUCTION PROGRAMS

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

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

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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:

- 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.
- 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.
- 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.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- 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.

- 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).
- 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 nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race. color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records: (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale. rental or financing of housing; (i) any other nondiscrimination provisions in the specific 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).
- 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.
- 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."
- 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
1/	Mayor
1000000	
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Canton, OH	12/12/2022

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#### HOME-ARP CERTIFICATIONS

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

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

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

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

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

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

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

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

MMMM	1 12/12/2022
Signature of Authorized Official	Date

Mayor, City of Canton

Title

## CANTON, OH HOME-ARP Allocation Plan

# Submitted to HUD as a Substantial Amendment to the Approved 2021 Annual Action Plan

## Consultation

# <u>Section 1: Describe the consultation process including methods used and dates of consultation</u>

See Appendix A for all Stakeholder Consultation materials. Stakeholder comments received throughout the various sessions and individual meetings are summarized below and referenced throughout the Needs Assessment & Gaps Analysis.

The City of Canton and Stark County (each of which is receiving a separate HOME-ARP funding allocation) collaborated on the stakeholder consultation process. In most cases, the same stakeholders cover the city and county, most without regard for the jurisdictional boundary that separates the two. Together, the city and county engaged in an extensive stakeholder consultation process over the course of four months beginning in July 2022. The first round of consultations focused on identifying the QPs and their unmet housing and service needs. A brief PowerPoint presentation on the HOME-ARP program was presented followed by questions meant to engage participants in identifying unmet needs among the qualifying populations they served. Details of Round 1 are included in the chart below.

ROUND 1 STAKEHOLDER CONSULTATIONS								
Date	Method	Participants Stakeholders	PJ Staff/ Consultants	Agency/Organization Type (required stakeholders in italics)				
	0 7 14 .:			, ,				
July 20, 2022	GoToMeeting	22	11	Homeless service providers, veterans				
2:00-3:30 pm	virtual session			service provider, Domestic violence				
				provider, Public/private organizations				
				addressing the needs of the QPs, Public				
				agencies that address the needs of the				
				<i>QPs, Continuum of Care</i> , Business,				
				Affordable housing provider, Public				
				housing authority, Philanthropic				
				organization, Nonprofit organization				
July 21, 2022	GoToMeeting	10	9	Continuum of Care, Public housing				
9:00-10:30 am	virtual session			authority, Homeless services providers,				
				Local government, Affordable housing				
				provider, HMIS				
July 21, 2022	GoToMeeting	8	8	Continuum of Care, Homeless service				
2:00-3:30 pm	virtual session			providers, Business, School district				

The second round of stakeholder sessions was rescheduled for October 3, 5, and 6. The purpose of this round was to provide a summary of the stakeholder comments collected in July and a summary of the Needs Assessment & Gaps Analysis. Each session began with a detailed PowerPoint presentation summarizing key findings from the stakeholder consultation and the data analysis. Participants were

asked to provide feedback on the summary of stakeholder-identified needs and the needs identified through the data analysis. Details of Round 2 are included in the chart below.

ROUND 2 STAKEHOLDER	R CONSULTATIONS			
Date	Method	Participants Stakeholders	PJ Staff/ Consultants	Agency/Organization Type (required stakeholders in italics)
October 3, 2022 1:00-2:30 pm	GoToMeeting virtual session	11	8	Public housing authority, Continuum of Care, Homeless service provider, HMIS, Nonprofit organization, Business, School district
October 5, 2022 1:00-2:30 pm	GoToMeeting virtual session	7	4	Domestic violence service provider, Homeless service provider, HMIS, School district
October 6, 2022 10:00-11:30 am	GoToMeeting virtual session	10	2	Homeless service providers, Domestic violence service provider, Continuum of Care, HMIS

Following a review of the participant stakeholders and information collected during the Round 1 and Round 2 sessions, the city and the county identified the need to seek additional participation from civil rights/fair housing/disability rights organizations, veterans organizations, and domestic violence service providers. Details of these sessions are summarized below.

ADDITIONAL CONSULTATIONS									
Date	Method	Agency/Organization Type (required stakeholders in italics)							
October 5, 2022	GoToMeeting virtual session	Public organizations that address civil rights, fair							
2:00-3:00 pm		housing, disability rights (3)							
October 6, 2022	Teams Meeting virtual session	Domestic violence service provider							
1:00-2:00 pm									
October 7, 2022	Teams Meeting virtual session	Veterans organization							
9:00-10:00 am									

# Section 2: List the organizations consulted and summarize feedback received and results of upfront consultation with these entities.

A list of all invited stakeholders is included in Appendix A. Also, included in Appendix A are summaries of the comments received during each stakeholder consultation session along with the participating entities.

All required stakeholder categories were engaged either through group stakeholder sessions, individual interviews, or via e-mail to obtain data.

The general themes and trends that emerged from the stakeholder sessions include the following:

 More affordable and accessible rental housing is needed for households up to 50% AMI through new construction and preservation with smaller developments and scattered sites available as options to expand housing choice

- Many landlords refuse to accept Housing Choice Vouchers given the higher market rents they can charge, and many landlords also refuse to rent to tenants who are homeless or released offenders, or who have a criminal history, evictions on their record, or poor credit
- Better collaboration with landlords is needed to increase the acceptance of HCVs from persons who are homeless or have criminal histories.
- The current level of HCV is inadequate to serve families in need of subsidized rental housing
- Subsidized housing has long waiting lists with little turnover among PSH and affordable rental units
- The level of supportive services available for those who are homeless is insufficient, contributing to the potential for returning to homelessness. These services include legal, financial counseling, case management, employment training, and more.
- There is a need for affordable housing that is accessible for persons with disabilities and accessible to transportation, amenities, good schools, etc.
- Increasing rental costs are impacting nearly all household groups, placing more households at risk for homelessness
- Lower income households who cannot afford rising rental rates are moving out of their units to avoid having an eviction action on their record. This is placing a strain on agencies who then must find them housing, front rent and utility deposits, etc.
- Gentrification is causing displacement in some city neighborhoods but there are no affordable units for these households
- Persons with limited English proficiency cannot find resources to help them understand and navigate the system. They do not understand the eviction process, they do not know about Legal Aid or how to use the homeless hotline.
- There are subsidies and services available for homeless veterans but finding rental units is very difficult.
- The number of adults and children who received emergency shelter from DVPI surged 73% in the first six months of 2022.
- Victims of domestic violence need TBRA so they don't have to wait on the SMHA HCV waiting list, even it was open. Otherwise, they risk having to return to their abuser.

## **Public Participation**

See Appendix B for evidence of Public Participation conducted for the plan.

# Section 1: Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan.

- *Date(s) of public notice: 11/21/2022*
- Public comment period: start date 12/5/2022 end date 12/19/2022
- *Date(s) of public hearing: 12/14/2022*

### Describe the public participation process:

To broaden public participation, the city included the following elements in its public notice:

- The priority needs identified through the stakeholder consultation process and Needs Assessment & Gaps Analysis
- The proposed budget for the HOME-ARP allocation
- The online link where the public could review the draft allocation plan
- Informed the public that oral comments were encouraged at the public hearing
- The online link to the December 19th public hearing for persons wishing to participate remotely

The city also provided the notice to Stark Housing Network (CoC) for posting on its website.

The virtual public hearing was held on December 14, 2022 at 10 am. A brief Power Point presentation was made before the meeting was opened for comments. A list of attendees is included in Appendix B. A copy of the recording of the public hearing was posted on the city's website.

#### Section 2: Describe efforts to broaden public participation.

See response above.

## <u>Section 3: Summarize the comments and recommendations received through the public</u> participation process either in writing, or orally at a public hearing.

During the public hearing, several commenters asked clarifying questions about submission of requests for funding and the timeline for when the funds would be available. All questions were answered.

No written comments were received.

# Section 4: Summarize any comments or recommendations not accepted and state the reasons why.

All comments received were responded to during the public hearing. No written comments were received.

## **Needs Assessment and Gaps Analysis**

This section presents the results of the homeless needs and gaps analysis, drawing on CoC HMIS data, Point-In-Time (PIT) count information, and public federal data sources. Where appropriate, this information is contextualized with feedback from community stakeholders. Although the city and county collaborated on stakeholder consultations, the needs assessment and gap analysis is specific to the City of Canton. Unless otherwise stated, Stark County data includes the City of Canton where jurisdictional data cannot be separated. Where data is available for Canton exclusively, it is provided.

Like many communities, Canton has an insufficient inventory of affordable housing for most income tiers up to 80% AMI. This shortage is impacting the Qualifying Populations in several ways:

- There is a lack of available and affordable units for persons exiting the homeless system. This, in turn, has caused lengthened stays in emergency shelter beds and transitional housing beds to just under six months.
- The tight rental market overall has caused rents to surge as landlords and property managers increase rents due to demand exceeding supply. As a result, landlords are less interested in accepting tenants with rental vouchers because they can achieve higher rents than the HUD fair market rents.
- With increasing mortgage interest rates, renters who were hoping to become homebuyers are remaining renters since they've been priced out of the sales market. This means less turnover in the rental market.
- Households with incomes above 80% of AMI have more options in the rental market. If they are unable to rent within their income tier (e.g., an 80-100% AMI household finding a unit that is affordable to an 80-100% AMI household), then they tend to rent down-market. In other words, they will rent units that are affordable to households in lower-income tiers. This squeezes out the lower-income households from renting within their own income tier, causing cost burden for many who then rent up-market.
- The resulting shortage of units both affordable and available for renter households at or below 30% AMI increases housing insecurity on extremely low-income households, making them at risk of becoming homeless

Table 1 includes the current inventory of resources available within Stark County. Using the 2022 Point in Time count of persons and families who were homeless on the night of January 23, there are no gaps in the homeless inventory. However, the PIT count is a count on a single night and doesn't capture the full profile of homeless persons and families who depend on the Canton/Stark County CoC throughout the year. These trends are discussed in subsequent sections of the plan.

Table 1. Homeless Needs Inventory and Gap Analysis

Canton, OH													
	Current Inventory				(Janu	Iomeless Population huary 23, 2022 PIT Count)			Gap Analysis				
	Family		Camily Adults Only Vets		Family Adult			Family		Adults Only			
	# Beds	# Units	# Beds	# Units	# Beds	least 1 child)		Vets	Vets Victims of DV	# Beds	# Units	# Beds	# Units
Emergency Shelter (non-DV)	172				8								
Emergency Shelter (DV)	49												
Safe Haven			8										
Transitional Housing (non-DV)													
Transitional Housing (DV)	26												
Rapid Re-Housing (all persons)	29		131										
Rapid Re-Housing (families)	29												
Permanent Supportive Housing	156		412										
Other Permanent Housing	3												
Sheltered Homeless						33	89	7	163				
Unsheltered Homeless							5	2					
Current Gap										0	0	0	0

**Data Sources:** 1. 2022 Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultations; 4. Alliance Area Domestic Violence; 5. Domestic Violence Project, Inc.; 6. 2022 HDX Report from Stark County CoC

Within the city's rental housing inventory, there is a housing gap for households at 0-30% and 31-50% AMI (see Table 2). Analyzing the household occupancy of rental units by income tier provides additional information. According to CHAS data, there are 5,400 renter households in Canton at 0-30% AMI. However, there are only 4,940 rental units affordable to this group of households. Further exacerbating the situation is that only 2,585 of these 4,940 affordable units are occupied by 0-30% AMI households. The remaining 2,355 units are occupied by households with incomes above 30% AMI. *This results in a housing gap of 2,815 rental units affordable to 0-30% AMI renter households*.

