

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

M22-MC390210

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M-21-MP-39-0210

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Columbus

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

31-6400223

*** c. UEI:**

E212WH2HVV55

d. Address:

*** Street1:**

90 West Broad Street

Street2:

*** City:**

Columbus

County/Parish:

*** State:**

OH: Ohio

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

43215-9000

e. Organizational Unit:

Department Name:

Finance and Management

Division Name:

Grants Management

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

*** First Name:**

Lucie

Middle Name:

*** Last Name:**

McMahon

Suffix:

Title:

Grants Management Coordinator

Organizational Affiliation:

*** Telephone Number:**

614-400-5453

Fax Number:

*** Email:**

LMMcMahon@columbus.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:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

* 12. Funding Opportunity Number:

M-21-MP-39-0210

* Title:

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

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:

Homelessness reduction and housing stability projects and programs.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

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

Add Attachment

Delete Attachment

View Attachment

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

* a. Federal	<input type="text" value="16,433,138.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="16,433,138.00"/>

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

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

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

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

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

Authorized Representative:

Prefix: * First Name:

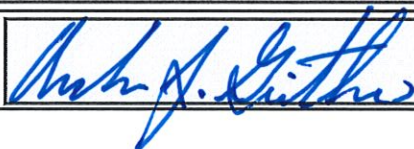
Middle Name:

* Last Name:

Suffix:

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

* Signature of Authorized Representative:



* Date Signed:

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.



Signature of Authorized Official



Date



Title

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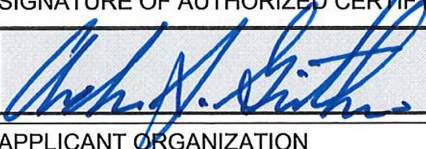
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Columbus	DATE SUBMITTED March 21, 2023

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.

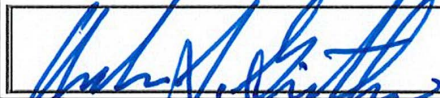
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1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
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14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Columbus	DATE SUBMITTED March 21, 2023

LOCALiQ

The Alliance Review | Ashland Times Gazette
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

City of Columbus
Attention: Lucie McMahon/Grants Management
City Of Columbus
90 W Broad ST
4TH FL
Columbus OH 43215-9000

STATE OF OHIO, COUNTY OF FRANKLIN

The Columbus Dispatch, a newspaper printed and published at Columbus, Franklin County, Ohio, and of general daily circulation, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue dated on:

02/07/2023

and that the fees charged are legal.
Sworn to and subscribed before on 02/07/2023



Legal Clerk


Notary, State of WI, County of Brown

18-25-26

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RYAN SPELLER
Notary Public
State of Wisconsin

NOTICE OF PUBLIC MEETING AND COMMENT PERIOD CITY OF COLUMBUS HOME-ARP ALLOCATION PLAN

February 7th, 2023
City of Columbus
90 West Broad Street
Columbus, OH 43215

The City of Columbus is initiating a public comment period and will hold a public meeting for the City's HOME-ARP Allocation Plan. The City of Columbus was allocated a one-time grant of \$16,433,138.00 from the U.S. Department of Housing and Urban Development (HUD) through the American Rescue Plan Act and the HOME Investment Partnerships Program (HOME-ARP). HOME-ARP funds must be used to address the need for homelessness assistance and supportive services in Columbus. The City of Columbus is seeking input on proposed projects for HOME-ARP funding, outlined in a proposed HOME-ARP Allocation Plan. The Plan will be submitted to HUD through a Substantial Amendment to the City's 2021 Annual Action Plan.

The City's HOME-ARP Allocation Plan is proposing to utilize the grant funds for the development of affordable rental housing; supportive services; tenant-based rental assistance; administration and planning; and non-profit operating and capacity building assistance.

The HOME-ARP Allocation Plan will be available for public review and comment beginning February 13th, 2023 and ending on February 28th, 2023 on the City of Columbus, Department of Finance and Management, Grants Management Section's webpage at:

<https://www.columbus.gov/finance/financial-management-group/Grants-Management/>.

Those wishing to attend or speak at the public meeting may attend in-person at 141 N Front Street, Columbus, OH 43215, at 3:00 p.m. on February 15th, 2023. Those who are not able to attend the in-person meeting may use the following link to virtually provide feedback to the City on the Plan: <https://app.smartsheet.com/b/form/9fea76d22d534d5d988a18f62b3bd895>. Comments may also be submitted via email to the Grants Management Section at grantsmgmt@columbus.gov. All comments received by February 28th, 2023 will be considered by the City and included in the Plan.

Please contact the Grants Management Section through email at grantsmgmt@columbus.gov or by telephone at 614-645-8200 to request an interpreter, language services, a hard copy of the HOME-ARP Allocation Plan, reasonable accommodation requests, or other assistance while attending this hearing. Please contact the City as soon as possible to ensure these arrangements.



THE CITY OF **COLUMBUS**

ANDREW J. GINTHER, MAYOR

HOME-ARP Allocation Plan

Prepared by City of Columbus

Department of Finance and Management –
Grants Management

90 W. Broad Street
Columbus, OH 43215

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Introduction

The City of Columbus is a U.S. Department of Housing and Urban Development (HUD) Entitlement Community and Participating Jurisdiction (PJ). This designation allows for HUD to allocate funds for programs to support the City's most vulnerable families and individuals through the Emergency Solutions Grant (ESG), the HOME Investment Partnerships (HOME) program, the Housing Opportunities for Persons with Aids (HOPWA) grant and the Community Development Block Grant Program (CDBG). These HUD resources are made available to the City on an annual basis. In addition to these annual allocations HUD funding can be made available to Participating Jurisdictions to address specific needs or national priorities.

On March 11, 2021, President Biden signed the American Rescue Plan Act (ARPA or ARP) into law, enabling over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses.

To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. **These eligible activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.** The program described in this notice for the use of the appropriated ARP funds is the HOME-American Rescue Plan or "HOME-ARP".

The City of Columbus has been allocated a total of **\$16,433,138** of HOME-ARP funding. The U.S. Department of Housing and Urban Development issued the Community Planning Division (CPD) [Notice 21-010](#) which outlines the requirements for the use of funds in the HOME-American Rescue Plan Program. Requirements include funding limitations including eligible and ineligible activities, uses and Qualifying Populations.

The mechanisms through which PJs must plan and apply for HOME-ARP funding is also prescribed by HUD. To receive its HOME-ARP funds, a PJ must engage in consultation and public participation processes and develop a HOME-ARP Allocation Plan that meets the requirements established in the CPD Notice 21-010 and submit it to HUD as a substantial amendment to its Fiscal Year 2021 Annual Action Plan. The HOME-ARP Allocation Plan must describe how the PJ intends to distribute HOME-ARP funds, including how it will use these funds to address the needs of HOME-ARP Qualifying Populations. The Notice also includes requirements for an assessment of unmet needs of each Qualifying Population and an assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system.

Per HUD guidelines the activities described in the proposed plan must primarily benefit the qualifying individuals and families who are homeless, at risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or in other vulnerable populations as defined below:

HOMELESS

Homeless as defined in [24 CFR 91.5](#), **1, 2, or 3** below:

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

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- i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
2. An individual or family who will imminently lose their primary nighttime residence, provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. (ii) No subsequent residence has been identified; and
 - iii. (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - i. (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - ii. (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

AT RISK OF HOMELESSNESS

At risk of Homelessness, as defined in [24 CFR 91.5](#):

1. An individual or family who:
 - i. Has an annual income below 30 percent of median family income for the area, as determined by HUD;
 - ii. Does not have sufficient resources or support networks, e.g., family, friends, faith based or other social networks, immediately available to prevent them from moving to an emergency

- shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
- iii. Meets one of the following conditions:
- A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - B. Is living in the home of another because of economic hardship;
 - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - D. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - F. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
2. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
3. A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

THOSE FLEEING OR ATTEMPTING TO FLEE, DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING, OR HUMAN TRAFFICKING, AS DEFINED BY HUD

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

Domestic violence, which is defined in [24 CFR 5.2003](#) includes felony or misdemeanor crimes of violence committed by:

1. A current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with

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the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);

2. A person with whom the victim shares a child in common;
3. A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
4. A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
5. Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating violence which is defined in 24 CFR 5.2003 means violence committed by a person:

1. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
2. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship;
 - b. The type of relationship; and
 - c. The frequency of interaction between the persons involved in the relationship.

Sexual assault which is defined in 24 CFR 5.2003 means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking which is defined in 24 CFR 5.2003 means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

1. Fear for the person's individual safety or the safety of others; or
2. Suffer substantial emotional distress.

Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

1. Sex trafficking means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
1. Labor trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

OTHER QUALIFYING POPULATIONS

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

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

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- i. has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
- ii. has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph of the “At risk of homelessness” definition above, established at [24 CFR 91.5](#)

Veterans and Families that include a Veteran Family Member that meet the criteria for one of the Qualifying Populations described above are also eligible to receive HOME-ARP assistance.

Consultation

The City of Columbus recognizes the importance of stakeholder engagement to inform the use of its allocated HOME-ARP funds. The Department of Finance and Management (DoFM) consulted with a wide range of housing services providers including but not limited to members of the City of Columbus and Franklin County Continuum of Care (CoC), homeless and domestic violence service providers, veteran's groups, the public housing agency serving the City's geographic area (Columbus Metropolitan Housing Authority), public agencies that address the needs of the Qualifying Populations, and both public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities. City staff compiled these contacts to create a consultation contact list including **over 100 local housing service provider organizations and agencies**. All of those included in the consultation contact list were invited to participate in both the HOME-ARP online survey and the in-person stakeholder input meeting.

Survey

The online HOME-ARP survey was sent to the consultation contact list and remained open to respondents from August 24th through September 16th, 2022. The survey was **completed by 52 stakeholders from 40 distinct organizations and agencies**. The brief survey consisted of 13 total questions. The first nine questions gathered contact and organizational information and were followed by one ranking then three open-ended questions. Reference [Appendix A](#) to view the complete survey.

Rank the use of HOME-ARP funding

The following four uses of funds are allowable by HOME-ARP. The ranking is scaled with number one being your first choice of funding use, and number four being your last or least favorable use of funding. Please choose each number only once.

Development of affordable rental housing *

☐ 1 ☐ 2 ☐ 3 ☐ 4

Tenant-based rental assistance *

☐ 1 ☐ 2 ☐ 3 ☐ 4

Supportive services *

☐ 1 ☐ 2 ☐ 3 ☐ 4

Acquisition/ development of non-congregate shelter *

☐ 1 ☐ 2 ☐ 3 ☐ 4

Figure 1: Ranking question used in the City's HOME-ARP survey

Why did you select your number one funding use? *

Please explain why the funding source selected as number one is your preferred use of HOME-ARP funding.

What are your ideas for housing projects?

Do you have ideas for housing projects that the City should consider when planning for the use of these funds? Include how would you match the projects with appropriate supportive services. Please share your ideas!

How can the City ensure impactful use of funds?

Is there anything else you would like us to know about your clients, their needs, your agency's needs, or potential uses for the HOME-ARP funding?

Figure 2: Open-ended questions used in the City's HOME-ARP survey

The responses to the open-ended questions have been integrated into the [List of Organizations Consulted with and Summarized Feedback](#) section included below. The City has organized this summarized information by respondent organization or agency, shown in the feedback column.

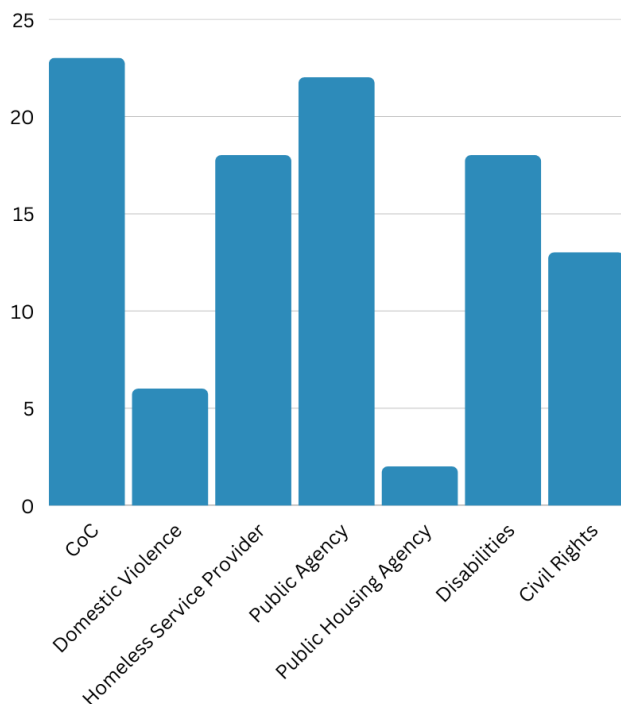
The following charts and graphs represent the types of organizations the respondents represent, populations the respondents work with, the selected biggest obstacle faced by their organization, and their ranking of the potential use of HOME-ARP funds.

