



Franklin County
Board of Commissioners

**ECONOMIC DEVELOPMENT
& PLANNING**

HOME-ARP Allocation Plan

Franklin County Department of
Economic Development & Planning

150 S Front St #10
Columbus, OH 42315

Table of Contents

Introduction.....	3
Consultation	3
Summary of Consultation Process Including Methods Used and Dates of Consultation.....	3
Public Participation.....	12
Public Participation Process	12
Efforts to Broaden Public Participation	12
Summary of Comments and Recommendations in Public Participation Process	12
Summary of Comments and Recommendations Not Accepted.....	14
Needs Assessment and Gap Analysis	14
Size and Demographic Composition of Qualifying Populations in Franklin County.....	14
Current Resources Available to Assist Qualifying Populations.....	16
Unmet housing and service needs of qualifying populations	19
Gaps in Current Shelter, Housing Inventory and Service Delivery	20
Additional Characteristics Associated with Instability and Increased risk of Homelessness	21
Priority Needs for Qualifying Populations	21
Determination of Level of Need and Gaps in Shelter, Housing and Services.....	21
HOME-ARP Activities	21
Method of Solicitation.....	21
Administration of Eligible Activities.....	22
Use of HOME-ARP Funding.....	22
Distribution of Funds in Accordance with Priority Needs	22
Rationale of Plan to Fund Eligible Activities	22
HOME-ARP Production Housing Goals	23
Estimated Affordable Rental Housing Units	23
Production Goals and Priority Needs	23
Preferences.....	23
Implementation of Limits to Eligibility	23
HOME-ARP Refinancing Guidelines	23
Appendix A HOME-ARP Communication Materials.....	24
Appendix B HOME-ARP Survey	27

Introduction

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

To address the critical need for homelessness assistance and supportive services across the country, Congress appropriated \$5 billion in ARPA funds to be administered by the U.S. Department of Housing and Urban Development (HUD) through the HOME Investment Partnerships program to carry out activities that **must primarily benefit qualifying individuals and families** who are homeless, at risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other vulnerable populations as defined by HUD.

HOME-ARP funds can be used for four the **eligible activities** of (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services, and (4) acquisition and development of non-congregate shelter units.

As a HOME program participating jurisdiction (PJ), Franklin County received \$3,158,302 to benefit our community's qualifying populations. The Allocation Plan describes the County's intended use and distribution of the HOME-ARP funds and identifies any preferences for eligible activities as required in [HUD Notice CPD-21-10](#). The development of the HOME-ARP Allocation Plan has been informed through stakeholder consultation and community engagement.

Consultation

Summary of Consultation Process Including Methods Used and Dates of Consultation

Franklin County's Office of Economic Development and Planning consulted with a wide range of housing services providers including all required agencies and service providers listed in CPD-21-10. This cumulative contact list included **110 local housing and service provider agencies**, including but not limited to members of the City of Columbus and Franklin County Continuum of Care (CoC), homeless service providers, domestic violence, dating violence, sexual assault, stalking, or human trafficking service providers, veteran's groups, the public housing agency serving the County's geographic area (Columbus Metropolitan Housing Authority), public agencies that address the needs of the qualifying populations, and both public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

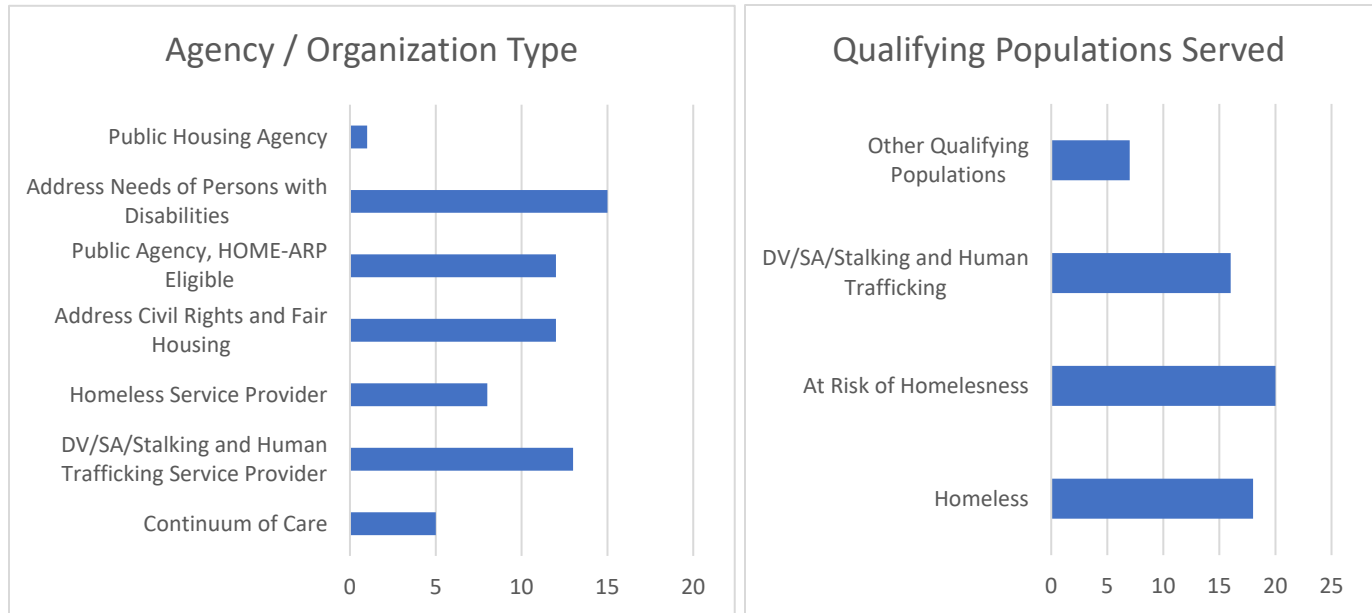
All of those included in the consultation contact list were invited to participate in both the HOME-ARP online survey and the virtual stakeholder input meeting. Franklin County's community development administrator emailed the contact list on four occasions leading into, during and after the open survey period and virtual meeting. Examples of these email communications are included within as Appendix A HOME-ARP Communication Materials. Any responses, questions or comments were quickly responded to by the Franklin County staff.

