

# **HUD-ARP ALLOCATION PLAN**

**City of East Cleveland, Ohio**

**MARCH 31, 2023**



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# HOME-ARP Allocation Plan

## Introduction

On March 11, 2021, President Biden signed the American Rescue Plan Act (ARPA or ARP) into law, enabling more than \$1.9 trillion in relief funding to address the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses. As part of the legislation, Congress appropriated \$5 billion in ARP funds to be administered through the U.S. Department of Housing and Urban Development's (HUD) HOME Program 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 shelters.

The 651 State and local participating jurisdictions (PJs) eligible to receive HOME-ARP grants, including the City of East Cleveland, are required to submit a HOME-ARP Allocation Plan to HUD for review. The HOME-ARP Allocation Plan describes how the participating jurisdiction intends to distribute its HOME-ARP funds, including how it will use these funds to address the needs of HOME-ARP qualifying populations.

The City of East Cleveland has been allocated a total of \$ 911,984 in HOME-ARP funding. HUD issued the Community Planning Division (CPD) Notice 21-10, outlining the requirements for the use of funds in the HOME-American Rescue Plan Program. The Notice requires that the Allocation Plan be submitted to HUD by March 31, 2023 as a substantial amendment to the City of East Cleveland's Fiscal Year 2021 Annual Action Plan. All funds must be spent by September 30, 2030.

## Consultation

*In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a Participating Jurisdiction (PJ) must consult with:*

- *CoC(s) serving the jurisdiction's geographic area,*
- *homeless service providers,*
- *domestic violence service providers,*
- *veterans' groups,*
- *public housing agencies (PHAs),*
- *public agencies that address the needs of the qualifying populations, and*
- *public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.*

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

Homelessness issues in Cuyahoga County are handled on a countywide basis through the Cleveland/Cuyahoga County Office of Homeless Services (OHS), the lead agency of the Cleveland/Cuyahoga County Continuum of Care (CoC). The CoC system serves all Cuyahoga County residents, including East Cleveland residents. On October 13, 2022, the Cuyahoga County Department of Development and the Office of Homeless Services convened an online meeting of more than 50 stakeholder agencies and organizations. Information shared with participants included background on the HOME-ARP program, as well as the Qualifying Populations and eligible activities. Cuyahoga County Department of Development staff noted that three jurisdictions – Cleveland, East Cleveland, and Cuyahoga County – received HOME-ARP funds.

OHS staff shared information with the CoC partners about community needs and how additional funding could positively affect specific projects, including information from the CoC's report submissions to HUD. The HOME-ARP Program was also discussed at one or more meetings of the Cleveland/Cuyahoga County Office of Homeless Services Advisory Board. It is important to note that communication among the dozens of agencies and organizations is an ongoing process. For example, ongoing communication among the stakeholders informs the CoC's report submissions to HUD, which in turn is utilized when special funding opportunities such as the HOME-ARP Program arise.

On January 13, 2023, a meeting was held that included the East Cleveland Mayor, executive office staff, the Community Development Director, and several members of City Council. The discussion focused on issues involving homeless and at-risk homeless persons in East Cleveland.

### ***List the organizations consulted:***

Note: Agencies/organizations are listed only once, even though the agency/organization may be active in more than one category.

Note: \* means member of the Cleveland/Cuyahoga County Office of Homeless Services Advisory Board.

Note: Method of Consultation was the October 13, 2022 input meeting, plus emailed comments provided by organizations, plus discussions held by the Cleveland/Cuyahoga County Office of Homeless Services

Advisory Board. This consultation outreach included Lived Experience members of the CoC’s Advisory Board. Their names are not listed here for privacy reasons.

Note: Feedback is summarized following the table.

<b>Type of Agency/Organization (Consultation Categories Listed in HUD Notice 21-10)</b>	<b>Agency/Organization Consulted</b>
Continuum of Care	Cleveland/Cuyahoga County Continuum of Care
Public Housing Authority	* Cuyahoga Metropolitan Housing Authority
Veterans	* U.S. Department of Veterans Affairs
Public Agencies that address the Qualifying Populations	* City of Cleveland – City Council
	* City of Cleveland – Dept. of Aging
	* City of Cleveland – Department of Community Development
	City of Cleveland – Dept. of Public Health
	City of Euclid
	City of Lakewood
	* Cleveland Metropolitan School District
	* Cuyahoga County – Alcohol, Drug Addiction & Mental Health Services Board
	* Cuyahoga County – County Council
	* Cuyahoga County – Department of Children and Family Services
	Cuyahoga County – Department of Development
	Cuyahoga County – Department of Health and Human Services
	Cuyahoga County – Prosecutor’s Office -Social Work Division
	Greater Cleveland Regional Transit Authority
	* Ohio Department of Jobs & Family Services
Homeless Service Providers (including Organizations that address the Qualifying Populations)	AIDS Taskforce of Greater Cleveland
	* Bellfaire JCB
	Care Alliance
	Catholic Charities
	CHN Housing Partners
	* City Mission
	Cleveland YMCA
	* Collaborative to End Human Trafficking
	* Community West Foundation
	* Emerald Development and Economic Network (EDEN)
	Enterprise Community Partners
	Famicos Foundation
	Family Promise Cleveland
	Focus North America
	Front Steps Housing & Services
	* FrontLine Service
	* Humility of Mary Housing

	Jewish Family Service Association
	* Joseph and Mary’s Home
(domestic violence)	* Journey Center for Safety & Healing
	Lakewood Community Service Center
	* Lutheran Metropolitan Ministry
	Metanoia Project
	* MetroHealth System
	* Northeast Ohio Coalition for the Homeless
	Ohio City, Inc.
	Salvation Army
	Sisters of Charity Health System
	Stella Maris
	The Haven Home
	United Way
	University Settlement
	Volunteers of America
	West Side Catholic Center
	Western Reserve Land Conservancy – Vacant and Abandoned Properties Action Council
	* YWCA of Cleveland
Public or Private Organizations that Address Fair Housing, Civil Rights, and the Needs of Persons with Disabilities	City of Cleveland – Department of Community Development – Fair Housing
	Cleveland Mediation Center
	Equality Ohio
	Legal Aid Society of Cleveland
	LGBT Community Center
	Organize! Ohio

***Summarize feedback received and results of upfront consultation with these entities:***

At the October 13, 2022 meeting, participants provided feedback on the discussion. In general terms related to East Cleveland, the participant comments focused on the overall need for more affordable housing and the need to assist households at-risk of homelessness.

In addition, the City of Cleveland’s HOME-ARP consultation survey completed in April 2022 was available to the City of East Cleveland ([here](#)). The two cities share a lengthy community boundary, and the general demographic, housing, and socio-economic issues in East Cleveland are similar to the issues in the adjacent areas of Cleveland. The City of Cleveland’s consultation survey reached conclusions that are applicable to East Cleveland, particularly the overall need for more affordable housing.

## Public Participation

*In accordance with Section V.B of Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program (page 13), the Participating Jurisdiction (PJ) must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, the PJ must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current Citizen Participation Plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.*

*PJs are required to make the following information available to the public:*

- *The amount of HOME-ARP Cuyahoga County will receive, and*
- *The range of activities Cuyahoga County may undertake.*

*Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current Citizen Participation Plan as required by 24 CFR 91.105 and 91.115.*

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

- ***Date(s) of public notice: 3/10/2023***
- ***Public comment period: start date - 3/14/2023 end date - 3/28/2023***
- ***Date(s) of public hearing: 3/29/2023***

***Describe the public participation process:***

*In accordance with Section V.B of Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program (page 13), the City of East Cleveland (the Participating Jurisdiction (PJ)) provided for and encouraged citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, the City of East Cleveland provided residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The City of East Cleveland followed its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current Citizen Participation Plan. In addition, the City of East Cleveland held **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.*

*Throughout the HOME-ARP allocation plan public participation process, the City of East Cleveland followed its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and provided*

meaningful access to participation by limited English proficient (LEP) residents that are in its current Citizen Participation Plan as required by 24 CFR 91.105 and 91.115.

The draft of this document was posted for public review on the City of East Cleveland's website at [www.EastCleveland.org](http://www.EastCleveland.org).

