

CITY OF LORAIN

HOME-ARP Allocation Plan

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

INTRODUCTION

The City of Lorain (City) received an allocation of \$1,729,944 from HUD's HOME Investment Partnership Program – American Rescue Plan (HOME-ARP) funding. This funding is intended to be used for specific activities centered around housing and services for the Qualifying Populations (QPs) which includes those who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and part of other populations where providing supportive services or assistance would prevent a family's homelessness or serve those with the greatest risk of housing instability. The activities that can be undertaken with this funding are development and support of affordable housing, tenant-based rental assistance, supportive services and/or the acquisition and development of non-congregate shelter units.

CONSULTATION

Description of the consultation process including methods used and dates of consultation:

To begin the planning process, the City utilized a Technical Assistant (TA) to assist with complete comprehension of the requirements and compliance in building the plan. The TA is familiar with the City staff and provided technical assistance to the City in the past for other funding sources from HUD. Regular weekly meetings were held with the TA and the Building, Housing, and Planning (BHP) Staff that were dedicated to the creation of the HOME-ARP plan.

The City of Lorain in Lorain County is part of the Ohio Balance of State Continuum of Care (BoSCoC). Lorain County is part of the Region 4 homeless planning region for the BoSCoC. BHP attends the regularly scheduled monthly CoC meetings to engage with organizations and agencies that provide services to the population in which this funding will serve. The CoC is designed to promote a communitywide commitment to the goal of ending homelessness by helping communities provide a full range of emergency, transitional, and permanent housing, and supportive service resources. It is also responsible for recommending organizations and projects to receive federal funding with a priority on projects in Lorain County. The CoC receives funding from the United States Department of Housing and Urban Development (HUD).

The consultation process began with an 8 question survey to engage the community and was available to everyone for two weeks from July 8, 2022 through July 26, 2022. The survey was promoted to the general public by way of the City's website and Facebook page. It was also shared to all members of Council, all Continuum of Care Agencies, and City Staff.

After the survey closed, and with assistance from the CoC Coordinator, BHP hosted thirteen (13) different consultation meetings over Zoom and in person with thirty three (33) different agencies and organizations from the CoC that provide support and assistance to the qualifying populations. The consultations discussed the survey results, the services provided by each agency, the barriers that exist for the Qualifying Populations (QPs), and what gaps remain in the housing and services systems that support the QPs. Each consultation session was scheduled for one hour with similar or like-kind agencies to allow for discussions to be more focused, in-depth, and thought provoking.

ORGANIZATIONS CONSULTED:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Lorain Metropolitan Housing Authority	Public Agency addressing the needs of QPs, Lorain County Public Housing Agency Serving: All QPs	1-hour Zoom meeting 8/5/22	Affordable Housing is a barrier to all populations, especially the qualifying populations The availability of landlords willing to rent affordable, decent, safe housing is lacking due to the housing stock age Need to build a landlord list. Landlords need mitigation funds, mediation, resident services Section 8 is not widely accepted in the area; payment standards are too low for vouchers; high fail inspection rate due to age and condition of housing units Lorain lacks strong resident services and needs a housing stability case manager The unmet needs include: pandemic issues, more deaths,

			<p>health disparities, healthy food shortage/cost of food barriers, issues connecting people to proper services</p> <p>Lack of mental health services resulting in: hoarding/high risk for eviction due to failed inspections; no support for emotional support animals (i.e., pet food, vet care, hygiene)</p> <p>Criminal Record barrier: LMHA is too restrictive on criminal background checks.</p> <p>Lack of larger bedroom count properties average wait times for larger units (3-5 bedrooms) is approx. 3-4 months</p> <p>Vacancy Rate is approx., 2-3%</p> <p>Can't build more public housing; need to leverage more project- based vouchers</p>
<p>Neighborhood Alliance</p> <p>Haven Center Shelter</p>	<p>Homeless shelter and service provider; Emergency Shelter, Homeless outreach, meal delivery, childcare</p> <p>Serving: All QPs</p>	<p>1-hour Zoom meeting 9/23/22</p>	<p>Reduced Emergency Shelter capacity due to Covid-19</p> <p>Currently trying to construct non-congregate shelter with funding from many different sources</p> <p>Difficult finding hotels to accept vouchers that are still available to provide temporary</p>

			emergency non-congregate shelter to individuals
Catholic Charities St. Elizabeth Center Homeless Shelter	Homeless shelter and service provider: Men's homeless shelter, and day drop-in center; case management Serving: homeless and at risk of homeless	1-hour Zoom meeting 9/23/22	Mental health services are in need Lack of decent landlord participation Lack of shelter for women, especially those considered chronic Seeing an increase in women and families coming to day drop-in center Barriers to affordable housing for many of their residents are criminal history including arson and sex offenders - this makes them ineligible for most subsidies
Lorain County Coordinated Entry	Homeless service provider: Central point of services and shelter/housing access Serving: all qualifying populations	1-hour Zoom meeting 9/23/22	Coordinated Entry is the central hub for all in-take of individuals seeking shelter. They see more requests for families to stay intact, along with emancipated youth and elderly on a fixed income. Important to offer diversion before admitting someone to shelter Availability of landlords is lacking Increased calls and walk-ins; over 700 calls logged in the month of July and August each

			<p>Individuals referred outside the county if no sources are available inside the City or County</p> <p>Increase in request for family assistance and keeping the family unit intact</p> <p>Households that have pets and do not want to leave their pets to come into shelter results in reduced access to housing case management services</p> <p>Resources needed: case management for unsheltered population that does not qualify for PATH Services and more homeless prevention outreach to residents. Many households state they were unaware of homeless prevention services and those services could have prevented their homelessness.</p>
<p>Persons with Lived Experience:</p> <p>St. Elizabeth Homeless Center</p>	<p>Qualifying Population</p> <p>Single adult men living in the St. Elizabeth shelter</p>	<p>1-hour in person meeting with 4 individuals who are living in the shelter 9/27/22</p>	<p>Very different ways of becoming homeless: loss of housing, mental health issues, addiction, lack of priorities, lack of bank account, criminal background, past evictions, loss of employment, financial assistance taking too long to process, stigmas, and lack of budgeting and life skills</p> <p>Medical issues play a big</p>

			<p>part in how they became homeless</p> <p>Landlord participation and acceptance is lacking, along with astronomical rents and requirements</p> <p>Lack of accessing or obtaining documents for proof of identity, especially if the individual is out of state</p> <p>Case management is helpful. They assist with budgeting and allowances and helping to get their finances right.</p>
Coalition on Homelessness and Housing in Ohio	<p>Public Agency/State CoC: Meeting with Erica: coalition of organizations and individuals committed to ending homelessness and to promoting decent, safe, fair, affordable housing</p> <p>Serving: All QPs</p>	<p>1-hour Zoom meeting 9/5/22</p>	<p>Seeing more individuals without children on the state level</p> <p>Most important housing option is more affordable housing</p> <p>State level has placed a priority on affordable housing development</p> <p>Shelters are not considered housing</p>
Lorain County Continuum of Care	<p>Homeless Service Providers: Monthly meeting of all CoC organizations and agencies</p> <p>Serving: All QPs</p>	<p>2.5 hour Zoom meeting – ongoing monthly</p> <p>1-hour in person meeting 09/16/22</p>	<p>Notice by City to entire CoC body that the funding is in and consultations will take place with each agency over time</p> <p>Meetings are held monthly and attended by up to 130 individuals</p> <p>Lack of understanding on how services actually</p>

			<p>work: help to fill out applications, access to the technology to do so, lack of a case manager to help them connect</p> <p>Case management is indeed necessary – even when CE gives out lots of resources folks don't know how to access</p> <p>Gap in case management for those in overflow motels or unsheltered non-PATH and/or limited access to services</p> <p>Supportive services need to be proactive, not reactive</p> <p>Need to cut red tape and reduce barriers to affordable housing (i.e., zoning laws, strict guidelines on grant funding, /spending)</p> <p>Funding does not match community needs</p> <p>No funding for boarding pets is a barrier to those needing access to shelter. Households choose to stay with the pets rather than entering into shelter.</p> <p>Lack of awareness of the social services that are available to prevent homelessness; or get the resources but aren't able to take the first steps to use the resource</p>
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			<p>Lack of staff to add additional case management services</p> <p>Need a housing case manager who is independent from any individual organization – like what P2R does</p> <p>At risk of homelessness population unaware of homeless prevention services</p> <p>Possible ideas: add an insert to the Lorain Water Bills (Elyria already does this) that provides resource information such as homeless prevention services available to Lorain water customers; more marketing in libraries, community squares, churches, and targeted social media posts. Change P2R listing in the Street Card to “resource navigation”</p>
<p>Family and Community Services, Inc.</p> <ul style="list-style-type: none"> • SVVF • Veteran Support Intake • Valor Home <p>Northeast Ohio VA Healthcare System/Community Resource and Referral Center/ Veterans Coordinated Entry</p>	<p>Veterans’ Group: Temporary Housing Program for Veterans</p> <p>Serving All QPs who are veterans</p>	<p>1-hour Zoom meeting 9/29/22</p>	<p>Veterans have a separate coordinated entry process than other QPs.</p> <p>Organization assists QP with hotels, financial assistance, temporary housing, transportation, food, and appliances to keep food.</p> <p>60-70% of veterans request Valor Home as the shelter where they’d like to go</p> <p>Influx in elderly 70-80</p>