SURVEY

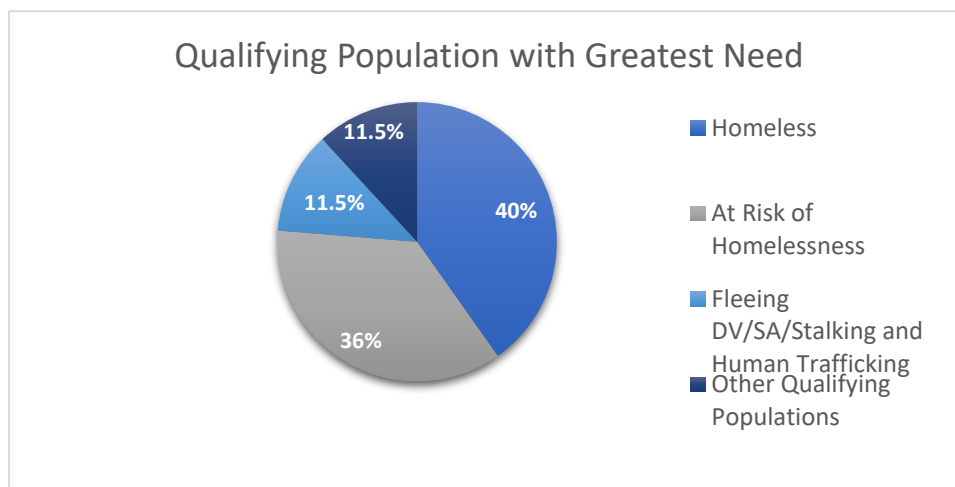
The Franklin County HOME-ARP survey was open for the three-week period of Monday December 12th through Friday December 30th, 2022. **The survey was sent to the complete consultation contact list and was completed by 26 stakeholders from 22 distinct organizations and agencies.** Respondents completed 11 required questions, followed by two optional open-ended questions and the option to upload community data sets or reports to

support the HOME-ARP planning process. The complete survey is included within as Appendix B HOME-ARP Survey.

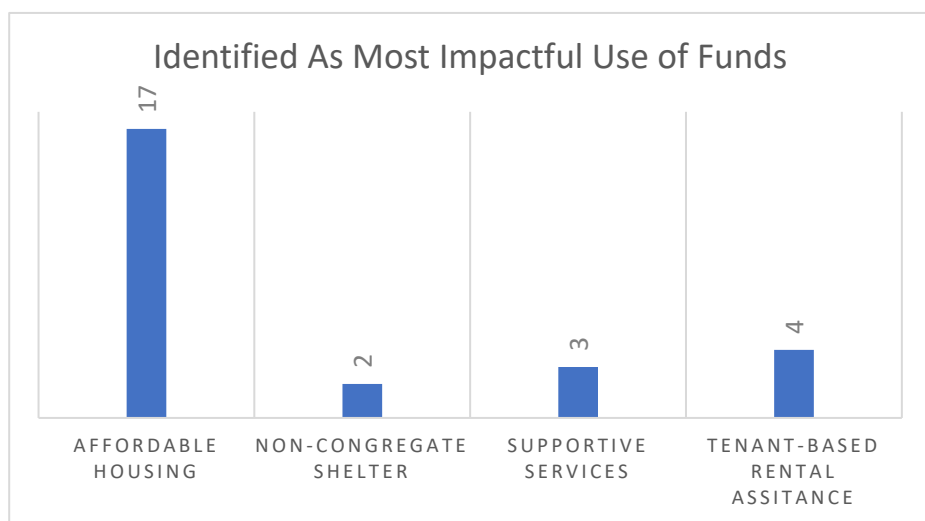
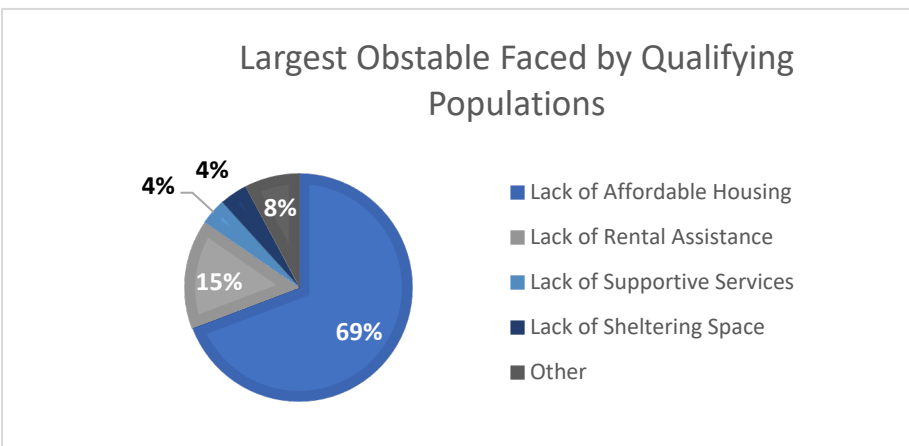
The initial four questions of the survey collected the name, agency or organization, position title, and contact information of respondents. These initial questions ensured each respondent was part of the intended survey stakeholder group. The next set of questions provided important information on the respondent's organizations and the clients they serve. The respondents represented all of the HUD required stakeholder groups and served all of the qualifying populations. As shown below, agencies / organizations that work with those experiencing homelessness and those at risk of homelessness were represented the most in the survey responses.



Respondents were instructed to identify which of the qualifying populations have the current highest level of need in the County. They were instructed to select only one qualifying population of the four eligible under HUD's requirements. As shown in the graph below, most respondents, **39%, chose those currently experiencing homelessness as the population in greatest need**, this was closely followed by those at risk of homelessness, 35%. Other qualifying populations and those fleeing or attempting to flee domestic violence, sexual assault, stalking and human trafficking were both chosen by 11.5% of respondents. Lastly the remaining respondents chose other populations who need supportive services for homelessness prevention.



The vast majority of respondents identified **lack of affordable housing as the largest obstacle for their clients**, followed by lack of rental assistance and then supportive services. Respondents that identified “other” as their selection commented that all options presented are equal and lack of access to “Housing First” model housing due to ongoing active substance use, issues with identification, open court cases, etc.



Respondents heavily favored the **creation of affordable house as the most impactful use of funding**. This data point supports the above-mentioned obstacle that community members in the County are facing of lack of affordable housing. The survey results show that affordable housing was followed by tenant-based rental assistance, supportive services and non-congregate shelter respectively.

In addition to the data provided above, survey respondents were given the option to reply to the two open ended questions; “What are your ideas for housing projects?”, and “How can the County ensure impactful use of funds?”. The responses to the open-ended questions have been integrated into the [List of Organizations Consulted, Method of Consultation and Summarized Survey Feedback](#) section.

VIRTUAL STAKEHOLDER ENGAGEMENT MEETING

Franklin County hosted a virtual stakeholder engagement meeting on December 21st, 2022. This meeting was **attended by 15 stakeholders representing 15 distinct agencies and organizations**. The goals of the stakeholder meeting were to bring together housing services stakeholders to discuss HOME-ARP funding, request data and input on current housing needs and ensure that the Franklin County community receives the most possible benefit from the funding allocated. The Franklin County team reviewed the stakeholders invited, introduced the HOME-ARP funding source, qualified populations, eligible activities and the allocation plan timeline.

Stakeholders in the meeting were encouraged to complete the HOME-ARP survey, provide data to support the allocation plan and to stay engaged in the planning process. The Franklin County staff provided their contact information and stated their intentions to reach out to all stakeholders again to participate in the public comment period planned for February 2023.