Agencies and organizations that were part of the October 13, 2022 stakeholder input meeting were also notified of the availability of the draft document.

At the public meeting for the HOME-American Rescue Plan Program, the agenda included the following items:

- Background that the meeting is to amend the 2021 HUD Annual Action Plan;
- Background of the HOME-American Rescue Plan (HOME-ARP) Program;
- The eligible activities of the HOME-ARP Program;
- Amount of funds that the City of East Cleveland will receive;
- Activities that the City of East Cleveland intends to fund;
- Content sections of the HOME-ARP Allocation Plan;
- Audience questions and answers.

**HOME-ARP Allocation Plan Public Contact Information**

Karen Hood, City of East Cleveland, Department of Development, 14340 Euclid Avenue, East Cleveland, OH 44112, email: [khoo@eastcleveland.org](mailto:khoo@eastcleveland.org).

***Describe efforts to broaden public participation:***

For the HOME-ARP Allocation Plan public meeting, the City of East Cleveland, undertook the following steps:

- Offered the public hearing via the internet.
- Scheduled the meeting at an early evening time, after evening rush hour.
- Offered translation services for non-English speaking residents, upon request.

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

There were no comments received at the public hearing. There were no comments received during the public comment period.

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

Not applicable.



## Legal Notice



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### Notice Text

CITY OF EAST CLEVELAND Department of Community Development Public Notice The City of East Cleveland's Community Development Department has drafted its Fiscal Year (FY) 2023 One-Year Action Plan. The One-year Action Plan is a strategic plan of identified priority needs, objectives, proposed uses with a detailed budget for FY 2023 Community Development Block Grant and HOME program funds. The purpose of the Plan is to determine appropriate programs and services to be made available to low- and moderate-income persons and households within East Cleveland. Also, an amendment to the FY 2021 Action Plan has been prepared and is available for public comment. The City of East Cleveland received an allocation of HUD HOME funding through the American Rescue Plan Act (ARPA) in the amount of \$911,984.00. This HOME Program funding through ARPA is intended to reduce homelessness and increase housing stability across the country. There will be a Public Meeting on the drafted FY 2023 Action Plan and amended FY 2021 Action Plan. The Public Meeting will be a Video Meeting which can be accessed through a smart phone or computer. The meeting is scheduled for March 29, 2023 at 5:30 p.m. Please contact Karen Hood March 27th or 28th 2023 at [khoo@eastcleveland.org](mailto:khoo@eastcleveland.org) for the sign-in information to attend this Public Meeting. The sign-in credentials will be sent via email prior to the meeting. The Action Plan documents will be available for Review and Comment on March 14, 2023 at [www.EastCleveland.org](http://www.EastCleveland.org). The plans will be available for a fifteen (15) day comment period beginning March 14, 2023, and ending March 28, 2023 Citizen participation is encouraged. Written comments will be accepted through March 28, 2023. You may submit comments to Karen Hood at the above e-mail address. Comments will be responded to within five days days from receipt. Brandon King, Mayor Melran Leach, Director Department of Community Development Council Korean C. Stevenson, President Juanita Goudy, Vice-President Nathaniel Martin, Member Patricia Blochowiak, Member Mark McClain, Member PD. MARCH 10, 2023 - 0010600608

## Needs Assessment and Gaps Analysis

*In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.*

### Overview

According to the National Alliance to End Homelessness (NAEH), “homelessness is one of our nation’s most misunderstood and vexing social problems.” It is also an issue that cuts across race, age, gender, marital status, family composition, and geography, causing “families with children, single adults, teenagers, and elderly individuals...to struggle with [its] devastating effects.” Homelessness is extremely difficult to quantify with complete accuracy due to the fluid and complex nature of the issues and the definitions, assumptions, and methodologies used by various organizations.

HUD’s 2022 Annual Homeless Assessment Report (AHAR) to Congress states that on a single night in January 2022, about 582,500 people were homeless in the U.S. While nearly two-thirds of all homeless were in sheltered locations, over one-third were staying in unsheltered locations, such as on the streets, in abandoned buildings, or in other places not suitable for human habitation. Tabulations are available on a statewide basis in AHAR, as well as on the HUD website. On that single night in January 2022, 10,654 persons experiencing homelessness were counted in Ohio, which made the state the 11<sup>th</sup> highest in the nation in terms of the number of persons experiencing homelessness.

East Cleveland contains 17,375 persons; 8,248 households, and 13,398 total housing units (2013-2017 ACS). Of the total housing units, 8,248 are occupied housing units, of which 5,442 are rental units and 2,806 are owner-occupied units.

East Cleveland coordinates with the Cleveland/Cuyahoga County Office of Homeless Services (OHS), as well as the many housing and service agencies serving the homeless when homeless needs arise among residents. Residents to be assisted include persons/households who are homeless; persons/households who are at-risk of homelessness; persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; and other populations requiring services or housing assistance to prevent homelessness and housing instability. While the OHS and those housing and service agencies assisting the homeless provide aid to persons from all 59 communities in Cuyahoga County, many of the housing options and services are physically located in Cleveland.

The OHS has been designated by the Continuum of Care Advisory Board as the Systems Administrator for the Homeless Management Information System (HMIS). HMIS collects HUD defined, standardized data elements on the extent and nature of homelessness in Cuyahoga County. The HEARTH Act requires all HUD funded ESG and CoC recipients to enter data into HMIS. Additionally, the OHS/CoC conducts the annual Point-in-Time (PIT) count, in accordance with HUD standards. Point-in-time (PIT) estimates are counts taken at homeless shelters and on the street on a single night in mid- to late January. An

additional estimation method is the utilization of Homeless Management Information System (HMIS) data. HMIS data are unduplicated counts of people in shelters usually compiled on an annual basis.

**OPTIONAL 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	347	95	959	959	6								
Transitional Housing	10	5	76	76	68								
Permanent Supportive Housing	2,437	695	3,122	3,122	636								
Other Permanent Housing *	607	187	217	217	84								
Sheltered Homeless						103	1,221	105	60				
Unsheltered Homeless						0	84	3	0				
<b>Current Gap</b>										**	**	**	**

**Suggested Data Sources:** 1. 2022 Point in Time Count (PIT); 2. 2022 Continuum of Care Housing Inventory Count (HIC); 3. Consultation

\*Rapid Re-housing

\*\*Gap Analysis can not be computed because the table draws on two different sources utilizing non-comparable data.

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
<b>Total Rental Units</b>	<b>5,442</b>		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,225		
Rental Units Affordable to HH at 50% AMI (Other Populations)	3,710		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,015	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		215	
<b>Current Gap</b>	<b>4,935</b>	<b>2,230</b>	<b>2,705</b>

**Suggested Data Sources:** 1. 2013-2017 American Community Survey (ACS) Report from HUD CPD Maps; 2. Comprehensive Housing Affordability Strategy (CHAS)

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

Qualifying populations who may be assisted using HOME-ARP Allocation funds are limited to those who are:

- Homeless;
- At-Risk of Homelessness;
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking; and
- Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability.

The definitions for the above-listed four qualifying populations who may be assisted have been published in the *Code of Federal Regulations* (CFR). The CFR is an arrangement of the general and permanent rules published in the *Federal Register* by the executive departments and agencies of the Federal Government, and is updated daily. The definitions for each category, as well as the size and demographic characteristics, where available, are explained below.

***Homeless as defined in 24 CFR 91.5***

Homelessness is defined in 24 CFR 91.5 as:

**Definition:**

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

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

*(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;*

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

*(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;*

*(ii) No subsequent residence has been identified; and*

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

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

*(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (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) 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) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance;*

*and*

*(iv) Can be expected to continue in such 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.”*

### **Homeless Persons/Households/Families – Determining Size of Population and Demographic Composition**

The OHS, which has been in existence for over 30 years, collects data on the extent and nature of homelessness in Cuyahoga County through both the annual Point-in Time (PIT) counts, which is conducted in accordance with HUD standards, and through tabulations submitted by the CoC providers at emergency shelters, transitional housing, and permanent supportive housing facilities utilizing the Homeless Management Information System (HMIS).