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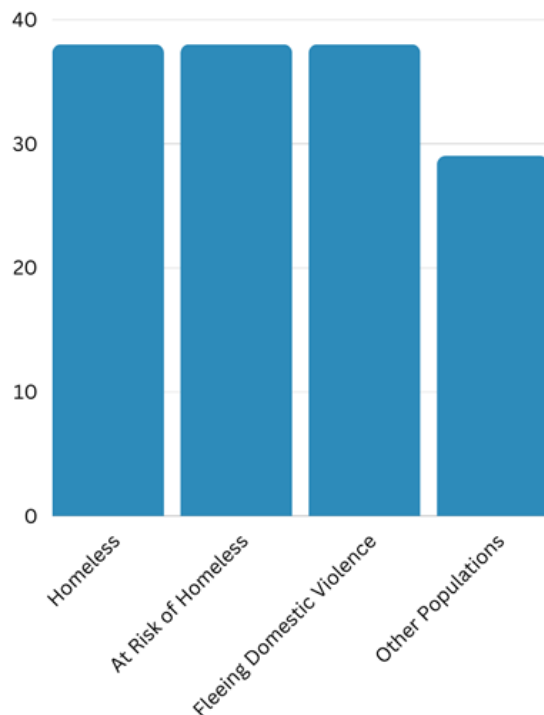
Organization / Agency Descriptions

Respondents were instructed to select all that apply



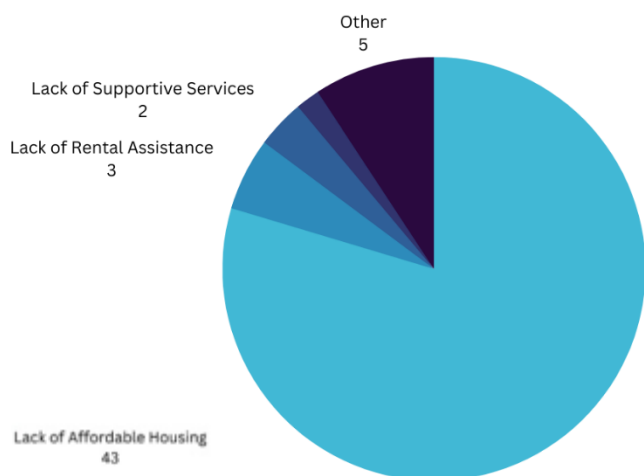
Qualifying Populations Agency / Organizations Serve

Respondents were instructed to select all that apply



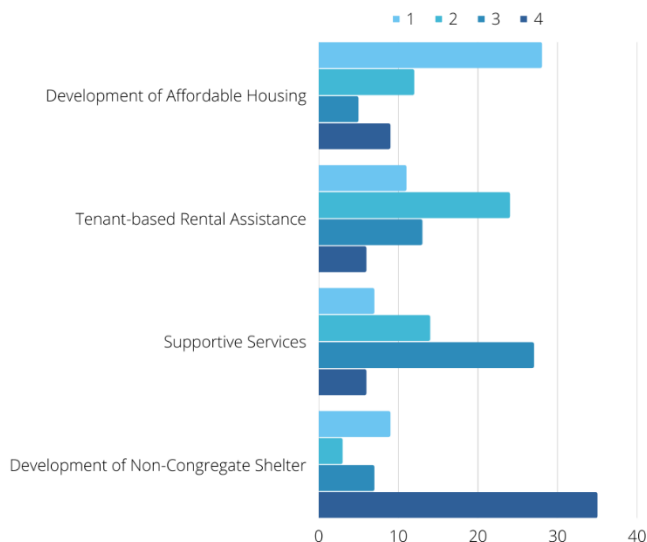
Biggest Obstacle Faced

Respondents were instructed to select only one



Rank the Use of HOME-ARP Funding

Respondents were instructed to rank with number one most favorable



The results of the survey, as shown graphically above, illustrate that the majority of housing stakeholders and providers agree that the **biggest obstacle facing Qualifying Populations is the lack of affordable housing in the City**. This need is emphasized through the data received by the ranking of HOME-ARP funding use, in which respondents ranked **“development of affordable housing” as the most favorable use of funds**, followed by tenant-based rental assistance, supportive services and lastly development of non-congregate shelter.

Stakeholder Input Meetings

The in-person stakeholder input meeting was held on September 13th, 2022 **and was attended by 51 stakeholders from 40 organizations and agencies**. DoFM staff reviewed the participant list after the input meeting and noticed that members of organizations that address civil rights and fair housing were not represented. To ensure this important group's perspective was included in the consultation process, an additional stakeholder input meeting specific to organizations that address civil rights and fair housing was held on October 12th, 2022 **and was attended by six stakeholders from three organizations**.

The meetings brought together housing stakeholders to discuss potential uses of HOME-ARP funding, collect data and input on housing needs, and gather participants feedback to ensure that the funding is put to the best possible use. All attendees were introduced to the HOME-ARP program, presented information on the funding's Qualifying Populations and eligible activities, and provided the City's projected project timeline to complete the required allocation plan.

In the initial stakeholder meeting participants were broken out into eight facilitated groups and were given 15 minutes to discuss three prompts that mirrored the survey. Reference [Appendix B](#) to view the facilitator's guide used by each group. At the end of this discussion period, all participants were called back together to share their biggest takeaways and the major points of their discussions. Each facilitator submitted their detailed notes to the DoFM staff and that feedback is summarized below by prompt.

Participants in the civil rights and fair housing specific meeting were prompted with the same three questions as the larger stakeholder group. The participant's feedback has been incorporated in the summarized sections below.

WHAT ARE THE LARGEST OBSTACLES THAT YOUR CLIENTS FACE?

The participating stakeholders identified the **lack of available affordable housing as the largest obstacle facing their clients and the Columbus community**. More specifically, stakeholders noted the City lacks affordable diversified housing to fit families of multiple sizes, units in locations that are near to accessible public transit, and units with the accessibility considerations needed for those with disabilities. Stakeholders identified that it is difficult to locate property owners and landlords who are willing to work with their organizations to house their clients including those in the housing choice voucher program and emergency rental assistance programs.

Participants in the civil rights and fair housing meeting identified that fair housing enforcement is currently underutilized. This is often due to tenant's fear of being retaliated against by landlords, leading to eviction and homelessness. This concern of retribution has materialized into poor living conditions in many Columbus housing units. Tenants, especially low-to-moderate income families and individuals, are having to choose between their health and safety or risk eviction when reporting hazardous housing conditions.

While affordable housing is being developed, participants suggested increased funding for and the streamlining of rental assistance programs. Stakeholders commented that the processes to obtain supportive services lacks flexibility, wait times for housing are at least six months and the current guidelines limit those who can be served. Stakeholders also identified that there are large barriers to access, silos that prevent coordination, and difficulty identifying and assessing families/individuals at risk to intervene before a crisis. The system is even more difficult to navigate for individuals who are experiencing housing instability or homelessness for the first time.

There must be changes to the current system to alleviate the time it takes to stably house Columbus residents. Process time for paperwork to enter programs, including intake and assessment procedures, are extremely long leading to unnecessary waiting periods for families and individuals in crisis. CMHA is the Public Housing Agency

responsible for the ownership and management of public housing property in Franklin County. According to CMHA there are 696 public housing units and 13,585 Section 8 subsidized housing vouchers in use. This availability is not nearly meeting demand. Stakeholders and residents anecdotally describe to local news outlets situations when CMHA has assigned vouchers to residents but unfortunately the vouchers expire before the resident is able to secure housing. According to the Columbus Dispatch, between July 2021 and February 2022, nearly 1,500 vouchers went expired.

WHAT DO YOU THINK THE BEST USE OF THE HOME-ARP FUNDING WOULD BE?

Participants identified that the **best use of HOME-ARP funding is the development of more affordable housing** and new partnerships to increase services for Qualifying Populations. In the planning of affordable housing development, participants suggested taking into consideration transportation, childcare, access to high-speed internet, access to supportive services, and accommodations for those with disabilities.

In tandem to the creation of additional affordable housing, participants suggested using the funds to preserve existing affordable units. This includes working with landlords who currently rent naturally occurring affordable housing. Stakeholders suggested coordinated efforts in providing stabilized housing options to Qualifying Populations, like updating housing lists that vet landlords.

WHAT ARE SOME OF YOUR IDEAS FOR ELIGIBLE HOUSING PROJECTS IN THE CITY OF COLUMBUS? HOW WOULD YOU MATCH THE PROJECTS WITH APPROPRIATE SUPPORTIVE SERVICES?

Participants commented that affordable and supportive housing is needed to prevent the homelessness of people from varying groups including youth, LGBTQ+, seniors, families, and those with disabilities. Stakeholders have identified that evictions often exacerbate problems for those who suffer from mental health issues. There have been over 42,010 eviction filings within the City of Columbus since March 15th 2020. Evictions per month continue to rise according to data compiled by [The Eviction Lab](#), a non-profit research group from Princeton University. Types of housing discussed to meet the needs of these groups included transitional and transient housing, short-term housing for pregnant women, temporary housing for those who are currently experiencing homelessness and spaces within affordable housing developments for supportive services to be delivered. Participants suggested the funds be used to purchase buildings to be rehabilitated and used for rental housing and for homeownership programs.

Stakeholders commented that supportive services must be connected to affordable housing. They also suggested that the best way to link projects with appropriate supportive services was through existing community partners with expertise and experience working with the Qualifying Populations.

The theme of education around housing was prevalent within the discussions. Participants suggested offering financial literacy programs for those who are seeking permanent, safe housing. Also suggested was landlord and property management education to ensure entities stay committed to renting affordable housing units to those with vouchers. Stakeholders commented that increased expenses, property taxes, and demand are leading to rent increases. Landlords may also be raising rents to increase barriers for those with housing choice vouchers. Participants identified a correlation between the companies with the highest eviction rates and companies with code enforcement cases and other safety and sanitary issues. Stakeholders can identify notorious “bad acting” landlords. The City can utilize stakeholders to evaluate landlords that are eligible for inclusion in future programs.

List of Organizations Consulted with Summarized Feedback

The DoFM staff consulted **40 local housing service provider organizations and agencies** including representative organizations from all HUD required stakeholder groups and 50% of [Columbus and Franklin County continuum of care member organizations](#).

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
Affordable Housing Trust Corporation	Columbus/Franklin County Continuum of Care (CoC) member	Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Input Meeting	Participated in group feedback included in “Stakeholder Input Meeting” section above.
ADAMH Board of Franklin Co.	Columbus/Franklin County Continuum of Care (CoC) member	Franklin Co. residents in need of behavioral health services	Survey	Identified biggest obstacle facing clients as lack of affordable housing. Recommended that the city clearly and directly address the housing needs of those at the lowest income levels, including those with less than 30% AMI.
Advocating Opportunity	Public or private organization that addresses civil rights and fair housing	Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey	Identified biggest obstacle facing clients as the lack of housing that services for international survivors of sex or labor trafficking who are awaiting legal immigration status. Recommended funds go toward affordable housing projects. They said the city should also incentivize and educate landlords on how they can and should support lower income residents.
Alvis, Inc.	Homeless service provider, Public or private organization that addresses the needs of persons with disabilities	Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Recommended groups of apartments or campus style housing near to public transportation, where residents can access on-site support services 24/7. Suggested using funds for support services that assist residents to be successful and contributing members of the neighborhoods they reside in.
Bhutanese Community of Central Ohio	Columbus/Franklin County Continuum of Care (CoC) member, Public or private organization that addresses civil rights and fair housing	Homeless individuals/families, Individuals/families at risk of homelessness, Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing, coupled with exploitation by landlords.
Catholic Social Services	Columbus/Franklin County Continuum of Care (CoC) member, Domestic violence service provider, Public or private organization that	Homeless individuals/families Individuals/families at risk of homelessness Other Other families requiring services or housing assistance to prevent homelessness or at	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Suggested the city also fund emergency services.

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Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
	addresses civil rights and fair housing	greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking		
Clintonville-Beechwood Community Resources Center	Domestic violence service provider, Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Other Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. As a housing service provider, CRC shared that their organization is very quickly running out of ERA2 dollars to provide rental and utility assistance, leading them to turn away individuals and families seeking assistance.
Columbus City Council	Columbus/Franklin County Continuum of Care (CoC) member	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Input Meeting	Participated in group feedback included in “Stakeholder Input Meeting” section above.
Columbus City Schools	Columbus/Franklin County Continuum of Care (CoC) member Homeless service provider, Public agency that addresses the needs of the HOME-ARP qualifying populations	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Suggested that housing options / conversion projects for housing in and around previous use school buildings should be considered. Suggested partnering with local school districts to develop supportive housing specific to families with school-age youth could be novel and effective stabilization programming. Youth ages 15-18 face a gap in services if they are ineligible or unable to access available services. Identified supportive transitional services as essential, noted that many youths are experiencing preventable compound trauma due to a lack of support when transitioning from one location/school/home/etc. to another. Developing a systemic transition program and providing adequate level personnel support to administer/monitor the program is essential.
Columbus Metropolitan Housing Authority	Public Housing Agency (PHA)	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey, Input Meeting	Identified biggest obstacles facing clients as lack of affordable housing and lack of rental assistance. Suggested building affordable housing through the use of combined funding streams and the collaboration among grantees to streamline the process. Identified need for funding to deliver supportive services for safe transition to market rate housing, homeownership, and/or self-sufficiency.