Franklin County, Ohio
HOME-ARP Allocation Plan

LIST OF ORGANIZATIONS CONSULTED, METHOD OF CONSULTATION AND SUMMARIZED SURVEY FEEDBACK

The County has organized consultation outcomes by respondent organization or agency below, including all responses to the open-ended questions from survey responses.

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Summarized Feedback
ADAMH Board of Franklin Co.	Columbus/Franklin County Continuum of Care (CoC) board member	Franklin Co. residents in need of behavioral health services	Survey, Stakeholder Engagement Session	Identified most impactful use of funds as production or preservation of affordable housing. Attended the virtual stakeholder engagement session. Highlighted that there is insufficient housing stock for those at or below 30% AMI. Stakeholder suggested understanding what is already available and working in the community is essential so that there is not unnecessary duplication.
Advocating Opportunity	Public or private organization that addresses civil rights and fair housing	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey	Identified most impactful use of funds as production or preservation of affordable housing. Commented that the reason for the increased homelessness population in Columbus is a direct result of housing that prices out lower income individuals and families. Shared that is difficult to refer trafficking survivors in need of housing to shelters when they are full.
Affordable Housing Trust Corporation	Columbus/Franklin County Continuum of Care (CoC) board member	Homeless individuals/families, individuals/families at risk of homelessness, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey	Identified most impactful use of funding as production or preservation of affordable housing. Commented that the lack of available rental units is the largest issue. Suggested funding existing LIHTC allocations that need assistance with filling gaps due to increased interest rates and increased construction costs.
Alvis, Inc.	Public or private organization that addresses the needs of persons with disabilities	Individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey	Identified most impactful use of funds as production or preservation of affordable housing. Alvis shared that transitional housing would be a beneficial use of funds to allow individuals to maintain sobriety, employment, and eventually independent living.
Bhutanese Community of Central Ohio	Domestic violence service provider, Franklin County/Columbus Continuum of Care (CoC) member, Homeless service provider Public or private organization that addresses civil rights and fair housing, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, veterans and/or families who qualify in any of the above categories	Survey, Stakeholder Engagement Session	Identified most impactful use of funds as tenant-based rental assistance. Attended virtual stakeholder engagement session. The stakeholder understands that the long-term solution would be affordable housing, however tenant-based rental assistance could prevent homelessness in the short-term.
City of Columbus	Franklin County/Columbus Continuum of Care (CoC) board member, Public agency that addresses the needs of the HOME-ARP eligible populations, Public or private organization that	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault,	Survey	Identified the most impactful uses of funding as production or preservation of affordable housing and purchase and development of non-congregate shelter. Would like for Franklin County and the City of Columbus to collaborate in their use of HOME-ARP funds. Suggested Family

Franklin County, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Summarized Feedback
	addresses civil rights and fair housing, Public or private organization that addresses the needs of persons with disabilities	stalking, or human trafficking, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, veterans and/or families who qualify in any of the above categories		Permanent Supportive Housing, services of individuals and families earning less than \$50,000 annually and the development of housing for pregnant/parenting single head of households as used of funding. Commented that stop-gap transitional/mobile housing developments provide relief to the system and a respectful place to stay for those stuck in limbo due to lack of deeply affordable housing.
Clintonville-Beechwood Community Resources Center	Public or private organization that addresses civil rights and fair housing, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Survey, Stakeholder Engagement Session	Identified the most impactful use of funding as tenant-based rental assistance, because they work heavily with older individuals, who are particularly vulnerable to victimization in shelters. Attended the virtual stakeholder engagement session.
Columbus Metropolitan Housing Authority	Franklin County/Columbus Continuum of Care (CoC) member, Public Housing Agency (PHA), Public agency that addresses the needs of the HOME-ARP eligible populations	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, veterans and/or families who qualify in any of the above categories	Survey	Identified the most impactful use of funding as supportive services. As the housing authority, CMHA noted a lack of coordination in serving residents. While they have access to affordable housing and rental assistance, it is important for these individuals achieve self-sufficiency through supportive services.
Columbus State Community College	Public agency that addresses the needs of the HOME-ARP eligible populations	College students at greatest risk of housing instability	Survey, Stakeholder Engagement Session	Identified most impactful use of funds as production or preservation of affordable housing. While they provide some rental assistance to their students, the current housing rates will continue to pose a challenge. Suggest more housing counseling programs to support community members as their income grows. Attended the virtual stakeholder engagement session.
Columbus Urban League	Homeless service provider, Public or private organization that addresses civil rights and fair housing, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, veterans and/or	Survey, Stakeholder Engagement Session	Identified most impactful use of funds as production or preservation of affordable housing. Suggested funds be used to gather current housing inventory, develop low income housing, and convert commercial buildings into affordable housing. Attended the virtual stakeholder engagement session.

Franklin County, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Summarized Feedback
		families who qualify in any of the above categories		
Columbus Veterans Association	Franklin County/Columbus Continuum of Care (CoC) member, Homeless service provider	Veterans and/or families who qualify in any of the above categories	Survey	Identified most impactful use of funding as production or preservation of affordable housing. Noted that although housing vouchers exist, the lack of available housing is constricted. Commented that non-congregate housing is needed for couples and those with pets, as well as emergency housing for those with sex offenses.
Community Housing Network	Franklin County/Columbus Continuum of Care (CoC) member, Homeless service provider, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, veterans and/or families who qualify in any of the above categories	Survey, Stakeholder Engagement Session	Identified most impactful use of funds as production or preservation of affordable housing, specifically for those who have a fixed or low income. Noted a need for housing options for those with a 20% AMI fixed income, or extremely low income at or below 30% AMI. Attended the virtual stakeholder engagement session.
Community Shelter Board	Columbus/Franklin County Continuum of Care (CoC) collaborative applicant and member, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families, individuals/families at risk of homelessness	Survey, Stakeholder Engagement Session	Identified most impactful use of funds as production or preservation of affordable housing. Suggested re-development of vacant hotels/motels into affordable housing units as a use of funds. Attended the virtual stakeholder engagement session.
Equitas Health	Domestic violence service provider, Franklin County/Columbus Continuum of Care (CoC) member, Homeless service provider, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, veterans and/or families who qualify in any of the above categories, Franklin County residents living with HIV	Survey	Identified the most impactful uses of funding as production or preservation of affordable housing and purchase and tenant-based rental assistance. Suggested Converting hotels into long term and transitional housing units, evaluating foreclosed and abandoned apartment building across the city to determine if they can be renovated to be able to be safe and affordable housing. Commented that there are populations that do not feel safe accessing traditional congregate shelters, particularly trans and non-binary folx, and folx living with HIV. Non-congregate shelter would allow folx to feel safe and to access the housing system and supports that they need to become independently and stably housed more quickly more quickly and efficiently. Recommended joint ventures to provide housing education/employment services and longer-term housing/rental assistance.