The PIT count counts sheltered persons staying at shelters and transitional housing, as well as unsheltered homeless persons on one night in mid- to late January. The PIT count provides a snapshot of homelessness. It is not a definitive assessment of homelessness in a community, but when done in a consistent method, each year, it can be used as a benchmark for trends in the community, particularly for the sub-populations that are counted. PIT counts for 2022 are shown on ***Attachment 1 – HUD 2022 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations.***

As shown, of the 1,331 households counted, 1,247 households were sheltered (at emergency shelters or in transitional housing) and 84 households were unsheltered. The sheltered households were composed of 1,137 households without children, 103 households with children (that included 346 persons), and seven households that were only children. The 84 unsheltered households were all households without children.

**Age** was listed for both sheltered and unsheltered persons. For sheltered households that included persons in households without children, 80 persons were age 18 to 24 and 1,057 persons were over age 24. For the sheltered households that included persons in households with children, 235 persons were under age 18, 24 persons were age 18 to 24, and 87 persons were over age 24. Ages were not

listed for the seven persons in households with only children. For the 84 unsheltered households, five persons were age 18 to 24 and 79 persons were over age 24.

**Ethnicity** was also listed for both sheltered and unsheltered persons. For sheltered persons, 74 persons identified as Hispanic/Latino and 1,416 persons identified as Non-Hispanic/Non-Latino. For unsheltered persons, four persons identified as Hispanic/Latino and 80 persons identified as Non-Hispanic/Non-Latino.

**Gender** was also listed for both sheltered and unsheltered persons. For sheltered persons, 556 persons identified as female, 922 persons identified as male, and 12 persons identified as transgender. For unsheltered persons, 18 persons identified as female and 66 persons identified as male.

**Race** was also listed for both sheltered and unsheltered persons. For sheltered persons, 1,074 persons identified as Black or African American, 378 persons identified as White, 13 persons identified as Asian, two persons identified as American Indian or Alaska Native, and 23 persons identified as Multiple Races. For unsheltered persons, 58 persons identified as Black or African American and 26 persons identified as White.

The PIT count also listed both sheltered and unsheltered **chronically homeless households and persons**. For sheltered persons, there was one chronically homeless household that contained six persons. There were also 178 persons in households without children. There were 20 persons who were unsheltered, none of whom had children.

The PIT count also listed both sheltered and unsheltered **other homeless persons**. For sheltered persons, 432 persons were severely mentally ill; 279 persons had chronic substance abuse; 102 persons were Veterans; 15 had HIV/AIDS; 60 were Victims of Domestic Violence; 87 were unaccompanied youth (seven were under age 18 and 80 were age 18-24); 20 were parenting youth age 18-24; and 27 were children of parenting youth. For unsheltered persons, 45 persons were severely mentally ill; 40 persons had chronic substance abuse; three persons were Veterans; one had HIV/AIDS; and five were unaccompanied youth age 18-24.

Through HMIS data, it was estimated by the OHS/CoC that about 2,044 persons experience homelessness on any given night; about 7,250 persons experience homelessness each year; and about 3,441 persons – both individuals and families – lose their housing and become homeless annually.

The Northeast Ohio Coalition for the Homeless (NEOCH) has also calculated estimates of the homeless population for over a decade (<http://www.neoch.org/research-and-stats/>). Utilizing a methodology based on U.S. Census estimated population figures, and using the broader Department of Education definition of homelessness, NEOCH estimated that:

- The number of homeless persons in Cuyahoga County was 19,000 persons in 2020,
- According to local Homeless Management Information System data reported through Cuyahoga County’s Office of Homeless Services, 5,470 individuals utilized emergency shelter in 2020, and
- 3,805 adults and 1,292 children went through Coordinated Intake (the “front door” of the community’s homeless system) in 2020.

### ***At-Risk of Homelessness as defined in 24 CFR 91.5***

Persons At-Risk of Homelessness as defined in 24 CFR 91.5 are:

#### **Definition:**

*“(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.”*



## **At-Risk of Homelessness – Determining Size of Population and Demographic Composition**

As illustrated in the above definition of at-risk of homelessness, there are numerous factors that increase an individual's or family's risk of being homeless, including poverty, low income, cost burden, housing condition problems, evictions or foreclosures, and lack of health care.

### **Poverty**

The *2013-2017 ACS* data from the CPD Maps Reports showed that in East Cleveland, 6,844 persons were in poverty. Of those, 63% (4,340 persons) were persons in family households and 37% (2,504 persons) were persons in non-family households. Of the 1,318 family households in East Cleveland with incomes below the poverty level, 82% (1,081 families) were renters and 18% (237 families) were owners.

### **Income Below 30% of the Area's Median Family Income (MFI)**

Having an income that is less than or equal to 30% of the area's median family income (MFI) puts extremely low-income individuals and families with children at-risk of homelessness because there are so few housing options that are affordable. The *2013-2017 ACS* data from the CPD Maps Reports showed that in East Cleveland, 3,340 households had an income that was below 30% of the MFI. Household types that were most likely to have extremely low incomes included small family households and elderly households.

### **Cost Burden of Greater Than 30%.**

Paying a high percentage of one's income for housing (cost burden) is another indicator of housing fragility. The *2013-2017 ACS* showed that in East Cleveland 2,504 renter households (46% of all renters) had a cost burden of greater than 30%. Of these 2,504 renter households, 1,874 renter households had incomes that were 0-30% AMI and 630 renter households had incomes that were 30-50% AMI.

### **Substandard Housing**

Substandard housing, where the unit lacked complete plumbing or kitchen facilities, was uncommon, affecting a total of 45 extremely-low and low renter households. While the Census definition of substandard (lacking complete plumbing or kitchen facilities) does not capture the extent of repair needs, the age of housing can be an indicator of condition. The *2013-2017 ACS* CPD Maps Report showed that 34% of the housing stock in East Cleveland (2,780 units) was built between 1950 and 1980 and 62% (5,152 units) was built before 1950. These homes are now at least 40 years old, requiring systems replacement and a significant rehabilitation investment.

### **Overcrowding**

The *2013-2017 ACS* CPD Maps Report also showed that very few renter households experienced overcrowding (1.01 -1.5 people per room), but of the 54 renter households that did, most had incomes that were 50% or less of the HAMFI. There were 40 renter households who experienced severe overcrowding (>1.51 people per room). Most were renters with incomes that were 50% or less of the HAMFI.

## **“Doubling Up”**

Persons “doubling up” by staying with family or friends or “couch surfing” from house to house because of economic hardship or housing loss are at-risk of homelessness. Doubling up may be a temporary arrangement, the precursor of living in a shelter or on the street, or part of an ongoing cycle of housing instability and homelessness. Even those able to find housing after doubling up may not remain stably housed due to a high rent burden and a shortage of affordable rental units. In 2019, the Center on Budget and Policy Priorities estimated that 3.7 million people lived in doubled-up households. Using poverty figures, the National Alliance to End Homelessness estimated that 16% of persons in poverty (12,445 persons) were doubled-up in Cuyahoga County.

## **Eviction From Rental Property**

An eviction happens when a landlord expels people from property he or she owns. Evictions are landlord-initiated involuntary moves that happen to renters, and causes a family to lose their home. They are often also expelled from their community and their children have to switch schools. Families regularly lose their possessions, which are piled on the sidewalk or placed in storage, only to be reclaimed after paying a fee. A legal eviction comes with a court record, which can prevent families from relocating to decent housing in a safe neighborhood, because many landlords screen for recent evictions. Studies also show that eviction causes job loss, as the stressful and drawn-out process of being forcibly expelled from a home causes people to make mistakes at work and lose their job. Eviction also has been shown to affect people's mental health. According to the Eviction Lab at Princeton University, 13,957 evictions have been filed in Cuyahoga County since March 2020. In East Cleveland, there were 654 eviction filings in 2019. The number of eviction filings decreased to 458 in 2021, but increased to 535 in 2022 (The Legal Aid Society of Cleveland, from East Cleveland Municipal Court records).

## **Mortgage Foreclosure of Owner-Occupied Housing**

A mortgage foreclosure occurs when a homeowner is no longer able to make mortgage payments as required. This allows the lender to seize the property, removing the homeowner and selling the home, as stipulated in the mortgage contract. Cuyahoga County, Ohio – located in the Cleveland-Elyria metropolitan area – has one of the highest foreclosure rates of any U. S. county. According to a recent report from Attom Data Solutions, a total of 3,100 housing units were in foreclosure in the first half of 2022, up 175.8% from the first half of 2021. The foreclosure rate in Cuyahoga County of one in every 199 homes ranks as the second highest of the more than 1,700 counties and county equivalents reviewed.