Moving up the income spectrum, there are 3,485 renter households at 31-50% AMI. For this income group, there is an over-supply of 6,155 units affordable to them. However, only 1,515 of the 6,155 units are occupied by 31-50% AMI households. The remaining supply of 4,640 units are occupied by households of other income tiers, likely including some of the 0-30% AMI households who are living in units outside of their income tier that would cause them to be cost burdened. *This results in a housing gap of 1,970 rental units affordable to 31-50% AMI renter households*.

The CHAS data used to complete this analysis is from 2014-2018 and was the current data set at the time this analysis was conducted. It does not reflect current housing market conditions that have resulted from the COVID-19 pandemic, including recent rent surges. However, it is still valuable in analyzing the degree to which households above 30% AMI and above 50% AMI are renting down-market due to a lack of housing inventory for higher-income households.

Table 2. Housing Gap Analysis

Renter Households	0-30% AMI	31-50% AMI
Total Households	5,400	3,485
Affordable Housing Units	4,940	6,155
Units Occupied by Appropriate Income Tier <sup>1</sup>	2,585	1,515
Units Occupied by Other Income Households <sup>2</sup>	2,355	4,640
Gap <sup>3</sup>	2,815	1,970

 $<sup>\</sup>overline{\phantom{a}}$  Number of housing units occupied by a household of the same income tier (i.e., a 0-30% AMI household occupies a unit that is affordable to a 0-30% AMI household)

#### Section 1: The size and demographic composition of Qualifying Populations

#### 1. Homeless as defined in 24 CFR 91.5

The number of Stark County residents that meet the definition of homeless under 24 CFR 91.5 was derived from the 2022 PIT Count, conducted by the Canton, Massillon, Alliance/Stark County Continuum of Care (CoC) on January 23, 2022. The PIT Count identified a total of 247 persons experiencing homelessness in 2022. Of the counted homeless individuals, 219 (88.7%) were sheltered and 28 (11.3%) were unsheltered. In terms of racial and ethnic demographics, 97 (39.3%) of homeless individuals were Black/African American, 102 (41.3%) were White, 42 (17%) were multiple races, and 33 (13.7%) were Hispanic.

Between January 2021 and July 2022, a total of 4,257 homeless persons were served by the Stark County Continuum of Care.

<sup>&</sup>lt;sup>2</sup> Number of housing units occupied by a household that is not of the same income tier (i.e., a 0-30% AMI unit is occupied by a household above 30% AMI)

<sup>&</sup>lt;sup>3</sup> Total Number of Households minus Units Occupied by Appropriate Income Tier equals the number of units needed to house the balance of the households within that income tier that are occupying units affordable to households above their income tier (i.e., the housing gap). Data Source: 2014-2018 Comprehensive Housing Affordability Strategy (CHAS)

Table 3. Persons Served by Stark County CoC, January 2021-July 2022

Program	Persons Served
Emergency Shelter	1,620
Permanent Supportive Housing and Supportive Housing	1,471
Rapid Re-Housing	1,000
Street Outreach	166
Total	4,257

According to the FY2021 Performance Measurement Module, 1,108 individuals experienced homelessness for the first time during the period October 1, 2020-September 30, 2021. This is a 6.2% decrease from 2020 when 1,181 persons experienced homelessness for the first time. These numbers account for persons entering emergency shelter, transitional housing, safe haven, and permanent housing programs.

#### 2. At Risk of Homelessness as defined in 24 CFR 91.5

According to 2014-2018 CHAS data, in Canton there is a housing gap of 2,815 rental units affordable to 0-30% AMI households. The 2,815 households represented by this unit gap are living in units that are affordable to higher-income households, meaning they are all cost-burdened and paying more than 30% of their monthly income on housing costs. In addition, there is a housing gap of 1,970 rental units for 31-50% AMI households. Many of the 1,970 households represented by this unit gap are living in units that are affordable to higher-income households although some are likely occupying units affordable to 0-30% AMI. The housing gap for both of these income groups represents renter households who are living in units where they are cost-burdened, putting them at risk for homelessness.

Based on HMIS data from January 1, 2021-June 30, 2022, 38% of leaver households exited to temporary destinations. Exiting to a temporary destination may indicate a greater risk of returning to homelessness.

Stark County assisted 1,445 (67% of applicants) households through the Emergency Rental Assistance Program within the last 24 months through July 13, 2022. Of these households, the average income was approximately \$12,853.21, equivalent to the federal poverty level for a 1-person household or 21% of AMI. Households requiring emergency rental assistance may be at greater risk of experiencing homelessness if they cannot sustain ongoing rent and utility payments. The majority of these households were assisted due to one-time Covid-related funding that ended in June 2022. Currently, the CoC's Coordinated Entry can only refer households to one program that offers rental assistance: the City of Canton's ESG program that provides about \$72,800 annually.

Stark Metro Housing Authority's Housing Choice Voucher waiting list includes 1,793 applicants. Of these, 85% are extremely low-income households at 0-30% AMI. With only 75 vouchers in the program, waiting list households will wait years to receive a voucher. These 1,793 households are at risk for homelessness.

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

Stark County sheltered 59 adults and 44 children who were escaping domestic violence from January through December 2021. There were 52 adult females and 6 adult males. Children aged 12 and younger

numbered 38. The majority were White (61 individuals/59%) followed by 26 (25%) who were Black/African American and 5 (4.9%) Hispanic individuals. There were 34 disabled individuals.

From January through June of 2022, 34 adults and 26 children were sheltered. There were 41 adult females and 19 adult males. Of the children, 25 were 12 years of age or younger. A total of 25 of the individuals were disabled. There were 35 (58%) White individuals and 21 (35%) were Black/African American with one Hispanic (1.7%).

The Domestic Violence Project, Inc. (DVPI) provided emergency shelter to 75 adults and 31 children during calendar year 2021. Fifty percent were White, 44% were Black/African American, and the race/ethnicity of 15 individuals was unknown. During the first six months of 2022, the number of adults and children who received emergency shelter from DVPI surged. A total of 127 adults and 56 children were assisted, equivalent to an overall increase of 73% in only six months. Of these, 49% were White and 38% were Black/African American. Furthermore, DVPI tracked 588 persons fleeing domestic violence from January-June 2022 whose shelter needs could not be met, an unduplicated number. These persons and families would be at risk for homelessness.

# 4. 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

Those at greatest risk of housing instability include 2,730 renter households at 0-30% AMI and the 735 renters at 31-50% AMI who are severely cost-burdened (i.e., paying more than 50% of their income on housing costs). This represents 22% of all renter households in Canton.

According to HMIS data, 973 people were assisted by an emergency shelter during the period January 1, 2021 through December 31, 2021; of these 313 or 32.2% were Black/African American. During the same period, 557 people were receiving rapid rehousing assistance; of these, 36.6% were Black/African American, highlighting that this segment of the population is disproportionally represented among people experiencing homelessness. Three percent were Hispanic. Of households that exited Rapid Rehousing programs, 35.7% of adult leavers had no cash income, putting these households at greater risk of returning to homelessness if unable to support ongoing rent payments.

From January 1, 2021 through June 30, 2022, 879 households exited to temporary destinations and 99 households exited to unknown destinations. Households receiving temporary assistance and those exiting to temporary destinations are more likely to return to homelessness or face a greater risk of housing instability than those exiting to permanent destinations.

# Section 2: 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):

Stark Metropolitan Housing Authority (SMHA) owns and manages 1,720 public housing units throughout the county. Of those, 1,106 units are in the greater Canton area. SMHA also administers 75 Housing Choice Vouchers. The Authority received an additional 61 Emergency Housing Vouchers during Covid, all of which have been issued.

In Table 1, the Stark County CoC housing inventory includes 244 emergency shelter beds (100% occupancy rate), including 23 motel beds for overflow. There are 8 Safe Haven beds (100% occupancy), 568 Permanent Supportive Housing beds (90.32%), 160 Rapid Rehousing beds (100%), and 3 Other Permanent Housing beds (100%). There are 75 beds for survivors of domestic violence. DV transitional housing provides 26 of those beds and is the only provider of transitional housing in the county.

#### Section 3: Describe the unmet housing and service needs of qualifying populations:

#### 1. Homeless as defined in 24 CFR 91.5

HMIS indicated 2,315 individuals were served by the homeless system during the period from January 1, 2021-June 30, 2022. According to the 2022 HIC, Stark County has 568 Permanent Supportive Housing beds, 244 emergency shelter beds, 26 Transitional Housing beds and 8 Safe Haven beds. This includes 253 year-round beds and 23 overflow beds (consisting of hotel rooms covered by an outside agency, such as Child and Protective Services). With a length of stay (in emergency shelters and transitional housing beds, primarily) averaging several months, the available inventory is insufficient to meet the needs of the population experiencing homelessness.

The resounding comment heard from stakeholders was the same overwhelming need: affordable rental housing. Subsidized units fill quickly and experience very little turnover with long waiting lists for affordable housing and permanent supportive housing. Many permanent supportive housing providers rely on scattered site privately owned units, and many tenants are refused by landlords who are no longer willing to accept rental assistance or have tenant selection policies that act as barriers for special needs populations.

According to stakeholders, more case management and wrap-around supportive services are needed to assist in stabilizing tenants and decreasing individuals' chances of returning to homelessness. Stakeholders indicated that people who are single, have a disability, and are Black/African American are disproportionally represented in the homelessness system.

#### 2. At Risk of Homelessness as defined in 24 CFR 91.5

According to 2014-2018 CHAS data, there is a gap of 4,785 rental units affordable to 0-30% AMI households and a gap of 1,970 units affordable to 31-50% AMI households in Canton. This indicates that the supply of affordable housing is insufficient for households earning 0-30% AMI and those earning 30-50% AMI.

Looking more closely at cost-burdened households reveals specific trends about the QP households at greatest risk for homelessness.

In Canton there are 5,400 renter households at 0-30% AMI. Of these, two-thirds (66.8%) are cost burdened and pay more than 30% of their income on housing costs. More notably, 2,730 of the 5,400 households are severely cost-burdened and pay more than 50%. Among the 3,485 households at 31-50% AMI, the rate of cost burden is higher still at 68%. Typically, rates of cost burden decline as income rises; however, this is not the case in Canton. By comparison, the rate of severe cost burden does decline for 31-50% AMI households. All these cost-burdened households are at risk of homelessness but the risk is much higher among the severely cost-burdened.