Franklin County, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Summarized Feedback
Ethiopian Tewahedo Social Services (ETSS)	Domestic violence service provider	Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey	Identified most impactful use of funds as supportive services, specifically for survivors of domestic violence. Commented that the County needs to ensure collaborative effort and provide a culturally responsive services.
Franklin County Board of Commissioners	Local government official, Public agency that addresses the needs of the HOME-ARP eligible populations	Homeless individuals/families Individuals/families at risk of homelessness Other Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Stakeholder Engagement Session	Attended the virtual stakeholder engagement session.
Franklin County Department of Job and Family Services	Franklin County/Columbus Continuum of Care (CoC) member, Public agency that addresses the needs of the HOME-ARP eligible populations	Homeless individuals/families, individuals/families at risk of homelessness, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, Franklin County families on public benefits	Survey, Stakeholder Engagement Session	Identified most impactful use of funds as production or preservation of affordable housing. Attended the virtual stakeholder engagement session. Noted that with increasing rent costs, families that have never received public assistance before are having to seek them out. Recommended rental subsidies tied to things such as continuous employment that allow families to save money and be better equipped to handle emergencies that might otherwise leave them in debt.
Furniture Bank of Central Ohio	Domestic violence service provider, Homeless service provider	Homeless individuals/families Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Stakeholder Engagement Session	Attended the virtual stakeholder engagement session.
Lutheran Social Services Faith Mission-Homeless Shelter and Services	Homeless and Domestic Violence Service Providers	Homeless individuals/families, individuals/families at risk of homelessness, families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability,	Stakeholder Engagement Session	Attended the virtual stakeholder engagement session.
National Affordable Housing Trust	Public or private organization that addresses civil rights and fair housing, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families, individuals/families at risk of homelessness, families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, veterans and/or families who qualify in any of the above categories, Franklin County residents with low to moderate incomes including seniors	Survey	Identified most impactful use of funding as production or preservation of affordable housing.

Franklin County, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Summarized Feedback
Neighborhood Services, Inc.	Homeless and Domestic Violence Service Providers	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories	Stakeholder Engagement Session	Attended the virtual stakeholder engagement session.
Ohio Hispanic Coalition	Domestic violence service provider	Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey	Identified most impactful use of funds as supportive services. The Latino/Hispanic community is in need of bilingual and bicultural supportive case management in the housing space.
Sanctuary Night	Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey, Stakeholder Engagement Session	Identified most impactful use of funding as purchase and development of non-congregate shelter. Attended the virtual stakeholder engagement session. Suggested the use of old hotels/schools to house women in efficiency 1-5 year apartments to assist existing programming.
The Community Builders, Inc.	Public or private organization that addresses civil rights and fair housing, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability	Stakeholder Engagement Session	Attended the virtual stakeholder engagement session.
The Legal Aid Society of Columbus	Franklin County/Columbus Continuum of Care (CoC) member, Public or private organization that addresses civil rights and fair housing, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families, individuals/families at risk of homelessness, those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability, veterans and/or families who qualify in any of the above categories	Survey	Identified most impactful use of funding as production or preservation of affordable housing. Commented that current Rental assistance programs have been helpful in many eviction cases as a way to keep poor tenants from becoming homeless to begin with.
Woda Cooper Companies, Inc.	Public or private organization that addresses civil rights and fair housing, Public or	Homeless individuals/families Individuals/families at risk of homelessness	Survey, Stakeholder Engagement Session	Identified most impactful use of funds as production or preservation of affordable housing because the current demand for affordable housing cannot be filled fast

Franklin County, Ohio
HOME-ARP Allocation Plan

Agency/Org Consulted	Type of Agency/Org	Populations Served	Method of Consultation	Summarized Feedback
	private organization that addresses the needs of persons with disabilities	Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking Veterans and/or their families who qualify in any of the above categories		enough. Attended the virtual stakeholder engagement session. Suggested funds be used as gap financing to help offset rising construction costs and a rising interest rate environmental. Unlike market rate developments, affordable housing rents are capped so as rates rise, affordable housing deals cannot support as much debt.
YMCA of Central Ohio	Domestic violence service provider, Franklin County/Columbus Continuum of Care (CoC) member, Homeless service provider, Public or private organization that addresses civil rights and fair housing, Public or private organization that addresses the needs of persons with disabilities	Homeless individuals/families Individuals/families at risk of homelessness Other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability Those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	Survey	Identified most impactful use of funding as production or preservation of affordable housing and tenant-based rental assistance. Suggested conversion of hotels, reducing barriers for developers, and working with communities to eliminate bias regarding individuals in poverty. With an overwhelmed shelter system, the YWCA recommended this use of funding as a way to prevent homelessness.

Public Participation

Public Participation Process

The County understands the importance of receiving input from the public as part of the HOME-ARP allocation planning process. County staff provided residents with reasonable notice of one week to participate in the open comment period and attend the public hearing. Each of the 100+ stakeholders engaged in the consultation process were sent the draft plan directly via email and invited to attend the public hearing. To encourage public participation the County provided an option to participate in the meeting virtually, this meeting link was shared in all communications about the meeting. 15 individuals from 9 different organizations attended the public meeting in person and virtually. In addition to comments made during the meeting, 4 additional comments were received through the online participation form.

The public hearing was held in person at an accessible and centrally located County building and included information on the amount of HOME-ARP funding the County was allocated with range of activities eligible for funding use. All flyers and promotional materials for the meeting included contact information to request additional accommodations needed for persons with disabilities and limited English proficient (LEP) residents.

DATE OF PUBLIC NOTICE: FEBRUARY 8TH, 2023

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

DATE OF PUBLIC HEARING: FEBRUARY 16TH, 2023

Efforts to Broaden Public Participation

To broaden public participation the County posted the request for plan feedback on the home page of the Department of Economic Development and Planning's webpage and provided an option to attend the meeting virtually. **The County also created an easily completed online form to submit feedback on the draft plan.** For accessibility to those most vulnerable in the community, the form does not require respondents to have email addresses and can be viewed and used via mobile device.

Summary of Comments and Recommendations in Public Participation Process

Comment #1: Is there a possibility of utilizing this money to partner with someone else that already has money, so that were putting in 50% of the dollars and someone else is putting in 50% and we double the number of units?

Response: That unit estimate is with the additional funds that are likely to be received by a project, the estimate you are seeing in the plan are units that would specifically be built by Franklin County's with these funds. We do anticipate that there will be other funds used in tandem with HOME-ARP. Our units will likely be spread out into larger projects. We anticipate maybe partnering with the City of Columbus like we have in the past with HOME funds.

Comment #1a: What I was really trying to get at was can we stretch our money further by having another partner that is bringing in dollars and adding that to ours?

Response: We will be doing that. The actual units we hope to produce will be far outside of our estimated 8. The estimate provided was created via HUD provided worksheets for unit production estimates, determined by our amount of funding.

Comment #2: CSB submitted a while back a request to allocate the HOME-ARP money to purchase hotels and refurbish them into permanent supportive housing to serve homeless populations and 5 million dollars can produce 70-80 units of affordable housing at that price tag, was our request considered in this allocation and if so how did you balance that request against the proposal for these 8 units.