## **Youth Who Age Out of Foster Care**

Youth who age out of foster care have little or no support system on which to fall back. According to the Public Children Services Association of Ohio Factbook, published June 2021, in Cuyahoga County there were 152 youth who aged out of foster care in 2020 and 147 youth who aged out 2021.

## **Housing Insecure Disabled Persons**

HUD states that Federal laws define a person with a disability as "any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment." A person who is housing insecure disabled conforms to the above definition and is low or extremely low income.

### **Persons Without Health Insurance**

The 2013-2017 ACS showed that an estimated 9% (1,533 persons) of all persons in East Cleveland were without health insurance.

### **Young, Single Parent, Female-Headed Households**

The Cuyahoga County Board of Health and the Ohio Department of Health data showed that in 2018 there were 710 live births to mothers age 19 and under.

### **Victims of Domestic Violence (DV)**

The Ohio Attorney General's Domestic Violence Report showed that in 2022, there were 1,391 DV incident charges that occurred in Suburban Cuyahoga County. East Cleveland did not submit information for 2022, but there were 60 charges in 2020 and 75 charges in 2019.

### **Incarcerated Persons Eligible for Release**

The Cuyahoga County Office of Re-entry showed that there were approximately 6,000 to 7,000 incarcerated persons eligible for release in Cuyahoga County annually.

### **Older Adults with Low or Extremely Low Incomes**

A HUD mandated table in the Consolidated Plan showed that for older adults by income category, there were 1,555 elderly households (9% of the total population) age 62+.

### **Recent Immigrants**

The 2018 U.S. Census, Population Estimates, Estimates of the Components of Resident Population Change, (GCT-PEPTCOMP): April 1, 2010 to July 1, 2018 showed that there were 5,113 persons who were recent immigrants between 2017-18 in the Cleveland-Elyria Metro Area.

### **Persons With Previous Episodes of Homelessness**

A shelter usage study looking at persons with previous episodes of homelessness was undertaken at Case Western Reserve University's Mandel School of Applied Social Sciences, Center on Urban Poverty and Community Development in 2009 using OHS's HMIS data. It found that about "5.5% stayed three or more times in shelter (usually emergency shelter) in a 3-year period" and OHS 2019 PIT count counted 257 total chronically homeless persons.

### **Socially Isolated Persons**

A socially isolated person is a person who has one or more characteristics for being at-risk of homelessness and no financial resources or support networks. There is no estimate of the number of people falling into this category.

### **Living in a Condemned Property**

This category refers to a person (or persons) who take up residence in a vacant and/or condemned property without paying rent and without permission of the owner of the property. These structures usually have no utilities, and may be open, vacant, and vandalized. While there is no estimate of the number of people falling into this category, several members of East Cleveland City Council thought that it was an issue.

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

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

**Definitions:**

*“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 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*
- 2) 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.*

### **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking – Determining Size of Population and Demographic Composition**

Domestic violence, dating violence, sexual assault, stalking, and human trafficking cause devastating impacts for both the victims, as well as their families. The Centers for Disease Control and Prevention (CDC) estimates that over a lifetime, 1,629,000 (35.6%) Ohio women and 1,274,000 (30.0%) Ohio men will be the victim of rape, physical violence, and/or stalking by an intimate partner (*National Intimate Partner and Sexual Violence Survey (NISVS)*, 2010, Tables 7.4 and 7.5). In 2022, Ohio witnessed 310 cases (2.61 per 100,000 persons) of human trafficking (*WorldPopulationReview.com, Human Trafficking by State*).

### **Victims of Domestic Violence**

Domestic or “Intimate partner violence:” is one or more of four types of behavior occurring between two persons (and sometimes related children) in a close relationship, including current and former spouses and dating partners: Physical abuse, sexual abuse, threats of physical or sexual abuse, or emotional abuse (Centers for Disease Control and Prevention (CDC)). It can also include economic threats and harm by one person against another person who live together or did live together. Perpetrators of domestic violence use power and control to hurt, scare and isolate the victim.

An incident of intimate partner violence frequently results in a sudden loss of housing, as a victim seeks safety. This situation often includes the children of the victim. Emergency shelters temporarily meet housing needs and provide support services such as counseling, support groups, legal assistance, health care, housing, transportation, money, and referrals. For the longer term, affordable housing is needed to assist a person, and their children, to stabilize their situation.

Determining exact numbers regarding the incidents of domestic violence is difficult, however there are several sources that provide estimates of these incidents (or subsets of these incidents). The CoC is one of the agencies that provide estimates, primarily through the annual PIT counts. While HEARTH ACT regulations prohibit homeless data for persons who identify as survivors of domestic

violence (DV) from being entered into the HMIS data collection system from an abundance of caution to maintain the confidentiality of DV survivors. DV providers are required however, to enter data about their clients in a "Comparable Data Base" system that includes the standardized HUD required data elements.

The CoC HUD 2022 PIT count showed that there were 60 survivors of domestic violence, all of whom were sheltered. Of the 60 persons, 59 persons were staying at emergency shelters and one person was staying in transitional housing.

The State of Ohio's Bureau of Criminal Identification and Investigation is another entity that compiles estimates of domestic violence. Their annual Domestic Violence Report statistics show domestic violence incidents by county, and for some cities, by year. East Cleveland did not submit any reports for 2021 or 2022, but in 2020, there were 60 domestic violence charges filed and 111 incidents, but no charges filed. In 2019, there were 75 domestic violence charges filed, 20 other charges filed, and 141 incidents, but no charges filed.

### **Victims of Dating Violence**

Dating and relationship violence is a pattern of coercive and abusive tactics employed by one person in a relationship to gain power and control over another person. It can take many forms, including physical violence, coercion, threats, intimidation, isolation, and emotional, sexual or economic abuse.

A CDC study stated that 9.4% of high school students reported being hit, slapped, or physically hurt on purpose by their boyfriend/girlfriend in the 12 months prior to the survey (*2011 Youth Risk Behavior Survey*). About 1 in 5 women and nearly 1 in 7 men who ever experienced rape, physical violence, and/or stalking by an intimate partner, first experienced some form of partner violence between 11 and 17 years of age (*NIPSVS, 2010*). The number of persons experiencing dating violence is not listed in the CoC HUD PIT count.

### **Victims of Sexual Assault**

Sexual violence is sexual activity when consent is not obtained or freely given. It is a serious public health problem in the United States that profoundly impacts lifelong health, opportunity, and well-being. Anyone can experience or perpetrate sexual violence. The perpetrator of sexual violence is usually someone the survivor knows, such as a friend, current or former intimate partner, coworker, neighbor, or family member. Sexual violence can occur in person, online, or through technology, such as posting or sharing sexual pictures of someone without their consent, or non-consensual sexting.

The CDC estimates that over a lifetime, 1,886,000 (41.2%) Ohio women and 1,048,000 (24.7%) Ohio men will be the victim of sexual violence other than rape (*NIPSVS, 2010, Tables 7.1b and 7.2*). The number of persons experiencing sexual assault is not listed in the CoC HUD PIT count.

### **Victims of Stalking**

Stalking is a public health problem that affects millions of people in the United States. Stalking involves a perpetrator's use of a pattern of harassing or threatening tactics that are both unwanted and cause fear or safety concerns in a victim. Tactics can include following, harassing or threatening the victim repeatedly; telephoning and text messaging constantly; waiting on the victim outside or inside places; watching the victim from afar; or sending unwanted letters or emails.

Sexual violence affects millions of people each year in the United States. Researchers know the numbers underestimate this problem because many cases are unreported. While the number of persons experiencing stalking is not listed in the CoC HUD PIT count, a sense of the magnitude of the problem can be seen by reviewing state and national statistics by several agencies, including the National Intimate Partner and Sexual Violence Survey (NISVS) and the CDC.