			<p>years old</p> <p>Lack of community communication and understanding which causes elderly individuals to be dropped off at door of Valor Home with expectations they will be taken care of</p> <p>Barriers to willingness to enter into homeless shelter system. Stigma to homelessness. Pride.</p> <p>Assisting QP who have long-term illnesses or mental health issues that cause them to desire homelessness rather than feel like a burden to others</p>
<p>Persons with Lived Experience YWCA: Women's Campus Transitional Housing Program</p>	<p>Homeless Service Provider and shelter for women</p> <p>Serving: Homeless</p>	<p>1 hour in person session with 3 individuals 10/4/22</p>	<p>Criminal background, ongoing legal issues, poor past choices, and previous evictions, cause issues with obtaining and maintaining housing</p> <p>Disability and lack of wheelchair accommodations reduces housing options</p> <p>Separation from spouse or loss of spouse causes a decline in the ability to maintain the home</p> <p>Unknown resources to assist with maintaining home ownership.</p> <p>Consider placing resources on social</p>

			<p>media, libraries, city message boards, and laundry mats. Basically, anywhere QP goes to stay warm.</p> <p>Transportation issues</p> <p>Case Workers are available and meet regularly.</p> <p>Food insecurities: food deserts and increase in food cost, Issues with having enough pantry orders/food donations</p>
<p>Safe Harbor: Genesis House</p> <p>Blessing House</p>	<p>Domestic Violence shelter and service provider; Children's Shelter for emergency placement, child abuse victims, and homeless youth.</p> <p>Serving: Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking</p>	<p>1-hour Zoom Conference 10/5/22</p>	<p>Safe Harbor: Genesis House does not report or enter data into the HMIS system</p> <p>Victims usually do not stay long enough (2 weeks to 45 days) to be eligible for most housing programs.</p> <p>Victims may return to their partner.</p> <p>Barriers include criminal backgrounds, past evictions, lack of social supports, and lack of diversion funds.</p> <p>Blessing House: Mental health matters are trending among this vulnerable population</p> <p>Noticing a need for shelter for larger families to stay intact. Increase of homeless youth being separated from families due to lack of family</p>

			<p>shelter options. Households must split up in order to access shelter.</p> <p>Issues with QP having pets - they refuse to rehome or give up</p> <p>Case management is understaffed or lack experience</p> <p>Lack of resources</p> <p>Unmet needs: motel vouchers/shelter availability, access to shelters for large families, shelter options/resources for non-service animals (pets and emotional support animals), wraparound services,</p> <p>QP Barriers: lack of resources, available affordable housing, rental application fees, past evictions, low credit score, and criminal history.</p> <p>Need for availability of housing that doesn't discriminate on the basis of credit, criminal history, financial history</p> <p>Best use of funds: increase affordable housing inventory and funding for a housing coordinator.</p>
The LCADA Way The River IOP	Homeless and services providers:	1-hour Zoom Conference 10/13/22	<p>Variety of QP at risk</p> <p>Barriers for those with</p>

	Serving: All QPs		<p>conviction history, eviction history and landlords refusing to work with agency assisting the QP</p> <p>The more difficult the situation, the more difficult to find appropriate housing</p> <p>Greatest risk of housing instability is women and children</p> <p>Lack of sustainable jobs to allow for success in paying bills and sustaining housing</p> <p>Lack of availability of housing</p>
Lorain City Schools	<p>Public Agency</p> <p>Serving: All QPs</p>	1-hour Zoom Conference 10/13/22	<p>Families are doubling up, high schoolers couch surf, transitioning from high school to college, and/or don't have permanent or stable housing</p> <p>Issues with month-to-month tenants which make it easier to evict</p> <p>Housing is absolutely needed. Lorain needs affordable housing units immediately</p> <p>Grocery stores are needed. Lorain has pockets of food deserts and lacks quality shops</p>
Humility of Mary/Faith House I & II	<p>Homeless housing and service provider</p> <p>Serving: Women of the</p>	1-hour Zoom Conference 10/13/22	<p>Size of the family is a barrier to shelters or larger bedroom count apartments or houses</p>

	QP		<p>Vouchers are hard to come by</p> <p>Not many PSH units available to families</p> <p>Lack of progress being made by residents or fear the responsibility to be on their own</p> <p>Influx of younger population with no income, unable to apply for housing without source of income. Cost of living and application filing fees hitting hard</p> <p>Some available housing is unsafe and wouldn't pass a section 8 inspection. Landlords are providing 30 day eviction notices instead of fixing repairs. They would rather just take in a new tenant who is desperate</p> <p>Inflation and inability to afford basic cost of living</p>
50 M Real Estate, LLC	<p>Private organization</p> <p>Serving: At Risk of Homeless QPs</p>	<p>1-hour Zoom Conference 10/13/22</p>	<p>Want to help second chance residents and have worked with several agencies to do so; however, there is lack of follow-up after monetary support is provided for tenant by agencies.</p> <p>Some agencies do not communicate with landlords the status of a tenant's rental assistance</p>

			<p>application or verify funding via a promissory note.</p> <p>Unaware of tenant mental health or issues before renting to them, undertake the risk unknowingly</p> <p>Landlords are taking a risk when renting to second chance tenants but would be more willing to help house tenants if the community social service agencies develop better relationships with landlords.</p>
Lorain County Department of Jobs and Family Services	<p>Public Agency</p> <p>Serving: All QPs</p>	<p>1-hour Zoom Conference 10/13/22</p>	<p>Housing is just one aspect of the need.</p> <p>A comprehensive solution is needed that includes: mental health, behavioral health, life skills coaching, all in one package</p>
Lorain County Urban League	<p>Services Provider</p> <p>Serving: All QPs</p>	<p>1-hour Zoom Conference 10/6/2022; part of the BIPOC community & HUD certified counseling services</p>	<p>Public Agency that addresses the needs of the QP: Service program provider for African American and disadvantaged individuals which includes youth development, HUD Certified housing counseling, civic engagement, entrepreneurship, & health services, and facilitates a racial equity program</p> <p>Challenges with transportation, language</p>

			<p>barriers, criminal justice system, past evictions, and income inequality</p> <p>Court system inflexible to individuals working or maintaining employment</p>
P2R	<p>Housing and Services Provider</p> <p>Serving: All QPs</p>	1-hour Zoom Conference 10/6/2022; part of the BIPOC community	<p>Challenges with placing individuals in shelters or housing if they've exhausted all of the support system; especially those who experienced incarceration or mental health issues</p> <p>Individuals are being bounced around between agencies and there's a lack of resources for vouchers and hotel bans due to damaged properties</p>
El Centro de Servicios, LLC	<p>Services Provider</p> <p>Latino social services for Lorain County; HUD certified housing counselor</p> <p>Serving: All QPs</p>	1-hour Zoom Conference 10/6/2022; part of the BIPOC community	<p>Challenges to access services such as translation services, employment, affordable housing, and mental health care</p> <p>Limited budgets to provide shelter and services to individuals in need</p> <p>Issues with tenants destroying landlord's property causing them to not rent anymore</p> <p>Lack of investment in social services for organizations who offer support</p>

			<p>Great need for rental and utility assistance to prevent homelessness</p> <p>Lack of health data for minorities</p>
Community Foundation of Lorain County	<p>Public Agency</p> <p>Serving: Organizations that serve all QPs</p>	1-hour Zoom Conference 10/6/2022; part of the BIPOC community	<p>Competition for funding by all agencies</p> <p>Too many hoops to jump through for funding</p> <p>Lack of togetherness among all agencies and organizations who support the QP</p> <p>Need for better relationships amongst organizations and agencies</p>
Salvation Army	<p>Organization that addresses the needs of Social services non-profit</p> <p>Serving: All QPs</p>	1-hour Zoom Conference 10/12/22	<p>Refers individuals to coordinated entry</p> <p>Sometimes has hotel vouchers available</p>
UCAN Collaboration Case Managers	<p>Non-profit organization: Collaboration of Case Managers in Lorain County by way of United Way</p> <p>Serving: All QPs</p>	1-hour Zoom Conference 10/12/22	<p>Larger families and families with pets are becoming a larger at risk of homelessness population</p> <p>Difficult for individuals to find housing let alone retain housing</p> <p>Increase in college students age 18-19 years old asking for housing assistance outside of wanting to leave their parents, it's more serious than that</p> <p>Influx of females and single parents with children accessing</p>

			<p>homeless and shelter services</p> <p>Lack of understanding among tenants who don't understand notices and evictions and lease terms.</p>
<p>Emerald Development & Economic Network</p> <p>CHN Housing Partners</p>	<p>Nonprofit Organizations providing housing and services</p> <p>Serving: All QPs</p>	<p>1-hour Zoom Conference 10/12/22</p>	<p>Increase in individuals returning to homelessness due to past-due rents or not able to pay their rent</p> <p>Difficult to find payee agency</p> <p>Huge issue with tenants understanding their rights and landlords taking advantage of that</p> <p>Lack of education among renters who need educated on their rights</p>
<p>Legal Aid Society of Cleveland</p>	<p>Public organization that addresses fair housing, civil rights, and needs of persons with disabilities: Legal Aid provider to the residents of Lorain County</p> <p>Serving: All QPs</p>	<p>1-hour Zoom 10/14/22</p>	<p>Highest at risk of homelessness seen in legal aid is families with multiple children; and seniors.</p> <p>Landlords selling properties they've rented out for decades causing tenants to be evicted</p> <p>Those with greatest housing instability are those who were recently homeless and those with mental health issues, especially those without connection to treatment, or who experienced major life events</p> <p>Barrier is an influx in month-to-month tenancy</p>