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Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
		Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories		
Columbus Metropolitan Library	Public agency that addresses the needs of the HOME-ARP qualifying populations	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacles facing clients as lack of affordable housing and lack of sheltering space. Suggested the creation of a housing land bank and more spaces where those experiencing homelessness can spend time throughout the day with safe places to sleep.
Columbus State Community College	Columbus/Franklin County Continuum of Care (CoC) member Public agency that addresses the needs of the HOME-ARP qualifying populations	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey	Identified biggest obstacle facing clients as lack of affordable housing. Suggested the creation of additional student housing (college/trade) that provides transitional housing for students and their families while they are working on a degree or certificate. Scholar House I, II & III are good models, with the inclusion of availability for single students, and that provides housing support with transitional services beyond the completion of the degree (3-6 months after degree completion).
Community Housing Network	Columbus/Franklin County Continuum of Care (CoC) member, Public or private organization that addresses the needs of persons with disabilities, Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing and supportive services. Due to the lack of affordable housing, there is a gap of funds and service providers within the area. Identified projects like Touchstone Field Place II and Poplar Fen Place are two good example projects in Community Housing Network, Inc.'s pipeline that would be successful if HOME-ARP dollars were available. These projects receive funding from multiple other resources, including LIHTC, which will help the City leverage their funds.
Community Shelter Board	Columbus/Franklin County Continuum of Care (CoC) collaborate applicant and member, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Recommended using funding to acquire commercial properties like hotels and motels convert them to permanent supportive housing for people living in shelters or on the street. Commented that permanent supportive housing is a highly effective intervention for people with disabilities who are experiencing long-term homelessness. Stated Columbus has more than 2,000 units of permanent supportive housing available, but an estimated 985 more households need permanent supportive housing annually. Recommended permanent supportive housing as a key strategy to decreasing street homelessness in the City.
Creative Housing, Creative Renovations	Public or private organization that addresses the needs of persons with disabilities	Individuals/families at risk of homelessness Other	Survey	Identified biggest obstacles facing clients as lack of affordable housing. Commented that wages are not meeting the needs of housing prices. Suggested the city distribute funds to all at risk populations, including those with IDD.

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HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
The Corporation for Supportive Housing	Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing and supportive services. Commented that current developers and property management are not able to provide enough inventory for Low to Moderate Income (LMI) tax credits, Federal Home Loan Bank and/or CDBG programming. Suggested creating more units that are scaled appropriately and complement those units with a robust service budget to assure that people stay housed.
Equitas Health	Columbus/Franklin County Continuum of Care (CoC) member Homeless service provider, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacles facing clients as lack of affordable housing, including rental properties that accept subsidies or vouchers. Suggested creation of non-congregate shelters, to serve LGBTQ+ (particularly to serve nonbinary and transgender populations), through the conversion of hotels and condemned buildings into studio apartments to serve more individuals/ families. Commented that existing shelter options can be unsafe or uncomfortable for LGBTQ+ individuals and particularly youth services for this population are lacking.
FC Veterans Service Commission	Columbus/Franklin County Continuum of Care (CoC) member Homeless and veterans service provider Public agency that addresses the needs of the HOME-ARP qualifying populations	Veterans and/or their families who qualify in any of the above categories	Survey	Identified biggest obstacle facing veteran clients as lack of affordable housing. Suggested assistance for the veterans that mimics the "Commons at Livingston" that would provide rent, food, and utilities.
Finance Fund	Public or private organization that addresses civil rights and fair housing	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Identified a need for rental support programming and the creation of additional affordable units.
Franklin County Board of DD	Columbus/Franklin County Continuum of Care (CoC) member Public or private organization that addresses civil rights and fair housing Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey	Identified biggest obstacle facing clients as lack of affordable housing, combined with needs for ADA compliance. Suggested the City build a broad coalition around HOME-ARP funding through demonstrated need, transparency on utilization, and showcasing success stories.
Freedom a la Cart	Domestic violence service provider	Those fleeing/attempting to flee domestic violence, dating	Input Meeting	Participated in group feedback included in "Stakeholder Input Meeting" section above.

City of Columbus, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
		violence, sexual assault, stalking, or human trafficking		
Franklinton Cycleworks	Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey	Identified biggest obstacle facing clients as the coordination of all services available. Suggested using funding to create a holistic approach to support services, including individual support to understand and address the factors that are causing homelessness. Recommended focus in landlord acceptance of section 8 vouchers and the creation of additional affordable housing.
Furniture Bank of Central Ohio	Domestic violence service provider Homeless service provider	Homeless individuals/families Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing, specifically keeping those who are currently housed in their houses is essential to prevent the whole system from being overwhelmed. Once eviction or homelessness occurs it is costly to rehouse. Identified need for affordable furniture once housed.
Gladden	Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey	Identified biggest obstacle facing clients as lack of affordable housing. Commented that affordable housing would reduce evictions, house hopping, hotel stays and shelter stays.
Home for Families	Columbus/Franklin County Continuum of Care (CoC) member, Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacles facing clients as lack of affordable housing and the need for tenant based rental assistance. Suggested that the City invest in creative projects like hotel/existing building conversions, smaller-scale scattered-site projects, where focus is on rehab and renovation rather than new builds. Stated that there are many developers who can provide mid to high-end housing, and the City can help them with tax incentives, however it would be great for the City to use HOME-ARP funding to help fill the gap these developers are unable meet.
Homefull	Columbus/Franklin County Continuum of Care (CoC) member, Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Recommended the purchase and renovation of motels/hotels into affordable housing/permanent supportive housing for people experiencing homelessness.
Homeport	Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Veterans and/or their families who qualify in any of the above categories	Survey	Identified biggest obstacle facing clients as lack of affordable housing. Suggested funding could be utilized to supply gap financing for at-risk populations.

City of Columbus, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
Homes on the Hill Columbus Development Corporation	Homeless service provider, Public or private organization that addresses civil rights and fair housing	Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey, Input Meeting	Identified lack of affordable housing is the biggest obstacle their clients face. Gave specific ideas on how to use the funds including tiny homes, converting vacant parking lots into "drive in" gated / fenced "shelter" with full-service restroom and laundry facilities for those living in their cars. Discussed the Finland model - financial assistance, integrated and targeted support services, and most importantly increasing the supply of affordable housing. Recommended the City should focus on the equitable distribution of funds.
Jordan's Crossing	Homeless service provider	Homeless individuals/families	Input Meeting	Participated in group feedback included in "Stakeholder Input Meeting" section above.
Kaleidoscope Youth Center	Homeless service provider Public or private organization that addresses civil rights and fair housing	Homeless individuals/families Individuals/families at risk of homelessness Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Suggested that funding be used to assist with deposits and other fees associated with entering a new rental. Commented that existing rental assistance and housing programs often lack flexibility or accommodations for transgender or non-binary youth who may not identify with their name or gender as it exists on legal documents and may not have the means to change those documents.
Legal Aid Society	Public or private organization that addresses civil rights and fair housing	Homeless individuals/families Individuals/families at risk of homelessness	Fair Housing Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing and lack of support services. Suggested creation of fund that can assist with housing application fees, and the process of searching for and applying to housing. Suggested prioritizing single people as they are often not able to receive housing due to family prioritization. Identified preservation of existing affordable housing as a very important piece to dealing with the City's lack of available housing.
Lower Lights Ministries	Columbus/Franklin County Continuum of Care (CoC) member	Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Identified education and financial literacy as important component of safe and stable housing. Suggested providing assistance to get into affordable housing, coupled with wrap around services and financial education courses will set up individuals/families for long-term success.
LSS CHOICES	Domestic violence service provider	Homeless individuals/families Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Suggested that funding should be prioritized for individuals currently being sheltered.
National Adorable Housing Trust	Public/private organization that address fair housing, civil rights, and the needs of persons with disabilities	Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Input Meeting	Participated in group feedback included in "Stakeholder Input Meeting" section above.
New Directions	Homeless service provider Public/private organization that address fair housing, civil rights, and the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Input Meeting	Participated in group feedback included in "Stakeholder Input Meeting" section above.

City of Columbus, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
Neighborhood Services Inc	Homeless service provider, Public or private organization that addresses civil rights and fair housing	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Stated that <80% AMI struggle to find safe and decent housing, and <50% AMI are unable to find housing at all. Recommended building up our affordable housing supply and extending ERA funds to serve as the stop-gap until those projects are ready to be actualized. Suggested that partnerships with the county government, private construction companies, and local nonprofits, could provide grants to purchase landbank homes in disrepair, identify and teach people experiencing homelessness a valuable trade to repair them, give them the necessary work experience they can bring to a well-paying job at a partner construction company needing workers after it's completed, and provide them with a house they can take pride in. Presented that it would dramatically increase not just the quality of life of those in the program, but would raise neighboring property values, create a less fractured sense of community, and enhance the prospects for future private investment. In addition, suggested revisiting our zoning policies to enable temporary structures to be built on publicly owned vacant lots to keep people stably housed, readily able to be reached by service providers like Mt Caramel and Housing First.
Ohio Capital Corp for Housing	Columbus/Franklin County Continuum of Care (CoC) member	Development, Creation and Preservation of Affordable Housing	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Suggested allocation of funding to nonprofits who can effectively leverage that funding to provide affordable housing.
Ohio Civil Rights Commission	Public or private organization that addresses civil rights and fair housing	Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Fair Housing Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Commented that tenants are moving into housing that is hazardous because there are no other available options. Landlords are charging high application fees and not providing move in ready condition housing. Suggested education programming for tenants to understand their rights.
Ohio State Legal Services	Public or private organization that addresses civil rights and fair housing	Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Fair Housing Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Recommended the creation of transient housing, paired with support services. Commented that tenants are living in unhealthy conditions because of fear of losing housing and that there is an intersectionality of poor housing conditions and mental health. Suggested working with vetted landlords to have more vouchers accepted and conditions improved via housing lists.
Salvation Army	Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Veterans and/or their families who qualify in any of the above categories	Input Meeting	Participated in group feedback included in "Stakeholder Input Meeting" section above.
St. Stephen's Community House	Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of rental assistance. Recommends affordable housing should be created in neighborhoods that have social services accessible, especially services aimed at self-sufficiency

City of Columbus, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
		to prevent homelessness or at greatest risk of housing instability Veterans and/or their families who qualify in any of the above categories		such as workforce development, job obtainment/retainment and mental health services.
Star House	Domestic violence service provider, Homeless service provider, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Recommended to incorporate the needs of teens and young adults at risk of homelessness into programming. These populations have limited rights and resources and must have immediate access to safety and supportive services to meet their unique needs. Recommend placing emphasis on the outcomes desired to ensure impactful use of funds.
The Columbus Foundation	Public or private organization that addresses the needs of persons with disabilities	Donors, supporting foundations, and nonprofits.	Survey, Input Meeting	Identified the biggest obstacle facing clients as lack of affordable housing and lack of support services. Suggests funds will be most impactful using a mix of support services such as emergency needs and long-term housing supply development in the City's neighborhoods where services and public transit are most prevalent.
The Community Builders	Public or private organization that addresses civil rights and fair housing, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey	Identified the biggest obstacle facing clients as lack of affordable housing. Recommends the funds to use a Housing First approach that uses safe, stable housing as a platform for providing services and resident success plans. Recommends the creation of permanent, integrated housing that allows families and individuals experiencing or at risk of homelessness to live in stable housing alongside the general population is a necessary resource that there is not enough of in the region. Suggests aligning the use of HOME-ARP (as a capital source), OHFA funding awards, and 811 rental subsidies to create a powerful program. Any of the three could require a supportive services plan and partner MOUs to ensure the appropriate resident supports are there.
The NRP Group	Public or private organization that addresses civil rights and fair housing Public or private organization that addresses the needs of persons with disabilities	Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey	Identified the biggest obstacle facing clients as lack of affordable housing. Suggested production of affordable units via developers as a solution to the housing crisis. Commented that their group has +/-1000 units of affordable housing that cannot move forward without City assistance.
The Salvation Army	Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey	Identified biggest obstacle facing clients as lack of affordable housing. Commented that most available rental units do not meet HUD FMR standards and do not meet criteria to be affordable to their clients.

City of Columbus, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
		Veterans and/or their families who qualify in any of the above categories		
Urban League	Public or private organization that addresses civil rights and fair housing	Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Veterans and/or their families who qualify in any of the above categories	Survey, Fair Housing Meeting Input	Identified biggest obstacle facing clients as lack of affordable housing. Recommended programming that focuses on keeping people stabilized in current homes until more affordable housing is available. Suggested using funding to convert commercial buildings into affordable housing. Commented that the City should also support agencies that can provide holistic wrap around supportive services to make the future rental assistance more meaningful.
VA Central Ohio Health System	Columbus/Franklin County Continuum of Care (CoC) member Homeless and veteran service provider	Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Suggested that tax credits could benefit at risk populations, but that process often takes a long time. Suggests the creation of a new alternate housing solution that has a threshold between a hotel (no upfront utility and furniture costs) and a lease. Commented that zoning restrictions and community sentiment will be challenges in this process that the City needs to focus on.
Volunteers of America Ohio & Indiana	Columbus/Franklin County Continuum of Care (CoC) member Homeless service provider	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Veterans and/or their families who qualify in any of the above categories	Survey	Identified biggest obstacle facing clients as lack of affordable housing. Identified the lack of safe and secure affordable housing as a major barrier seen when assisting those that are homeless.
Woda Cooper Companies, Inc.	Public or private organization that addresses civil rights and fair housing Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing. Suggested funds should be used as a gap filler in new construction developments financed through the 4% LIHTC, and have units set aside to serve the funding's eligible populations.
YMCA of Central Ohio	Columbus/Franklin County Continuum of Care (CoC) member Domestic violence service provider, Homeless service provider, Public or private organization that addresses civil rights and fair housing	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey, Input Meeting	Identified biggest obstacle facing clients as lack of affordable housing and rising housing costs even among traditionally "affordable" housing. Suggested development of homes, improvement of existing homes and stabilization of households. Identified a gap of unmet needs for folks who do not qualify for permanent supportive housing but do qualify for shelter. Providing services to keep them out of shelter and prevent trauma would be a major benefit, but are often only qualified after they enter shelter. Recommended that agencies who are able to bill Medicaid should subsidize a portion of the supportive services needed.

City of Columbus, Ohio
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Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Feedback
The Reeb Family Center	Homeless service provider, Public or private organization that addresses civil rights and fair housing	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Input Meeting	Participated in group feedback included in “Stakeholder Input Meeting” section above.