The National Intimate Partner and Sexual Violence Survey (NISVS) reports that about 1 in 3 women and 1 in 6 men have been stalked at some point in their lives. While most women and men first experience being stalked as adults, approximately 24% of female victims and 19% of male victims reported being stalked as minors, with nearly 58% of female victims and 49% of male victims having experienced stalking before the age of 25. The CDC estimates that over a lifetime, 818,000 (17.9%) Ohio women will be the victim of stalking (NIPSVS, 2010, Table 7.3). The number of persons experiencing stalking is not listed in the CoC HUD PIT count.

### **Victims of Human Trafficking**

Human trafficking is a serious crime and a violation of human rights. It involves force, coercion, or fraud to exploit a person into slave labor or sexual exploitation, and can happen to people of all ages, genders, races, or religions. Cases have been reported in all 50 states, the territories of the United States, and the District of Columbia. There are two types of a severe form of trafficking in persons. The first type is known as *labor trafficking*, in which individuals are compelled to work or provide services. The second type is known as *sex trafficking*, in which individuals are compelled to engage in commercial sex. Both types employ the use of force, fraud, or coercion to control their victims. Women are often used for sexual exploitation, while men are usually used for forced labor. It is believed that one in five human trafficking victims are children, exploited for begging, child pornography, or child labor. There were 310 cases (2.61 per 100,000 persons) of human trafficking in Ohio in 2022 (WorldPopulationReview.com, Human Trafficking by State). The number of persons experiencing human trafficking is not listed in the CoC HUD PIT count.

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

#### **Definition:**

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

*(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 (iii) of the “At-risk of homelessness” definition established at 24 CFR 91.5:*

*(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 persons reside per room, as defined by the U.S. Census Bureau;*

*(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or*

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

### **Other Populations Requiring Services or Housing Assistance to Prevent Homelessness – Determining Size of Population and Demographic Composition**

Other populations refer to 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. Other populations can include the following types of populations:

#### **Persons With Previous Episodes of Homelessness**

One group that would qualify is persons with previous episodes of homelessness, primarily chronically homeless persons. A shelter usage study looking at persons with previous episodes of homelessness was undertaken at Case Western Reserve University’s Mandel School of Applied Social Sciences, Center on Urban Poverty and Community Development in 2009 using OHS’s HMIS



data. It found that about “5.5% stayed three or more times in shelter (usually emergency shelter) in a 3-year period.” Additionally, the OHS 2022 PIT count showed that 204 persons were chronically homeless. Of those persons, 184 persons were sheltered and 20 persons were unsheltered. Of the persons who were sheltered, 165 persons were chronically homeless persons in households without children and six persons were chronically homeless persons in households with at least one child. All 171 persons were at emergency shelters. There were 13 chronically homeless persons in households without children who were at transitional housing.

### **Youth Who Age Out of Foster Care**

Another group who would qualify is youth who age out of foster care. These persons are being released from a supervised housing setting and have little or no support system to fall back on. According to the Public Children Services Association of Ohio Factbook (published June 2021), in 2020 there were 152 youth who aged out of foster care and in 2021 there were 147 youth who aged out.

### **Persons Released from Physical Health Institutions**

While the number of persons being released from physical health institutions who would be at-risk of homelessness is not believed to be a major problem within East Cleveland, there are some exceptions. The persons most at-risk in this situation would be those who have lost employment during their hospital stay, do not have sufficient savings to pay ongoing housing and housing-related costs during their hospital stay, and do not have a support network of other persons to assist them through this period. The number of at-risk persons released from physical health institutions is not easily obtainable.

### **Persons Released from Mental Health Institutions**

While being treated for mental disabilities that require staying in an institutional setting, persons may be located in either a public or private facility. Upon release, it is the portion of this group in the public facilities that is more likely to be at-risk of homelessness. The Alcohol, Drug Addiction and Mental Health Services (ADAMHS) Board of Cuyahoga County develops additional housing units for persons that are part of the mental health system caseload. One of the groups specifically targeted for assistance through this program are persons being released from public mental health institutions who are returning to Cuyahoga County and are at-risk of homelessness. The number of at-risk persons released from mental health institutions is not easily obtainable.

### **Incarcerated Persons Eligible for Release**

The Cuyahoga County Office of Reentry, under the auspices of the Department of Health and Human Services, exists to create an organizational structure that supports reentry research, community education, and best practices in the delivery of services for re-entrants. The Office is designed to assist policy makers, community leaders, and service providers in identifying reentry challenges and convening such entities to work together to target resources and comprehensive and cost-effective solutions. Incarcerated persons eligible for release is also a group that is more likely to be at-risk of homelessness, because not only do they have little income, they also have a much more difficult time obtaining employment or housing due to the incarceration. The Cuyahoga County Office of Re-entry showed that there were approximately 6,000 to 7,000 incarcerated persons eligible for release in Cuyahoga County annually.

## **Other Populations at Greatest Risk of Housing Instability – Determining Size of Population and Demographic Composition**

Being low income, which HUD defines as having an annual income that is less than or equal to 50% of the MFI, **AND** having one or more factors that put individuals and families with children at-risk of homelessness, puts them at the greatest risk of housing instability.

The 2013-2017 ACS data from the CPD Maps Reports showed that in East Cleveland, 4,810 households (58% of all households) had an income that was below 50% of the MFI. Household types that were most likely to have low incomes included small family households (1,130 households) and elderly households (1,575 households).

The factors that put individuals and families with children at-risk of homelessness include:

Individuals and families with children who have moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance. The number of at-risk individuals and families with children who have moved because of economic reasons two or more times is not easily obtainable;

Individuals and families with children who are living in the home of another person because of economic hardship (doubling-up). The number of at-risk individuals and families with children who are “doubled-up can be estimated using poverty figures released by the National Alliance to End Homelessness, who estimated that 16% of persons in poverty (12,445 persons) were doubled-up in Cuyahoga County;

Individuals and families with children who have 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. According to the Eviction Lab at Princeton University, there have been 13,957 evictions filed in Cuyahoga County since March 2020. In East Cleveland, there were 535 eviction filings in 2022 (The Legal Aid Society of Cleveland, from East Cleveland Municipal Court records), putting those individuals and families with children at-risk of homelessness;

Individuals and families with children who live 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 persons. The number of at-risk individuals and families with children who live in a hotel or motel is not easily obtainable;

Individuals and families with children living in a single-room occupancy or efficiency apartment units in which there resides greater than 1.5 persons per room (severe overcrowding). The number of at-risk individuals and families with children who live in single-room occupancy or efficiency apartment units that are severely overcrowded is not easily obtainable by unit size, however severe overcrowding in housing units in East Cleveland is not a significantly issue generally;

Individuals and families with children who are exiting a publicly funded institution, including a: health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution. The number of at-risk individuals and families with children who are exiting a health-care facility or a mental health facility is not easily obtainable. The number of at-risk individuals and families with children who are exiting foster care or other youth facility, according to the *Public Children Services Association of Ohio Factbook*, showed that in Cuyahoga County in 2020 there were 152 youth who aged out of foster care and 147 youth who aged out 2021. The

number of at-risk individuals and individuals in families with children in Cuyahoga County who are exiting a correction program or institution is estimated by the Cuyahoga County Office of Re-entry to be approximately 6,000 to 7,000 incarcerated persons eligible for release annually; **OR**

Individuals and families with children who live in housing that has characteristics associated with instability and an increased risk of homelessness, such as at-risk individuals and families with children who were below the poverty rate; persons living in substandard or condemned housing or moderately overcrowded conditions; renters or owners whose housing was in mortgage foreclosure; housing insecure disabled persons; persons without health insurance; young, single parent, female-headed households; older adults with low or extremely low incomes; recent immigrants; or socially isolated persons without any support systems.

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

In Cuyahoga County, the extensive network of public, private, and non-profit agencies that comprise the Cleveland/Cuyahoga County Continuum of Care (CoC) work in concert to meet the needs of homeless persons, actively promoting an approach that focuses on preventing and ending homelessness and rapidly returning people who have become homeless to housing. The network includes providers of housing and supportive services for the homeless, as well as governmental departments and area non-profit agencies that provide services and link persons to mainstream benefits, helping the homeless to find, and retain, housing.