Table 4. Cost Burden Among Lower Income Renters

	Total		Cost burdened		Severely Cost burdened	
	#	%	#	%	#	%
Total Renters	15,905	100.0%	7,100	44.6%	3,525	22.2%
Very Low-Income Renters (0-50% AMI)	8,885	55.9%	5,975	67.2%	3,465	39.0%
30-50% AMI	3,485	21.9%	2,370	68.0%	735	21.1%
0-30% AMI	5,400	34.0%	3,605	66.8%	2,730	50.6%

Data source: 2014-2018 CHAS data

Stakeholders reported that TBRA is useful with landlords working through the YWCA of Canton when a community health worker is assigned to provide social service needs to tenants. Otherwise, more available and affordable housing units are needed to take full advantage of existing rental assistance programs.

According to the SMHA reports for northeast, northwest, southeast, and southwest Canton, there were 16,424 households on the public housing waitlist as of May 25, 2022. Of those households, 14,038 (85.5%) were extremely low-income. There were 3,355 (20%) disabled, 310 (1.9%) veterans, and 732 (4.5%) victims of domestic violence identified. Most households, 11,653 or 71%, were headed by females. The households were split mostly between White (7,748 or 47%) and Black/African American (6,901 or 42%) with 726 (4.4%) Hispanic households.

SMHA maintains four separate waiting lists for the four quadrants of the city, and there are most likely many duplicate applicants on each list. (SMHA's system does not allow it to provide an unduplicated number.) However, considering the extremely high number of applicants, there is a high probability that households waiting for public housing may be doubled-up in units occupied by other households. ACS data for 2020 provides the number of housing units that are overcrowded (more than 1.00 person per room) and severely overcrowded (more than 1.50 persons per room). In Canton, 2% of all occupied rental units were overcrowded (323 units) and 0.2% were severely overcrowded (31 units). Among 0-50% AMI households, CHAS identified 160 units households as living in overcrowded conditions. For Stark County as a whole, 0.3% of all renter households (133) were overcrowded and 0.8% (397) were severely overcrowded.

Poor credit history and a criminal record in the past 10 years have been identified as barriers for households accessing affordable households. Rental assistance and legal services for eviction prevention were identified as needed services to retain tenancies and prevent poor rental history from becoming a barrier for future tenancies.

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

According to the APR from January 1, 2021 to June 30, 2022, 1,092 households had a history of domestic violence. Of those, 243 were actively fleeing domestic violence. According to the 2022 HIC, only 49 shelter beds were dedicated for survivors of domestic violence. Transitional housing has been identified

as a successful model for individuals fleeing domestic violence and human trafficking, particularly when finding permanent affordable housing is difficult.

The Domestic Violence Project, Inc. (DVPI) tracked 588 persons (unduplicated) fleeing domestic violence from January-June 2022 whose shelter needs could not be met.

# 4. 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

According to HMIS, during the period January 1, 2021-June 30, 2022, 2,315 households exited the homeless system. Of these, 978 (42%) exited to temporary living situations, including transitional housing and temporarily staying with friends or family, or unknown destinations. Households without permanent housing may be more likely to experience returns to homelessness. Even among households exiting to permanent destinations, 25.6% exited to rentals without ongoing subsidy. Together, these suggest a need for both affordable housing units, as well as tenant-based rental assistance to support extremely low, and low-income households.

Stakeholders identified criminal background checks as a barrier to rental housing. Many landlords who were previously only going back 3-5 years on criminal background checks are now going back 5-10 years due to the fear of nonpayment after the Covid-19 eviction moratoria. Additionally, poor or no credit scores and rental histories are barriers. Stakeholders indicated 1,157 unique households were housed in a shelter since Covid-19 began. Many households were housed more than once bringing the total households served to 5,383. There is also a need to have landlord education and training programs to keep them informed of program guidelines and help them feel comfortable renting to disadvantaged households.

Stakeholders reported that Rapid Rehousing households without ongoing supportive services and employment are more likely to return to homelessness. Services such as case management, financial literacy, budgeting, basic life skills, workforce development and training, childcare and transportation, when provided beyond the time limitations of housing and/or rental assistance, are needed to promote stability and prevent returns to homelessness.

**Veterans:** There are a total of 71 beds available for veterans according to the 2022 HIC. During the period from January 1, 2021 to June 30, 2022, 31 chronically homeless veterans and 120 non-chronically homeless veterans were housed through the CoC. Of the 151 veterans, only 31.8% exited to a positive destination while 22.5% exited to temporary housing. Veterans often face additional, compounding barriers that may include mental health and/or substance abuse disorders, lack of income or rental history, or criminal history.

**Persons with Disabilities**: From January 1, 2021 to June 30, 2022, there were 3,601 instances of a mental health disorder or developmental or physical disability were reported among persons assisted. While many individuals experience more than one condition concurrently, it is evident people with disabilities are a significant portion of those experiencing homelessness. Furthermore, for people with disabilities, accessible housing is a continuing and critical need, ranging from individuals in wheelchairs to medical beds and in-home healthcare services in order to maintain housing stability. Overall, there is a need for permanent housing that can accommodate persons with disabilities. This typically includes a bathroom equipped with grab bars, installation of handrails, walk-in showers and tubs, along with accessible doors

and cabinets. Medical respite care was identified as a need for individuals discharged from hospital settings. Other needs of this population to maintain housing stability are the same as everyone else: access to employment and accessible public transportation.

## 5. <u>Identify any gaps within the current shelter and housing inventory as well as the service delivery system:</u>

According to OH 2-1-1 Counts, 11,200 requests were made for housing and shelter assistance between January 2021 and June 2022 in Stark County. This was the top request at 30.1%. Over 57.2% of these requests were made for rental assistance. While most requests were adequately met, 10% of rental assistance requests could not be met. Rates for unmet requests were high for those seeking temporary housing solutions through shelter (7%) and home repair or maintenance needs for low-income homeowners (20%). Home repair/maintenance includes adaptations for safety and disability access, general upkeep, and weatherization. This indicates an unmet need for supportive services and reinforces stakeholder comments indicating a lack of affordable and accessible housing options.

The Stark County Annual Performance Reports (APR) from January 1, 2021 to June 30, 2022, reported a total of 2,315 households staying at least one night in emergency shelter, permanent supportive housing, permanent housing, rapid re-housing, or on the street.

Table 5. Exits from the Homeless Service System

	% Positive Destinations	# Positive Destinations	Total Households Exited		
By Household type					
Adult-only Households	48.4%	620	1,281		
Households with Children	62.4%	643	1,031		
Child-only Households	100%	3	3		
By Pathway					
ES	54.1%	726	1,343		
PSH + PH	43.5%	148	340		
RRH	56.7%	304	536		
Street Outreach	91.7%	88	96		
All Households	54.7%	1,266	2,315		

Nearly 55% of households exiting the homeless system exited to positive housing destinations. This suggests that there is an overall lack of permanent housing resources for all household types that entered the homeless system, especially for those who were able to access only emergency shelter or rapid rehousing resources.

Stakeholders indicated the need for more affordable one- to three-bedroom units. There is also a need to build housing distributed throughout Stark County rather than a large multi-family building in Canton. There is a great need for affordable housing in Canton, but stakeholders discussed how multi-family living in the city is not for everyone and there is a need throughout the rest of Stark County. Stakeholders also indicated the need for more employment, case management, and counseling.

The 2014-2018 CHAS Data identified 3,710 renter households in Canton with income below 30% AMI who are at risk of homelessness. There are 2,450 renter households between 31-50% AMI, thus there is a total 4,785 unit-gap in housing in units both affordable and available. This suggests that households are experiencing cost burden and severe cost burden by occupying units that are not affordable to them, putting them at greater risk of housing stability and homelessness.

#### 6. Identify priority needs for qualifying populations:

Based on stakeholder consultations and data analysis, the following priority needs among Qualifying Populations emerged from the planning process:

- Rental housing that is affordable and accessible to individuals and households at 0-30% AMI
- An adequate inventory of deeply subsidized housing for Qualifying Populations. Very low rental
  vacancy rates and escalating rents make it difficult for them to find units they can afford and
  remain stably housed.
- Emergency shelter beds and transitional housing for the rising numbers of persons experiencing or fleeing from domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Increased investment in supportive services to assist the QPs

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

In addition to feedback from stakeholders, the following data sources were consulted to determine the needs and system gaps for HOME-ARP qualifying populations:

- American Community Survey (ACS), 2016-2020
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018
- Canton, Massillon, Alliance/Stark County CoC 2022 Point-In-Time Count
- Canton, Massillon, Alliance/Stark County CoC 2022 Housing Inventory County (HIC)
- Canton, Massillon, Alliance/Stark County CoC 2022 HDX Competition Report
- Stark County Coordinated Entry System (CES)
- Stark County CoC Annual Performance Reports (APR)
- 2021 System Performance Measures
- United Way of Greater Stark County's 2-1-1 Counts
- Alliance Area Domestic Violence data for January 2021-June 2022
- Stark Metro Housing Authority
- Domestic Violence Project, Inc.

## **HOME-ARP Activities**

# <u>Section 1: Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:</u>

Canton will issue a Request for Proposals (RFP) from developers, service providers, and/or subrecipient organizations to develop new rental housing units. The RFP will, at a minimum, specify eligible applicants, eligible activities, minimum and maximum funding amounts, application thresholds, and underwriting criteria, and will provide instructions on how to submit an application for funding. The RFP will include bonus points for proposed projects that will leverage other resources, such as project-based rental assistance, and other state and federal funding.

Applications may be evaluated according to criteria such as organizational or developer experience, capacity, demonstrated effective grant management experience, services offered, housing need, project readiness, and leveraged resources, among other factors. The RFP process will be finalized once HUD approves the city's Allocation Plan.

## 2. Describe whether the PJ will administer eligible activities directly:

Canton will not directly administer HOME-ARP activities beyond program administration and planning.

3. 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:

No HOME-ARP administrative funds have been provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

Table 6. Use of HOME-ARP Funding

Table 6	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 309,846		
Acquisition and Development of Non- Congregate Shelters			
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$1,754,327		
Non-Profit Operating	\$ 64,336	2.5 %	5%
Non-Profit Capacity Building	\$ 64,336	2.5%	5%
Administration and Planning	\$ 380,623	14.79 %	15%
<b>Total HOME ARP Allocation</b>	\$ 2,573,468		

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

The HOME-ARP budget was driven by the following priority needs identified as a result of stakeholder consultation and data analysis:

- Rental housing that is affordable and accessible to individuals and households at 0-30% AMI
- An adequate inventory of deeply subsidized housing for all Qualifying Populations. Very low rental vacancy rates and escalating rents make it difficult for them to find units they can afford and remain stably housed.
- Emergency shelter beds and transitional housing for the rising numbers of persons experiencing or fleeing from domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Increased investment in supportive services to assist the QPs

Three of the four priority needs indicate strong demand for more affordable rental units. All QPs will have access to the HOME-ARP-funded units. Canton will allocate 68% of its HOME-ARP grant to the development of affordable rental housing and 12% to supportive services. The city will make available up to 2.5% of its HOME-ARP budget to the capacity building needs and another 2.5% to the operating expenses of nonprofit organizations that are awarded HOME-ARP funds for other eligible HOME-ARP activities. The remaining 14.79% of the grant will be allocated to program administration.