The City appreciates the time our community partners dedicated to this planning process. The results of the consultation process will inform the use of funds for the HOME-ARP allocation and have provided City staff with a unique data set specific to the qualified populations. The lack of affordable housing available in the City was identified by 41 of the 52 survey respondents as the largest obstacle facing their clients and was the most common obstacle discussed in the input meetings. A common theme throughout the consultation process was that supportive services must be connected to the created affordable housing. Those who directly serve the qualified populations made it clear that all eligible activities for the funding would benefit the community. Additionally, the need for more housing units for all income levels is driving high housing costs, eviction rates and a lack of available units for all income levels. Increasing the supply of affordable housing for the City’s most vulnerable populations through HOME-ARP resources will help alleviate the city-wide housing shortage.

Public Participation

Public Participation Process

The City has provided for and encouraged citizens to participate in the development of our HOME-ARP Allocation Plan. DoFM staff provided residents with reasonable notice of one week to participate in the open comment period and attend the public hearing. All 100+ stakeholders engaged in the consultation process were invited to attend the public hearing via email.

The public hearing was held in person at an accessible and centrally located City building. All emails and promotional materials for the meeting included contact information to request additional accommodations needed for persons with disabilities and limited English proficient (LEP) residents. **The hearing was attended by 32 stakeholders and members of the public.**

DATE OF PUBLIC NOTICE: FEBRUARY 7TH, 2023

PUBLIC COMMENT PERIOD: FEBRUARY 13TH – 27TH, 2023

DATE OF PUBLIC HEARING: FEBRUARY 15TH, 2023

Efforts to Broaden Public Participation

To broaden public participation the DoFM posted the request for plan feedback on the department's webpage. The request was made through an online form as shown below. The form does not require respondents to have an email address and is viewable and usable via mobile device. A total of four community members responded to the form, their questions and the City's responses are included below.

The screenshot shows a web form titled "City of Columbus HOME-ARP Allocation Plan Public Participation Feedback Form". The form is divided into two main sections: a dark blue header area with white text and a white content area with dark blue text. The header area contains the title and a thank you message. The white content area contains instructions, a deadline, and contact information. The form fields include: "Name *" (text input), "Email Address" (text input), "Select your Role in the Community *" (dropdown menu), "Feedback *" (text area), and a checkbox for "Send me a copy of my responses". A "Submit" button is at the bottom right. A link for "Privacy Notice | Report Abuse" is also present.

City of Columbus HOME-ARP Allocation Plan Public Participation Feedback Form

Thank you for reviewing the [HOME-ARP Allocation Plan](#) for the City of Columbus. Public participation is important part of the City's planning process, your time and feedback are appreciated.

Please complete this form to submit comments or questions on the drafted Allocation Plan. Feedback will be accepted via the form through Monday, February 27th, 2023. All comments and questions will be addressed in the draft HOME-ARP Allocation Plan submitted to HUD. The City will post this updated version of the plan in April 2023 and expects the plan to be approved by HUD in July 2023.

In addition to this form, feedback can be provided to the City via the HOME-ARP Allocation Plan public hearing. **This will be held on February 15th 2023 at 3:00PM, 141 N. Front Street, Columbus, OH.**

If you have any questions regarding this form or the HOME-ARP planning process, please contact grantsmgmt@columbus.gov.

Name *

Email Address

Select your Role in the Community *

Feedback *

Please provide your comments or questions on the proposed HOME-ARP Allocation Plan below.

☐ Send me a copy of my responses

Submit

[Privacy Notice](#) | [Report Abuse](#)

Figure 3: City of Columbus Public Participation Form

Summary of Comments and Recommendations in Public Participation Process

The City received 28 comments and recommendations through our public participation process. Reference [Appendix C](#) to view all comments and corresponding responses.

Summary of Comments and Recommendations Not Accepted

All comments and recommendations during the public participation process were accepted and taken into consideration.

Needs Assessment and Gap Analysis

DoFM staff reviewed the existing City of Columbus [Five Year 2020-2024 Consolidated Plan](#) and [Annual Action Plan](#), the Columbus Metropolitan Housing Authority's Five Year and [Annual PHA Plan](#), and the Mid-Ohio Regional Planning Commission (MORPC)'s [Regional Housing Strategy](#) to help determine the needs that exist for the City's Qualifying Populations. In addition to these plan reviews, the City sent data requests to all stakeholders engaged in the consultation process. The following entities provided data to inform the plan:

- | | |
|----------------------------|---------------------------------------|
| 1. Star House | 6. Columbus City Schools |
| 2. Community Shelter Board | 7. Community Housing Network |
| 3. Equitas Health | 8. U.S Department of Veterans Affairs |
| 4. ADAMH Franklin County | 9. Community Housing Network (CHN) |
| 5. YMCA of Columbus | 10. The Legal Aid Society of Columbus |

Data for each of the four Qualifying Populations has been compiled in the following section to create a Needs Assessment and Gap Analysis. The section addresses each of the Qualifying Populations individually below. The analysis includes their size, demographics, existing resources available and current unmet needs.

Homeless

SIZE AND DEMOGRAPHIC

The data used to assess the size and demographics of Columbus and Franklin County's homeless population has been captured and reported by the [Community Shelter Board \(CSB\)](#). All Continuums of Care are required to designate a collaborative applicant to submit a consolidated CoC application for funding for the community as a whole. The CSB is Columbus and Franklin County's collaborative applicant. CSB creates System and Program Indicator Reports that monitor the current CSB funded and non-CSB funded programs that participate in the organization's data system.

CSB's fiscal year 2022 System and Program Indicator Report, covering July 1, 2021 through June 30, 2022, breaks down those served into the three categories of family, men's and women's systems. According to this report 709 family households were served in emergency shelter programs. Of these households, 69% of the heads of households were black, 25% were white and 5% were Hispanic. The Households included in the family system included 977 adults and 1,544 children with the highest percentage of children being between the ages of 3-7. In the men's system, 3,249 single men were housed. The race and ethnicity of these men were 61% black, 31% white, 5% multi-racial and 4% Hispanic. The average age of the men sheltered was 45 years old. In the Women's System, 1,485 single women were housed. The average age of these women was 43 years old. These race and ethnicity of these women were 52% were black, 39% were white, 8% multi-racial and 4% were Hispanic.

In the prevention system, 1,323 households were served, totaling 4,233 individuals. This population included 1,591 adults and 2,642 children. **The number of households served increased 59% from the previous year.** Of those who were assisted in this program, 59% of the heads of households were female. The average age of the head of household was 33.

The rapid re-housing system served 2,051 households of which 1,409 were single adults and 643 were families. The average length of participation was 163 days for singles adults and 209 for families. Of the families served, 6% of the heads of household were male and 94% were female. In the single adults, 71% were male and 29% were females. Within the families served, 818 were adults, and 1,382 were children. The families' heads of household

were 74% black and 20% white, and the single adults were 62% black and 30% white. Both the families and single adult populations were 4% Hispanic.

The permanent supportive housing programs served 2,294 households, consisting of 2,439 adults and 467 children. Of these households, only 1 % exited to homelessness. Of those served, 61% of these households had female heads of household and 39% had male heads of household. The demographics of the heads of households were 62% black 32% white and 1% Hispanic.

RESOURCES CURRENTLY AVAILABLE

CSB works with a variety of partners in the City of Columbus and Franklin County to provide services to those who are facing homelessness. The CSB system of care served more than 15,000 people last year with homelessness prevention, shelter, street outreach, rapid re-housing, and permanent supportive housing. The table below, sourced from the [CSB FY 2022 Program Evaluation](#), summarizes the available emergency shelter resources to those experiencing homelessness and the outcomes in Franklin County and the City of Columbus.

FY2022 Emergency Shelter System Providers and Capacity

Agency	Shelter Type	Regular	Regular Overflow	Social Distancing Total	Seasonal Overflow	Total Capacity
Lutheran Social Services	Single Adult Shelter VA Emergency Housing	252	21	240	-	240
Maryhaven	Inebriate Shelter	50	5	50	6	56
Southeast, Inc.	Single Adult Shelter	160	10	160	10	170
Volunteers of America	VA Emergency Housing	15	-	15	-	15
YMCA ²	Single Adult Shelter Seasonal Overflow Family Shelter	215	204	322	144	466
YWCA ²	Family Shelter	50	-	50	-	50
Total Capacity		742	240	837	160	997

¹ Huckleberry House emergency shelter beds are excluded from this report.

² YMCA and YWCA provide overflow for the family system and YMCA provides overflow for the single adult system.

City of Columbus, Ohio

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The City of Columbus has **nine planned affordable housing development projects**. **A total of 511 affordable housing units will be rehabilitated or newly constructed by the end of 2024.** These new construction and rehabilitation projects will service a variety of populations including seniors and families and include a new permanent supportive housing development with 44 units. The projects are distributed throughout the City of Columbus and are funded via City Capital funding as well as HUD grant funds.

The Columbus Metropolitan Housing Authority (CMHA) is currently **planning nine projects that will create or sustain affordable housing units**. Each of the projects are partially funded by HUD and will be completed over the next three years. The projects are a combination of new construction, rehabilitation, and acquisition. CMHA plans to construct about 300 new affordable housing units over the next few years. CMHA owned affordable housing units will provide housing for multiple populations within the City including families, seniors, and veterans.

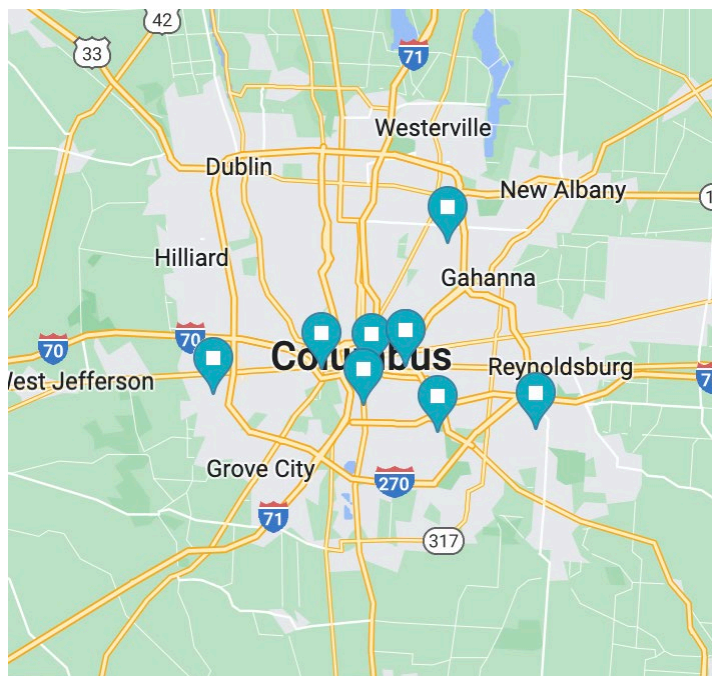


Figure 4: Locations of City of Columbus planned housing projects

UNMET HOUSING AND SERVICE NEEDS

The primary unmet need cited by Continuum of Care leaders and other housing stakeholders consulted during the development of this plan is affordable housing units. CSB provided the City with the current needs inventory and gap analysis data shown below. This data below shows there is a gap of 1,068 family beds and 3,023 adult beds to address the needs of homeless individuals.

Table 1: Franklin County Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	414	114	684	684	39								
Transitional Housing	50	20	39	39	40								
Permanent Supportive Housing	635	199	2245	2245	377								

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Other Permanent Housing						261	1788	446	14				
Sheltered Homeless						163	800	72	63				
Unsheltered Homeless						4	333	19	133				
Current Gap										1068	305	3023	3023

The Community Shelter Board reports that from July 1, 2022 through December 30, 2022 the Street Outreach program served 243 individuals in Franklin County. 123 of those persons served through Street Outreach remained homeless. This data shows the City's homeless individuals and families can be disinterested in going to the congregate shelters and that it can be difficult for agencies to provide the resources needed to house the Homeless QP. Some Columbus service providers explained during the consultation process for this report that congregate shelters can feel unsafe to individuals due to a variety of challenges like mental health, addiction or an individual having pets. Service providers suggested increasing supportive services that keep homeless individuals from having to move into congregate shelter. One example of a supportive service that might accomplish this for individuals and families is the provision of restrooms, laundry and other basic services for those living in their cars or outdoors.

Although there are a number of non-profits in the City serving the community's homeless populations, service providers reported that there are limited resources for programs that offer specific mental health services, addiction services, job training programs and other supportive services tailored an individuals' needs. This is especially true for specific groups like youths, those who identify as LGBTQ+ and individuals who are chronically homeless. These populations often require trauma informed and culturally competent care which can be especially difficult to provide to un-housed and transient persons.

At Risk of Homelessness

SIZE AND DEMOGRAPHIC

Per 24 CFR §91.5, an individual or family is considered at risk of homelessness if their income is below the 30% Area Median Family Income (AMI), they do not have sufficient resource or supported networks, and have experienced housing instability. Within the City of Columbus, the HOME Investment Partnership program 2022 30% AMI income limits are as follows: 1 person \$19,700, 2 people \$22,500, 3 people \$25,300, 4 people \$28,100 and 5 people \$30,350.

Data reported by the [Comprehensive Housing Affordable Strategy \(CHAS\) data](#) for the years of 2015 through 2019 was used to determine the demographics of those at risk of homelessness within the City of Columbus. As of 2015, the median household income in the City of Columbus is \$45,659. The total number of households with less than or equal to 30% AMI, or \$13,697, who are reported as currently housed is 63,720. Of those households, 51,685 or 81% are renters and 12,035 or 19% own their homes. 79.5% of households making less than or equal to 30% AMI have at least one of the four housing problems: incomplete kitchen facilities, incomplete plumbing facilities, more

than 1 person per room, and cost burden greater than 30%. This data shows the reality of the poor conditions of the cost burdened residents who are at risk of homelessness.