**CURRENT HOUSING RESOURCES AVAILABLE**

In Cuyahoga County, Emergency Housing facilities (congregate shelter units) for persons experiencing a housing crisis include emergency shelters, Temporary Housing, and Veteran Grant and Per Diem programs. Permanent housing options (non-congregate shelter units) include Safe Havens, Rapid Re-Housing (RRH), and Permanent Supportive Housing (PSH), as well as Public Housing and Housing Choice Vouchers. The CoC supports a continuum of housing and services to homeless individuals and families throughout Cuyahoga County. Shelter resources are physically located in the City of Cleveland. Permanent housing is available throughout the county. This inventory is shown on ***Attachment 2 - HUD 2022 Continuum of Care Homeless Assistance Programs, Housing Inventory Count Report (HIC)*** and includes bed counts for the following facility types:

***Emergency Shelter***, as defined by HUD, is “any facility, the primary purpose of which, is to provide a temporary shelter for the homeless in general or for specific populations of the homeless, and which does not require occupants to sign leases or occupancy agreements.”

The 2022 HIC shows there are 26 emergency shelter facilities with 1,563 total year-round beds, of which 85 are seasonal beds and 151 are overflow beds. Of these 1,563 beds, six are for Veterans and 61 are for Youth. The inventory includes three facilities for families with 60 family units (231 beds and 16 overflow beds); two mixed population facilities with 35 family units (116 beds) and 41 beds for adult-only individuals; 14 facilities for adult-only individuals (918 beds); and three facilities for child-only individuals (21 beds).

**Transitional Housing**, as defined by HUD, is “a project that is designed to provide housing and appropriate supportive services to homeless individuals and families to facilitate movement to independent living within 24 months, or a longer period provided by HUD.” The HEARTH Act (2009) has re-directed funding and policy away from a 24-month “transitional housing” approach. CoCs were encouraged to re-allocate CoC funding away from transitional housing toward permanent housing options like Rapid Re-Housing and Permanent Supportive Housing.

The 2022 HIC shows there are seven transitional housing facilities with a total of 93 beds, of which 68 beds are for Veterans and 20 beds are for Youth. The inventory includes one mixed population facility with five family units (10 beds), 8 beds for adult-only individuals, and 7 beds for child-only individuals, as well as six facilities for adult-only individuals (68 beds).

There are three **Safe Haven** facilities for adult-only individuals with a total of 45 beds, 25 of which are for Veterans.

**Permanent Supportive Housing**, as defined by HUD, is “permanent housing in which supportive services are provided to assist homeless individuals and families with a disability to live independently.”

The 2022 HIC shows there are 28 **Permanent Supportive Housing** facilities with a total of 5,559 beds, of which 858 beds are for chronically homeless, 636 beds are for Veterans, and four beds are for Youth. The inventory includes one facility with 19 family units (72 beds); 15 mixed population facilities with 676 family units (2,365 beds) and 1,870 beds for adult-only individuals; and 12 facilities for adult-only individuals (1,252 beds).

There are also eleven **Rapid Re-housing facilities** with a total of 824 beds, of which 84 beds are for Veterans and 71 beds are for Youth. The inventory includes eight mixed population facilities with 187 family units (607 beds) and eight facilities for adult-only individuals (212 beds). There is one facility that is just for adult-only individuals (5 beds).

**HOME Tenant-Based Rental Assistance (TBRA)**, permits jurisdictions to create flexible programs that provide assistance to individual households to help them afford the cost of market-rate housing. Depending on the program, assistance can range from the initial rental deposit on an apartment to one or more monthly rental payments and/or utility payments. This program was employed by East Cleveland during the Covid 19 Pandemic, and was successful in ensuring that income eligible households did not lose their housing.

**Public Housing** and the Housing Choice Voucher Program provide an affordable housing choice to extremely low-income families, the elderly, and persons with disabilities living in East Cleveland. While the Cuyahoga Metropolitan Housing Authority (CMHA) manages numerous public housing units in Cleveland, Aphorp Tower, with 163 units for extremely low-income elderly residents, is the only public housing development located in East Cleveland. CMHA has a maintenance and improvement plan for its facilities, including Aphorp Tower, and allocates funds on an ongoing basis to accomplish those tasks.

The Parma Public Housing Agency (PPHA) sold the 60-unit Chevybrook Estates, located in Parma, that it once owned and managed. According to the Agency’s most recent Annual Plan, the PPHA identified the development of two programs for the use of proceeds of the funds from the sale. These programs are in compliance with section 18(a) (5) of the 1937 Act and 24 CFR 970.19(c) and 24CFR 970.19(e). The programs are the *Security Deposit Assistance Program*, which will be developed/implemented and administered for Housing Choice Voucher/Section 8 participant families with children to move to areas with less than a 10% poverty rate in Cuyahoga County and the *Home Purchase Down Payment*

*Assistance Program* for Family Self Sufficiency Families, where the agency will assist in the down payment and closing costs associated with the home loan.

CMHA and PPHA administer both HUD’s Project-Based Voucher Program and Housing Choice Voucher Program. The Project-Based Voucher Program’s housing vouchers go with the individual property that is being rented. HUD states that “the Housing Choice Voucher Program is the federal government's major program for assisting extremely low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments.” As of January, 2021, there were about 622 Housing Choice Vouchers in use by eligible families throughout East Cleveland.

**Market rate rental housing** is available in East Cleveland in a wide range of styles and prices. Compared to rental rates in other parts of the country, rates in East Cleveland are less expensive, however they are still unattainable for many households with extremely low incomes. Additionally, housing costs for both owners and renters went up substantially during and after the Covid 19 Pandemic, adding heightened pressure for the availability of affordable housing.

The *2013-2017 ACS* showed that there were 13,398 housing units in East Cleveland, 62% of which were occupied. Of the occupied units, 5,442 units were rental units. The *2013-2017 ACS* also showed that the median contract rent for renter-occupied units in East Cleveland was \$491, while over 3,300 households had incomes that were 0-30% HAMFI, which currently is \$25,600 for a family of four. Of all of the rental housing units available in East Cleveland, only 1,225 rental housing units were deemed affordable to households with incomes of 0-30% HAMFI (HUD Area Median Family Income), illustrating the enormous gap that exists between extremely low-income households and the availability of affordable housing. Therefore, without some type of assistance, it is unlikely that households with very low incomes can afford market rate housing.

## **CURRENT SERVICE RESOURCES AVAILABLE**

HUD defines mainstream benefits and services as services that “consist of a wide variety of publicly funded services, programs, and entitlements for low-income people that address basic needs, including, but not limited to, income and employment, housing, food and nutrition, health and behavioral health services, child welfare, and transportation.”

In Cuyahoga County, benefits and services are provided through numerous state, county, and local governmental departments, and include services such as health care, mental health and chemical dependency treatment and counseling, early childhood and youth services, and educational assistance and employment services. Additionally, homeless housing providers work diligently to ensure that clients are aware of, and enrolled in, all applicable mainstream benefits, such as Temporary Assistance to Needy Families (TANF), food stamps, WIC, and income through Social Security.

The following services and facilities meet the needs of homeless individuals and families, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

**Homeless Funding:** The CoC receives and allocates approximately \$33 million in Continuum of Care (CoC) funds and \$2.4 million in Emergency Solution Grants (ESG) annually. Additionally, the CoC actively pursues all applicable grant funding from government entities and foundations.

**Housing:** The CoC provides access to shelter and housing options. For homeless persons, the CoC is committed to a Housing First approach, which is an evidence-based practice to quickly and successfully connect individuals and families experiencing homelessness to housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements (National Alliance to End Homelessness).