			Most unmet need is social work type services; housing search and counseling services (housing navigator); mental health services; child care; transportation
Nord Center	Public agency/ mental and emotional health through prevention, treatment, and advocacy, and housing services Serving: All QPs	1-hour Zoom Conference 10/12/22	Unmet needs include mental health assistance whether individuals don't want help or don't know how to get help; landlord refusal to rent to clients; misconception of who agencies assist
MHARS Board	Public organization that addresses needs of persons with disabilities: Mental Health, Addiction & Recovery Services Board of Lorain County Serving: All QPs	1-hour Zoom Conference 9/29/22	Provides rental subsidies under housing programs Seeing population of extremely low income individuals and families which makes it impossible for them to afford market-based rents. Clients feel victimized by landlords
Lorain County Homeless Task Force	Nonprofit Housing and Services Organization that seeks to eliminate homelessness in Lorain County Serving: Homeless QP	1-hour Zoom 10/12/22	Trends: 55+, youth, and lack of income Lack of safe affordable housing Clients are enrolled in housing stability programs but cannot find landlords willing to accept agency assistance. Those with EHV vouchers either have to request extensions on their voucher or end up losing their voucher due

			<p>to inability to find a unit</p> <p>Need to explore more ways to build relationships with landlords</p> <p>Need a housing specialist and wraparound services</p> <p>QPs are being placed into housing programs that do not fit their needs due to lack of affordable and/or supportive housing</p>
Congregation Leaders	<p>Private organizations that address service needs: Faith Based Organizations</p> <p>Serving: All QPs</p>	<p>Survey sent to 60 leaders – 3 responded</p>	<p>Seeing more need for utility assistance.</p> <p>There is a great need for shelters or housing for the larger homeless families/populations</p> <p>There is a lack of affordable housing and assisted living for those struggling with mental illness</p> <p>Case management and assistance with work training is an unmet need</p> <p>Great need for assistance to help those with criminal backgrounds. Especially felonies</p>
City of Lorain Police Department	<p>Public Agency</p> <p>Serving: All QPs</p>	<p>ATTEMPTED: Zoom call or in person meeting</p>	<p>Did not receive response to request for either type of meeting</p>
Lorain County Sherriff Department	<p>Public Agency</p> <p>Serving: All QPs</p>	<p>INVITED: to Zoom call</p>	<p>Did not attend</p>
Lorain County Children Services	<p>Public Agency that addresses housing and</p>	<p>INVITED: Zoom call 1/25/2023</p>	<p>We have 3 youth getting ready to age out of foster</p>

	<p>service needs</p> <p>Serving: Children of the QP</p>		<p>care come May 2023.</p> <p>Many shelters remove foster youth from their programs due to breaking rules.</p> <p>Youth aging out of foster care tend to be harder to house. They have experienced traumas and often lack proper guidance. Once they turn 18 many do not want to follow anyone's rules. So, for this population, patience and forgiveness is vital to a successful housing plan.</p> <p>There is a lack of housing options for youth. Transitional housing would be beneficial to this population as most need to learn life skills.</p> <p>There is rental assistance for youth aging out of foster care, but we have no pool of landlords to work with. Would like to work with a landlord that would be willing to lease to our agency and we could sub-lease to our aging out youth. We would be responsible for repairs and, if need be, eviction processes. We just can't find a landlord that is willing to work with us.</p>
NORD Center Sexual Assault Services	Domestic Violence provider – Sexual Assault Center	Email correspondence 2/15/2023	579 individuals served, 235 were under age 18, 108 are adults, and 236 are co-survivors.

	Serving: Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking		<p>Services provided are child advocacy and rape crisis center for anyone in Lorain County who has been a victim. Collaborate with law enforcement and children services.</p> <p>The greatest unmet need is for mental health services and emergency shelter and legal costs for victims. Transportation is also a barrier to getting services.</p> <p>Unmet housing needs is resources and housing so victims can leave the offenders home safely</p>
New Sunrise Properties	<p>Private Agency that addresses Housing Needs</p> <p>Serving: All QPs</p>	1-hour Zoom conference 10/12/22 & 1/13/2022	Did not attend
Lorain County Office on Aging	<p>Public Agency that addresses services needs</p> <p>Serving: Senior QPs</p>	INVITED: Zoom call 0/12/2022 and 1/13/2022	Did not attend
City of Lorain Fair Housing Board	<p>Public Board that serves Fair Housing</p> <p>Serves: All QPs</p>	INVITED: Zoom 10/14/2022	Did not attend
Individuals from the QP	Qualifying Population: Individuals with lived experiences	Short survey handed out at the homeless stand down event on 10/19/2022	<p>Responses from 28 individuals asking what could have helped them early on before they experienced challenges with their living situation:</p> <ul style="list-style-type: none"> • Rental Assistance • Being more independent from

			<p>a partner who died to fully understand how to live without them</p> <ul style="list-style-type: none"> • Help from PHA • Knowledge about more resources/access to such • Medical services/medication
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CONSULTATION FEEDBACK SUMMARY:

The City received similar feedback from the many different consultations conducted. The following comments are the expressed opinions of the respondents.

- There is a lack of decent landlord participation, availability of landlords is lacking along with outrageous rents and requirements, and a lot of landlords are out of state without a local agent
- There are challenges with transportation
- Transportation is an unmet need
- Medical issues play a large part in how individuals become homeless
- Case management is helpful and assists with budgeting and allowances to help with finances
- Most important option is affordable housing
- Shelter is not considered housing
- There are limited budgets to provide shelter and services to individuals in need
- Influx of females and single parents with children accessing homeless and shelter services
- Veteran shelters are seeing an influx of more elderly clients
- Barriers to enter into homeless shelter system because of stigma, pride
- Long term illness plays a large role in homelessness and lack of desire to receive assistance
- Criminal background status creates barrier to obtain housing or enter shelter
- Spousal loss plays a large role in homelessness or becoming at risk of homelessness
- Lack of knowledge about resources to assist with services or housing
- Food pantries and donations are low
- Greater need for families entering shelter system
- QPs with pets have become more prevalent
- Case management is understaffed
- There is a lack of sustainable jobs available in the area
- Month to month leases make it hard to avoid evictions if the landlord wants to change the lease

- Influx of younger population with no income, unable to apply for housing without source of income. Cost of living and application filing fees hitting hard
- Some available housing is unsafe and wouldn't pass a section 8 inspection. Landlords are providing 30 day eviction notices instead of fixing repairs. They would rather just take in a new tenant who is desperate

PUBLIC PARTICIPATION

Public Participation Process

Dates of the public comment period and public hearing

During the development of the City of Lorain HOME-ARP Allocation Plan, the City hosted a Public Hearing on December 14, 2022 at 5pm in City Hall Council Chambers. The purpose of the meeting was to gather additional input from community members about the needs and gaps in housing and services for the Qualifying Populations. A PowerPoint presentation outlined the HOME-ARP requirements, definitions of the qualifying populations, activities that can be funded, and details about preferences and limitations. Over 20 people attended the public hearing; this exceeds what the City has seen for any federal public hearing to date. There were many questions regarding the types of projects that could be funded and examples given about thoughts and plans agencies have for how they'd like to spend this money for their specific agency, if awarded. The City encouraged additional feedback about where the largest need is for the QPs.

Public Notice, in both English and Spanish, was placed in the local newspaper, posted on the 1st floor bulletin board and the 5th floor bulletin board in City Hall, posted onto the City's Facebook Page, the City's website on the News Flash page and the dedicated HOME-ARP webpage. Emails were also sent to members of the local CoC. The dedicated HOME-ARP webpage is updated periodically to add new information or provide notice of upcoming surveys or events.

- **PUBLIC HEARING PUBLIC NOTICE: 12/1/2022** **“Attachment A”**
- **PUBLIC HEARING: 12/14/2022**
- **DRAFT PLAN PUBLIC NOTICE: 2/6/2023** **“Attachment B”**
- **DRAFT PLAN PUBLIC COMMENT PERIOD: 2/7/2023 - 2/21/2023**

PUBLIC PARTICIPATION PROCESS:

To encourage public participation, the City of Lorain created an 8-question survey to encourage citizens of Lorain to easily participate in the conversation about the services and housing gaps and needs among the Qualifying Populations.

The survey was posted for 2 weeks on the website and the City's Facebook page. Email notices with the link went out to the CoC, members of City Council, members of the Departments in City Hall, on the Facebook page and shares from the Facebook page. The survey was conducted via a ranking system where the respondent answered by selecting a number between one and the last, whereas one was the most important and the highest/last number was the least important for each question. The survey then calculated the sum of each priority need based on the number selected by the respondents. The lower the total rank, the higher the priority.

The City received 115 responses and asked which group they identify with: Non-profit or Community-Based Organization (59%), General Public (16%), Person of the QPs (10%), Other (14%). We provided an explanation for the survey and gave a detailed description of the

qualifying populations and the eligible activities to assist respondents with understanding the survey.

The respondents provided the following recommendations regarding priorities:

- The City should prioritize assistance to families with children
- The City should prioritize supportive services for the qualifying populations
- The City should create shelters out of existing buildings within the City
- The City should prioritize housing services under supportive services for the qualifying populations
- The City should prioritize the funding in the following order: supportive services, affordable rental housing, non-congregate shelters, tenant based rental assistance
- The biggest gaps in the current shelter and housing inventory are the lack of shelters for homeless families
- The biggest gaps in the supportive service system are the lack of services for homeless families

Describe efforts to broaden public participation:

Public participation was encouraged through the City's website, the use of social media, shares by members of the community, and visits by staff to locations where the qualifying populations could be found, such as the Homeless Stand Down event hosted by the Lorain County Homeless Taskforce. The Continuum of Care, made up of over 130 members, shared information with their staff and clients to assist the City with getting the word out about participating in the survey, attending the public hearing, and sharing feedback to the team. The City also attended all monthly CoC meetings to ensure all participants were aware of the upcoming events happening around HOME-ARP.