Of the Columbus residents making less than or equal to 30% AMI, **49,895 households, or 78%, are paying more than 30% of their income in rent and 39,550 households, or 62%, are paying over 50% of their income in rent.** This cost burden is exacerbated by recent increases in rental cost for those living in the City limits. [Rentometer](#) collected prices for three-bedroom apartments across five cities per region for April through June 2022. The report found Columbus' average 3-bedroom rent rose from \$1,327 in 2021 to \$1,681 in 2022, a 27% increase. The change marks the highest increase when compared to the four other Midwest cities of Cincinnati, Milwaukee, Indianapolis and Kansas City.

In addition to increased rental prices, our community experienced extremely high unemployment rates April through July of 2020, reaching 12.6% at the peak. Though these rates have stabilized in 2022, they remained well above the national average throughout 2021. The combination of high rental prices and unemployment levels have hit the qualified population of at risk of homelessness particularly hard. As of 2020, there are 165,105 people living below the poverty line in Columbus. This poverty rate of 19.1% is 42.54% higher than the Ohio average.

RESOURCES CURRENTLY AVAILABLE

While there are traditionally some resources available to populations who are homeless, it is difficult to find resources that are available to the population that is at risk of homelessness. During the COVID-19 outbreak, there were several new federal programs that assisted those who needed help paying their mortgage and rent if they were impacted by the pandemic. Many of those programs have come to an end, leaving this population with little resources to prevent becoming homeless.

The City's Emergency Rental Assistance (ERA) program has been operational since 2020, funded through the US Treasury's COVID-19 response funds, and has a deadline for use of funds of September 30th, 2025. The City however projects to use all available funding by the end of 2023 due to the huge demand for Emergency Rental Assistance. Understanding the current need, the City requested and has been allocated additional funding from the US Treasury to continue supporting those program applicants. The additional funds total at least \$15 million and are pending an allocation date.

The current ERA program provides relief to thousands of households who are at risk of homelessness and has assisted over 13,602 applicants. Of the households who applied for the program, close to 9,000 self-identified as black and over 2,000 identified as white. About 3,000 of the household applicants are men and over 9,000 women applied for the program. Over 8,000 applicants who were less than 30% AMI applied for the program. The full list demographics of applicants to the program can be found in the table below.

Table 2: City of Columbus Emergency Rental Assistance Program

Demographic Information	Households Assisted	Percentage of applications
All Applications	13,602	
Ethnicity		
Black	8,971	65.95%
Asian	79	0.58%
Hispanic	645	4.74%
Multi-Racial	375	2.76%

City of Columbus, Ohio
HOME-ARP Allocation Plan

Demographic Information	Households Assisted	Percentage of applications
White	2,338	17.19%
Native American	43	0.32%
Some other race	327	2.40%
Prefer not to answer	348	2.56%
Gender		
Male Applicants	2,999	22.05%
Female Applicants	9,378	68.95%
Transgender Female	10	0.07%
Transgender Male	5	0.04%
Nonbinary	17	0.12%
Prefer not to answer	15	0.11%
Income Level		
Less than 30% AMI	8,165	60.03%

Even with this current program support City residents are experiencing well above average eviction levels as seen in the chart below. Columbus has experienced over the national average of evictions continuously since November 2021.

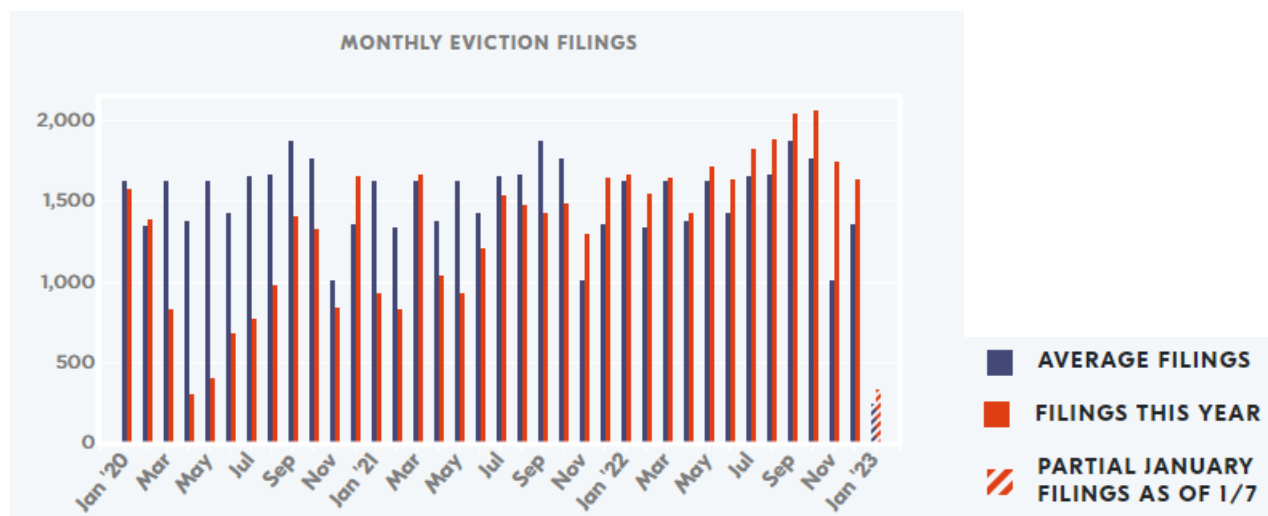


Figure 5: Monthly City of Columbus Eviction Data via [Eviction Lab](#)

UNMET HOUSING AND SERVICE NEEDS

In Columbus, those experiencing housing instability are some of the least served and most vulnerable. High cost of rent and eviction levels leave families and individuals who have challenges with housing affordability few options. Tenant Based Rental Assistance (TBRA) and other supportive services can help to fill this gap to prevent members of the community from becoming homeless. Of those who are currently housed, there is a large gap in the availability of rental units. As seen in the table below, there is a current gap of 86,000 households in need of affordable rental units. The Columbus Dispatch reported in February 2022 that there were over 20,000 residents in Columbus Metropolitan's Housing voucher lottery pool. This demonstrates the large need for financial assistance for low income families to remain housed.

Housing stakeholders in Columbus consulted for this report stated that there is a need to strengthen the City’s crisis response system to prevent homelessness when possible by connecting people quickly with services when needed. In many cases, that support is financial assistance for housing costs but also assistance with finding available affordable housing being provided by a responsible landlord. Service providers recommending the City lead an effort to collaborate with current ERA and TBRA service providers to organize a list of landlords who provide affordable, safe and sanitary housing. The recommendation was suggested to be a living document which could help service providers quickly find available units for clients.

Table 3: Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	197,315		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	51,685		
Rental Units Affordable to HH at 50% AMI (Other Populations)	163,735		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		41,510	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		44,490	
Current Gaps			86,000

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

A highly predictive risk factor for homelessness is previous experience of homelessness and living in overcrowded conditions. Somewhat predictive risks of homelessness for both those that are at imminent risk of homelessness and those that are receiving rapid re-housing services are: 1) Being pregnant; 2) Having a young child; 3) Head of household younger than 24 years old; 4) Overall house cost burden; 5) History of child protective service involvement; 6) Frequent moves (4+); 7) Not holding a lease; 8) Childhood adversity or disruptions. In addition, there are “shocks” that can move a family into homelessness, like birth of a child (health shock); relationship shocks (fight with a spouse/partner) and income shocks (loss of employment).

Studies show that the most successful intervention that formerly homeless families receiving rapid rehousing assistance can have is priority access to deep long-term housing subsidies. Deep subsidies reduce by more than one-half most forms of residential instability, improve multiple measures of adult and child well-being, and reduce food insecurity.

The U.S. Department of Health and Human Services Office of Disease Prevention and Health Promotion correlates a limited rental market with few affordable vacancies to people with the lowest incomes being forced to rent occupy substandard housing. Substandard housing may expose them to health and safety risks such as vermin,

mold, water leaks, and inadequate heating or cooling systems. They may also be forced to move in with others, potentially resulting in overcrowding. Overcrowding may affect mental health, stress levels, relationships, and sleep, and it may increase the risk of infectious disease. Housing costs that are more than a household can reasonably afford can lead to foreclosure or eviction. Forced moves may also happen if a landlord is in foreclosure or the property is deemed unsafe for living.

City residents of the Latitude Five25 apartment towers, formerly known as Sawyer Towers, recently have experienced the hard realities of substandard housing that the U.S. Department of Health and Human Services reported on. These buildings have been privately owned since 2016 and the ownership changed hands again in 2020. Due to unsafe conditions the apartment towers were ordered to close in December 2022. Residents were evacuated from the buildings and many were relocated to an emergency shelter. This shelter was in place for the first 72 hours following the closure, afterward those interested were relocated to two motels. At the time of the closure, 154 of the 392 units were occupied. This is one example of how the lack of quality affordable housing options and supportive services in the City of Columbus can keep citizens in unsafe and precarious housing conditions.

In 2021 a record number of evictions were filed in Franklin County. According to a [U.S. Census Bureau](#) survey half of all Ohio renters anticipate facing an eviction in the next two months. In 2022 20,834 evictions were tracked in the City of Columbus by Eviction Lab, totally 2.23% of the City's population. Evictions that go through the court system have lasting impact on community members and result in a permanent record, which can cause potential landlords to refuse to rent to evictees in the future. Research has shown that renters who are forced to move are more likely to relocate to poorer and higher-crime neighborhoods compared to those who move voluntarily. Evictions may be especially traumatizing to residents due to short relocation notices.

Service providers consulted for this report noted that those who are in the At Risk of Homelessness QP might have a better chance of staying housed with the provision of additional programming like job training and financial life-skills education. The City also heard from social service providers who suggested the City increase programs to improve the quality of available affordable housing. This can be accomplished through code enforcement efforts, incentivizing landlords to rent to low income families and granting home repairs to low- and moderate-income homeowners.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

SIZE AND DEMOGRAPHIC

Sexual violence is a form of oppression in which sex is used as a weapon by those with power against those without power. Sexual Violence is a public health epidemic in the United States and in Ohio, impacting our family members, neighbors and friends. The term "sexual violence" encompasses all abusive and coercive acts of violence in which sex/sexuality is used as a weapon to harm, humiliate, control, exploit, and/or intimidate. It impacts individuals of all ages, and its pervasiveness knows no demographic boundaries. Sexual violence is a traumatic crime that affects survivors physically, mentally, emotionally, behaviorally and spiritually. It also impacts families, communities, and systems. The City of Columbus has multiple organizations, listed below, that assist those Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking. Although the true size and demographic information of this population is a difficult measure to present, these organizations report the use rate of the services that they provide.

Domestic violence in LGBTQ+ relationships, although underreported, is higher than in heterosexual relationships. There are additional barriers within the LGBTQ+ community that make it challenging to find culturally competent services to report domestic and sexual violence and receive help. In a survey done by the [National Coalition of Anti-Violence Programs](#), it was found that in the LGBTQ+ community, 20% had experienced physical violence, 4% experienced sexual violence, and 11% had involved the use of a weapon. Many sexual violence victims support may feel less accessible to non-cisgender individuals and male identifying individuals.

[Freedom A La Cart](#), serves individuals who are survivors of sex trafficking and exploitation within the City. This organization serves approximately 400 individuals annually via supportive services. Individuals are provided a variety of services including utilities assistance, crisis assistance, resource management and provides a variety of other services. Due to the sensitive nature of the organization's work demographic information is not readily available through their reports. The most recent internal survey, in 2016, showed the specific work force development program participants were 98% female and of those 83% had children.

LSS CHOICES for Victims of Domestic Violence is the only domestic violence safe haven shelter in Franklin County. This organizations offers 120 beds and according to their [2020 Annual Report](#), provided 44,587 nights of shelter to those victims of domestic violence. The average length of stay at CHOICES has increased by 55% in 2022, and the average daily census of the shelter's population also is trending upwards by roughly 32%.

The shelter averaged 130 residents per day between January and September 2021, but averaged 173 residents per day between those same months in 2022. Through September, the average length of stay was 117 days, compared to 53 days at that same point in 2021

The Ohio Attorney General's Office reports that in 2021 Columbus police responded to almost 2,600 incidents that resulted in a domestic violence-related charge and over 6,500 incidents that were reported did not result in charges being filed. Studies at the Emory School of Medicine have concluded that [85% of Domestic Violence/Intimate Partner Violence are women](#). Using this as an estimate for the breakdown of gender demographics in the City's domestic violence-related incidents, 7,735 women have been part of the total 9,100 incidents in 2021.

At the state level, the [Ohio Domestic Violence Network](#) reported that 9,118 individuals and 3,965 children received shelter through domestic violence agencies in 2021. The National Network of to End Domestic Violence's 16th annual [Domestic Violence Counts Report](#) conducted a national count of domestic violence services on September 9, 2021. The data from this report showed 2,456 victims were served state-wide in one day, including 1,548 adults and children provided shelter in emergency shelters, transitional housing, hotels, motels, or other housing, and 908 victims provided supportive services through domestic violence programs.

RESOURCES CURRENTLY AVAILABLE

In Columbus, victims can seek shelter in any of the shelters in the City. This population can also use the housing available to homeless populations if they are homeless. There are non-profits within the City that work specifically with those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. [Freedom A La Cart](#) offers services specifically for sex trafficking victims including utility assistance, crisis assistance, and resource management to help those who are becoming independent by connecting them with resources and furnishings for their home. Individuals are also given help with employment coaching, life skills workshops, educational mentors, educational/vocational training funding assistance, and crisis assistance. [LSS CHOICES](#) offers a 24-hour crisis and information hotline, counseling services, support groups and legal and

community advocates for those impacted by domestic violence. CHOICES staff and trained volunteers also conduct domestic violence awareness and prevention outreach throughout our community.