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

The priority needs in Canton were selected based on the following data and stakeholder comments:

- Rental housing that is affordable and accessible to individuals and households at 0-30% AMI
  - Subsidized units fill quickly and experience very little turnover with long waiting lists for affordable housing and permanent supportive housing. Many permanent supportive housing providers rely on scattered site privately owned units, and many tenants are refused by landlords who are no longer willing to accept rental assistance or have tenant selection policies that act as barriers for special needs populations.
- An adequate inventory of deeply subsidized housing for all Qualifying Populations. Very low rental vacancy rates and escalating rents make it difficult for them to find units they can afford and remain stably housed.
  - In Canton, 51% of the 5,400 renter households at 0-30% AMI are severely cost-burdened and pay more than 50% of their income on housing. Among the 3,485 households at 31-50% AMI, 68% are severely cost-burdened
  - More than 85% of the 16,424 households on the waitlist for public housing are 0-30% AMI households. (This list may include duplicates based on the regional waitlists maintained by SMHA.)
- Emergency shelter beds and transitional housing for the rising numbers of persons experiencing or fleeing from domestic violence, dating violence, sexual assault, stalking, or human trafficking
  - According to the APR from January 1, 2021 to June 30, 2022, there were 243 persons
    actively fleeing domestic violence. According to the 2022 HIC, only 49 shelter beds were
    dedicated for survivors of domestic violence.
- Increased investment in supportive services to assist all QPs
  - Across all Qualifying Populations, stakeholders emphasized the need for a wide range of supportive services to assist in keeping all Qualifying Populations stably housed.

## **HOME-ARP Production Housing Goals**

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

Canton proposes to develop 6-7 affordable rental units at a per-unit development cost of \$225,000.

# 2.Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

Canton estimates the development of 6-7 affordable rental housing units for all Qualifying Populations will address the strong demand for expanding the rental inventory of deeply subsidized housing for Qualifying Populations. Very low rental vacancy rates and escalating rents make it difficult for them to find units they can afford and remain stably housed. As identified in the needs analysis, 51% of the 5,400 renter households at 0-30% AMI are severely cost-burdened and pay more than 50% of their income on housing. Among the 3,485 households at 31-50% AMI, 68% are severely cost-burdened. More than 85% of the 16,424 households on the waitlist for public housing are 0-30% AMI households.

The city will work with developers and local non-profit entities to acquire, rehabilitate and/or construct new affordable rental units. The city may work with Stark Metro Housing Authority to secure project-based vouchers in addition to potentially utilizing HOME TBRA to ensure units are financially sustainable throughout the minimum compliance period.

## **Preferences**

# 1.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:

Canton will provide access to all Qualifying Populations with a preference for chronically homeless individuals and families for its HOME-ARP activities. All other eligible Qualifying Populations will be selected in chronological order for any HOME-ARP activities. Chronically homeless QP applicants will be prioritized for admission for occupancy based on the following criteria:

- 1. Chronically Homeless Individuals and Families with the Longest History of Homelessness and with Severe Service Needs
- 2. Homeless Individuals and Families with a Disability and with Long Periods of Episodic Homelessness and Severe Service Needs
- 3. Homeless individuals or heads of household (in the case of families), as defined in 24 CFR 578.3, who are eligible for CoC Program-funded PSH and who have severe service needs. In the case of individuals or heads of households with equally severe service needs, those with the longest cumulative length of documented homelessness during the last three years will receive priority.
- 4. Homeless individuals and heads of households (in the case of families) who are:
  - a. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project, where, before residing in the transitional housing, they had lived in a place not meant for human habitation, in an emergency shelter, or in a safe have; or
  - b. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project if they were fleeing or attempting to flee domestic violence before residing in the transitional housing even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven before entering the transitional housing.

# 2.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:

The preference for chronically homeless individuals and families for HOME-ARP activities was determined by the priority needs identifying rental housing that is affordable and accessible to individuals and households at 0-30% AMI and deeply subsidized for extremely low-income Qualifying Populations along with increased investment in supportive services to increase their likelihood of becoming stably housed. The challenges faced by chronically homeless individuals and families are exacerbated by the lack of affordable housing available to them. Without rental units that are available and affordable to them, in conjunction with a strong supportive services component, this Qualifying Population is more likely to return to homelessness. The stable environment provided by housing and supportive services can provide them with opportunities to receive physical and mental health care, mainstream benefits, education and employment training, employment and other services critical to long-term maintenance of stable housing and an improved quality of life.

3.If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference.

#### CANTON, OH HOME-ARP ALLOCATION PLAN

Canton will establish a preference for chronically homeless individuals and families for its HOME-ARP activities. All other Qualifying Populations will be selected in chronological order for any HOME-ARP activities.

## Referral Methods

# 1.Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJs may use multiple referral methods in their HOME-ARP program. (Optional):

Canton will use the CoC Coordinated Entry in conjunction with additional methods in identifying qualifying populations to be referred to the HOME-ARP project since the CE does not currently accept all HOME-ARP Qualifying Populations. In an effort to reach all Qualifying Populations and provide them with access to HOME-ARP activities, Canton will require the use of additional referrals from outside organizations. These may include the homeless hotline and emergency assistance providers, among other entities. The referral method will be finalized as part of the implementation process through the development of a policy and procedure manual to administer the HOME-ARP program.

# 2.If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

Canton will use the CoC Coordinated Entry in conjunction with additional methods in identifying qualifying populations to be referred to the HOME-ARP project since the CE does not currently accept all HOME-ARP Qualifying Populations. In an effort to reach all Qualifying Populations and provide them with access to HOME-ARP activities, Canton will require the use of additional referrals from outside organizations. These may include the homeless hotline and emergency assistance providers, among other entities. The referral method will be finalized as part of the implementation process through the development of a policy and procedure manual to administer the HOME-ARP program.

# 3.If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

As indicated above, the CoC Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project, and the CoC CE prioritization will not be utilized to admit qualifying populations to projects. Rather, the Coordinated Entry System will be used as one method of referral to HOME-ARP assisted projects. Any referrals to the HOME-ARP assisted project(s) that come from the CoC's Coordinated Entry System would be prioritized according to the CoC's prioritization as follows:

- 1. Chronically Homeless Individuals and Families with the Longest History of Homelessness and with Severe Service Needs
- 2. Homeless Individuals and Families with a Disability and with Long Periods of Episodic Homelessness and Severe Service Needs
- 3. Homeless individuals or heads of household (in the case of families), as defined in 24 CFR 578.3, who are eligible for CoC Program-funded PSH and who have severe service needs. In the case of individuals or heads of households with equally severe service needs, those with the longest cumulative length of documented homelessness during the last three years will receive priority.
- 4. Homeless individuals and heads of households (in the case of families) who are:
  - a. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project, where, before residing in the transitional housing, they had lived in a place not meant for human habitation, in an emergency shelter, or in a safe have; or

b. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project if they were fleeing or attempting to flee domestic violence before residing in the transitional housing even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven before entering the transitional housing.

Referrals made to HOME-ARP assisted projects from the CE will have gone through this prioritization; however, CE will not be used as the exclusive referral source for HOME-ARP assisted projects. Beyond establishing a preference for chronically homeless individuals and families, all other eligible QPs will be selected in chronological order for any housing or supportive services.

# 4.If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

As indicated above, Coordinated Entry will not be used to admit applicants directly to a HOME-ARP activity as it does not include all of the qualifying populations. Referrals will be accepted from other sources including the homeless hotline and emergency assistance providers, among other entities. Households eligible for the preference of chronically homeless households will be selected in accordance to prioritization outlined above. All other QPs will be admitted in chronological order. The referral method will be finalized as part of the implementation process through the development of a policy and procedure manual to administer the HOME-ARP program.

# Limitations in a HOME-ARP Rental Housing or NCS Project

1.Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Canton will not include any limitations for eligibility for its HOME-ARP activity.

2.If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable.

3.If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable.