Response: The way that the price of these units and the style that we presented of the 8 units is based on new construction. HUD provided a worksheet for all applicants to estimate that if they created new units with their production of housing goals what that would look like. This very high level and very preliminary. It is just to gauge what the current costs of the creation of new units is, it doesn't mean that we're going to build that exact amount, and it doesn't mean that is what it's going to cost. We have not decided how exactly those new units will be produced, so the CSB's proposal is welcomed during our implementation and RFP processes. This is just the planning phase and this allows us to take a look at how much an average cost would be to just have an estimate for the plan, not for implementation.

Comment #2a: I just want to make sure we are on the same page, we already submitted that proposal a while back it is not something that you are expecting from us. We submitted that proposal more than a year ago.

Response: It is great to have the proposal and it can inform the planning process as an option for we could use the funds, but we can't dedicate funds to any specific project until we get through the allocation planning phase. We had to use the tools provided by HUD to do a best estimate of new construction just for the plan. Once the implementation guidelines are available, once we're ready to take the next steps, we will hold a competitive process for the use of the affordable housing funds.

Comment #3: Once you get through the process with HUD are you then going to issue a notice of funding availability, that will be broadly distributed to the public asking for request for use of these funds? And are you intending to try to stretch that funding out or are you trying to use it as quickly as possible?

Response: The goal is to create the housing as quickly as possible. Once the decisions are made and once we have the implementation guidance, we intend on spending the vast majority of the funding available on the creation affordable housing. We will work quickly and we will give notice of funding availability through RFPs and anything else that is appropriate for how we plan to do implementation. We want to build the housing as soon as possible, and we are not planning to stretch it out to 2030 among services. The services that we are planning to provide at this very preliminary stage are to support the housing that we are building.

Comment #4: Are the supportive services for the individuals that are going to be housed in the built affordable housing units going forward or to get them into the units?

Response: Our current intention is for the supportive services to be for the people living in the affordable housing units. We know that this is just a fraction of the supportive services costs that are necessary for these individuals, again we hope to partner with other projects potentially, depending on RFPs. We do anticipate a chunk of supportive services funding will come from outside sources.

Comment #5: Do you have any developers that you guys are bookmarked to work with? I would encourage that Franklin County has an economic EVAP program it is black and brown women emerging developers.

Response: We have not chosen any potential developers at this time.

Comment #6: How did you decide on your admin percentage? You almost used the full 15%. That is one way you could have 400 thousand more to put toward projects.

Response: 14.25% does not exceeding the statutory limit for administration of the HOME-ARP funds. The County intends to use consulting services to plan for and administer our HOME-ARP programming.

Comment #7: We would have liked to see more money allocated to supportive services. Creating new affordable housing is vital too.

Response: The County hopes that they will be able to work collaboratively with the City through their use of supportive services funds. The City's draft Allocation Plan includes capacity building and trainings for the same non-profit organizations that serve the County.

Comment #8: I suggest utilizing current infrastructure established by non-profits to most efficiently distribute the \$1,000,000 TBRA. Many stakeholders are already trained in federal ERA funds distribution with thorough auditing in place and with proven results. Smaller partners should be considered due to limited nature of funds and recommend reaching out to CSB/Stable Housing Initiative to leverage existing systems. This would allow admin funds and non-profit funds to stretch and support as much of the community as possible in an efficient way.

Response: The county is not planning to fund any TBRA through this allocation.

Comment #9: I appreciate the intentional effort to collect data from the community. The common theme represented speaks to: funding as production or preservation of affordable housing. tenant-based rental assistance. Suggested conversion of hotels

Response: The county welcomes suggestions for the creation of affordable housing, however no specific decisions on implementation have been made at this time.

Comment #10: I think that any programs that can support students in higher education is very valuable.

Response: Students that fall within the qualifying populations will be able to be supported through this funding.

Summary of Comments and Recommendations Not Accepted

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

Needs Assessment and Gap Analysis

Size and Demographic Composition of Qualifying Populations in Franklin County

Homeless as defined in 24 CFR 91.5

As mandated by HUD, all Continuums of Care are required to submit a census of the homeless population in their area. This inventory data was collected by The Community Shelter Board (CSB) to compose the size and demographic of the homeless population in Franklin County. Below we discuss data provided by CSB in their System and Program Indicator Report FY2022, which covers the period of July 1, 2021, through June 30, 2022.

In this report, CSB identifies three emergency shelter types: family, women's, and men's. In the 2022 fiscal year, 709 households were served in family shelters. Of these 709 households, 94% were female head of households. The race and/or ethnicity of the heads of household were 69% black, 25% white, 5% multi-racial, and 1% other. In men's emergency shelters, 3,249 individuals were served, of which 247 were Veterans. Of the men served, 61% were black, 31% were white, 5% were multi-racial, and 2% were other ethnicities. The age range with the highest percentage of individuals served was men aged 35-44 years. 1,485 single women were served in emergency

women's shelters. Of these women, 52% were black, 39% were white, 8% were multi-racial, and 1% were other. The average age of these women was 43 years old.

At Risk of Homelessness as defined in 24 CFR 91.5

As defined by HUD, at risk of homelessness, is an individual or family who has an income below the 30% Area Medium Family Income (AMI), do not have sufficient resources or support networks to prevent homelessness, or have housing instability. According to the [HUD Income Limit Report](#) in Franklin County for the year 2022 was \$19,700 for 1 person, \$22,500 for 2 people, \$25,300 for 3 people, \$28,100 for 4 people, and \$30,350 for 5 people.

According to Comprehensive Housing Affordability Strategy data compiled by HUD for the years 2015 through 2019, there are 58,070 people with a household income that is less than or equal to 30% of AMI. The reported individuals are housed, 17,395 or 30% own the home they live in, while 40,675 or 70% are renters.

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

Domestic violence is any form of violence or abuse that occurs in a domestic setting, whereas dating violence is violence that occurs by at least one member within a dating relationship. It is often challenging to document the size and demographic of these populations for safety reasons; therefore, they are often underreported.

As reported by the [Franklin County Forensic Science Center](#), there has been a steady increase in domestic violence in the past years. They reported that from 2018 to 2021 there was a 166.7% increase in domestic violence cases. COVID-19 may have been a factor for such a jump in cases, due to stay-at-home orders making it difficult for victims to have time away from their abusers to seek out help. For both men and women, intimate partner violence encompasses the most cases. During the three years reported in their studies, there were 90 cases of domestic violence reported, 61% of victims were African American/Black, 30% were white, and 10% were other races. In situations of child-parent, family, parent-child, and other cases, men are more likely to be involved in domestic violence; however, in intimate partner, or dating violence, women are more likely to be victims. The Franklin County Blueprint for Safety reported 33,462 911 domestic violence calls in 2022. They also reported 4,604 domestic violence misdemeanors and 411 domestic violence felonies filed. LSS CHOICES, a domestic violence service provider in Columbus, reported that they served 827 unduplicated domestic violence survivors in shelter during 2022. Of these sheltered individuals, 470 were black, 180 were white, 37 were Hispanic, 134 were other races, and 6 are unknown. The largest portion of these survivors were children consuming 53% of the population, 45% were women, and 2% were men. Most of the individuals reported English as their primary language, but 149 are reported as speaking another language primarily. In addition to these 827 individuals, their community-facing programs served 603 individuals experiencing domestic violence.