Another local non-profit, [Sanctuary Night](#), provides services to vulnerable women in Columbus. The organization allows women a place to rest, eat, connect, and receive resources. Their clients receive meals, clothing and hygiene items. 98% of the clients served by Sanctuary Night identify as women. The clients identify as being “dually diagnosed with a mental/behavioral disorder and substance abuse disorder”, “experiencing homelessness or at-risk of experience homelessness”, and/or “involved in sex work, prostitution, or have been sex trafficked.”

Harriet’s Hope is a planned affordable housing community within the City of Columbus. The affordable housing development will have 52 units of one- and two-bedroom apartments along with a flexible community space. The building will serve female human trafficking survivors. Harriet’s Hope will also provide a series of supportive services to residents including case management, substance abuse treatment, trauma informed therapy, vocational services, financial management, healthcare service and peer support.

Across the state, the [National Network to End Domestic Violence](#) reports that there are 70 identified domestic violence programs. The Network reported that the services of these programs include but are not limited to emergency shelter, counseling, legal and advocacy.

UNMET HOUSING AND SERVICE NEEDS

At a state-wide level, the [National Network to End Domestic Violence](#) reports that domestic violence programs provide a variety of services state-wide, but there are needs that aren’t being met. In 2021 data from the National Network to End Domestic Violence, it was reported there were 286 unmet requests for services including emergency shelter, housing, transportation, childcare and other support services. Providers reported that these requests could not be met due to lack of resources.

The City is currently working with Sanctuary Night, funding the “Getting To 24/7” program with Community Development Block Grant (CDBG-CV) funding and State CDBG funding. Sanctuary Night is a small non-profit mostly serving the west side. Other neighborhoods lack services for survivors of human trafficking and domestic violence in other parts of the City.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

SIZE AND DEMOGRAPHIC

The “Other Populations” Qualifying Population consists of a few HUD definitions and includes many of Columbus’ poorest and unstably housed individuals and families. This population consists of those who have been previously served in shelters, by ERA funds and other temporary housing assistance. The total number of households served by Columbus’ ERA program is over 13,600. The QP also consists of families who are severely cost burdened by their housing expenses. This population continues to increase as Columbus’ cost of housing rises and the need for new affordable housing units continues to not be met. In a recent article published by the Columbus Dispatch, The United Way of Central Ohio, in Franklin County in 2022, 21,000 people were evicted from their homes. The United Way says this is a 41% increase from the previous year. They also state that between 2021 and 2022, the average rent cost increased by 56% between 2016 and 2022.

The “Other Populations” QP includes a family which is cost burdened by their housing expenses or spend 30% or more of their monthly income of housing. Households can qualify for this QP in two ways.

- 1.) Has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs).
 - 30% of the area median income for a family of four in 2022 was \$28,100.
 - This family was considered cost burdened when their rent was more than 30% of their monthly income, or more than \$703.
 - This family was severely cost burdened when their rent was more than 50% of their monthly income, or more than \$1,952.
- 2.) Has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph of the “At risk of homelessness” definition above, established at [24 CFR 91.5](#)
 - 50% of the area median income for a family of four in 2022 was \$48,050.
 - This family was considered cost burdened when their rent was more than 30% of their monthly income, or more than \$1,201.
 - This family was severely cost burdened when their rent was more than 50% of their monthly income, or more than \$2,002.

According to HUD’s Comprehensive Housing Market Analysis for Columbus, Ohio, from July 2020 “In the Columbus HMA, approximately one-fifth of total renter households are estimated to be cost-burdened, and a similar proportion experience severe cost burden; these proportions are similar to trends reported nationally. Among households with incomes below 50 percent of the area median income, nearly 30 percent experience cost burden in the Columbus HMA, above the national rate, and nearly one-half of households in the HMA report severe cost burden, below the national rate”.

In many cases families’ immediate housing needs are addressed through programs for this QP after entering the homelessness system but often emergency solutions do not solve a family’s long term need for healthy and affordable housing. This QP includes the most housing cost burdened families and individuals in the City. In many cases, these households are cost burdened due to their inability to increase their income due to a reliance on social programs and low paying jobs. These families are at great risk of homelessness due to any unexpected expense or costly circumstance. As noted throughout this document, these populations are underserved and often cannot receive assistance until they meet specific homeless definitions.

Households with veterans and elderly individuals are at high risk of housing instability and can often fall into this QP because of their fixed incomes. The US Department of Veterans Affairs reported that up to 450 veterans enter the homeless system every year in the County. There are between 70 to 80 veterans at any given time who are homeless and in the last year there were 104 newly identified homeless veterans. The Ohio State University’s College of Social Work (OSU) reports the number of adults who are 65 or older who reside in the county is projected to increase from 10% to 15% between 2010 and 2040. In 2022, there are currently 102,178 elderly households in the County, and 73% of those households own their own homes. In Franklin County the average monthly income for those 65 or older households is \$1,685.25 month or \$20,223 a year.

According to OSU, older adults living in Franklin County need at least \$35,484 a year to meet their basic needs and 38% of older household are living on less than that number. According to the Ohio Housing Finance Agency in their 2021 Ohio Housing Needs Assessment, 57% of residents in Franklin County who are 65 or older are renting

and paying over 30% of their income on housing expenses and 23% of those who own their home are paying over 30% of their income on household expenses.

The City of Columbus will not include any additional conditions in its definition of other Qualifying Populations as established in the HOME-ARP notice.

RESOURCES CURRENTLY AVAILABLE

There are a variety of resources available to veteran populations experiencing unsheltered homelessness in the county including outreach and prevention services and onsite case management. Veterans have access to emergency housing and transitional housing services and corresponding supportive services including rapid re-housing, prevention, and shallow subsidies. They are also able to use the city-wide services provided to homeless populations if they become homeless.

There are limited resources available to those who are elderly and living in the City of Columbus. The Central Ohio Agency on Aging created the Home Assistance Program to help provide Qualifying Populations with emergency rental support. This program reaches 50+ year old residents in the area who live in the City of Columbus school district, have a specific household income, and have trouble paying for their rent and/or utilities.

UNMET HOUSING AND SERVICE NEEDS

HUD describes 'Other Populations' as households where providing supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability. The greatest solution to supporting these residents in Columbus is the development of more affordable housing. More units for these residents to safely occupy can prevent situations of overcrowding and occupancy of unhealthy units.

Another resource described as a support the City could increase to serve the 'Other Population' is offering additional grant resources to low income homeowners to improve their home's condition. Residents who qualify as 'Other Populations' may be able to remain housed if the with the provision of additional resources devoted to the rehabilitation or repair of their home. Differed maintenance can accelerate poor conditions of affordable units owned by 'Other Populations'. Often times these units are owned by elderly residents or are homes which were passed down from parent to child. With the rising cost of housing and construction, 'Other Populations' may make the decisions to not make home repairs in order to avoid become cost burdened. Additional home rehabilitation grants for persons with disabilities could assist residents to improve their homes to accommodate their ability needs and keep them in their homes.

Columbus's population is growing and housing market pressure have an effect on the City's "Other Populations" resources and housing stability. A growing number of older adults are also vulnerable to high housing costs. Older residents also have higher rates of disabilities.

The elderly populations throughout the County are also experiencing unmet needs. The Central Ohio Agency on Aging reports there are three issues the population of 50+ in the area are facing: increase cost of rent and utilities, lack of safe/affordable housing stock, and limited access to emergency housing support resources. The Agency reports that the average cost for a one-bedroom apartment in the City of Columbus is \$1,000 or more and many of the individuals in this age category are living on less than this a month. There are limited resources available, and more support is needed to bridge the technology and transportation gap that hinders some from receiving these resources.

Many individuals and families in the ‘Other Populations’ QP are experiencing housing instability related to income levels and increasing housing costs. Programs to enhance life-skills and job opportunities can result in an increased household income and a more stable housing status of households in the ‘Other Populations’ QP. These supportive services were reported as lacking by those social service providers consulted for this report. The City also heard from social service providers who suggested the City increase programs to improve the quality of available affordable housing for the ‘Other Populations’ QP. This can be accomplished through code enforcement efforts, incentivizing landlords to rent to low income families and granting home repairs to low- and moderate-income homeowners. Housing stakeholders in Columbus consulted for this report stated that there is a need to strengthen the City’s crisis response system to prevent homelessness when possible by connecting people quickly with services when needed. In many cases, that support is financial assistance for utilities, mortgage or rent expenses.

Priority Needs for Qualifying Populations

Throughout DoFM’s creation of this plan, the need for additional affordable housing has been identified as the greatest priority. During the consultation and data collection process, each of the Qualifying Populations have shown a substantial need of affordable housing as well as additional needs in supportive services and Tenant Based Rental Assistance (TBRA). The chart below summarizes the determined priority needs of each of the Qualifying Populations.

Qualified Population	Priority Needs Identified
Homeless	The primary unmet need of those experiencing homelessness in the City, as cited by Continuum of Care leaders and other homeless system stakeholders consulted during the development of this plan, is affordable housing . The current needs inventory and gap analysis data shows there is a gap of 1,068 family beds and 3,023 adult beds to address the needs of homeless individuals. A variety of HOME-ARP eligible supportive services were also identified as opportunities to better serve this population.
At Risk of Homelessness	Of those who are non-homeless, there is a large gap in the availability of affordable rental units. Current data collected shows a gap of 86,000 households in need of affordable rental units. Both the creation of affordable housing and availability of TBRA are priority needs to fill this gap to prevent members of the community from becoming homeless. A variety of HOME-ARP eligible supportive services were also identified as opportunities to better serve this population.
Those fleeing, or attempting to flee domestic violence	The City understands that the domestic violence programs currently available provide a variety of services to residents, but there are needs that aren’t being met. Statewide 2021 data shows that there were 286 unmet requests for services including emergency shelter, housing, transportation, childcare and other support services. This Qualified Population’s needs are difficult to identify, however based on the data available they are in immediate need of affordable housing, supportive services and TBRA .
Other qualified populations, as defined by HUD	In determining the unmet needs of the Other Qualified Populations a mix of available data, including information from veterans and elderly residents, was used to establish the priority needs of the population. The Other Qualified Populations in Columbus priority needs are affordable housing and TBRA to ensure that they remain housed as housing costs continue to increase in the City.

Determination of Level of Need and Gaps

DoFM used a combination of data sources, stakeholder engagement and community feedback to determine that the priority need is affordable housing in the City. **There is a current gap of 86,000 households in need of affordable rental units and a current waitlist of 30,000 families for Section 8 subsidized housing vouchers. There are also large gaps in emergency sheltering within the City, including 114 units for families, 684 beds for adults and 39 beds for Veterans.** In addition to data provided by the Community Shelter Board and the Columbus Metropolitan Housing Authority, the City utilized public federal data such as the American Community Survey. When evaluated, the data and feedback from stakeholders and the public align to support the need for additional affordable housing in our community.

The income to housing cost burden of the at risk of homeless population is very high in Columbus. **Currently 78% of households are paying more than 30% of their income in rent and 62%, are paying over 50% of their income in rent.** This cost burden is exacerbated by recent increases in rental cost for those living in the City limits. Data supports the City's decision to include tenant based rental assistance as a use of the funding to prevent those at risk of homelessness from becoming homeless and support residents who will occupy newly constructed HOME-ARP funded units.

The gap analysis also showed that there is **a need to strengthen the City's crisis response system to identify those experiencing homelessness, prevent homelessness when possible, connect people with housing quickly, and provide services when needed.** Many of the families or individuals who receive assistance to prevent and mitigate homelessness or to flee violent circumstances require wrap-around services with their housing because of the compounding challenges they face. The City will continue to support organizations that provide supportive services to help program participants' access all available assistance.

The City has decided to not put funding toward creating more non-congregate sheltering. It was determined that while there is a need for non-congregate sheltering within the community, the need to create affordable and transitional housing and supportive services for the Qualifying Populations was a better use of the funds to assist the community. The supportive services that are needed within the community are services that will help individuals and families to get into a long-term housing solution. If the City were to create non-congregate sheltering, it would open more beds, but the City's goal of providing permanent housing would not be achieved. By providing affordable housing and supportive services, more room will ultimately be made available in the current non-congregate sheltering communities. The decision on how to use the HOME-ARP Funds came from data reviewed, discussions with agencies who work with Qualifying Populations and public participation.

HOME-ARP Activities

Method of Solicitation

The City's methods of solicitation for the implementation of HOME-ARP funding will encourage funds to be leveraged with private and public funding sources to support the development of rental housing, tenant based rental assistance and the provision of supportive services. All City HOME-ARP funds will be contracted in compliance with City and Federal procurement rules. The City plans to solicit organizations to develop and operate rental housing, tenant based rental assistance and provide supportive services, in accordance with HOME-ARP regulations and requirements.

HOME-ARP funds will be awarded to nonprofit or for-profit organizations, based on the merit of proposals or applications received prior to or during the grant implementation period. HOME-ARP is a new funding source with unique and complex rules. The complexity of the HOME-ARP regulations will need to be matched by the capacity and experience of HOME-ARP funded organizations. Additionally, greater preference will be given to proposals or applications which are in line with the City's priorities. The future method for soliciting applications for HOME-ARP grant funding may be through competitive processes and issuances of a Notice of Funding Award (NOFA) or a Request for Proposal (RFP).

If it will help expedite the creation of affordable housing units for the Qualifying Populations, the City may directly acquire or utilize existing City owned property for a HOME-ARP affordable housing development activity. The City would then convey that such property is a planned HOME-ARP affordable housing development project and may solicit the construction or rehabilitation activities as well as future operations for the property.