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

During the Public Hearing, most comments were centered on the types of activities the program can fund with comments about specific projects that an individual was interested in doing.

- The first comment received was a statement from administration after attending a meeting in Columbus about housing: Affordable housing is found to be a great need in the City of Lorain and Lorain County. Research has uncovered a great need for housing, affordable housing number one, followed by transportation.
- How many projects are you funding? Is there a cap on the amount? Can this funding be used for projects already in process? It was explained that there is no max amount at this time and that Notice of Intents were released the week prior. No plan is currently in place and that we are utilizing this feedback for the development of said plan.
- There is a need to serve formerly incarcerated individuals to assist them with getting on their feet, getting job training, and getting employment.

- Attendee mentioned individuals who “squat” in abandoned houses and asked if anything can be done about that
- There was expressed concern about temporary shelters that house only men or only women and the limitation that creates.
- There were concerns about sex offenders not being allowed in temporary shelters or the non-congregate shelter but having no place for them to go.
- There is a need for non-congregate shelters for families.
- Clarification and additional details were requested and provided about the qualifying populations
- Inquiry about the funding being available for existing programs or is it just for new programs.

During the second public comment period, from February 7-21, three email comments were received with the subject line HOME-ARP but were not related to the HOME-ARP plan. The messages sent by the residents were addressed separately and immediately.

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

The City accepted all of the feedback from the public hearing as this was a hearing on needs and no specific projects were proposed or discussed. Most attendees had more questions than comments. Further clarification was requested on what kind of activities the funding can support. There was also discussion about the details behind the preferences and limitations. The City reiterated the importance of any projects or activities utilizing this funding must provide access to all of the qualifying populations.

As mentioned above, the second comment period from February 7-21 received three emails from residents that were not specific to the HOME-ARP plan and those inquiries were addressed separately and immediately.

NEEDS ASSESSMENT AND GAPS ANALYSIS

The information provided in this section draws on the needs and gaps analysis, consultations, CoC HMIS (Homeless Management Information System) data, Point-In-Time (PIT) count information, public federal data sources, and independent studies conducted for the City.

Like many communities, Lorain has an insufficient inventory of affordable housing for most income tiers up to 80% Area Median Income (AMI).

The Lorain Metropolitan Housing Authority (LMHA) manages over 1400 0-6 bedroom units in Lorain County and the waiting lists for housing are approximately 6 to 12 months or longer for project based occupancy.

According to the Comprehensive Housing Affordability Strategy (“CHAS”) data, there is over 33,000 renter households in Lorain County at or below 100% HUD Annual Median Family Income (HAMFI), 11,000 of which are at or below 30% HAMFI. Over 6,000 have income between 30% and 50% HAMFI and more than 6,000 between 50% and 80% HAMFI. More than 24,000, or 73%, of renters experience housing problems, which includes incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and are cost burdened greater than 30% to 50% of their income. Cost burden is the ratio of gross housing costs to household income. If an individual makes \$15.00 an hour (\$1,200 gross pay biweekly) and rent plus utilities costs \$1,000, they are 41% cost burdened. This also doesn’t take into consideration car payment(s), gas and insurance, debt payments, or any additional expenses necessary for stability.

While available affordable housing is lacking, so is the need for temporary shelter to assist the QPs with transitioning from homelessness to shelter to stable housing. The existing shelters in the area serve very specific qualifying populations and most of them don’t include all populations into one shelter. There is only one shelter in Lorain County that accepts all qualifying populations. The gaps analysis shows that there is a gap of 3 larger shelter rooms or 8 beds available for large families and an additional 15 beds and units needed for singles/adults. There is an overwhelming need for shelters for families so they don’t need to be split up during an extremely difficult time in their lives.

Emergency Shelter, Transitional Housing, and Permanent Supportive Housing shows a gap need of 8 family beds and 15 adult beds necessary to provide for the QPs.

The City and County also lack sufficient supportive service resources to assist the QPs with transition from homeless to shelter or housing. Staffing for case management is low and making sure clients have sufficient services for their needs is challenging in today’s climate. The lack of a proper transportation system inhibits individuals from reaching the services that are available. Lorain County has a transit system that is extremely underwhelming and not robust or effective in serving the most vulnerable population. Funding is lacking to create programs that will assist the QPs with case management and transportation services.

GAPS & NEEDS QP ANALYSIS PROFILE TABLE

TOTAL HOMELESS-SHELTERED	Total	Veteran	Chronic	Physical/ mental health condition	Experienced DV/Fleeing DV	No Income
Adults	116	24	37	79	17	73
Children	15		4	1	5	

Data Source: 2022 Lorain Sheltered Homeless Annual Performance Report

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	30	6	84	0	0								
Transitional Housing	7	2	42	0	30								
Permanent Supportive Housing	210	59	221	221	200								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						7	116	31	6				
Unsheltered Homeless						4	25	2	3				
Current Gap										8	3	15	15

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

OPTIONAL 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 (<i>City of Lorain</i>)	12,129		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	5,186		
Rental Units Affordable to HH at 50% AMI (Other Populations)	6,237		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		354	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		352	
Current Gaps			706

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

SIZE AND DEMOGRAPHIC COMPOSITION OF QUALIFYING POPULATIONS WITHIN THE PJ'S BOUNDARIES:

The City of Lorain is one of the ten largest communities in Ohio, located on the shores of Lake Erie at the furthest point North of Lorain County in the State of Ohio. The City of Lorain is part of the Lorain County Continuum of Care (CoC), which is part of the Balance of State Continuum of Care (BoSCoC) and encompasses nine cities, seven Villages, and eighteen Townships. As Ohio's ninth largest city, the estimated population is 65,211 across 23.67 square miles of land. The City has the highest renter occupancy at 44% and the oldest housing stock in the County at 24% of homes built before 1939.

Homeless as defined in 24 CFR 91.5

The CoC Point In Time Count (PIT Count) is conducted County-wide to determine those who are unsheltered homeless. Lorain County has seen a significant increase in homelessness since 2017. The Public health and economic crisis plays a huge role in the challenges faced by the homeless community. The Lorain County Coordinated Entry System was implemented in 2018 to address the need for additional homeless support.

As of the 2023 PIT count, 37 total persons were found completely unsheltered; the demographic is made up of 31 adults and 6 children under the age of 17. This includes 23 white persons, 8 black persons, 4 multiple race person and 2 unknown. Of these persons, 22 are male, 11 are female, 1 is questioning, and 2 are unknown. There were no veterans or domestic violence victims reported in the PIT count at the time of the reporting.

As of the 2022 PIT count, 33 total persons were unsheltered; this includes 1 family with children and adults; 29 adults age 25 and over; 2 adults age 18-24. There were no veterans or domestic violence victims reported in the PIT count.

Sheltered Homeless, as of the data retrieved from 2022, indicates 131 total persons were sheltered without permanent housing. This includes 116 adults and 15 children. Of this total, 88 were adult men, and 28 were adult women. Of the 15 children, 6 were male and 9 were female. 13 were between the ages of 18-24. Of the 131 total, 79 were white, 49 were Black/African American, 1 American Indian, and 2 Multiple Race and 26 were Hispanic.

As is the case in most communities in America, black individuals make up 9% of the population in Lorain County but make up 30% of the total homeless population. People who are Hispanic make up 10% of the Lorain County population but make up 13% of the homeless demographics. Whites make up 77% of the Lorain County population and account for 48% of the homeless population.

At risk of homelessness as defined in 24 CFR 91.5

From year 2020-2021, individuals with an average income ranging from \$100-\$2000 month declined slightly from 40% of the total to 37%, which is well below the 30% Annual Median Income for the area. This loss of income and the rise of rental rates can be a direct correlation

to the increase of the at risk of homelessness population. According to the City of Lorain's Municipal Courts, from 2019 to 2022, there were 8,118 evictions filed in the City of Lorain. Many of the evictions filed were repeat defendants.

Furthering the evidence of growth in this population, since December 2020, the Lorain County Urban League through a collaboration with the City of Lorain, received over 100 applications for their Emergency Assistance Program (EAP). This program provides assistance to households who have fallen in arrears with rent and/or utility payments. Additionally, the United Community Assistance Network has provided \$313,324.02 in assistance of rent and deposits to the residents of Lorain County.

According to the Lorain City Schools' Wrap-Around Services, there are 29 families doubling-up; meaning families are forced to live together in inadequately sized housing due to a lack of financial resources. There are 18 students that are currently living in shelter, 12 in hotels, and six that are couch surfing, sleeping in cars, etc.

There were a total of 27 households served through the Lorain Nord Center's housing programs during 2022; one household was previously homeless and returned to the program for assistance.

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

There were no domestic violence victims categorized under unsheltered individuals, but 10 individuals were counted as sheltered with an emergency housing voucher or temporary housing. From July 2021 through December 2022, Genesis House provided shelter for 136 adults, totaling 1,632 nights of safe shelter. Shelter was also provided to 108 children for a total of 1,289 nights of safe shelter.

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

The majority of Lorain's households (54%) fall below the HUD Area Median Income (AMI) and these households are disproportionately renters.