Ohio ranks fifth in the nation for human trafficking as reported by the Ohio Department of Health. Another report by the US Attorney's Office for the Southern District of Ohio, reported the second-highest number of defendants charged with human trafficking in the US. In a 2020 study done by the [Ohio Attorney General](#) on human trafficking, it was identified that 147 of 148 potential victims were women. The largest portion of these victims were aged 21-29. Of these potential victims, 68% were white, 22% were black, 8% were Asian/Pacific Islander, and 1% were unknown.

Due to the nature of these offenses, it is difficult to find data to support the size and demographic of those that are or have experienced sexual assault and stalking. With the current resources available to support these populations, it is clear that they exist, however victims often fear reporting these events.

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

As defined in 212(a) of NAHA (42 U.S.C. 12742(a)), these are populations that require services or housing to prevent homelessness yet do not qualify under any of the other populations listed above. The data below, provided by the CMHA, represents a portion of these populations as of March 2023. These individuals who use or are on waiting lists for public and subsidized housing could be at risk of experiencing homelessness, but do not fall within the other qualifying populations.

Assistance Type	In use	On waiting list
Public Housing Units	211	635
Section 8 Subsidized Housing Vouchers	13,698	10,942

Other populations that are at risk of housing instability are the elderly and persons with disabilities. According to the [American Community Survey](#), there are 167,514 people 65 and over in Franklin County. 43.5% of this population are male, and 56.5% are female. The elderly population is considered at risk of homelessness because most of the population relies on a fixed income, while housing costs continue to increase. The Ohio State University's College of Social Work reported that the elderly in Franklin County need at minimum \$35,484 a year to afford basic necessities. 38% of the elderly population are living below that amount. The median annual income for this population is actually \$20,223, putting them at risk of experiencing homelessness. The Ohio Housing Finance Agency reported 57% of elderly residents in Franklin County who rent are spending over 30% of their income on housing expenses and 23% of those who own their homes are paying over 30% of their income on housing expenses. As reported in the 2021 ACS, there are 149,479 people (11.4% of the population) with a disability living in Franklin County.

Veterans are another population that require services or housing assistance to prevent homelessness in Franklin County. As of the 2021 census there are 59,227 veterans residing in Franklin County. The US Department of Veteran's Affairs reports that up to 450 Veterans become homeless every year in the US.

Current Resources Available to Assist Qualifying Populations

Homeless as defined in 24 CFR 91.5

Provided by the CSB, the table below demonstrates the capacity of the emergency shelters in Franklin County. In addition to these emergency shelters, there are a number of additional non-emergency shelters that service Franklin County. In total, the Community Shelter Board along with a system of providers throughout the county served over 15,000 individuals in providing shelter and other homeless services.

FY2023 Emergency Shelter System Providers and Capacity

Agency	Shelter Type	Regular	Regular Overflow	Total Capacity
Lutheran Social Services	Single Adult Shelter VA Emergency Housing	252	21	273
Maryhaven	Inebriate Shelter	50	6	56
Southeast, Inc.	Single Adult Shelter	160	10	170
Volunteers of America	VA Emergency Housing	15	-	15
YMCA ²	Single Adult Shelter Seasonal Overflow Family Shelter	222	244	466
YWCA ²	Family Shelter	50	-	50
Total Capacity		749	281	1030

According to the CSB System and Program Indicator Report for FY2022 the average daily waitlist number for emergency shelters are as follows:

- Men's Emergency Shelter
System—29 Days
- Women's Emergency Shelter
System—16 Days
- Family Emergency Shelter
System—45 Days

At Risk of Homelessness as defined in 24 CFR 91.5

Resources to assist those at risk of homelessness are more difficult to find in comparison to those who are currently homeless. While there were programs put in place during the pandemic to provide housing assistance, these programs have ended, or will in the near future, putting this population at greater risk of becoming homeless.

Franklin County has PRC (Prevention, Retention, and Contingency) programs that provide short-term benefits to low-income families. The goal of these programs is to move them out of poverty and assist them in becoming self-sufficient. Categories of this program include emergency assistance, disaster assistance, community projects, and a temporary emergency rental assistance program that was established in response to COVID-19.

The county's [Prevention, Retention, and Contingency \(PRC\) Emergency Rental Assistance Program](#) offers multiple types of assistance to its recipients affected by the COVID-19 pandemic. The program has the flexibility to cover up to 100% of a resident's delinquent rent costs to get them caught up with their landlord, can help to cover the cost of up to three additional months of, and help with utilities. The program is eligible for families located within Franklin County, with at least one minor child and/or a pregnant person in the household and a household income at or below 80% AMI. The program began on June 1, 2021 and was run until the funding was exhausted.

The Columbus Metropolitan Housing Authority provides housing assistance for very low-income families, the elderly, and the disabled through their [Housing Choice Voucher](#) program. The purpose of this program is to allow participants to live in safe, quality affordable housing in the private market. According to a report by the CMHA, there are currently 13,582 resident vouchers in use and 696 public housing units. It is reported that there are nearly 30,000 people on the waiting list, which is currently closed to new applicants. This represents that the availability of affordable housing does not remotely meet the needs of the community.

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

While victims of these specific populations can seek shelter from any shelter in the county, there are specific resources available to them as well. [LSS Choices](#) serves domestic violence victims in multiple ways in Franklin County. They can provide victims of domestic violence with temporary emergency shelter, counseling, legal advocates, support groups, and hotline support. This organizations offers 120 beds and according to their [2020 Annual Report](#), provided 44,587 nights of shelter to those victims of domestic violence. The average length of stay at CHOICES has increased by 55% in 2022, and the average daily census of the shelter's population also is trending upwards by roughly 32%.

[Freedom A La Cart](#), located in Columbus, is a resource for survivors of sex trafficking. Each year, Freedom A La Cart provides supportive services to over four hundred survivors. Through programs like their Butterfly Program, they are able to aid survivors by providing them with long-term support that will allow them transition back into society. They provide services such as independent living assistance, employment coaching, support group meetings, case management, crisis assistance, and more. In addition, they have a court support program, as well as a workforce development program.

The CMHA recently received \$15.6 million dollars that they will put towards construction of Harriet's Hope, an affordable housing community that will serve human trafficking survivors. Harriet's Hope will include both single and two-bedroom apartments, and other amenities for its residents such as on-site computers and a laundry facility. This project will be the first of its kind in Ohio to advocate for female human-trafficking survivors. Harriet's Hope will be drug and alcohol-free to allow victims to focus on recovery and long-term sustainability. The project is expected to be completed in late 2023.