Shelter access and housing options include:

- *Coordinated Entry:* instituted to provide better housing options than entering shelter, when possible, by redirecting households to alternative housing options, providing short-term cash assistance, and if diversion is not possible, referring to appropriate shelter.
- *Emergency Shelter:* 26 facilities, with 1,563 total beds, of which 151 are overflow beds, that provide emergency shelter until a more permanent housing solution can be found.
- *Transitional Housing:* Seven facilities, with 93 total beds that provide transitional housing for a longer time period, link clients to mainstream benefits, other social services, and housing resources. Transitional Housing beds in the CoC are all provided through the Veteran Administration (VA) Grant and Per Diem (GPD) Program. The VA is a co-leader on the “Ending Veteran Homelessness” Work Group. While GPD beds technically are listed as TH, the VA has aligned the GPD program with the CoC and U.S. Interagency Council on Homelessness objectives of “housing first” and rapid exit. Over the past 3 years, the VA has established different “types” of GPD beds within the broad GPD category that are defined by lengths of time, and have encouraged providers to shift their programs to the shorter term and rapid exit focus. All of this work is to align with the benchmark measure of linking veterans with permanent housing within 90 days.
- *Safe Haven:* Three facilities, with 45 total beds.
- *Permanent Supportive Housing:* 28 facilities, with 5,559 total beds that provide permanent supportive housing.
- *Rapid Re-housing Projects:* Eleven facilities, with 824 beds.
- *Public Housing:* Cuyahoga Metropolitan Housing Authority (CMHA) and Parma Public Housing Agency (PPHA). CMHA manages numerous affordable rental housing units for extremely low-income individuals and families. Both CMHA and PPHA offer tenant-based assistance, as well as Housing Choice Vouchers, which can be used anywhere in the area.

**Health/Mental Health Care/Substance Abuse Counseling & Treatment:** Provide free/low-cost health/mental health care/substance counseling & treatment: Care Alliance, MetroHealth Hospital, Circle Health Clinic, Murtis Taylor Human Services System, FrontLine Service, Alcohol Drug Addiction and Mental Health Services Board of Cuyahoga County.

**Transportation:** Provides free trolleys in downtown Cleveland; bus/rapid transit passes throughout county: Greater Cleveland Regional Transit Authority.

**Income Assistance:** Provides links to mainstream benefits: Cuyahoga County Department of Employment & Family Services.

**Educational Opportunities/Job Training:** Provides GED classes, education, employment classes and training: Cuyahoga Community College, area high schools, Cuyahoga County Work & Training, Employment Connection, Ohio Bureau of Vocational Rehabilitation, Towards Employment, City of Cleveland Division of Workforce Development.

**Food and Nutrition:** Provides food, free meals, and other food assistance: Cleveland Food Bank, Hunger Network of Greater Cleveland, local hunger centers, area churches.

**Legal Aid/Mediation:** Provides free or low-cost legal assistance: Cleveland Homeless Legal Assistance Program, Legal Aid Society of Cleveland, Cleveland Mediation Center, Cuyahoga County Bar Association.

**Homeless Advocacy:** Advocates for the rights of the homeless: Northeast Ohio Coalition for the Homeless (NEOCH), Coalition for Housing and Homelessness in Ohio (COHHIO).

**Veterans Services:** Provides various services for veterans: U.S. Department of Veterans Affairs, Louis Stokes Cleveland VA Medical Center, Veterans Service Commission, Veterans Upward Bound Program, Disabled American Veterans. Examples of other facilities and services include: Supportive Services for Veterans Families (SSVF): This program was introduced by the Veterans Administration (VA) and funded directly by the VA through grant(s) awarded to communities to prevent veteran homelessness, and to rapidly re-house veterans who are homeless. In Cuyahoga County, two agencies are funded: FrontLine Service and the Volunteers of America (VOA). These efforts are fundamental to the Ending Veteran Homelessness initiative.

*VA Community Referral and Resource Center (CRRC):* The VA has awarded funds competitively to establish CRRCs throughout the country, including one in Cleveland. The CRRC is operated by the VA in the community, essentially as a drop-in center for veterans to access information and resources.

*Domiciliary:* This facility, an adjunct to the VA Medical center, functions as a “step down” from the VA hospital for people who need ongoing mental health and substance abuse treatment/recovery support.

### **Organizations That Provide Referrals for Assistance**

There are many organizations in Cuyahoga County that provide referrals to persons in need on an on-going basis, both in terms of housing referrals and social services, such as emergency food, clothing, and free meals. These organizations include local government agencies, faith-based groups, and non-profit organizations.

***Describe the unmet housing and service needs of qualifying populations:***

East Cleveland’s Five-Year Consolidated Plan, which examined both housing needs assessment data and the housing market analysis of available units clearly indicated that the number, condition, and expense of available housing units do not meet the needs of extremely low or low-income residents living in the East Cleveland. For homeless persons or those at-risk of homelessness, the most significant problem remains the lack of housing that individuals and families with children can afford.

***Homeless as defined in 24 CFR 91.5***

**Housing**

Because the most immediate need for individuals and families with children who are homeless is for at least temporary shelter (congregate or non-congregate), there is a need for additional shelter space, as well as physical improvements to existing shelters.

For homeless persons, the CoC is committed to a Housing First approach, which is an evidence-based practice to quickly and successfully connect individuals and families experiencing homelessness to housing without preconditions and barriers to entry, The goal is the creation of additional Permanent Supportive Housing, that will provide the stability of permanent housing with supportive services for those who need it. Additionally, as existing PSH units age, maintenance and repair needs will need to be addressed.

**Services**

There is a need for physical and mental health care, counseling, substance abuse counseling, food assistance, and transportation assistance such as bus and rapid transit passes.

***At-Risk of Homelessness as defined in 24 CFR 91.5***

**Housing**

For those at-risk of homelessness, funding is needed to ensure that those individuals and families with children who are housed remain in their housing by providing rental assistance and utility payment assistance. It is also important to work to expand the number of affordable housing units that are in good condition, particularly rental units, so that more individuals and families with children can obtain housing that they can afford.

**Services**

There is a need for physical and mental health care, counseling, substance abuse counseling, food assistance, transportation assistance such as bus and rapid transit passes, and educational and job training.

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

An incident of intimate partner violence frequently results in a sudden loss of housing, because the survivors (and sometimes their children) need to leave a home quickly in an emergency in an attempt



to find safety. Sometimes they are evicted because of property damage caused by the abuser. Sometimes they cannot afford private housing because they have limited or no income.

### **Housing**

A survivor of domestic violence may need safety, health care, housing, money, transportation and support to escape the abuse. Emergency shelters temporarily meet housing needs, as well as provide support services. Survivors of DV who seek emergency shelter through Coordinated Entry are assisted to access a DV shelter. If space is not available in a DV specific shelter, DV survivors are referred to safe and secure shelter in a confidential shelter location and linked with a DV services provider immediately to develop a safety plan and legal protection if needed. Additional DV housing is needed to meet the increasing issue of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and Human Trafficking.

For the next step, affordable housing is needed to assist survivors of domestic violence (and their children) to stabilize their situation by providing rental assistance and utility payment assistance. It is also important to work to expand the number of affordable housing units that are in good condition, particularly rental units, so that more individuals and families with children can obtain housing that they can afford.

### **Services**

There is a need for physical and mental health care, counseling, substance abuse counseling, food assistance, transportation assistance such as bus and rapid transit passes, and educational and job training. Legal assistance is available through the Legal Aid Society of Cleveland. Financial help with housing is available through the Crime Victim Compensation Fund, Temporary Assistance for Needy Families, and the Homeless Prevention and Rapid Rehousing Program. Cuyahoga County, in partnership with the City of Cleveland, recently opened the new Family Justice Center, a one-stop center for victims of domestic violence, sexual assault, child abuse, elder abuse and stalking.

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

#### **Housing**

For those at-risk of homelessness, funding is needed to ensure that those individuals and families with children who are housed remain in their housing by providing rental assistance and utility payment assistance. It is also important to work to expand the number of affordable housing units that are in good condition, particularly rental units, so that more individuals and families with children can obtain housing that they can afford.

#### **Services**

There is a need for physical and mental health care, counseling, substance abuse counseling, food assistance, transportation assistance such as bus and rapid transit passes, and educational and job training.

***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

#### **Unmet Shelter and Housing Inventory Gaps**

There is a need for affordable housing units for all four types of populations. Additionally, there is a need for non-congregate shelters and housing, particularly for women who are survivors of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and Human Trafficking where they can be safe, secure, and provided with needed services.

Since the start of the pandemic, there have been increasing difficulties encountered in protecting the health of individuals and families in the wake of contagious diseases. There is now the realization that there is a need for more non-congregate shelters for all populations in case there are health issues in the future.

There is a need for shelters that are accepting of/can accommodate the needs of persons with severe mental illness, who need more extensive support services; shelters for couples, families, and multi-generational families; shelters for persons with disabilities and the medically fragile, who may need different types of support services; and shelters that allow pets, since many people who are homeless can't abandon their pets (and sometimes their closest companion) to an unknown fate, as a trade-off for permission to stay in a shelter.