According to the CHAS data, there are over 11,000 renters in Lorain County at or below 30% HUD Annual Median Family Income (HAMFI). 100% of these households experience housing problems, which could include incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and are cost burdened greater than 30%. Cost burden is the ratio of gross housing costs to household income. If an individual makes \$15.00 an hour (\$1,200 gross pay biweekly) and rent plus utilities costs \$1,000, they are 41% cost burdened. This also doesn't take into consideration car payment(s), gas and insurance, debt payments, or any additional expenses necessary for stability.

The Rapid Rehousing program assists clients that are currently homeless and need assistance with securing permanent housing through financial assistance and case management. According to the 2/22/2022 Lorain Rapid Rehousing Annual Performance report for the night of the Point In Time count, there were 31 households served, meaning secured permanent housing, which included 25 adults and 6 children, with 7 adults being identified as chronically homeless. Among the households,

there were at least 27 with physical, mental, or health related conditions reported; there were 3 persons that reported they experienced domestic violence or are currently fleeing domestic violence; and 16 of the households reported having no income at intake of the program. 38.71% of persons identified as White, 41.94% identified as Black, African, or African American, 16.13% identified as Multi-Racial, and 3.22% identifying as American Indian, Alaska Native, or Indigenous. 83.87% identified as Non-Hispanic/Non-Latin(a)(o)(x) and 16.13% identifying as Hispanic/Latin(a)(o)(x). Considering Lorain County's population consists of 9% Black, African, or African American, there is a large disparity among this community with 41.94% Black, African, or African American representing our current homeless population.

According to HMIS Rapid Rehousing Program New vs Re-entry Client Report for the year 2022, Rapid Rehousing served a total of 98 households which encompassed 154 persons. Of that, 91 households encompassing 146 persons total were first time recipients of services for rent, security deposits, utility deposits, and case management. There were 7 households with 8 persons that were returning clients requesting assistance again.

According to the Program Recidivism reports for the year 2022 for both of our emergency shelters, in 2022 the shelters had 582 clients exit their shelter programs. Of those exits, only 105 exited to permanent destinations and 15 returned to shelter at some point during that year.

CURRENT RESOURCES AVAILABLE TO ASSIST QUALIFYING POPULATIONS, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing: HOUSING

There are over 1,400 0-6 bedroom units available throughout the County by the Lorain Metropolitan Housing Authority (LMHA). There are 3,156 Tenant Based Rental Assistance vouchers and Section 8 vouchers, 117 Veterans Affairs Supportive Housing (VASH) vouchers, 46 Emergency Housing vouchers, and 72 Project-Based vouchers available through LMHA. Over \$1.6 million dollars have been paid out to assist with rental needs for over 9,000 families in the County.

Two types of housing across eighteen locations are available to those most at risk of homelessness and other vulnerable populations with an income of less than 30% AMI: Section 8 Project-Based and LIHTC Housing. In addition, Housing Choice Vouchers (Section 8 vouchers) are available through the Lorain Metropolitan Housing Agency. According to the LMHA, waiting lists for Section 8 project-based housing are approximately 6 to 12 months, with an occupancy rate of 98%. Approximately 2000 of a total of 3129 Housing Choice Voucher holders in Lorain County choose to live in the City of Lorain. 955 units are available in the City for the low-income population and of those 739,216 are designated to seniors and the disabled.

SHELTER

In Table 1, the Lorain County CoC emergency shelter inventory includes 114 beds at five different shelters, where only two shelters allow children (98% occupancy). There are 21 beds available for anyone fleeing a domestic violence and/or intimate partner relationship (100%). There are 49 beds available in transitional housing (85%), 30 rapid rehousing units (99%), and 280 units of permanent supportive housing, 200 reserved for Veterans, but all require a disability to be admitted.

There is only one congregate shelter available to all of the qualifying populations that accepts everyone without discrimination based on familial status or sex. There are no non-congregate shelters available aside from hotels that accept vouchers from temporary stayers. The remaining shelters in the area are single sex only and are scattered throughout the City and County.

Rapid rehousing is available to clients through the Nord Center and referred through Coordinated Entry (CE). This program allows approved applicants to lease an available unit from any participating landlord or property manager. A wait list exists to include adults, families, single parents with children or couples, and anyone who is homeless who is referred by CE qualifies due to their extensive assessment system in place.

The County has a dedicated domestic violence center that advocates on behalf of those who are victims of domestic violence. Lorain County Safe Harbor-Genesis House has a 21-bed crisis shelter for anyone fleeing a domestic violence, intimate partner relationship. They may stay for only 45 days before they are transitioned out into either transitional housing or permanent housing. Their goal is to maximize the victim's opportunity to survive and for families to heal, and to assist individuals to obtain physical and mental well-being, all while helping them gain independence, and minimize the trauma involved in coping with family violence.

In fiscal year 2021-2022, shelter was provided to 102 adults and 86 children. They also provided community education and batterer's intervention programs that included 59 presentations to adults, 122 community awareness activities, 178 school presentations and 429 points of services.

They have a 24/7 365 days a year hotline and online chat available to anyone who needs their assistance. They provide resources to assist with finding housing, employment, and/or ongoing support services. Children advocates provide art therapy and work directly with the children in the shelter to help navigate their trauma. Genesis House provides Legal Advocacy support, ongoing aftercare support, and support groups.

SUPPORTIVE SERVICES

The City of Lorain is unique in many ways due to the nature that most available housing units, supportive services, and shelters are located directly in the City and accessible by all County residents.

Since mid-2021, the City allocated \$200,000 for the Lorain County Urban League to manage an Emergency Rental Assistance Program. The funding assists individuals from Lorain who need emergency rent, mortgage, or utility assistance so they can remain housed. The program has assisted thirty six rental households and one homeowner since the program's inception and there are forty-four remaining applications to be reviewed for approval. This funding supports those at risk of homelessness and those with extremely low incomes. Assistance was provided to twenty applicants with extremely low income, twelve applicants with low income, and three applicants with moderate income under the HUD income guidelines at the time of the distribution.

The City has also provided funding to the Second Harvest Food Bank to assist with the influx of households needing assistance with access to food.

The CoC has organizations that assist the QPs with access to case management, transportation arrangements, access to health services, jobs and employment training programs.

TBRA

There are 3,156 Tenant Based Rental Assistance Vouchers available through LMHA in Lorain County.

UNMET HOUSING AND SERVICE NEEDS OF QUALIFYING POPULATIONS:

In speaking with the community partners in the county, the most unmet needs and services is the need for affordable housing, supportive services, and non-congregate shelter. Throughout the consultations, it was echoed among multiple stakeholders that the QPs have the most difficult time with finding decent, safe, and affordable housing; accessing resources such as case management, transportation assistance with life skills, tenant/landlord mediation services, mental health services; and assistance with overcoming the stigma of having a criminal record.

Homeless as defined in 24 CFR 91.5

The unmet housing need for the homeless population is shelter and permanent housing, and supportive services. Throughout the City of Lorain there is a shortage of available affordable housing units and also a shortage of available beds for individuals seeking shelter. The County has only 30 shelter beds available for families among 6 units, and 84 shelter beds available for adults. Among the 79 beds available in transitional housing, only two are available for families; and of the 631 beds available in Permanent supportive housing, only 59 are available to families, or less than 1%. There are 152 sheltered and unsheltered homeless persons or families with at least one child, but only 114 emergency shelter beds available in the County; leaving a vacancy of 40^{+/-} beds at any given time.

It was echoed throughout the consultations and public hearing that there is not enough available housing or shelter for large families and multi person households. Many times families will choose to remain homeless so they may stay together rather than be split up between shelters. The gap analysis provides evidence that there is a lack of shelters accessible to families and for the shelters that do accept families, there aren't enough beds available.

To combat homelessness, an unmet need that must be addressed is the availability of supportive services from case management through transportation. More importantly, placing an emphasis on transportation is required for this population to stabilize their living situations and reduce individuals' chances of returning to homelessness. The transportation system in Lorain County does not provide regularly scheduled stops to or around the services that are available to the QPs.

At risk of homelessness as defined in 24 CFR 91.5

The abundance of comments heard from the community about the housing needs for the at-risk of homeless population are affordable rental housing.

According to the Comprehensive Housing Affordability Strategy ("CHAS") data, there is over 33,000 renter households in Lorain County at or below 100% HUD Annual Median Family Income (HAMFI), 11,000 of which are at or below 30% HAMFI. Over 6,000 have income between 30% and 50% HAMFI and more than 6,000 between 50% and 80% HAMFI. More than 24,000, or 73%, of renters experience housing problems, which includes incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and are cost burdened greater than 30% to 50% of their income. Cost burden is the ratio of gross housing costs to household income. If an individual makes \$15.00 an hour (\$1,200 gross pay biweekly) and rent plus utilities costs \$1,000, they are 41% cost burdened. This also doesn't take into consideration car payment(s), gas and insurance, debt payments, or any additional expenses necessary for stability.

There are over 2,000 households on the LMHA waiting list to obtain public housing. This list has an average wait time of 6-24 months depending on the size of the unit desired. Additionally, 2,002 households received rent or utility assistance in 2022 through the Lorain County Jobs and Family Services Department. The Emergency Rental Assistance provided by the City of Lorain to the Lorain County Urban League is quickly running out and additional funding is unavailable. There remains a wait list of 34 more applicants who applied for Emergency Rental Assistance but there may not be enough funding to cover all who qualify.

Unmet services for this population include a variety of Supportive Services that are unavailable or unattainable for this QP. There is an overwhelming staff shortage of Case Managers to address the overwhelming influx of individuals at risk of losing their housing. This population experiences insufficient resources or support networks available to them that could aid in the ability to maintain suitable and sustainable housing. They find themselves

living out of hotels or couch surfing, or living in their car. There are many who are or were once incarcerated and have nowhere to go once their time is served.