Administration of Eligible Activities

The City plans to utilize 10% of the allocated HOME-ARP funds on the administration and planning of eligible activities. This includes the cost of City staff and contracting required to implement the HOME-ARP program. The City did not provide any portion of its administrative and planning funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan. The City does plan to request reimbursement from HUD for costs associated with the development of the HOME-ARP Allocation Plan which are costs incurred before the establishment of a HOME-ARP grant agreement with HUD but are eligible HOME-ARP administration and planning expenses. HOME-ARP administration and planning expenses include but are not limited to grant management, program implementation, policy and compliance, procurement, financial administration and reporting.

Use of HOME-ARP Funding

Use of HOME-ARP Funding	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 4,100,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 1,000,000		
Development of Affordable Rental Housing	\$ 8,290,000		
Non-Profit Operating	\$ 700,000	4.3 %	5%
Non-Profit Capacity Building	\$ 700,000	4.3 %	5%

City of Columbus, Ohio
HOME-ARP Allocation Plan

Administration and Planning	\$ 1,643,138	10 %	15%
Total HOME ARP Allocation	\$ 16,433,138		

Current inventory and gaps analysis point to the significant need in the City for additional rental units that are affordable to the HOME-ARP Qualifying Populations, supportive services that help those living in these units remain housed and tenant based rental assistance to prevent community members from increasing the current homeless population. Therefore, the City plans to invest \$8,290,000 in the development of affordable rental housing, \$ 4,100,000 in supportive services and \$1,000,000 in tenant based rental assistance. The City recognizes that the HOME-ARP is a new funding source with unique and complex rules. As a result, the City will invest \$700,000 in non-profit operating and \$700,000 in non-profit capacity building to support CHDOs and other non-profit organizations in carrying out HOME-ARP activities. Finally, the City will utilize \$1,643,138 to administer the HOME-ARP funding.

Rationale of Plan to Fund Eligible Activities

The City will use a large portion of the HOME-ARP funding to produce affordable housing. Based on the stakeholder responses gathered and the current homeless and housing inventories the highest prioritized use for HOME-ARP funds is to increase the supply of affordable housing available to the Qualifying Populations within the City of Columbus. This need is comprised of two root causes, lack of affordable housing available and the high cost of the housing that is available. The City intends to continue to work with stakeholders and the community to ensure that the affordable housing funded through this program takes into consideration all methods of creation. Our team will encourage applications that include creative ways to generate affordable housing units to ensure that the produced affordable housing works best for the qualifying populations served.

To help keep our community members housed and address affordability challenges within the housing inventory, the City will fund activities that provide Tenant Based Rental Assistance to qualifying populations. These resources will be utilized for providing payments towards housing and housing-related costs, such as rent, security deposits, utility deposits, and utility costs. The City was recently allocated an additional \$15,000,000 of U.S. Treasury Emergency Rental Assistance funding. The City will prioritize the limited HOME-ARP TBRA funds to assist those residents who do not qualify for Emergency Rental Assistance. TBRA resources may also be tied directly to a newly developed HOMR-ARP affordable housing unit.

The data reviewed and responses from the consultation process showed that an increase in funding for supportive services is needed by each of the Qualifying Populations and to complement the planned HOME-ARP housing development activity. City staff understands that the Qualifying Populations require a wide range of services and supports to remain stably housed or gain viable housing while experiencing homelessness. Stakeholders commented that the processes to obtain support services lacks flexibility and include on average six month wait times. The City will prioritize eligible supportive services for Qualifying Populations when they aim to keep residents stability housed. Stakeholders also identified that there are large barriers to access, silos that prevent coordination, and difficulty identifying and assessing families/individuals at risk to intervene before a housing crisis. To meet this need, the City has allocated funds for supportive services with the goal to relieve families and individuals of the common issues they face when attempting to seek new housing while homeless or keep existing housing to avoid homelessness.

HOME-ARP Allocation Plan

HOME-ARP funds will also be utilized for non-profit operating and non-profit capacity building per CPD Notice 21-10. The City will provide these resources to non-profits and Community Housing Development Organizations (CHDO) to carry out activities with HOME -ARP funds. These HOME-ARP funds are an opportunity for City partners to grow in their ability to service HOME-ARP Qualifying Populations.

HOME-ARP Production Housing Goals

Estimated Affordable Rental Housing Units

The City used the HUD provided production goal worksheet to estimate that 24 new affordable housing units will be created using HOME-ARP funding, at an average cost of \$276,332.00 per unit. This calculation includes an estimated 20% of total cost for ongoing operating costs or operating cost assistance reserve. The units will vary in size and will include three-bedroom units, suitable for a family of four and one-bedroom units, suitable for a single person or couple. Additional funding has also been allocated to onsite amenities of supportive services to the occupants of the units. The City expects the cost per unit to increase due to rising supply chain and labor shortages impacting the construction fields.

Production Goals and Priority Needs

As documented in the priority needs section and discovered throughout the planning process, the need for additional affordable housing in the City of Columbus is the highest priority in use of the HOME-ARP funding. Through the creation of additional affordable housing units, the City estimates HOME-ARP funds will establish 24 units of permanent affordable housing for City residents.

When available, the City will be leveraging other federal, state and local funding sources to increase the total number of affordable housing units produced. If other funding sources are not available, housing projects will be solely completed using HOME-ARP funding.

Preferences

In an effort to provide maximum program flexibility and opportunities to all City residents experiencing or at-risk of homelessness, DoFM has elected to not apply preferences among the Qualifying Populations for the entire HOME-ARP allocation. Instead, **the City has identified preferences for two HOME-ARP funded activities** shown below.

Use of HOME-ARP Funding	Preference of Qualifying Population
Tenant Based Rental Assistance (TBRA)	At-Risk of Homelessness
Development of Affordable Rental Housing	Homeless

The establishment of the preferences herein comply with all applicable fair housing, civil rights, and nondiscrimination requirements, (e.g., Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and Americans with Disabilities Act). **The City of Columbus will not establish limitations on eligibility for a HOME-ARP project or activity.**

Use of a preference or method of prioritization to address the unmet need or gap in benefits and services received by individuals and families in the Qualifying Population or category of Qualifying Population

The City will utilize preferences per CPD Notice 010-2021 for the funding allocated through this plan for the development of affordable rental housing activity and the tenant based rental assistance activity.

Those currently experiencing homelessness will be prioritized in the use of funds allocated to the development of affordable rental housing. The intention of this priority is to provide housing to those most vulnerable and currently without housing in our community. Per data collected in the needs assessment there is a gap in housing for 1,068 families and 3,023 adults to address the needs of homeless individuals. Prioritization will be accomplished per individual assessment at the time of intake through waitlists associated with each HOME-ARP unit but will not prohibit others within the Qualifying Populations from accessing resources.

Those at risk of homelessness will be prioritized in the use of funds allocated to tenant based rental assistance. As evidenced by the 30,000-household waiting list for rental vouchers and highly used rental assistance program, those at risk of homelessness can remain in their homes with additional assistance. The method of prioritization for the HOME-ARP TBRA program will not prohibit others within the Qualifying Populations from accessing resources but intake and waitlists will prioritize the funding for those who meet the At Risk of Homelessness HOME-ARP definition.

How preferences will address the unmet needs or gaps in benefits and services of the other Qualifying Populations that are not included in the preference

While preference will be given to those currently homeless and those at risk of homelessness in certain funding areas this will not prohibit the other Qualifying Populations from accessing services. Preferences associated with the HOME-ARP fund's expansion of affordable housing and tenant based rental assistance for the HOME-ARP Qualifying Populations will help meet the greatest needs for the most vulnerable persons in Columbus who meet the HOME-ARP Qualifying Population's definitions.

HOME-ARP Refinancing Guidelines

The City of Columbus does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

Appendix A | HOME-ARP Survey

City of Columbus HOME-ARP Survey

The City of Columbus is requesting your feedback on the use of HOME American Rescue Plan Act (HOME-ARP) funding. These funds have been allocated to reduce homelessness and increase housing stability across the country. The goal of this survey is to understand the needs of our community. We are asking our partners to provide input to ensure our city will implement best possible use of these funds.

Please be advised the eligible populations for these funds are not only homeless individuals, but also those who are at risk of being homeless, those who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, other populations where providing supporting services would prevent the family from becoming homelessness, those with the greatest risk of housing instability, and veterans and their families who qualify via the categories mentioned.

The HOME-ARP eligible populations definitions that can be found here: <https://www.hudexchange.info/programs/home-arp/overview/>. Take a moment to familiarize yourself with these populations before completing the survey.

Name *

Title *

Email Address *

Agency / Organization *

Agency / Organization Description *

Select all that apply

- ☐ Columbus/Franklin County Continuum of Care (CoC) member
- ☐ Homeless service provider ☐ Public Housing Agency (PHA)
- ☐ Domestic violence service provider
- ☐ Public agency that addresses the needs of the HOME-ARP eligible populations
- ☐ Public or private organization that addresses civil rights and fair housing
- ☐ Public or private organization that addresses the needs of persons with disabilities

Select the populations your agency works with. *

Check all that apply. The list includes all of the eligible populations within HOME-ARP funding.

- ☐ Homeless individuals/families
- ☐ Individuals/families at risk of homelessness
- ☐ Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking
- ☐ Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability
- ☐ Veterans and/or their families who qualify in any of the above categories
- ☐ Other

What services do you provide your clients? *

Check all that apply

- ☐ Housing Services
- ☐ Financial Housing Assistance
- ☐ Supportive Services
- ☐ Sheltering Services
- ☐ Other

Describe the services that you provide. *

Please include a description of all services you selected or included above. For example, if you selected housing services please include the kind of programming offered to the community.

What is the biggest obstacle your clients face? *

Select only one obstacle.

- ☐ Lack of Affordable Housing
- ☐ Lack of Rental Assistance
- ☐ Lack of Supportive Services
- ☐ Lack of Sheltering Space
- ☐ Other

Rank the use of HOME-ARP funding

The following four uses of funds are allowable by HOME-ARP. The ranking is scaled with number one being your first choice of funding use, and number four being your last or least favorable use of funding. Please choose each number only once.

Development of affordable rental housing *

☐ 1 ☐ 2 ☐ 3 ☐ 4

Tenant-based rental assistance *

☐ 1 ☐ 2 ☐ 3 ☐ 4

Supportive services *

☐ 1 ☐ 2 ☐ 3 ☐ 4

Acquisition/ development of non-congregate shelter *

☐ 1 ☐ 2 ☐ 3 ☐ 4

Why did you select your number one funding use? *

Please explain why the funding source selected as number one is your preferred use of HOME-ARP funding.

What are your ideas for housing projects?

Do you have ideas for housing projects that the City should consider when planning for the use of these funds? Include how would you match the projects with appropriate supportive services. Please share your ideas!

How can the City ensure impactful use of funds?

Is there anything else you would like us to know about your clients, their needs, your agency's needs, or potential uses for the HOME-ARP funding?

Upload community datasets and reports

Do you have data that would benefit the city in establishing the needs of the HOME-ARP eligible populations? Please upload any dataset or report that speaks to the needs of your clients to be used as part of the planning process.

Drag and drop files here or [browse files](#)

Thank you for participating in the HOME-ARP survey!

We look forward to reviewing your responses. Your input is invaluable to the planning process for the use of the HOME-ARP funds.

Please join us on Tuesday September 13th, from 10:00AM - 12:00PM to further discuss the use of HOME-ARP funding and provide real-time feedback on the City's planning process. This meeting will be held at the Jerry Hammond Center, in the Continental Room located at 1111 E Broad St. Columbus, OH 43205.

[Click here to register for the meeting today!](#)

If you have any questions regarding this survey or the HOME-ARP planning process, please contact grantsmgmt@columbus.gov.

☐ Send me a copy of my responses

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Appendix B | HOME-ARP Stakeholder Input Session Facilitator Guide

Columbus HOME-ARP Stakeholder Input Session Facilitator Guide

Thank you for agreeing to be a facilitator for this stakeholder input session. Our objective is to gather information from various organizations who work with the qualifying populations of the city's HOME-ARP funding allocation and understand the needs of our community. The goal of this session is to ensure that the funding received is put to the best use possible.

Please keep the discussion focused on the topic. Allow all ideas to be heard but do your best to prevent negativity in the discussion. Make sure every participant respect one another's ideas and time. Be sure to keep all discussion as on topic as possible and **keep the discussion of each question to 15 minutes for us to keep the complete discussion within the 45 minutes allotted.** If you think the discussion has ended for the topic, feel free to move on sooner. We are not going to address all aspects of the current homeless and housing issues in this session, but we will be able to use the input provided to help our community.

As discussed in the introductory portion of the meeting, please see review the important information for the participants to be aware of included below. This information is also available via the factsheets provided to all participants.

Qualifying populations for these funds are not only homeless individuals, but also those who are at risk of being homeless, those who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, other populations where providing supporting services would prevent the family from becoming homelessness, those with the greatest risk of housing instability, and veterans and their families who qualify via the categories mentioned.

Potential funding uses:

- Production or Preservation of Affordable Housing
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services, including Homeless Prevention Services, and Housing Counseling
- Purchase and Development of Non-Congregate Shelter
 - These structures can remain in use as non-congregate shelter or can be converted to: 1) emergency shelter under the [Emergency Solutions Grants \(ESG\) Program](#); 2) permanent housing under the [Continuum of Care \(CoC\) Program](#); or 3) affordable housing under the [HOME Program](#).

Before starting the session, please ensure that each member of your small group has the chance to introduce themselves and the organization that they represent. The intention of the introductions is to foster understanding of one another's perspectives.

Please use the following charts to fill in information as appropriate throughout the discussion process. Submit your digital notes to grantsmgmt@columbus.gov or your handwritten notes at the end of the session.