The OhioHealth Sexual Assault Response Network(SARNCO) serves the central Ohio area by providing advocacy and emotional support services for those experiencing sexual assault. SARNCO works in conjunction with medical and social services at OhioHealth Emergency Departments and other facilities. The list below contains the programs and services provided by SARNCO:

- 24-hour emergency room advocacy
- 24-hour sexual assault helpline
- Rape, abuse, and incest national network
- Sexual violence prevention program
- Aftercare advocacy
- Campus advocacy at the Ohio State University
- Recovery resources

Franklin County, Ohio
HOME-ARP Allocation Plan

The City of Columbus, located within Franklin County also has a domestic violence and stalking unit which facilitates prosecution of offenders, but also provides education, support, counseling, crisis intervention, and other forms of assistance for victims.

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

The Columbus Metropolitan Housing Authority owns 6 senior public housing units which encompass 570 units. In the same report, the CMHA provides that they provide 1,175 vouchers to special populations which include nonelderly disabled people.

Unmet housing and service needs of qualifying populations

Homeless as defined in 24 CFR 91.5

The main unmet need within the county as stated by nearly all stakeholders and continuum of care throughout the county is affordable housing. The following table, provided by the Community Shelter Board, shows the large need for beds in Franklin County.

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	414	114	684	684	39								
Transitional Housing	50	20	39	39	40								
Permanent Supportive Housing	635	199	2245	2245	377								
Other Permanent Housing						261	1788	446	14				
Sheltered Homeless						163	800	72	63				
Unsheltered Homeless						4	333	19	133				
Current Gap										1068	305	3023	3023

Franklin County, Ohio

HOME-ARP Allocation Plan

At Risk of Homelessness as defined in 24 CFR 91.5

The current gap in the availability of housing for the population to use their CMHA housing vouchers is substantial within the county. With 30,000 families on the waiting list, there is a definite need for housing. The Ohio Hispanic Coalition also noted that the Latino/Hispanic community could benefit from supportive case management that is bilingual to help them resolve housing issues with their landlord more effectively.

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

With cases of domestic violence, dating violence, sexual assault, stalking, and human trafficking being so widely underreported, it is challenging to identify which needs are not being met. In a report by the National Network to End Domestic Violence, it is noted that in Ohio 286 victims made requests for services, 64% of which were for housing and emergency shelter, were unmet. These requests also included childcare, legal representation, and other supportive needs.

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

As previously mentioned in other populations, there is an unmet need for affordable housing for the elderly populations. As reported by the Central Ohio Area Agency on Aging, older adults in the community struggle with the increasing housing costs, the lack of affordable housing, and limited access to emergency housing. Veterans in the community struggle with supportive services. Although many of them can be housed in emergency shelters, they may have additional conditions and struggles that cannot be fully supported in regular shelters.

Gaps in Current Shelter, Housing Inventory and Service Delivery

The CHAS data below for Franklin County demonstrates the need for housing in the area in order to prevent homelessness. According to the 2015-2019 ACS data, there is a current gap of 102,730 households in need of affordable rental units. This further proves the determination of a need for affordable housing in the area.

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	238,400		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	60,215		
Rental Units Affordable to HH at 50% AMI (Other Populations)	40,675		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		48,240	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		30,980	
Current Gaps			102,730

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

Additional Characteristics Associated with Instability and Increased risk of Homelessness

Franklin County will not include any additional conditions in its definition of other qualifying populations as established in the HOME-ARP notice.

Priority Needs for Qualifying Populations

In reviewing the results from the consultation process, the needs assessment, and the gaps analysis, it was determined that there is an **immense need for affordable housing in Franklin County**. Specifically, there is a critical need for additional housing units that are priced affordably for very and extremely low-income households. Each of the qualifying populations has unique and often competing immediate needs, however the **overlapping long-term need is for safe and affordable housing in the community**. The creation of affordable housing would benefit all qualifying populations by preventing at risk households from becoming homeless and providing housing availability to those who are currently homeless. The County understands that supportive services are needed to complement all housing programs. Funding will be available to provide the qualifying populations with the supportive services needed to acquire long-term housing solutions.

Determination of Level of Need and Gaps in Shelter, Housing and Services

Franklin County used a combination of data sources and community feedback to determine that there is an extensive need for affordable housing in the county, including the current gap of 102,730 households in need of affordable rental units and a gap of 1,068 family beds and 3,023 adult beds to address the needs of homeless individuals. In addition to data provided by the Community Shelter Board and the Columbus Metropolitan Housing Authority, we utilized public federal data such as the American Community Survey. When compared, the data and the feedback from continuum of care members and stakeholders align to support the need for the development of affordable housing in the County.

The County has decided to not put funding towards the other eligible activities of tenant based rental assistance and the creation of non-congregate sheltering. Although the data collected showed that there is a need for both tenant based rental assistance and non-congregate sheltering within the community, there is limited funding available through HOME-ARP and the need to create affordable housing with supportive services for the qualifying populations will meet the community's largest identified need. The County is prioritizing the creation of affordable housing as a long-term solution that will lead to, more availability in the current non-congregate shelters and tenant based rental assistance programs. The decision on how to use the HOME-ARP Funds came from data reviewed, discussions with agencies who worked with qualifying populations and public participation.

HOME-ARP Activities

Method of Solicitation

Franklin County will encourage HOME-ARP Program funds to be leveraged with private and public funding sources to support the development of rental housing and the provision of supportive services.

The County will solicit proposals through a competitive request for proposals process to develop and operate rental housing and provide supportive services, in accordance with HOME-ARP regulations and its own procurement rules and requirements. HOME-ARP funds will be awarded to non-profit or for-profit organizations, based on the merit of proposals or applications received prior to or during the grant implementation period.

Administration of Eligible Activities

The County plans use 14.5% of the allocated HOME-ARP funds on administration of eligible activities via the services of a contractor selected through a competitive request for proposals process, in line with the County's procurement rules. The envisioned roles and responsibilities for the subrecipient or contractor include but are not limited to grant management, program implementation, policy and compliance, procurement, financial administration and reporting.

Franklin County did not use HOME-ARP funds to appoint subrecipients or contractors for the development or administration of the HOME-ARP allocation plan.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 200,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,508,302		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 450,000	14.25%	15%
Total HOME ARP Allocation	\$ 3,158,302		

Distribution of Funds in Accordance with Priority Needs

As evidenced through the consultation process, needs assessment and gap analysis, the priority need in Franklin County is the creation of affordable housing. The County has used this data to distribute majority of the available HOME-ARP funds towards lessening the current gaps and meeting this data and community determined need. Therefore, the County plans to invest \$2,508,302 in the development of affordable rental housing and \$200,000 in supportive services to help those living in the created units remain housed. The County will also utilize \$450,000 to administer the HOME-ARP funding.