Unaccompanied Youth have an extremely hard time obtaining housing due to their age. This puts a heavy burden on those who are looking for housing when there may not be an established credit score or income history to support the qualifications. Many youth ages 18-24, especially those still in school, find themselves couch surfing or living with relatives because their home life is unsuitable for them. Students are finding themselves and their families doubling up to share the expenses while living in an insufficient living environment not large enough for each household.

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

The unmet housing need for victims of sexual assault and domestic violence is having access to resources and housing when it is necessary for them to leave their home because the perpetrator is in the home. There is also a need for emergency shelter for victims to have a safe place to go after fleeing so they may keep their families together.

Most of the unmet services need go hand in hand with each other to address the overall approach to combating sexual assault, domestic violence, and human trafficking. The most difficult challenge this QP faces is access to services that can provide them with the support and assistance they need to transition from a traumatic event to getting better. The lack of transportation prohibits individuals from accessing the services they need. Without transportation, they can't access the much needed mental health services specific to sexual assault trauma, which is only located in a specific area of the County. In order to provide survivors with access to services, they must first find a way to get there.

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

According to the CHAS report in 2022, 10 households exited the homeless system to temporary living situations, including transitional housing and temporarily staying with friends or family, or unknown destinations. Households without permanent housing may be more likely to experience returns to homelessness. This suggests a need for affordable housing units to support extremely low and low-income households.

The City had a Fair Housing Impediment Study conducted that determined that even when decent, affordable housing is available, source-of-income discrimination limits housing choices for Housing Choice Voucher holders, preventing them from living in choice neighborhoods. The City is currently in the process of adopting an amendment to the Fair Housing ordinance prohibiting Source-of-Income discrimination.

Criminal background checks also serve as a barrier to rental housing. Many landlords who were previously only going back 3-5 years on criminal background checks are now going back 5-10 years due to the fear of nonpayment after the Covid-19 eviction moratoria.

The most unmet service need viewed by the community and stakeholders is the need for homeless prevention services. This includes employment assistance and job training, especially for those who may have a criminal history. There is a need for access to housing search and counseling services to assist with locating affordable housing searches, tenant/landlord mediation, and rent assistance. Legal services are needed for this population because of the possibility of facing eviction for unpaid rent due to their extremely restrictive income. This population also lacks the services for budgeting and credit counseling to understand its importance.

According to the Homeless Systems Strategic Plan for Lorain County that was conducted in 2021, recommendations were made for landlord recruitment efforts to be made between various agencies and organizations to re-build relationships with landlords by offering various supports and incentives to encourage landlords to accept the various subsidies that are offered to those needing more long-term supports. During consultations, most agencies have agreed there is a need of a housing specialist to lead this effort.

It is also recommended to increase supportive services for Spanish Speaking individuals. These families are not well represented in HMIS data as they tend to stay with friends and family than enter a shelter program. Lorain County lacks Spanish speaking services in several critical housing/homeless programs.

During consultations, it has been addressed that wrap-a-round supportive services are lacking for households that recently secured permanent housing. There are services available for those that are chronic and secure permanent supportive housing, but rarely is there supportive services for those that are unable to secure supportive housing programs that would benefit from additional services. Currently, Rapid Re-Housing Program and Homeless Prevention assist clients with additional supports as well as one shelter that serves men only. Otherwise, there is no other supportive assistance for those exiting shelter programs. Clients have stated they are unfamiliar with community resources, how to access the resources, and oftentimes, the application process is too complicated for them to navigate on their own. Clients and agencies have both stated having a housing retention specialist would greatly enhance the likelihood of retaining housing and preventing those at most risk or instability returning to homelessness.

Veterans: There were 24 homeless veterans in 2022, according to the 2022 Annual Performance Report. Of these 24, 5 were chronically homeless and 19 non-chronically homeless veterans were housed through the CoC. Veterans often face additional, compounding barriers that may include mental health and/or substance abuse disorders, lack of income or rental history, or criminal history.

GAPS WITHIN THE CURRENT SHELTER, HOUSING INVENTORY, AND SERVICE DELIVERY SYSTEM:

According to 2-1-1 Counts, 1,758 requests were made for housing and shelter assistance between February 2022 and February 2023 in the City of Lorain. This was the top request at 24.7%. Of this request for housing and shelter, 20.3% was for shelter and 52.7% was for rental assistance. 220 requests were made for transportation assistance with 19% was for public transportation, and 18% for automobile assistance.

According to a study conducted in 2021 by the Corporation for Supportive Housing (CSH) to evaluate the community's current response to homelessness and provide a strategic plan for implementation. It was concluded that there is a need to construct 87 new units of permanent supportive housing, and assisting youth with shelter and housing intervention. It stated the need for improved collaboration among the organizations that support the homeless populations. It also stated urgent needs which included identifying and securing funding to support a person and organization with capacity to lead the work forward. This was accomplished by bringing in the Continuum of Care Coordinator through United Way of Lorain County.

While affordable housing is lacking, so is the need for temporary shelter to assist the QP with transitioning from homelessness to shelter to stable housing. The existing shelters in the area serve very specific qualifying populations and most of them don't include all populations into one shelter. There is only one shelter in Lorain County that accepts all qualifying populations. The gaps analysis shows that there is a gap of 3 larger shelter rooms or 8 beds available for large families and an additional 15 beds and units needed for singles/adults.

An Older Adults Needs Assessment was also conducted in 2021 by The Lorain County Office on Aging (LCOOA) and it was determined that the lack of transportation is the County's number one issue for all of the qualifying population. Over 8% of Lorain households on average have no access to a vehicle, compared to 5.4% of Lorain County households, and 8% of Ohio households. It has been recommended in many studies conducted for the City that the recommendation is for the City to work with the Lorain County Public Transit system and major employers to identify ways that transit can be provided to allow for key jobs-housing connections to be made.

Affordability of housing was also noted as a huge concern, with more than 50% of renters age 60 and over has income below \$25,000, while 15% have been behind on their rent and fear being evicted. At the time of drafting this plan, the 2022 HUD Income limits for 30% AMI is \$17,950 for one person.

PRIORITY NEEDS FOR QUALIFYING POPULATIONS:

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

- Rental housing that is affordable and accessible to individuals and households within the Homeless QP, the At Risk of Homeless QP, those fleeing or attempting to flee, domestic

violence, dating violence, sexual assault, stalking, or human trafficking, and others with income at or below 0-30% AMI.

- Non-Congregate shelter for families for the homeless QP
- Supportive Services to provide the necessary resources to the Qualifying Population to assist in the transition from shelter to being house for the Homeless QP, the At Risk of Homeless QP, those fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, and others with income at or below 0-30% AMI.

DETERMINING LEVEL OF NEED AND GAPS IN SHELTER, HOUSING, & SERVICE DELIVERY SYSTEMS THROUGH DATA:

In addition to feedback from the community, stakeholders, CoC members, and the Qualifying Population, the following data sources were consulted to determine the gaps and needs for the HOME-ARP QP:

- Lorain County CoC Annual Performance Reports, 2020 and 2022
- Homeless System Strategic Plan for Lorain County
- Lorain County Coordinated Entry System (CES)
- Lorain Metropolitan Housing Authority
- Lorain County Safe Harbor (Genesis House) Domestic Violence Data from 2021-2022
- Lorain County Older Adults needs Assessment 2021
- United Way of Greater Lorain County 211 System
- Neighborhood Retail Commercial Study, unpublished report, 2016
- Performance Profile Ohio Balance of State CoC
- HUD 2022 OH-507 CoC Homeless Assistance Program Homeless Population & Subpopulation
- 2023 Housing Inventory County (HIC) Report Ohio BoSCoc
- United Way of Greater Lorain County 2-1-1 Counts Data

HOME-ARP ACTIVITIES

Soliciting Applications:

The City will issue a Notice of Funding Opportunity (NOFO), consistent with the approved allocation plan, soliciting applications for funding. The NOFO will specify that the City is seeking applications related to the funding opportunities identified in the plan.

Activity Administration

The City will administer the overall HOME-ARP Program. The City will announce its intent to engage with outside agencies via the NOFO and expects to identify subrecipients to administer service activities and developers to produce the housing and NCS units. The City reserves the right to administer the program activities directly if no qualified subrecipients or developers are identified.

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

N/A

USE OF HOME-ARP FUNDING

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 600,000.00		
Acquisition and Development of Non-Congregate Shelters	\$ 380,301.60		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 490,150.80		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 259,491.60	15 %	15%
Total HOME ARP Allocation	\$ 1,729,944.00		

Distribution of HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The HOME-ARP budget was driven by result of the needs and gaps assessment and consultations with the stakeholders.

- Affordable rental housing for individuals and households at 0%-30% AMI
- Investment in supportive services for all QPs, particularly transportation services
- Creation of non-congregate shelter that can serve homeless families

The City will allocate 21% of its HOME-ARP grant to the creation of non-congregate shelter to increase the number available of beds and family size units ;34% to supportive services; and 28% will be available for the development of affordable housing. The remaining 15% will be set-aside for administration and planning.

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

The priority needs, determined by survey, consultations, and previously conducted studies for the City of Lorain, concluded that there is an imminent need for non-congregate shelter availability, permanent housing, and supportive services underlining transportation.