Question 1: What are the largest obstacles that your clients face?	Speaker (Name and Organization)	Qualifying Populations Discussed	Points made

Question 2: What do you think the best use of the HOME-ARP Funding would be?	Speaker (Name and Organization)	Qualifying Populations Discussed	Points made

<p>Question 3: What are some of your ideas for housing projects that meet the eligibility in the City of Columbus?</p> <p>How would you match the projects with appropriate supportive services?</p>	Speaker (Name and Organization)	Qualifying Populations Discussed	Points made

Appendix C | Summary of Comments and Recommendations in Public Participation Process

Comment #1: Is this affordable housing funding just targeted at new rental construction or is existing home ownership targeted in this as well?

Response: Funding can be used for multiple types of affordable housing, rental, or home ownership.

Comment #2: Would preservation of existing housing for elderly or veterans fall into this plan?

Response: Yes, it could, but that would be part of the project implementation process that we have not begun yet.

Comment #3: Over what time frame would the four million dollars on supportive services be spent?

Response: That is part of the implementation process, we will have until 2030 to spend the funds. We do not know yet when we will have the grant agreements for those funds.

Comment #4: How long will the service supports be in place, for 1 year or for 5 years?

Response: It depends on how we utilize it since there are a lot of opportunities in the supportive services category. We haven't decided how exactly we're going to do the request for proposals process yet and what kind of services we will spend those funds on. We do anticipate a lot of those services, or at least some, would be associated with other HOME-ARP projects, because we certainly want to get wrap around services and support folks in either new housing or existing shelters.

Comment #5: Within the data collected that you spoke about a bit earlier, is there any data that measures the extent to which new construction alleviates the homelessness issue? Any numbers on correlation there?

Response: We did not speak to it in that manner. The data that we collected has shown the need for additional units to become available. There is a current permanent shelter gap specifically for those experiencing homelessness of 635 individual, 2246 family and 377 veteran units. There isn't anything in the data shows what is going to alleviate this gap for those experiencing homelessness other than that with more units, correlating to more availability.

Comment #6: There was one category that you allocated \$0 to, [Acquisition and Development of Non-Congregate Shelters], what was the reason behind that?

Response: It was ranked the lowest priority of the stakeholders during the consultation process. We know this amount of funds is not going to be enough to solve the homelessness issue, and we certainly know there is a shortage of beds, but that when we have a limited amount of funds, we have to set budgets.

Comment #7: Will there be any increase or inclusion regarding fair housing laws and education?

Response: Yes, we as a city, already have a fair housing program and with all HUD funding have to certify that we are affirmatively furthering fair housing. That could be a supportive service item that we fund more through HOME-ARP. We are also considering fair housing laws when we are considering preferences, our waitlist, and our new affordable housing units. I am not sure implementation wise if there will be more programmatic dollars going towards fair housing, but certainly a consideration across the board when it comes to HUD funding.

Comment #8: Is there anything that will be helpful for you all to know from us that are you looking for anybody to help with the plan, or information from this group to help with the plan and if so what type of questions do you have for us that we can help with that.

Response: The draft plan is very data heavy and encompassing, but we really want everyone to read it and figure out what you think we are missing. Let us know what we didn't do, what we didn't learn, what we didn't write and send it via the feedback form.

Comment #9: This is in relation to the question about deciding to fund non-congregate shelter. How is it justified in the plan there was that gap, considering both family and single beds, of 4000+, is that gap less than the data that was provided for needing affordable housing units? Or was the data for needing affordable housing more subjective than objective data of a gap?

Response: We saw both data and commentary for the need of affordable housing. The data is in the plan, again, we know there is a need for more congregate and non-congregate shelters, but we had to make some tough decisions.

Comment #10: Can you define affordable housing?

Response: The qualifying populations must be served through the affordable housing that is funded with HOME-ARP, so it's homeless, those at risk of homelessness, and those other populations in the other two categories that are specifically defined by HUD. There are also income limits that need to be considered and additional criteria that folks have to meet to qualify to its deeply affordable housing.

Comment #11: When I think of affordable housing, I think of CMHA, what else would be considered affordable housing? If I meet the criteria to qualify for affordable housing what are my options when you're defining housing? Is it CMHA, is it homeport, what are the housing options?

Response: Affordable housing is a clearly defined term in the HUD notice for this program. When we're talking generically about affordable housing it's different to different people in different circumstances. A person with \$0 income is not a good candidate for homeownership opportunities, but a person at 50% AMI through the right supports like habitat for humanity could be.

Comment #12: Once you get approved and you have the money in the City bank account, when are you thinking you will start to receive grant applications?

Response: The City is anticipating fall of this year, we want to hit the ground running. The data was not surprising, but it was heartbreaking and motivating to get this money out there, some units built, and services to these folks.

Comment #13: For the non-profit operating and non-profit capacity building could you talk a little about how you arrived at that category?

Response: We can spend those funds on either non-profits who are delivering other supportive services, who need a boost in operating or need to build capacity to deliver those services. We are excited that some of those dollars may also be allocated to our community housing development organizations. Those folks could benefit from some additional operating and capacity building funding while also building some of the affordable housing units with the HOME-ARP funds.

Comment #14: Did the data show any targeted areas of the city where you would think we really need to go there or was it just anywhere within the city in terms of where we need to see this housing?

Response: We did map out in the plan where current planned projects are, but those projects are not servicing specifically this population. We did not go to that granular level of like neighborhood level for this population. The larger point to the data was that it's everywhere, we're not going to have enough money to support everyone everywhere, so we want to support as many as we can, as quickly as possible.

Comment #15: Earlier on in the conversation there was some concern about focusing the money on a singular population, even though they were asking for singular populations and so I was wondering if the preferences kind of smooth that out for you or how did you resolve that it seems like a conflict that we're going to tell you who to serve but you're not allowed to serve only them.

Response: We think that HUD is anticipating this March 31st deadline and they're going to supply us with some more information on how we will do implementation, how projects can be built, and more specific reporting requirements. This is all preliminary and high level, but those RFPs will describe everything, and we will hopefully learn all of that by that time.

Comment #16: With the cost of construction bring high are you looking at rehabbing any existing properties or are you mainly focusing on building new construction?

Response: That would be once we get into the implementation part of the process. We want to be able to leverage other public and private funding to stretch those dollars as far as we can and typically that can happen a lot more with the development of larger rental housing projects, but you never know what kind of proposals we might get when we start to do the RFP process.

Comment #17: You provided some data about the new production units that you were envisioning, one of the metrics I saw was 24 units at 276K per new unit. Can you say anymore at this stage about what characteristics you are envisioning with these units or are we still in early days on that?

Response: We are still in early days. That estimate was based on some current projects, and it is our best guess by mixing in a couple of different types to find some averages to get us to an estimate. To your point of about construction costs, they are crazy right now, and HUD actually is not going to tie us to those numbers. It will probably change, and hopefully not increase, but you know the market is what the market is right now so we can't make any firm choices now.

Comment #18: If you build, will the expectation for the rehabs be HOME rules?

Response: There are HOME-ARP rules that all of the funded programming will follow.

Comment #19: Are the construction standards specific to HOME-ARP?

Response: The construction standards are HOME, but in terms of regulation and affordability timeframe, there will be different numbers for that.

Comment #20: The goal of the 24 new units, are they primarily preferred to be for homeless units or affordable housing?

Response: The units have to serve the qualified populations. Again, these are high level definitions. The notice, which is linked in the plan, has much more specific criteria that show you who actually meets these definitions. It is important to understand that the goal of the 24 units, are HOME-ARP assisted units. When you put HOME-ARP funds into a project, as much as we want to leverage and stretch these funds, we are going to be going this way because whatever number of HOME-SRP units you have on a project, they have different rules. Particularly in this

instance if we were building an affordable project, let's put a couple of HOME-ARP assisted units not make the whole project a HOME-ARP assisted project. So, you're not going to see these 24 units in one area, it'll be 2 here, 3 there, and 4 over there. We're going to try to leverage with other funding opportunities available to get larger developments of which this is a small piece.

Comment #21: Is there any preference with the city staff or leadership for larger vs smaller projects? The leveraging makes sense, but if that average of 270k per unit is brought down, is there an appetite for that? Would you want a mix of larger and smaller projects to hit that average, because I'm thinking there is more room for more than 24 units if that average is brought down.

Response: We are not there yet; however, we would love for you to put your ideas in writing and submit them to us because this could influence how we write our RFPs.

Comment #22: Is there consideration during the RFP process that you would mitigate some of the populations that aren't called out in these populations HUD gave you, the lowest common denominator. Are we going to give extra consideration to the homeless that are also gender specific and race specific? Are we considering making the RFP stickier for those who are having a hard time? So, if in homelessness, what we do know, is that women and people of color are the ones that have the hardest time getting into housing. What we're saying is that although it's hard, we may not consider how to solve that, because we can have all of these checked off and still have a gender and race issue.

Response: We cannot violate fair housing laws and so we have to make all of our services and our housing accessible across the board.

Comment #23: How many families are these dollars looking to serve?

Response: We have not done that math yet, but that would be something good to look into. We will set a goal for that and keep saying as many as possible, but we can definitely try to set a goal.

Comment #24: If this is going to be governed by HOME construction guidelines, are you going to try to keep the per unit or per family HOME amount down to restrict the restrictive governance that they get put on or are those not going to apply here? So the 10, 20 year resale provisions, are you going to try to avoid those or does that not apply here?

Response: There are different affordability periods under HOME-ARP then there are under HOME, but as a general rule we would expect 15 years.

Comment #25: Hi! Thanks for holding the Plan public hearing. It was very informative. 1. It seems that \$1m designated for rental assistance could be better used for housing development given the City is expecting another \$15m in rental assistance. Housing was identified the primary need, \$1m could create an additional 3 - 4 units based on the unit rate provided. 2. It was clear that 24 housing units would be developed with the \$8.3m for that purpose. What do you anticipate \$4.1m in support services will provide? Is there a goal or how was that amount determined?

Response: 1. It is correct that the creation of affordable housing has been identified as the primary need, however the City understands that combating homelessness is a multitiered process that must take into consideration the need to keep those who are currently housed in their homes. The City looks forward to the forthcoming \$15M in rental assistance funding but at the time of this publication does not know when those funds will be available. Understanding that currently 49,895 households, or 78%, are paying more than 30% of their income in rent and

39,550 households, or 62%, are paying over 50% of their income in rent, we felt it was necessary to ensure there are funds available to prevent these at risk households from becoming homeless. 2. Through our gap analysis the City found that there is a need to strengthen the City's crisis response system to identify those experiencing homelessness, prevent homelessness when possible, connect people with housing quickly, and provide services when needed. We anticipate that the funds will be used to strengthen the system in a variety of eligible ways, please refer to page 42 of the program [Notice 21-010](#) for a complete explanation of the options for uses of supportive services funds. The families or individuals who receive assistance to prevent and mitigate homelessness or to flee violent circumstances require wrap-around services with their housing because of the compounding challenges they face. We understand that a home alone cannot always ensure a path from homelessness.

Comment #26: Thank you for the opportunity to provide feedback on the HOME-ARP Allocation Plan. We appreciate the City of Columbus prioritization of development for affordable rental housing and the preference of the homeless population as the qualifying population. We are interested in the strategy around the City's direct acquisition of property to be used for affordable housing development as means to maximize the scope of the affordable housing development that can be accomplished with these funds. We recommend decreasing the amount dedicated to supportive services, capacity building, operating and administration and planning line items to increase the funds available for development of affordable rental housing. This is a once in a lifetime opportunity to develop deeply affordable housing for the homeless population and funding should be maximized for this scope. We recommend setting a higher goal for developing new affordable housing units than the estimated 24 units, based on the production goal worksheet. To that end, we recommend assessment of creative ways to add affordable housing units, like the ones proposed by the Continuum of Care through conversion of hotels and motels. The Plan does not seem to encourage these creative methods of adding to the local inventory of deeply affordable housing that works best for the homeless population. This opportunity should be captured in the Plan. Thank you for the opportunity to provide feedback.

Response: The City accepts and takes into consideration your suggestions. As presented in the plan, the conclusions drawn from the needs assessment and gap analysis show that although affordable housing is the primary need there are other needs the qualified populations are currently facing that this unique funding stream can meet. At this time, we plan to keep the allocation amounts as presented in the draft plan as is. Our team agrees that the plan can specifically speak to encouraging creative methods of affordable housing for the homeless population, this has been added to the plan in the "[Rationale of Plan to Fund Eligible Activities](#)" section.

Comment #27: I had a recent discussion with our partners who provide direct services to unhoused families about how we could best design units specifically for their needs. They said their biggest need is for larger families. Obviously there is a need across the board but the absolute hardest to place are families with a larger number of children. As we discussed it became clear the ideal was a single-family homes with 3 or more bedrooms (more is even better), with a safe place to play (decent size fenced in backyard). Leave out the amenities (master bath, walk-in closet, garage) you might find in a typical 3-bedroom home and optimize the space for an extra bedroom or two, and a bigger yard.

Response: Thank you for your input and we will keep this in mind during the implementation phase of these projects.

Comment #28: I don't see any program actually being described here for housing production. There is a statement: "City used the HUD provided production goal worksheet to estimate that 24 new affordable housing units will be created using HOME-ARP funding, at an average cost of \$276,332.00 per unit. This calculation includes an

HOME-ARP Allocation Plan

estimated 20% of total cost for ongoing operating costs or operating cost assistance reserve." I can't imagine that the City is NOT planning to leverage this resource by combining it with 4% tax credits and hard debt. \$8 million of HOME-ARP used as gap financing can help produce about 80-100 new units, not 24.

Response: Specific housing production programs will be selected after this plan is approved by HUD. We are currently in the planning phase of this funding, not the implementation phase which is when specific projects for housing production will be chosen. The estimate of 24 new units is not a limit, but an estimate of how many could be produced using the HUD provided worksheet using only the HOME-ARP funding source.