## Appendix A: Stakeholder Consultation Materials

DUDI IC ODCANIZATION OD ACENCY NAME	AGENCY/ ORGANIZATION TYPE	HOME ADDOUGH IEVING DONIE ATVONG GERVER
PUBLIC ORGANIZATION OR AGENCY NAME	Nonprofit organization	HOME-ARP QUALIFYING POPULATIONS SERVED
Alliance for Children & Families		Homeless, At risk of homelessness, Other populations
American Red Cross	Nonprofit agency	All QPs
Beacon Charitable Pharmacy	Nonprofit program	All QPs
Canton Christian Home	Homeless service provider	At risk of homelessness, other populations
Canton City Public Health	Public Agency	All QPs
Canton City School District	Local School District	All QPs
Canton Police Department	City Government	All QPs
Catholic Charities	Homeless service provider	All QPs
Chesters Mop Inc.	Homeless service provider	At risk of homelessness, other populations
Coleman Professional Services	Mental health service provider	All QPs
Coming Together Stark County	Nonprofit agency	All QPs(diversity/inclusion)
CommQuest	Homeless service provider	Homeless, At risk of homelessness, Other populations
Community Legal Aid	civil/ fair housing rights	All QPs (civil / fair housing rights)
Community Restoration Centers of Stark County	Homeless service provider	All QPs
Crossroads UMC/Canton for All People	Homeless service provider	All QPs Persons fleeing, or attempting to flee, domestic violence, dating violence, sexual
Domestic Violence Project, Inc.	DV Service provider	assault, stalking, or human trafficking
Early Childhood Resource Center	Nonprofit educational agency	All QPs (preschool childcare)
EDEN	Affordable housing provider	All QPs (housing provider)
Equitas Health	Health agency	All QPs (HIV/STI testing)
Family & Community Services	Homeless service provider	All QPs
Family Court	Government agency	All QPs
Goodwill Industries	Nonprofit agency	All QPs
Greater Stark County Urban League	Nonprofit agency	All QPs
Habitat for Humanity East Central Ohio	Affordable housing provider	At risk of homelessness, other populations
Homeless Outreach Team	Homeless service provider	Homeless
ICAN Housing	Homeless service provider	All QPs
Lifecare Clinic	Health agency	All QPs
NAMI Stark County	Mental health agency	At risk of homelessness, Other populations
Phoenix Rising	Mental health service provider	All QPs
Refuge of Hope	Homeless service provider and Domestic Violence provider	Homeless, At risk of homelessness, Other populations
Robert F Fay, CPA	Board member	All QPs (on the board of agencies assisting QPs)
Salvation Army ( Alliance)	Homeless service provider	Homeless, At risk of homelessness, Other populations
Salvation Army (Canton)	Homeless service provider	Homeless, At risk of homelessness, Other populations
Salvation Army (Massillon )	Homeless service provider	Homeless, At risk of homelessness, Other populations
Sisters of Charity Foundation of Canton	Foundation	All QPs
Stark Community Foundation	Foundation	All QPs
Stark County Board of Developmental Disabilities	Disability provider	Homeless, At risk of homelessness, Other populations
Stark County Board of Education (Educational Service Center)	County Education Service	All QPs
Stark County Community Action Agency		All QLs
comm, community remoti recitiv		All OPs
	Nonprofit agency School District	All QPs
Stark County Educational Service Center	School District	All QPs
Stark County Educational Service Center Stark County Fair Housing	School District civil/ fair housing rights	All QPs All QPs (civil / fair housing rights)
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council	School District civil/ fair housing rights County Mental Health organization	All QPs All QPs (civil / fair housing rights) All QPs
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department	School District civil/ fair housing rights County Mental Health organization County Public Organization	All QPs All QPs (civil / fair housing rights) All QPs All QPs
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department  Stark County Houses of Worship  Stark County Mental Health and Addiction Recovery	School District civil/ fair housing rights  County Mental Health organization  County Public Organization  Nonprofit agency	All QPs All QPs (civil / fair housing rights) All QPs All QPs All QPs All QPs
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department  Stark County Houses of Worship  Stark County Mental Health and Addiction Recovery (StarkMHAR)	School District  civil/ fair housing rights  County Mental Health organization  County Public Organization  Nonprofit agency  HMIS - Homeless service provider	All QPs All QPs (civil / fair housing rights) All QPs All QPs All QPs All QPs All QPs
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department  Stark County Houses of Worship  Stark County Mental Health and Addiction Recovery (StarkMHAR)  Stark County Sheriff Department	School District civil/ fair housing rights  County Mental Health organization  County Public Organization  Nonprofit agency  HMIS - Homeless service provider  County Government	All QPs All QPs (civil / fair housing rights) All QPs All QPs All QPs All QPs All QPs All QPs
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department  Stark County Houses of Worship  Stark County Mental Health and Addiction Recovery (StarkMHAR)  Stark County Sheriff Department  Stark County Veteran's Service Commission	School District civil/ fair housing rights  County Mental Health organization  County Public Organization  Nonprofit agency  HMIS - Homeless service provider  County Government  Veteran public agency	All QPs All QPs (civil / fair housing rights) All QPs
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department  Stark County Houses of Worship  Stark County Mental Health and Addiction Recovery  (StarkMHAR)  Stark County Sheriff Department  Stark County Veteran's Service Commission  Stark Housing Network Inc.	School District civil/ fair housing rights County Mental Health organization County Public Organization Nonprofit agency HMIS - Homeless service provider County Government Veteran public agency Continuum of Care	All QPs All QPs (civil / fair housing rights) All QPs
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department  Stark County Houses of Worship  Stark County Mental Health and Addiction Recovery  (StarkMHAR)  Stark County Sheriff Department  Stark County Veteran's Service Commission  Stark Housing Network Inc.  Stark Jobs & Family Services	School District civil/ fair housing rights  County Mental Health organization  County Public Organization  Nonprofit agency  HMIS - Homeless service provider  County Government  Veteran public agency  Continuum of Care  County Government	All QPs (civil / fair housing rights) All QPs (civil / fair housing rights) All QPs involving veterans All QPs All QPs
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department  Stark County Houses of Worship  Stark County Mental Health and Addiction Recovery (StarkMHAR)  Stark County Sheriff Department  Stark County Veteran's Service Commission  Stark Housing Network Inc.  Stark Jobs & Family Services  Stark Metropolitan Housing Authority	School District civil/ fair housing rights County Mental Health organization County Public Organization Nonprofit agency HMIS - Homeless service provider County Government Veteran public agency Continuum of Care County Government Public housing authority	All QPs All QPs (civil / fair housing rights) All QPs
Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department  Stark County Houses of Worship  Stark County Mental Health and Addiction Recovery  (StarkMHAR)  Stark County Sheriff Department  Stark County Veteran's Service Commission  Stark Housing Network Inc.  Stark Jobs & Family Services	School District civil/ fair housing rights  County Mental Health organization  County Public Organization  Nonprofit agency  HMIS - Homeless service provider  County Government  Veteran public agency  Continuum of Care  County Government	All QPs (civil / fair housing rights) All QPs (civil / fair housing rights) All QPs involving veterans All QPs All QPs
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Stark County Educational Service Center  Stark County Fair Housing  Stark County Family Council  Stark County Health Department  Stark County Houses of Worship  Stark County Mental Health and Addiction Recovery (StarkMHAR)  Stark County Sheriff Department  Stark County Veteran's Service Commission  Stark Housing Network Inc.  Stark Housing Network Inc.  Stark Metropolitan Housing Authority  Stark Social Services Network  The Stark Community Support Network  United Way of Greater Stark County	School District civil/ fair housing rights County Mental Health organization County Public Organization Nonprofit agency HMIS - Homeless service provider County Government Veteran public agency Continuum of Care County Government Public housing authority County Government Support Service Agency Nonprofit agency	All QPs All QPs (civil / fair housing rights) All QPs
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## **HOME-ARP Stakeholder Discussions**

Please join us to discuss the federal HOME-ARP funds received by the City of Canton and Stark County, the Qualifying Populations that may receive assistance, and eligible uses of program funding. Stakeholders will be asked how these funds may address community housing needs and gaps in services related to this program. For additional details about HOME-ARP, view this video.

Stakeholder Session #1

July 20, 2022 | 2:00 - 3:30 PM

Meeting link: https://meet.goto.com/769362373

Join via phone: +1 (312) 757-3121

Access code: 769-362-373

Stakeholder Session #2
July 21, 2022 | 9:00 - 10:30 AM

Meeting link: https://meet.goto.com/544124733
Join via phone: +1 (872) 240-3412

Access code: 544-124-733

Stakeholder Session #3
July 21, 2022 | 2:00 - 3:30 PM

Meeting link: https://meet.goto.com/625856581
Join via phone: +1 (224) 501-3412
Access code: 625-856-581

For additional information, please contact:
City of Canton: Dawn Fish, dawn.fish@cantonohio.gov
Stark County: Diane Sheridan, dmsheridan@starkcountyohio.gov
Stark Housing Network: Marcie Bragg, mbragg@starkhousingnetwork.org

# HOME-ARP ALLOCATION PLANS: STAKEHOLDER CONSULTATIONS



Canton, OH Stark County, OH July 20-21, 2022





### AGENDA

What is HOME-ARP?

Allocation amounts

Qualifying populations

Eligible activities

Next steps

Discussion

### THE HOME-AMERICAN RESCUE PLAN (ARP)

# SEC. 3205. HOMELESSNESS ASSISTANCE AND SUPPORTIVE SERVICES PROGRAM.

of homelessness and other vulnerable rental assistance, supportive services, households who are homeless, at risk HOME funds to assist individuals or Provides \$5 billion of supplemental populations by providing housing, and non-congregate shelter.

Stark County HOME-ARP Allocation \$3,228,483 City of Canton HOME-ARP Allocation \$2,573,468

# QUALIFYING POPULATIONS

Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act

At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary

Other populations who do not qualify under any of the populations above but meet one of the following criteria:

- (a) Other families requiring services or housing assistance to prevent homelessness
- (b) Those at greatest risk of housing instability



an individual or family who lacks a fixed, regular, and adequate nighttime residence

an individual or family with a primary nighttime residence that is a public or private place not meant for human habitation, including a car, park, abandoned building, bus or train station, airport, or camping ground



HOMELESS

DEFINITION

HUD HOME-ARP

an individual or family living in shelter designated to provide temporary living arrangements



an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided



an individual or family who will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels



Income at or below 30% AMI, Lacks sufficient resources to attain housing stability AND:

1-person household — up to \$16,150 4-person household — up to \$27,750



Multiple Moves: Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance



Doubled Up: Is living in the home of another because of economic hardship



Hotel/Motel: Lives in a hotel or motel and the cost is not paid for by charitable organizations or by federal, state, or local government programs for low-income individuals



Overcrowded Housing: Lives in a single room occupancy (SRO) or efficiency apartment unit where two or more persons reside or where there are more than one-and-a-half persons per room



Exiting Institution: Is exiting a publicly funded institution or system of care (e.g., ¡ail, prison, psychiatric hospital, etc.)

## ELIGIBLE ACTIVITIES









OF AFFORDABLE

HOUSING

**PRESERVATION** 

**PRODUCTION** 

OR



OF NON-CONGREGATE SERVICES, AND HOUSING COUNSELING **PREVENTION** SUPPORTIVE HOMELESS SERVICES,

SHELTER



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**URCHASE AND** 

**DEVELOPMENT** 

## DISCUSSION

### **NEXT STEPS**

Comments from these stakeholder consultations will be considered when drafting the HOME-ARP Allocation Plan

Round 2 of stakeholder outreach is anticipated in September

15-day public comment period and public hearing on Draft HOME-ARP Allocation Plan planned for late November/early December

Submission of the HOME-ARP Allocation Plan anticipated in December

## FOR MORE INFORMATION

For additional information:

View a 21-minute narrated video with additional program info at:

HOME-ARP Overview Video or https://vimeo.com/701705670/4b0f271d58

A good overview of the eligible activities is available in a set of Facts Sheets on the HOME-ARP program on HUD's website at:

https://www.hud.gov/program offices/comm planning/home-arp/factsheets

City of Canton: Dawn Fish, dawn.fish@cantonohio.gov

Stark County: Diane Sheridan, dmsheridan@starkcountyohio.gov

Stark Housing Network: Marcie Bragg, mbragg@starkhousingnetwork.org

7/20/2022 2:00-3:30 pm

Organizations represented:

Stark County Veterans Service Commission

Domestic Violence Project, Inc.

Crossroads UMC / Canton for All People

Testa Companies Vantage Aging

Alliance Area Habitat for Humanity

Workforce Initiative

Stark Metro Housing Authority

Stark Housing Network

Catholic Charities Stark Community Foundation

Stark County Family Council
Alliance for Children & Families
Conton City Public Health

Canton City Public Health

ICAN, Inc. (4 unidentified)

Agency/Organization Type (required stakeholders in italics)

Veterans service provider

DV service provider

Homeless service provider

Business

Homeless service provider
Affordable housing provider

Public/private entity that addresses the needs of QPs

Public housing authority Continuum of Care

Homeless service provider
Philanthropic organization
Homeless service provider
Nonprofit organization

Public agency that addresses the needs of the QPs

Homeless service provider

### 1. What are the most critical gaps and needs in the local homeless and housing service system?

- The lack of unit availability in Stark County. There are higher barriers on the population. They are going back 3-5 years on criminal history. The treasurer's office is taking back land for back taxes. If we could buy that land for housing it would help.
- Why are they extending their background checks? When the governor said no one could be evicted people who had the money did not pay the rent. Now the landlords are going back 5 to 10 years with the recent eviction's landlords are not willing to take that chance.
- A lack of affordable housing is needed as are better landlords that do not mind working with affordable housing.
- Landlords are not equipped with handling the population. They need ongoing training to keep up with rental guidelines and information. Who are we going to fund to make sure their affordable housing is long-term, and they aren't going to be homeless? The landlords need wrap-around services to make sure individuals stay housed for the long haul.
- HUD has put out guidance with housing individuals with criminal backgrounds.
   Landlords need guidance on what they can and can't do. If we can get landlords to attend fair housing trainings that would help so they can know what they can and can't do.
- If there was a way to get all the providers and their resources in a room with the landlords that would help us to make everyone aware of the resources.