- Non-Congregate Shelter
 - The need for a non-congregate shelter to assist the QP with transitioning between temporary and permanent housing is necessary. Most of the existing shelters are segregated by sex and not available to all QPs. It is evident from the analysis that there is a need for non-congregate shelter for all QPs including larger families.
- Housing
 - The City of Lorain lacks quality affordable housing units for individuals and families. There are over 2,000 people on the wait list for Public Housing through the Lorain Metropolitan Housing Authority. The wait time, on average, is 6-12 months with some properties having a wait list of 24 months or longer. There is also a lack of landlord participation with programs that assist those who fall under

the definition of the QP and an overall disregard for maintaining the units they lease in the community.

- Supportive Services
 - Increased investment in the supportive services across all QP's emphasized the need for supportive services to assist the qualifying population with transitioning out of homelessness.

HOME-ARP PRODUCTION HOUSING GOALS

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

The City estimates the number of affordable rental housing units available for the QP will be 2-3 units based on the allocation amount and other needs in the community.

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

The City estimates the development of 2-3 affordable rental housing units for Qualifying Populations to address the needs as outlined in the plan. The City will work with developers and local non-profit entities to acquire, rehabilitate, and/or construct new affordable rental units. The City may work with the Lorain Metropolitan Housing Authority to secure project-based vouchers to ensure units are financially sustainable throughout the minimum compliance period.

PREFERENCES

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

The City will provide access to all Qualifying Populations but will prioritize homeless individuals and families for access to emergency shelter. The only preference the city will permit will be for homeless individuals and families in the NCS in order to ensure that the unmet need for shelters for families is addressed. The City will ensure that the other QPs will still have nonpriority access to the NCS and access to all rental and service activities.

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

The City of Lorain will require an emergency non-congregate shelter to utilize a project-based waiting list open to referrals from all sources, including the CoC's Coordinated Entry System (CE). As with most CE's, there is a focus on priority need using vulnerability assessments. Nevertheless, the City wants to ensure that all QP's have access to shelter. The rental housing and services to be funded with the other HOME-ARP funds will be available to all 4 QPs without a preference.

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

A project has not yet been selected for shelter needs, but there will be a preference for the homeless QP to access emergency non-congregate shelter because most emergency shelters only allow access to individuals who have no other form of housing or shelter. This will address the unmet need of families seeking shelter who don't want to split up or for individuals who lack other resources available to assist with their shelter or housing needs.

Coordinated Entry (CE) may be contacted by any QP for general assessment but may also access the emergency non-congregate shelter project directly. This is to ensure that all QP's have streamlined access for their need. The City will ensure that any shelter project follows Fair Housing Compliance, and will not permit single-sex or adult-only NCS. It is anticipated that the NCS operator will have a preference for the currently homeless, but will be required to accept application from all QPs.

Access to supportive services will be provided based on chronological requests from service providers and individuals. The waiting list and processing of requests will be maintained by the subrecipient selected to administer the activity.

When selected, the affordable rental project will be required to maintain a project-based waiting list in chronological order.

REFERRAL METHODS

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

All people in the CoC's geographic area will have access to the project or activity, regardless of where or how they present for services. Services or shelter/housing provided by the agencies under the Lorain County CoC can be accessed through phone or walk-ins. A local 2-1-1 central contact for housing services is available for additional information about housing services in the county. This contact directs clients to the most direct services that meet their resource needs. The City will use chronological waiting lists for housing and any supportive services.

CE referrals will be permitted for all activities and CE referrals will be placed on the project activities waiting list in chronological order. The CE screening is anticipated to be used for determining eligibility of individuals and households for homeless population seeking non-congregate shelter only. CE and placement processes do not screen people out for assistance because of perceived barriers to housing or services, including but not limited to income or employment, drug or alcohol use, or a criminal record. In most projects, clients are not required to participate in services, although agencies will continually attempt to engage with clients if it is perceived that support is needed.

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

The CE is permitted to make referrals to all funded activities and has agreed to conduct intake from all four QPs. The CE screening process is anticipated to be used for NCS only. The City of Lorain will require the project or activity to have waiting lists open to referrals from all sources, but will use CE to make referrals, as necessary, for access to shelter. As with most CE's, there is a focus on priority need using vulnerability assessments. Nevertheless, the City wants to ensure that all QP's have access to shelter.

Any housing project funded with HOME-ARP will accept applicants to a direct project waitlist. This will ensure that all QPs have access to housing. The CE may be involved to undertake an initial assessment for eligibility; the information will ultimately be submitted directly to the project.

Supportive services will accept all QPs. The Activity may accept referrals from CE but also referrals from other providers as well as individual applications and the activity will have a chronological wait list as referrals come in from all sources. Each activity will be responsible for undertaking an activity based wait list and determining QP eligibility.

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

The CE uses a vulnerability assessment as its method of prioritization for its referrals. The City will use project based or activity based chronological waiting lists for all activities, but will use the CE intake referrals to place persons on the chronological project waitlist for the NCS project.

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

The City of Lorain will use project/activity-based chronological waiting lists for all projects and activities. Prioritization for currently homeless will be permitted for specific NCS projects.

LIMITATIONS

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

The City does not intend on limiting eligibility for any HOME-ARP projects.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families

in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City does not intend on limiting eligibility for any HOME-ARP projects.

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

Not Applicable

HOME-ARP REFINANCING GUIDELINES

- **Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity**

The City of Lorain will not be allocating funding to refinancing existing debt.

- **Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.**

The City of Lorain will not be allocating funding to refinancing existing debt.

- **State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.**

The City of Lorain will not be allocating funding to refinancing existing debt.

- **Specify the required compliance period, whether it is the minimum 15 years or longer.**

The City of Lorain will not be allocating funding to refinancing existing debt.

- **State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.**

The City of Lorain will not be allocating funding to refinancing existing debt.

- **Other requirements in the PJ's guidelines, if applicable:**

Not Applicable

**Notice of Public Hearing
2021 Annual Action Plan
HOME-American Rescue Plan (HOME-ARP)**

City of Lorain, Ohio
Department of Building, Housing and Planning

The City of Lorain (City) will be submitting a Substantial Amendment for the 2021 Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD). The Amendment consists of changes to the Home Investment Partnership Program (HOME) Grant to include the HOME-ARP Allocation Plan. The City of Lorain was awarded \$1,729,944.00 in HOME-ARP funds in a one-time allocation from HUD to benefit Qualifying Populations in the City of Lorain.

A public hearing for informational purposes and public comments on eligible HOME-ARP activities will be held on Wednesday, December 14, 2022 at 5:00 p.m. located at:

Lorain City Hall, Council Chambers
200 West Erie Ave., 1st Floor
Lorain, Ohio 44052

The City's proposed Allocation Plan for the HOME-ARP substantial amendment will be available for public review and comment for a 30 day period after the public hearing and finalization of the draft plan. It will be available on the website www.cityoflorain.org and at the City of Lorain, Building, Housing and Planning Department, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052. Written comments relative to the Allocation Plan can be mailed to the above address or emailed to sarah_karpinski@cityoflorain.org.

The Allocation Plan is required by HUD for the City to receive federal HOME-ARP grant funds. The HOME-ARP Allocation Plan is a strategic plan detailing the allocation of funding to assist individuals or households who are experiencing homelessness, at risk of homelessness, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and/or non-congregate shelter, to reduce homelessness and increase housing stability. The Allocation Plan defines the City's proposed use of federal HOME-ARP grant funds to address these needs.

The City will provide technical assistance to citizens and groups representative of persons that request such assistance in developing funding request proposals and in the review of program activities and program performance. In addition, the City will make adequate provisions to assist non-English speaking residents in interpreting program opportunities and provisions on a case-by-case basis, as well as provide auxiliary aides and services for individuals with disabilities. For requests for special accommodations please email or call Sarah Karpinski, Program Manager I - Housing, sarah_karpinski@cityoflorain.org or 440-204-2020. Requests for special accommodations must be made with reasonable advance notice.

Aviso de Audiencia Pública
Plan de Acción Anual 2021
HOME-Plan de Rescate Americano (HOME-ARP)

Ciudad de Lorain, Ohio
Departamento de Construcción, Vivienda y Planificación

La Ciudad de Lorain (Ciudad) presentará una Enmienda Sustancial para el Plan de Acción Anual 2021 al Departamento de Vivienda y Desarrollo Urbano de U.S. (HUD). La Enmienda consiste en cambios a la Subvención del Programa de Asociación de Inversión en Vivienda (HOME) para incluir el Plan de Asignación HOME-ARP. La Ciudad de Lorain recibió \$1,729,944.00 en fondos HOME-ARP en una asignación única de HUD para beneficiar a las Poblaciones Calificadas en la Ciudad de Lorain.

Se llevará a cabo una audiencia pública con fines informativos y comentarios públicos sobre las actividades elegibles de HOME-ARP el Miércoles, 14 de Diciembre de 2022 a las 5:00 p.m. situado en:

Ayuntamiento de Lorain, Salas del Consejo
200 West Erie Ave., 1^{er} Piso
Lorain, OH 44052

El Plan de Asignación propuesto por la Ciudad para la enmienda sustancial de HOME-ARP estará disponible para revisión y comentarios públicos durante un período de 30 días después de la audiencia pública y la finalización del borrador del plan. Estará disponible en el sitio web www.cityoflorain.org y en el Departamento de Construcción, Vivienda y Planificación de la Ciudad de Lorain, 200 West Erie Avenida, 5 Piso, Lorain, OH 44052. Los comentarios escritos relacionados con el Plan de Asignación pueden enviarse por correo a la dirección anterior o por correo electrónico a sarah_karpinski@cityoflorain.org.