Rationale of Plan to Fund Eligible Activities

The County's primary use of the HOME-ARP funding is to produce affordable housing. The residents of Franklin County currently lack the affordable housing needed and are faced with high costs when searching in the current housing market. Based on the stakeholder responses gathered and the current homeless and housing inventories the highest prioritized use for HOME-ARP funds is to increase the supply of affordable housing available to the qualifying populations within Franklin County.

County staff understands that the qualifying populations require a wide range of services and supports to gain viable housing or remain stably housed. The data reviewed and responses from the consultation process showed that an increase in funding for supportive services is needed to complement the planned HOME-ARP housing development activity.

HOME-ARP Production Housing Goals

Estimated Affordable Rental Housing Units

Franklin County estimates that 8 new affordable housing units will be created using HOME-ARP funding, at an average cost of \$255,434.00 per unit. This calculation includes an estimated 20% of total cost for ongoing operating costs or operating cost assistance reserve. The units will vary in size and will include 2-bedroom units, suitable for a family of three- and one-bedroom units, suitable for a single person or couple. Additional funding has also been allocated to provide supportive services to the occupants of the units. These units will be available to all qualifying populations.

Production Goals and Priority Needs

Franklin County intends to work to address the large gap in available affordable supportive housing in the County via HOME-ARP program funds. Throughout the planning process the need for affordable housing has been at the forefront of the data collected and stakeholder feedback. Through the creation of additional affordable housing units, the HOME-ARP funds will establish 8 units of permanent affordable housing for County residents. The County intends to use, when available, leveraging from other federal, state and local funding sources to increase the total number of affordable housing units produced. If other funding sources are not available, housing projects will be solely completed using HOME-ARP funding.

Preferences

In an effort to provide opportunities to all qualified populations, the County has elected to not apply preferences among the qualifying populations.

Implementation of Limits to Eligibility

Franklin County does not intend limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population.

HOME-ARP Refinancing Guidelines

Franklin County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

Appendix A | HOME-ARP Communication Materials



Franklin County
Board of Commissioners

**ECONOMIC DEVELOPMENT
& PLANNING**

Share your important feedback!



Franklin County's HOME-ARP survey is **officially open!**

Please share your important feedback before the
survey closes this **Friday, December 23rd.**

Franklin County is reaching out to stakeholders,
who deliver housing services to our community,
requesting feedback on the use of HOME American
Rescue Plan Act (HOME-ARP) funding.

Across the country, these funds are used to reduce
homelessness and increase home stability. This
quick survey will serve as a valuable tool in
understanding the community's needs!

Share Your Feedback!



Franklin County
Board of Commissioners

**ECONOMIC DEVELOPMENT
& PLANNING**

HOME-ARP Survey Extended!



**Franklin County needs your
feedback to inform the HOME-ARP
allocation plan.**

This quick survey will serve as a valuable tool in
understanding our community's needs.

Share Your Feedback!

Appendix B | HOME-ARP Survey

Franklin County HOME-ARP Survey

Franklin County is requesting your feedback on the use of HOME American Rescue Plan (HOME-ARP) funding.

These funds have been allocated to reduce homelessness and increase housing stability across the country. The goal of this survey is to understand the needs of our community. We are asking our partners to provide input to ensure our County will implement best possible use of these funds.

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

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

Name *

Title *

Email Address *

Agency / Organization *

Agency / Organization Description *

Select all that apply.

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

Select the populations your agency works with. *

Select all that apply. This list includes all of the eligible populations within HOME-ARP funding.

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

What is the largest obstacle your clients face? *

Select only one obstacle.

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

Select the most impactful use of HOME-ARP funding *

Select only one use of funds.

- ☐ Production or Preservation of Affordable Housing
- ☐ Tenant-Based Rental Assistance
- ☐ Supportive Services
- ☐ Purchase and Development of Non-Congregate Shelter

Why did you select the most impactful funding use? *

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

Select the qualifying population with highest need *

Select only one of the qualifying populations listed below that experiences the highest level of housing needs in the County.

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

Why did you select the qualified population? *

Please explain why you selected qualifying population as experiencing the most housing needs.

What are your ideas for housing projects?

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

How can the County ensure impactful use of funds?

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

Upload community datasets and reports

We are asking our partners to provide the data they have available to ensure the County will implement best possible use of these funds. Please upload any of the following data to inform our funding decisions:

- Data on size and composition of the qualifying populations that the consultation partner collects and reports
- Data on the shelter, housing and services inventory for the qualifying populations
- Information on existing and anticipated resources available in the community for the eligible activities
- Annual reports, strategic plans, or similar materials which may provide helpful framing about the services provided, program outcomes and long-term community

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>		
* 3. Date Received: 03/31/2023		4. Applicant Identifier: <input type="text"/>
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: M-21-UP-39-0214
State Use Only:		
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>
8. APPLICANT INFORMATION:		
* a. Legal Name: Franklin County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 31-6400067		* c. UEI: LCCEABLRGGE7
d. Address:		
* Street1: 150 South Front Street, FSL Suite 10		
Street2: <input type="text"/>		
* City: Columbus		
County/Parish: <input type="text"/>		
* State: OH: Ohio		
Province: <input type="text"/>		
* Country: USA: UNITED STATES		
* Zip / Postal Code: 43215-7104		
e. Organizational Unit:		
Department Name: Economic Development&Planning		Division Name: Community Development
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: Genee	
Middle Name: <input type="text"/>		
* Last Name: Cosby		
Suffix: <input type="text"/>		
Title: Community Development Administrator		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 614-525-5578		Fax Number: <input type="text"/>
* Email: geneecosby@franklincountyohio.gov		

Application for Federal Assistance SF-424*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:**Type of Applicant 3: Select Applicant Type:***** Other (specify):***** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

*** 12. Funding Opportunity Number:**

M-21-UP-39-0214

*** Title:**

HOME-Investment Partnerships Program - American Rescue Plan

13. Competition Identification Number:**Title:****14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Franklin County's HOME-ARP Allocation Plan to serve the qualifying populations.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

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

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

* a. Federal	3,158,302.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	3,158,302.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

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

Authorized Representative:

Prefix: * First Name:
 Middle Name:
 * Last Name:
 Suffix:

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

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

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

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


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

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	County Administrator
APPLICANT ORGANIZATION	DATE SUBMITTED
Franklin County	3/30/2023

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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


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

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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE County Administrator
APPLICANT ORGANIZATION Franklin County	DATE SUBMITTED 3/30/2023

HOME-ARP CERTIFICATIONS

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

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

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

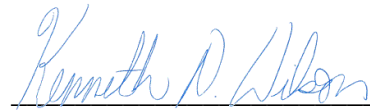
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

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

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

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



Signature of Authorized Official

3/30/2023

Date

County Administrator

Title

Approved to form

 First Assistant and Chief Counsel FCPO

Franklin County Prosecutor

3/30/23