- The preservation of existing housing is important as well. Can we put more attention in this? Within a couple of years updates are needed to the current stock. Put the dollars in the hand of the organizations that know what are needed.
- We work with a smaller community. We are having a hard time housing the homeless population because the landlords don't need the subsidy or won't accept it if it comes from a social service organization. It would help to preserve what we do have to house them.
- It takes a lot to house families. Without creating a pathway to maintain that it is not as effective long term.
- There is a lot of need for housing inspection. Make sure we include this component as well. We need to serve all Stark County not just the city for extra services to the 18-24 age group population. Making the transitional aging population aware of the resources available to them.
- If we build a big affordable housing complex, things like that take a lot of preplanning, a mix of funds, and the timeframe is longer. I'm not sure if we can do this in 6 years. Then the 20 years of affordability. If we do single family homes, there are shorter time frames and more affordable options. We should work with nonprofits that are going to be here tomorrow and not sell once they get tired.

### 2. What bedroom sizes are needed? What is in greatest demand?

- Mostly 1-bedroom for single persons and 3-4-bedrooms for families.
- Usually see bigger sizes requested. Need 2-3 bedrooms. It is hard to find them at affordable prices as well. It creates a problem of sustainability. We can cover for a couple months but then it is hard for on-going need.

### 3. What are the biggest risk factors among these populations?

- Income. Drug and Alcohol abuse as well. A lack of income is the issue. Is this related to lower wages or more training skills?
- Average rent is \$750. Yearly income downtown is \$24,000. 70% of the population are cost burdened and this was before the recent rent increases. The housing stock needed is just not there. \$15 hour is still cost burden not severely cost burden but still cost burden. What they are saying is inflation but it's just landlords taking advantage of what's going on. I have been trying to find someone to build affordable housing at a cheaper price but it's not possible. Cheapest build is 1,500 sq ft selling for \$320,000 new construction.
- Acquisition and renovation is something to consider because new construction is so expensive.
- It seems like there's a strong consensus that the funds should go towards affordable housing.

• I agree with what everyone has been saying so far. In terms of landlords in the community we are only seeing a drastic increase of landlords increasing rent amounts and also not being willing to work with tenants or some agencies for that matter. At times landlords are willing to accept rental assistance, but then immediately wanting to evict as soon as they're able to again. Affordable housing is drastically needed at this time for those we serve.

### 4. What are the supportive services that would be most helpful for your clients?

• We aren't answering because we don't think that is the solution.

### Additional Questions:

- How much money would the city and county keep for operations? 15% maximum can be kept for administration.
- If we go for the 9% tax credit, we can serve more people. We can leverage private funds to put into affordable housing projects with tax credit projects. One project has a 2-year waitlist and is doing well. The two that got approved in Stark County were 4% tax credits.
- I would like to see scattered sites. We have enough multi-family apartments concentrated downtown. Scattered site works better for those who do not do well in multi-family.
- I think families need choices on where they live. I think we need to consider where people want to live and raise their children.
- For ongoing subsides it would be ashamed to build something that would Rob peter to pay Paul just to operate new facilities. We don't want the current places to have to compete for funds if we build new projects.
- How will the plans be? Will there be two plans or individual plans?

7/21/2022 9:00-10:30 am

### Organizations represented:

(3 unidentified)

Habitat for Humanity East Central OH Stark Metro Housing Authority Stark Housing Network ICAN, Inc. Mayor, City of Canton Stark County HMIS Agency/Organization Type (required stakeholders in italics)

Affordable housing provider
Public housing authority
Continuum of Care
Homeless service provider
Local government
HMIS

### 1. What critical needs are not being met? What are the greatest needs for the population?

- Not being able to approve the private landlords' rent amounts. The development of
  affordable housing properties would be available and beneficial for families. We have
  more senior communities than families. If we could purchase the foreclosures in the
  city and renovate them for rent that would be good. The biggest need is actual
  affordable housing properties.
- HUD sets payment standards for 2022 and SMHA applied for a waiver for a higher standard. I can approve 120% of fair market rate right now. I would have to approve a lesser number with utility included. Landlords are asking for \$1,200 plus tenants have to pay their own utilities. The max I can approve is \$1,171 for a 3 bedroom. The ones I can approve are not in the best neighborhoods.
- SMHA has a separate thing with CoC for the homeless population. There is a new voucher emergency housing voucher that I can offer for people normally who would not be eligible for the program. One of the eligibility factors is they must be homeless or at a shelter. Surprisingly, it is doing better than the housing choice voucher due to owner incentives like extra security deposits if they give renters a chance. Another thing we offer is that we have a relationship with Habitat if they have housing we can use as rental units.
- We have been able to use the emergency program for the most vulnerable in the communities. We have a hard time housing rapid rehousing because of landlords going back on criminal history and rising rents.
- We have had landlords going back as far as 10 years on criminal records and just not giving people a chance.
- They know rapid rehousing is going to end and the jobs aren't there, so tenants won't have the jobs to pay their half of the rent.
- Landlords across the county are not renting to anyone with a voucher. We are finding it very difficult to rent. The credit scores, rental history, and criminal history are barriers. Since Covid began we have housed in the shelter 1,157 unique households many of them more than once. 5,383 households have been served.

- There has been an increase in the number of tenants not paying rent and it has worsened since COVID. Landlords went a long time without receiving rents. Then funding came in for the landlords to be made whole or partly paid. Millions of dollars came into Stark County. We were hoping it would make landlords whole with our rental assistance vouchers. They seem afraid that with regular voucher holders they will be left in the hole once again.
- Preservation of affordable housing is needed, maybe vacant land or the purchase of land to create affordable housing. I am interested in eligible activities and services that can be used for residents at the housing authority. We don't provide emergency housing and a lot of people think we do. What can we do from the supportive services side for those already in the housing?

### 2. What type of housing is most in demand for the qualifying population?

- Of the 1,500 on my waiting list at SMHA, 60% are 1-person families.
- It is a hit or miss to find them housing. Some landlords know when someone is moving out, they will let us know what's available. We try to have a good relationship with the landlords who rent to us in the past and sometimes people get a voucher and request a place a week later some are waiting 6 months.
- The voucher expires if they can't use it but we will extend it for 30 days for those with disabilities. We request proof they have attempted to find housing when they don't have a disability then we would give an extension. I expired 90 vouchers between December and July because they couldn't find units.
- Security deposits are going up and fraud is going up too so a lot of people who don't even live in the area or own a house are putting it for rent to collect the deposits.
- With TBRA it seems like it's hard to find housing if the housing isn't there, what will this do? It could be a technique where someone is building the units, and this is how they could pay for them.
- We did have a TBRA for pregnant women who were facing evictions and work with landlords through YWCA and come to an agreement they were working with a community health worker to work with social services needs and we had several families that worked in this program.

### 3. What type of supportive services are needed to get someone housed or keep them housed to make housing stability more successful?

- Employment, case management, counseling. Employment and education training are the top elements for best being successful and self-sufficient.
- ICAN has training programs for the YWCA, the rapid rehousing. We provide incentives if you stay employed for 60 days, 90days, and/or 1 year you can receive a check. A bigger thing is getting them to and from locations. We have a lot of bus passes. The system is changing we can't just buy a paper copy now they are getting passes and

- we are working to see how we can do that for the bus pass. I won't have the luxury to purchase two 1- day passes anymore. There are a lot of people hiring in restaurants and people don't want to do the work.
- We have a lot of partners that will contact us when they are doing the training. We
  do outreach for residents who want the training. We also have a partnership with
  Goodwill which gives them training in soft skills for on-the-job training then go into
  providing the actual training for janitorial or other positions available at SMHA. We
  can pay for certification for residents. We also do Section 3 to help residents get
  hired on to jobs that qualify.
- We need more supportive services. We need more than beyond the Medicaid billable. More peer support individuals. Housing support where we try to work with the induvial to maintain their home like budgeting. We can't force them and require services.
- When we get residents that are on the fence about working, we have programs like
  the earned income disallowance which helps get residents ready to pay more in rent
  when they start making more. The first 12 months it is disallowed at 12 months. At 24
  months it is disallowed at 6 months. It helps them get ready mentally for the
  increase. It can be helpful across the board when they are on the fence about
  working.
- We can build more housing but the problem is operating the properties. How long can it last?

### Additional Questions:

• Any activities regarding the programs we have talked about? Anyone seeking your services? Typically, in North Canton we have people requesting housing, but it is for more than the allowable rent amount.

7/21/2022 2:00-3:30 pm

### Organizations represented:

Stark Housing Network

Stark Co. Mental Health & Addiction Recovery Sisters of Charity Foundation of Canton

Testa Companies CommQuest

Stark Co. Educational Service Center Family & Community Services

ICAN, Inc.

(6 unidentified)

### **Agency/Organization Type** (required stakeholders in italics)

Continuum of Care

Homeless service provider Homeless service provider

Business

Homeless service provider

School district

Homeless service provider Homeless service provider

### 1. Most critical gap in resources to help keep clients housed or get housing?

- A lot of at risk for homelessness because it is no longer affordable. What can we do that is affordable? We need scattered sites so people can choose to live where they go to school in the current market.
- I've seen a lot of voucher programs with COVID resources. These is a need to find landlords who are willing to work with these programs. More housing that can be used for homeless needs.
- More benevolent landlords that are willing to accept the vouchers. We have a
  portfolio of rapid rehousing vouchers that are important to the program. We are
  meeting with landlords and telling them the benefits. We need to keep them in our
  community and landlords accepting them is so important to the program and helping
  to end homelessness.
- I'm hearing that even when they find landlords the housing isn't up to standards. The preservation of housing is important because landlords we do find can use that to make sure the units are up to par and livable.

### 2. What are some of the biggest risk factors for housing instability that cause people to reenter the system?

- A lot of research states that people need coaches to help get them on the right track for the long haul not just in the moment. Whether it's accessing childcare or finding the right job or apartment. That piece is harder to come by. Someone to just be there for the adult. We don't give that enough credit.
- Our CoC has been looking at the factor that puts someone closer to the shelter door and homelessness. It would be easier to identify these factors since we are doing that work already. From history of homelessness or folks doubled-up or living in the home of someone else are closer to entering the homeless cycle.
- We have two evaluators that look at the causes of homelessness since we received a large influx of money. People who are single or have a disability, Black/African

- American are overrepresented in our communities, and those who double-up are primarily the folks at risk.
- The Canton City School District used HOME-ARP homeless funds to contract with a housing navigator employed by Canton For All People. They are in the early stages of this. All her referral comes from the school district to help them navigate housing while their children are in school.

### 3. What types of units are most in need to address the current situation?

- One of the things we feel with working with the homeless prevention program is that we would benefit from more single-family homes so individuals can be a part of the community. We notice those who suffer the most thrive with subsidies with landlords that withdraw rent each month from their SSI or other funds. The automatic payments help set them up for success.
- We asked people years ago what type of housing they wanted. They saidcthey want housing near schools and their support systems and safe areas. How do we build housing in safe areas with greenspace and grocery stores?