El Plan de Asignación es requerido por HUD para que la Ciudad reciba fondos federales de subvención HOME-ARP. El Plan de Asignación HOME-ARP es un plan estratégico que detalla la asignación de fondos para ayudar a las personas o hogares que están sin hogar, en riesgo de quedarse sin hogar y otras poblaciones vulnerables, al proporcionar vivienda asequible, asistencia de alquiler, servicios de apoyo y/o no-refugio colectivo, para reducir la falta de vivienda y aumentar la estabilidad de la vivienda. El Plan de Asignación define el uso propuesto por la Ciudad de los fondos de la subvención federal HOME-ARP para abordar estas necesidades.

La Ciudad brindará asistencia técnica a los ciudadanos y grupos representativos de personas que soliciten dicha asistencia en el desarrollo de propuestas de solicitud de financiamiento y en la revisión de las actividades y el desempeño del programa. Además, la ciudad tomará medidas adecuadas para ayudar a los residentes que no hablen inglés a interpretar las oportunidades y disposiciones del programa caso por caso, así como brindar ayuda y servicios auxiliares para personas con discapacidades. Para solicitudes de adaptaciones especiales, envíe un correo electrónico o llame a Sarah Karpinski, Gerente de Programa I - Vivienda, sarah_karpinski@cityoflorain.org o 440-204-2020. Las solicitudes de adaptaciones especiales deben realizarse con una antelación razonable.

**Public Notice of Availability
Substantial Amendment to the FY 2021 Annual Action Plan
HOME-American Rescue Plan (HOME-ARP)**

City of Lorain, Ohio
Department of Building, Housing and Planning

The City of Lorain (City) will be submitting a Substantial Amendment for the 2021 Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD). The Amendment consists of changes to the Home Investment Partnership Program (HOME) Grant to include the HOME-ARP Allocation Plan. The City of Lorain was awarded \$1,729,944.00 in HOME-ARP funds in a one-time allocation from HUD to benefit Qualifying Populations in the City of Lorain.

In accordance with federal requirements outlined in Notice: CPD-21-10, notice is hereby given to citizens and stakeholders of the City of Lorain that a draft version of the HOME-ARP Allocation Plan is available for review and a 15-day public comment period will commence.

**Public Review and Comment Period for HOME-ARP Allocation Plan:
Tuesday, February 7, 2023 through Wednesday, February 22, 2023**

The City's proposed Allocation Plan for the HOME-ARP substantial amendment will be available for review on the City's website www.cityoflorain.org, at the City of Lorain, Building, Housing and Planning Department, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052, at the City of Lorain Main Library, 351 W 6th Street, Lorain, OH 44052, and at the South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055. Upon request, the Department of Building, Housing and Planning will provide a reasonable number of additional copies to citizens and groups. Written comments relative to the Allocation Plan can be mailed to BHP Housing Division, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052 or emailed to sarah_karpinski@cityoflorain.org. A summary of all citizen comments will be included in the substantial amendment to the Action Plan to be submitted to HUD on or before the March 31, 2023 deadline.

The Allocation Plan is required by HUD for the City to receive federal HOME-ARP grant funds. The HOME-ARP Allocation Plan is a strategic plan detailing the allocation of funding to assist individuals or households who are experiencing homelessness, at risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and/or non-congregate shelter, to reduce homelessness and increase housing stability. The Allocation Plan defines the City's proposed use of federal HOME-ARP grant funds to address these needs.

The City will provide technical assistance to citizens and groups representative of persons that request such assistance in developing funding request proposals and in the review of program activities and program performance. In addition, the City will make adequate provisions to assist non-English speaking residents in interpreting program opportunities and provisions on a case-by-case basis, as well as provide auxiliary aides and services for individuals with disabilities. For requests for special accommodations please email or call Sarah Karpinski, Program Manager I - Housing, sarah_karpinski@cityoflorain.org or 440-204-2020. Requests for special accommodations must be made with reasonable advance notice.

Aviso Público de Disponibilidad
Enmienda Sustancial al Plan de Acción Anual Para el Año Fiscal 2021
HOME-Plan de Rescate Americano (HOME-ARP)

Ciudad de Lorain, Ohio
Departamento de Construcción, Vivienda y Planificación

La Ciudad de Lorain (Ciudad) presentará una Enmienda Sustancial para el Plan de Acción Anual 2021 al Departamento de Vivienda y Desarrollo Urbano de EE. UU. (HUD). La Enmienda consiste en cambios a la Subvención del Programa de Asociación de Inversión en Vivienda (HOME) para incluir el Plan de Asignación HOME-ARP. La Ciudad de Lorain recibió \$1,729,944.00 en fondos HOME-ARP en una asignación única de HUD para beneficiar a las Poblaciones Calificadas en la Ciudad de Lorain.

De acuerdo con los requisitos federales descritos en el Aviso: CPD-21-10, por la presente se notifica a los ciudadanos y partes interesadas de la Ciudad de Lorain que una versión preliminar del Plan de asignación de HOME-ARP está disponible para revisión y un periodo 15 días para comentarios público comenzará.

Período de Revisión y Comentarios Públicos Para el Plan de Asignación de HOME-ARP:
Martes, 7 de Febrero de 2023 hasta el Miércoles, 22 de Febrero de 2023

El Plan de Asignación propuesto por la Ciudad para la enmienda sustancial HOME-ARP estará disponible para su revisión en el sitio web de la Ciudad www.cityoflorain.org, en el Departamento de Construcción, Vivienda y Planificación de la Ciudad de Lorain, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052, en la biblioteca principal de la Ciudad de Lorain, 351 W 6th Street, Lorain, OH 44052, y en la biblioteca de South Lorain, 2121 Homewood Drive, Lorain, OH 44055. Previa solicitud, el Departamento de Construcción, Vivienda y Planificación proporcionará un número razonable de copias adicionales a ciudadanos y grupos. Los comentarios por escrito relacionados con el Plan de Asignación se pueden enviar por correo a BHP Housing Division, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052 o por correo electrónico a sarah_karpinski@cityoflorain.org. Se incluirá un resumen de todos los comentarios de los ciudadanos en la enmienda sustancial al Plan de Acción que se presentará a HUD en o antes de la fecha límite del 31 de Marzo de 2023.

El Plan de Asignación es requerido por HUD para que la Ciudad reciba fondos federales de subvención HOME-ARP. El Plan de Asignación HOME-ARP es un plan estratégico que detalla la asignación de fondos para ayudar a las personas que están experimentando la falta de vivienda, o en riesgo de quedarse sin hogar, huyendo o intentando de huir, violencia doméstica, violencia en el noviazgo, agresión sexual, acecho o violencia humana, trata de personas y otras poblaciones vulnerables, proporcionando viviendas asequibles, asistencia para el alquiler, servicios de apoyo y/o refugio no colectivo, para reducir la falta de vivienda y aumentar la estabilidad de la vivienda. El Plan de Asignación define el uso propuesto por la Ciudad de los fondos de la subvención federal HOME-ARP para abordar estas necesidades.

La Ciudad brindará asistencia técnica a los ciudadanos y grupos representativos de personas que soliciten dicha asistencia en el desarrollo de propuestas de solicitud de financiamiento y en la revisión de las actividades y el desempeño del programa. Además, la Ciudad tomará medidas adecuadas para ayudar a los residentes que no hablen Inglés a interpretar las oportunidades y disposiciones del programa caso por caso, así como brindar ayuda y servicios auxiliares para personas con discapacidades. Para solicitudes de adaptaciones especiales, envíe un correo electrónico o llame a Sarah Karpinski, Gerente de Programa I - Vivienda, sarah_karpinski@cityoflorain.org o 440-204-2020. Las solicitudes de adaptaciones especiales deben realizarse con una antelación razonable.

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

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

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

City of Lorain, Ohio

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M-21-MP-39-0220

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** City of Lorain, Ohio

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

34-6001700

*** c. UEI:**

JK3XKMDBYLL7

d. Address:

*** Street1:** 200 West Erie Avenue

Street2:

*** City:** Lorain

County/Parish:

*** State:** OH: Ohio

Province:

*** Country:** USA: UNITED STATES

*** Zip / Postal Code:** 44052-1606

e. Organizational Unit:

Department Name:

Building, Housing & Planning

Division Name:

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

Prefix:

Mr.

*** First Name:**

Matthew

Middle Name:

*** Last Name:**

Kusznir

Suffix:

Title: Director

Organizational Affiliation:

*** Telephone Number:** 440-204-2083

Fax Number: 440-204-2080

*** Email:** Matt_Kusznir@cityoflorain.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US Department of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership Program

* 12. Funding Opportunity Number:

M-21-MP-39-0220

* Title:

HOME-ARP

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Housing, shelter, and/or supportive services for 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

9

* b. Program/Project

9

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 09/20/2021

* b. End Date: 09/30/2030

18. Estimated Funding (\$):

* a. Federal	1,729,944.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	1,729,944.00

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

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

Mr.

* First Name:

Jack

Middle Name:

W.

* Last Name:

Bradley

Suffix:

* Title:

Mayor

* Telephone Number:

440-204-2002

Fax Number:

440-204-2542

* Email:

Jack_Bradley@cityoflorain.org

* Signature of Authorized Representative:



* Date Signed:

3/3/2023

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 Mayor
APPLICANT ORGANIZATION City of Lorain, Ohio	DATE SUBMITTED 3/3/2023

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.
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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 Mayor
APPLICANT ORGANIZATION City of Lorain	DATE SUBMITTED 3/3/2023

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

3/3/2023
Date

Mayor

Title