#### **Unmet Service Delivery Gaps**

Additional funding is needed for food assistance; physical and mental health care; counseling; mental health counseling; substance abuse counseling; transportation assistance, such as bus and rapid transit passes; legal assistance, and education and job training.

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:***

No other information is being added to further refine the definition of Qualifying Population 4 (Other Populations - Persons At Greatest Risk of Housing Instability).

***Identify priority needs for qualifying populations:***

Qualifying Population 1:

Homeless Persons

A priority need of those experiencing homelessness in the Continuum of Care is expansion and renovation of **shelter** facilities, which serve all residents countywide. The facilities are available to serve all Cuyahoga County residents, including residents of East Cleveland. This need has been identified through stakeholder meetings, discussions at the Cleveland/Cuyahoga County Office of Homeless Services Advisory Board, CoC report submissions to HUD, and the Cuyahoga County Department of

Health and Human Services, 2022 RFP, *Alternative Housing and Related Services and Supports*, which included the intention of soliciting “innovative solutions that increase and/or improve shelters.” The lack of capacity at the existing adult women’s shelter, Norma Herr Women’s Center, was specifically noted in the RFP.

#### Qualifying Population 2:

##### Persons At-Risk of Homelessness

In suburban communities, there is more of a priority need to address at-risk of homelessness than literal homelessness. The City of East Cleveland intends to prioritize persons and households that are at-risk of homelessness, in order to prevent those persons and households from becoming homeless and placing more demands on the Continuum of Care system. HOME-ARP funds will be used to **develop affordable rental housing**, provide **supportive services**, and create a **tenant based rental assistance (TBRA)** program to allow households to address rent arrearage while regaining stability.

#### Qualifying Population 3:

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

Persons in this category often experience sudden loss of housing, creating a need for multiple services quickly. Most of the persons in this category are women. The expansion of the adult women’s **shelter** in Cleveland, serving all residents countywide including East Cleveland residents, will assist in meeting a priority need. Once in a shelter setting, existing supportive services are available.

#### Qualifying Population 4:

##### Persons At Greatest Risk of Housing Instability

Data in the Needs Assessment and Gaps Analysis shows an issue in a number of first-ring suburbs, such as East Cleveland, concerning renter households with housing instability resulting from extremely low income or low income households that are cost burdened or extremely cost burdened. Renter households at lower income levels that are paying more than 30%, or more than 50%, of their income on housing costs are in an unstable housing situation and may not be current on rent. In addition, situations such as job loss or unexpected major expenses can cause households to fall behind on rent. HOME-ARP funds will be used to **develop affordable rental housing**, provide **supportive services**, and create a **tenant based rental assistance (TBRA)** program to allow households to address rent arrearage while regaining stability.

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

A variety of local, state, and national data sources from public agencies and nonprofit/private organizations were analyzed to identify the characteristics of the shelter and housing inventory and

service delivery systems, along with current needs and gaps. Sources such as the consultation process were also utilized to ensure that the quantitative and qualitative information aligned in order to select appropriate activities on which to expend HOME-ARP funds.

## HOME-ARP Activities

***Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:***

For all three categories of activities listed below, the City of East Cleveland intends to use an RFP process to identify qualified providers to implement the projects. The City of East Cleveland will follow its existing contracting authority regulations to award contracts.

The City of East Cleveland intends to implement projects in three categories:

### Development of Affordable Rental Housing

The City will use HOME-ARP funds to contribute to the financing package of a multi-family rehabilitation or new construction project that would create long-term affordable housing units. Over time, there could be one or more projects implemented. No properties or project partners have been identified as of March 2023.

### Supportive Services

The City will partner with organizations and/or agencies to provide supportive services to households and persons from the service types listed in HUD Notice 21-10. Over time, there may be multiple projects implemented. No services or providers have been identified as of March 2023.

### Tenant Based Rental Assistance (TBRA)

The City will partner with one organization or agency to develop a program to provide a one-time payment to a household to pay up to six months of rent arrearage. The payment program may also include a limited number of future rent payments, while the household regains stability. No provider has been identified as of March 2023.

***Describe whether the Participating Jurisdiction (PJ) will administer eligible activities directly:***

### Development of Affordable Rental Housing

No.

### Supportive Services

Yes. Providers will be sub-grantees.

### Tenant Based Rental Assistance (TBRA)

No.

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

No portion of the HOME-ARP administrative funds will be provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan.

*In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.*

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 100,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 400,000		
Development of Affordable Rental Housing	\$ 300,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 111,984	12 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 911,984</b>		

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

A resident of East Cleveland can utilize the services and facilities administered by the service providers of the Cleveland/Cuyahoga County Continuum of Care if he/she becomes homeless. The City of East Cleveland will prioritize persons and households that are at-risk of homelessness, in order to prevent those persons and households from becoming homeless and placing more demand on the Continuum of Care system.

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

The community has a significant number of renter households that are extremely low income or low income that are cost burdened or extremely cost burdened, as shown in the Needs Assessment and Gaps Analysis. Renter households at lower income levels that are paying more than 30%, or more than 50%, of their income on housing costs are in an unstable housing situation and may not be current on rent. In addition, situations such as job loss or unexpected major expenses can cause households to fall behind on rent.

The HOME-ARP funds can be used to create a flexible **TBRA** fund to allow households to address rent arrearage while regaining stability.

The range of eligible **supportive services** is broad and can be utilized to address various issues such as, but not limited to, legal, employment, transportation, and income benefit program issues. The City of East Cleveland has also identified an issue with persons living outside or in abandoned buildings, and seeks to work with the Office of Homeless Services and the Continuum of Care to link persons with Coordinated Entry to provide shelter and supportive services.

New **affordable housing units** (rehabilitation or new construction) will provide a long-term solution for some households.

## HOME-ARP Production Housing Goals

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

### Development of Affordable Rental Housing

15 estimated units created.

Contribution toward rehabilitation or new construction equal to \$20,000 per unit.

### Supportive Services

100 estimated persons assisted

This item is difficult to estimate because the cost of different types of services can vary widely. A budget of \$100,000, and an estimated cost of service of \$1,000 per person, results in assisting about 100 persons.

### Tenant Based Rental Assistance (TBRA)

65-75 estimated households to be supported

CARES ACT TBRA program, administered by CHN Partners:

106 East Cleveland households assisted, average payment of \$5,350.

$\$5,350 \text{ average payment} / \$400,000 = 75 \text{ estimated households}$  (total will be lower after subtracting the provider's administration fee). Example: 10% overhead (\$40,000), would reduce the estimated households to be assisted to 67.

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

The City would use HOME-ARP funds to contribute to the financing package of one or more multi-family rehabilitation or new construction projects that would create long-term affordable housing units. Households at-risk of homelessness would have a more stable housing situation.



## Preferences

A preference provides a priority for the selection of applicants who fall into a specific Qualifying Population (QP) or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC Coordinated Entry (CE) as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a Participating Jurisdiction (PJ) is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).

- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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

Affordable Housing, Supportive Services, and Tenant Based Rental Assistance:

The City of East Cleveland does not intend to identify any preferences.

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

Affordable Housing, Supportive Services, and Tenant Based Rental Assistance:

The City of East Cleveland does not intend to identify any preferences.

## Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page 10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

***Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):***

Affordable Housing, Supportive Services, and Tenant Based Rental Assistance:

The City of East Cleveland does not intend to identify a referral method.

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

Affordable Housing, Supportive Services, and Tenant Based Rental Assistance:

The City of East Cleveland does not intend to identify a referral method.

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

Affordable Housing, Supportive Services, and Tenant Based Rental Assistance:

The City of East Cleveland does not intend to identify a referral method.

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

Affordable Housing, Supportive Services, and Tenant Based Rental Assistance:

The City of East Cleveland does not intend to identify a referral method.

### **Limitations in a HOME-ARP rental housing or NCS project**

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap

identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.

- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

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

Affordable Housing, Supportive Services, and Tenant Based Rental Assistance:

The City of East Cleveland does not intend to limit eligibility for a HOME-ARP rental housing project.

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

Not applicable.

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

Not applicable.