### 4. What are some of the other gaps in supportive housing that are currently not provided in Canton/ Stark County?

- One of the most difficult things is that once individuals move out of shelter, they have no one to help them move. We have a program called Restore that helps them get new furniture for their place but no one to help them move to their new home. That's one gap we see.
- Funding we used for rapid rehousing allowed us to pay for moving expenses, but it is running out soon. For permanent support services we do have some programs that are billed by Medicaid. It would be nice if all programs had this available to them.
- Removing barriers to mistakes that they made at some point in time that gets them stuck in a cycle. Community Legal Aid is something parents say they wish they had more access to. At I Promise in Akron that is the number one service parents need. Greater access to Community Legal Aid to remove barriers.

### Additional Comments:

- Under rental housing the notice also talked about operating funds for nonprofits and TBRA. Can we use these TBRA funds for subsiding operating cost?
- If organizations want to receive the operating funds and TBRA, will it be a separate grant?
- Is this new operating or existing operating?
- When COVID happened we had to turn back a lot of money because it wasn't marketed towards the people who need it, just the providers.



### City of Canton and Stark County, OH

### **HOME-ARP Stakeholder Consultations Round 2**

Join us for the final round of stakeholder consultations focusing on a review of the key findings on the unmet housing and supportive service needs of the Qualifying Populations. Stakeholder comments will be included in the Draft Allocation Plan anticipated to be released in November for a 15-day public comment period.

For additional details about HOME-ARP, view this video.

**Stakeholder Session #1 Oct 3, 2022 | 1:00 - 2:30 PM** 

Meeting link: https://meet.goto.com/665285117 Join via phone: +1 (224) 501-3412

Access code: 665-285-117

**Stakeholder Session #2 Oct 5, 2022 | 1:00 - 2:30 PM** 

Meeting link: https://meet.goto.com/255478357

Join via phone: +1 (224) 501-3412

Access code: 255-478-357

Stakeholder Session #3
Oct 6, 2022 | 10:00 - 11:30 AM

Meeting link: https://meet.goto.com/271747589

Join via phone: +1 (646) 749-3122 Access code: 271-747-589

For additional information, please contact:
City of Canton: Sherice L. Freeman, sherice.freeman@cantonohio.gov
Stark County: Diane Sheridan, dmsheridan@starkcountyohio.gov
Stark Housing Network: Marcie Bragg, mbragg@starkhousingnetwork.org

## **HOME-ARP ALLOCATION PLANS:** STAKEHOLDER CONSULTATIONS



Canton, OH Stark County, OH





### THE HOME-AMERICAN RESCUE PLAN (ARP)

# SEC. 3205. HOMELESSNESS ASSISTANCE AND SUPPORTIVE SERVICES PROGRAM.

of homelessness and other vulnerable rental assistance, supportive services, households who are homeless, at risk HOME funds to assist individuals or Provides \$5 billion of supplemental populations by providing housing, and non-congregate shelter.

Stark County HOME-ARP Allocation \$3,228,483 City of Canton HOME-ARP Allocation \$2,573,468

# QUALIFYING POPULATIONS

Homeless, as defined in section 103(α) of the McKinney-Vento Homeless Assistance Act

At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary

Other populations who meet one of the following criteria:

- (a) Families requiring services or housing assistance to **prevent homelessness**
- (b) Those at greatest risk of housing instability

# STAKEHOLDER IDENTIFIED NEEDS / ISSUES

More affordable and accessible rental housing for households up to 50% AMI through new construction and preservation with smaller developments and scattered sites considered to expand choice

with mental illness, homeless, criminal histories, evictions, poor credit, released Many landlords refuse HCV for higher market rents, and also refuse tenants offenders

Level of HCV is inadequate to serve families in need of subsidized rental housing Subsidized housing has long waiting lists with little turnover among PSH and affordable rental units

# STAKEHOLDER IDENTIFIED NEEDS / ISSUES

Inadequate level of supportive services that increase potential for returning to homelessness—legal, financial counseling, case management, employment training, and more

Better collaboration with landlords to increase HCV acceptance among those with criminal histories, mental illness, homeless Need affordable housing that is accessible to transportation, amenities, good schools

# DATA ANALYSIS: CONTINUUM OF CARE

247	2022 PIT count of total homeless with 28 unsheltered
4,257	Homeless persons served between January 2021 thru June 2022
151	Veterans housed through CoC, of which 31 were chronically homeless
1,181	Persons who experienced homelessness for the first time
978	Households exited the homeless system to temporary destinations
%2'16	Homeless engaged in street outreach who exited to positive destinations
1,092	Households with history of domestic violence, of which 243 were fleeing

# DATA ANALYSIS: CANTON & STARK COUNTY

4,785	Housing Gap of rental units for households at 0-50% AMI (Canton)
11,910	Housing Gap of rental units for households at 0-50% AMI (excludes Canton)
\$12,853	Average income of 1,445 households assisted with COVID-19 ERAP (all Stark Co)
20%	Households with persons with disabilities on SMHA waitlist for public housing

## PRIORITY NEEDS

### CANTON

Rental housing affordable and accessible to 0-30% households

PSH units

Supportive services

TBRA

## STARK COUNTY

Rental housing affordable and accessible to 0-30% households

**PSH** units

Supportive services

TBRA

## QUESTIONS?

### **NEXT STEPS**

Comments from these sessions will be considered when completing the two Allocation Plans A 15-day public comment period and a public hearing on the Draft Allocation Plan in each of the two jurisdictions will be scheduled in November (city) and December (county). All dates TBD.

Submission to HUD is anticipated in mid-December (city) and early January (county).

## FOR MORE INFORMATION

City of Canton: sherice.freeman@cantonohio.gov

Stark County: dmsheridan@starkcountyohio.gov Stark Housing Network: mbragg@starkhousingnetwork.org

10/03/2022 1:00-2:30 pm

Organizations represented: Agency/Organization Type (required stakeholders in italics)

Stark County HMIS HMIS

Alliance for Children & Families
Stark Metro Housing Authority
Stark Housing Network
Nonprofit organization
Public housing authority
Continuum of Care

Testa Companies Business
Stark Co. Educational Service Center School district

ICAN, Inc. Homeless service provider

(5 unidentified)

Following the presentation on a summary of the housing and service needs of the QPs, the following comments were made by participants:

- Can the funding be used to create new housing units? (yes)
- Who's developing housing in Massillon? (ICAN and a couple of other organizations)
- This is a very good summary of the HMIS data.

10/05/2022 1:00-2:30 pm

Organizations represented: Agency/Organization Type (required stakeholders in italics)

Stark County HMIS HMIS

DVPI Domestic violence service provider

Stark Co. Educational Service Center School district

ICAN, Inc. Homeless service provider

(1 unidentified)

Following the presentation on a summary of the housing and service needs of the QPs, the following comments were made by participants:

- Not all ERAP data may have been provided.
- (several comments and questions to explain the data)

10/06/2022 10:00-11:30 am

(4 unidentified)

Organizations represented: Agency/Organization Type (required stakeholders in italics)

Stark County HMIS HMIS

Stark Housing Network Continuum of Care

United Way of Greater Stark County

Alpha Homes

Vantage Aging

Homeless service provider

DVPI Domestic violence service provider

ICAN, Inc. Homeless service provider

Following the presentation on a summary of the housing and service needs of the QPs, the following comments were made by participants:

- NCS would make it safer to house homeless in future pandemics
- Survivors of domestic violence, human trafficking, etc. can access the Stark County Coordinated Entry since it includes all QPs

10/05/2022 2:00-3:00 pm

Organizations represented:

Canton Fair Housing Officer Stark County Fair Housing Officer Massillon Fair Housing Officer **Agency/Organization Type** (required stakeholders in italics)

Public agency that addresses fair housing, civil rights, disability rights Public agency that addresses fair housing, civil rights, disability rights Public agency that addresses fair housing, civil rights, disability rights

### What type of fair housing issues are you seeing among the homeless and other QPS?

- Increased rental rate impacting members of the protected classes and everyone else, placing them at risk of homelessness
- Landlords are increasing rents by \$100, placing the rents above the HUD FMRs and out of reach for tenants
- Tenants can't afford this and they're asking service agencies to assist them; some will leave their units before they get evicted to keep the eviction action off their record
- There is a high demand for affordable rental units for lower income households
- Many landlords do not provide reasonable accommodation for persons with disabilities
  who have emotional support animals. One tenant who filed a discrimination complaint
  became homeless waiting for the case to be resolved because the landlord does not want
  to conciliate.
- Persons with disabilities are at a greater disadvantage because the supply of units that are affordable and available and accessible is hardly there
- Some displacement due to gentrification occurring in Canton and rents are rising there
- Persons with limited English proficiency can't find the resources they need: they don't
  understand the eviction process, they don't know about Legal Aid; they don't know how
  to use the homeless hotline, and interpreters are hard to find (Spanish, Asian languages,
  East European languages)
- Renters without subsidies are barely getting by—these are also at risk
- Leases are usually for two years then convert to month-to-month but this is when landlords increase the rent because it's easier to evict, including persons with disabilities
- Some landlords are increasing rents without making any improvements to the units
- Out-of-state investors are buying up units, increasing the rents but leaving the units in the same condition
- The main challenge is getting more info about resources available to those who are homeless and those at risk of homelessness

### 2. What are some recommendations that would be appropriate?

- Rent control but Ohio doesn't have a law for it
- Stronger laws that are enforced against slumlords. Currently, there is no penalty or deterrence for renting units in substandard condition. Even when rents are escrowed, other units in the building are not improved.
- There are rental registry programs but none of them have any teeth.
- Massillon code enforcement works to inspect units but has weak enforcement powers against landlords. Need a stronger state law.
- More education for landlords on reasonable accommodation for emotional support animals.

2

• Fair housing training for all program subrecipients to decrease the likelihood they will

discriminate against tenants.

10/06/2022 1:00-2:00 pm

Organization represented:

Agency/Organization Type (required stakeholders in italics)

Domestic Violence Project, Inc.

Domestic violence service provider

• From July 2021-June 2022, we tracked 759 DV survivors whose shelter needs could not be met (i.e., they called the DV hotline but their shelter needs could not be met)

- In 2021, there were 576 unmet housing needs, the decrease probably being due to COVID
- DVPI tried to transition them out of shelter after 90 days
  - o The average stay has been 45 days
  - The length of stay is increasing due to not being able to find affordable units even with vouchers
  - DVPI would like TBRA vouchers to help re-settle survivors because they are waiting too long on the SMHA HCV waiting list, which may mean they have to return to their abuser while waiting; having their own vouchers would allow them to circumvent the SMHA HCV list
  - o The SMHA HCV waiting list is closed so survivors can't apply for vouchers
- Many survivors who have jobs and can pay rent (if they find units) still need rent and utility deposits to move in

10/07/2022 9:00-10:00 am

Organization represented:

**Agency/Organization Type** (required stakeholders in italics) *Veterans group* 

Northeast Ohio VA Healthcare System, Community Resource and Referral Center (CRRC)

### 1. What type of services are being provided to homeless and at risk homeless veterans in the county?

- The existing structure in Stark County includes PSH, RRH, TH—all of which have openings
- If a veteran head of household without children presents with an eviction notice, we can provide RRH or TH.
- Our agency has funding and we want to use it first (i.e., before other agencies or organizations use their funding to house/service veterans)
- We have VASH vouchers but the challenge here is to find rental units in the market
- For larger families with veteran members, we need 4- and 5-bedroom units, which are very difficult to find
- Stark County might have a gap in providing services to veterans

### Appendix B: Public Participation Materials

### CITY OF CANTON COMMUNITY DEVELOPMENT FY2021 AMENDED ANNUAL ACTION PLAN HOME- ARP ALLOCATION PLAN

CITIZEN INPUT VIRTUAL PUBLIC HEARING WEDNESDAY, DECEMBER 14, 2022 AT 10:00 A.M.

The HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) provides funding to HOME PJs to reduce homelessness and increase housing stability across the country. The City of Canton (the City) was awarded \$2,573,468 in HOME-ARP funds. This one-time funding creates a significant opportunity for the City to meet the housing and service needs of our community's most vulnerable. The City has created a HOME-ARP Allocation Plan (the Plan), that will address the needs of the qualifying Population (QP) through the eligible activities.

### **Public Hearing**

The City will hold a Virtual Public Hearing on the Plan on Wednesday, December 14, 2022 at 10:00 A.M. To access the virtual meeting, please visit our website at: <a href="www.cantonohio.gov/254/Development">www.cantonohio.gov/254/Development</a>. The purpose of this hearing will be to obtain citizen input and comments on the City's FY2021 Amended Annual Action Plan to include HOME - ARP.

### **Canton FY2021 Amended Annual Action Plan**

The City is proposing the following budget for the HOME-ARP portion of its FY 2021 Annual Action Plan:

### **HOME-ARP**

Supportive Services	\$309,846
Development of Affordable Rental Housing	\$1,754,327
Non-Profit Operating	\$64,336
Non-Profit Capacity Building	\$64,336
Administration and Planning	\$380,623
Total HOME-ARP Allocation	\$2,573,468

### **Citizen Comment Period**

The City's FY2021 Amended Annual Action Plan will be available for public review on the City's website beginning Monday, November 21, 2022 at the following URL: <a href="www.cantonohio.gov/254/Development">www.cantonohio.gov/254/Development</a>

The public comment period is open from December 5, 2022 to December 19, 2022. Interested parties may submit written comments and questions via email to <a href="mailto:communitydevelopment@cantonohio.gov">communitydevelopment@cantonohio.gov</a> any time during the public comment period. **Emailed comments must be submitted by 11:59 p.m. on December 19, 2022.** 

The purpose of the public comment period is to receive input regarding the above-mentioned plan that outlines recommended programs.

All citizens are encouraged to submit their views and proposals regarding the development of affordable rental housing, homelessness assistance and supportive services.





The Daily Jeffersonian | Record-Courier
The Daily Jeffersonian | Record-Courier
The Daily Record | The Repository
The Times-Reporter | The Independent
Akron Beacon Journal | Columbus Dispatch

PO Box 630599 Cincinnati, OH 45263-0599

### **PROOF OF PUBLICATION**

L-Canton Community Economic Deve L-Canton Community Economic Development 218 CLEVELAND SW AVE # 5TH CANTON OH 44702

STATE OF OHIO, COUNTY OF STARK

The Canton Repository, a daily newspaper of general circulation, printed and published in the county of Stark, in the State of Ohio; that the publication, a copy of which is attached hereto, was published in said newspaper in the issue dated:

11/21/2022

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### **PUBLIC NOTICE**

CITY OF CANTON
COMMUNITY
DEVELOPMENT
FY2021 AMENDED
ANNUAL ACTION PLAN
HOME-ARP ALLOCATION
PLAN
CITIZEN INPUT VIRTUAL
PUBLIC HEARING
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The purpose of the public comment period is to receive input regarding the above-mentioned plan that outlines

recommended programs.
All citizens are encouraged to submit their views and proposals regarding the development of affordable rental housing, homelessness resistance and supportive assistance and supportive services.

Equal Housing Opportunity Published in The Repostiory on November 21, 2022.

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W TO GET HELP

DATA

ARCHIVE: FY2022 ESG Competition Information

View more ESG competition information on the City of Canton website.

### **CITY OF CANTON-COMMUNITY DEVELOPMENT HOME ARP**

December 14, 2022 Citizen Input Virtual Public Hearing- HOME-ARP Citizen Input Notice of Virtual Public Hearing- HOME-ARP DRAFT- City of Canton HOME-ARP Allocation Plan Community Development | Canton, OH (cantonohio.gov)

Homeless Crisis Response Program (HCRP) – Shelter and Regional Ohio Department of Development (ODOD): Supportive Housing Program (SHP) and

The PY2022 SHP and HCRP Program Competition is now open. Scroll to view ODOD PY2022 application information.

View information from past ODOD grant competitions on our Funding Archives page.



















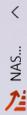














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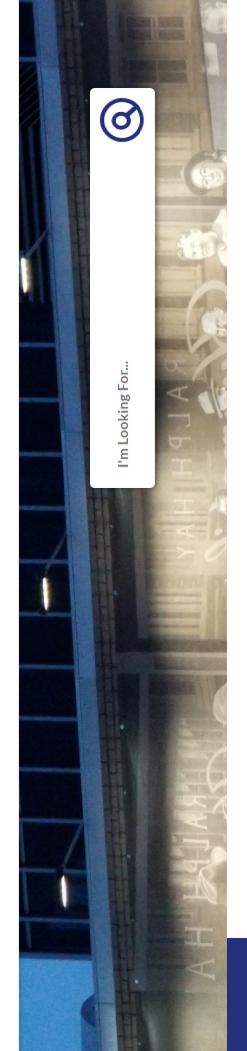
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Community Development

Citizen Input Notice of Virtual Public Hearing- HOME-ARP

December 14, 2022 Citizen Input Virtual Public Hearing- HOME-ARP

DRAFT- City of Canton HOME-ARP Allocation Plan

### HOME-ARP ALLOCATION PLAN DECEMBER 14, 2022 PUBLIC HEARING







### THE HOME-AMERICAN RESCUE PLAN (ARP)

# SEC. 3205. HOMELESSNESS ASSISTANCE AND SUPPORTIVE SERVICES PROGRAM.

of homelessness and other vulnerable rental assistance, supportive services, households who are homeless, at risk HOME funds to assist individuals or Provides \$5 billion of supplemental populations by providing housing, and non-congregate shelter.

Deadline for spending all funds: September 30, 2030 City of Canton HOME-ARP Allocation \$2,573,468

# QUALIFYING POPULATIONS

Homeless, as defined in section 103(α) of the McKinney-Vento Homeless Assistance Act

At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary

Other populations who meet one of the following criteria:

- (a) Families requiring services or housing assistance to **prevent homelessness**
- (b) Those at greatest risk of housing instability

# STAKEHOLDER IDENTIFIED NEEDS / ISSUES

More affordable and accessible rental housing for households up to 50% AMI through new construction and preservation with smaller developments and scattered sites to expand choice for tenants

Many landlords refuse Housing Choice Vouchers because HUD's payment standard is lower than current higher market rents

Some landlords refuse tenants who are homeless, have criminal histories, record of evictions, poor credit, released offenders

Level of Housing Choice Vouchers is inadequate to serve families in need of subsidized rental housing Subsidized housing has long waiting lists with little turnover among Permanent Supportive Housing and affordable rental units

# STAKEHOLDER IDENTIFIED NEEDS / ISSUES

Inadequate level of supportive services that increase potential for returning to homelessness—legal, financial counseling, case management, employment training, and more

Better collaboration with landlords to increase Housing Choice Vouchers acceptance among those with criminal histories, mental illness, homeless Need affordable housing that is accessible to transportation, amenities, good schools

## DATA ANALYSIS

/57	2022 PII count ot total homeless with 28 unsheltered
4,257	Homeless persons served between January 2021 thru June 2022
151	Veterans housed through CoC, of which 31 were chronically homeless
1,181	Persons who experienced homelessness for the first time
978	Households exited the homeless system to temporary destinations
1 %2.16	Homeless engaged in street outreach who exited to positive destinations
1,092	Households with history of domestic violence, of which 243 were fleeing
4,785	Housing Gap of rental units for households at 0-50% AMI
\$12,853	Average income of 1,445 households assisted with COVID-19 ERAP (Stark Co)
20%	Households with persons with disabilities on SMHA waitlist for public housing

# PRIORITY NEEDS IN THE CITY OF CANTON

Rental housing affordable and accessible to 0-30% households

Permanent Supportive Housing units

Supportive Services

Tenant-based Rental Assistance

# PROPOSED HOME-ARP BUDGET

Eligible Activities	Amount
Supportive Services	\$ 309,846
Acquisition / Development of Non-congregate Shelter	
Tenant-based Rental Assistance	
Development of Affordable Rental Housing*	\$ 1,754,327
Nonprofit Operating Expenses**	\$ 64,336
Nonprofit Capacity Building**	\$ 64,336
Administration & Planning	\$ 380,623
Total	\$ 2,573,468

 $<sup>^{</sup>st}$  City proposes to create 6-7 affordable rental units @ \$225,000

 $<sup>^{**}</sup>$  Nonprofit organizations approved for other HOME-ARP activities may apply for these

## PUBLIC COMMENT

### **NEXT STEPS**

Oral comments received today will be acknowledged in the plan All written comments must be received by December 19 to be included in the final plan

Email comments to communitydevelopment (a) cantonohio.gov

Submission to HUD is anticipated on or before December 21

## FOR MORE INFORMATION

City of Canton: sherice.freeman@cantonohio.gov

Stark Housing Network: mbragg@starkhousingnetwork.org From: Shannon McCullough-McKee
To: Sherice Freeman; Marjorie Willow

Cc: Dawn Fish

**Subject:** Attendees at HOME-ARP training

**Date:** Wednesday, December 14, 2022 11:56:01 AM

Attachments: <u>image001.png</u>

These are the names Sherice and I compiled of attendees at this morning's virtual meeting:

Megan Conkle

Kristine Windlam

Shana Smith

Ashley Huprich

Michael Farmer

Natalie McCleskey

Jennifer Keaton

Julie Sparks

Marcie Bragg

Maureen Austin

Shirene Starn-Tipyrik

Sherice Freeman

Shannon McCullough-McKee

Dawn Fish

Barb Shumaker

Linda Headley

Marjorie Willow

Please let me know if you need additional assistance.

Thank you.

### Shannon McCullough-McKee

Program/Project Technician

City of Canton Department of Development

Shannon.mccullough-mckee@cantonohio.gov

Phone: 330-438-4110 Fax: 330-580-2070



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5th Floor

### **HOME Webinar**

Citizen Input Notice of Virtual Public Hearing- HOME-ARP

December 14, 2022 Citizen Input Virtual Public Hearing-

Phone: 330-489-32

Directory

Directions

**HOME-ARP** 

**DRAFT- City of Canton HOME-ARP Allocation Plan** 

November 30, 2022, 9:00am ESG Application Workshop

FY 2023 Request for Proposals





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