

# The City of Mansfield, Ohio



## HOME-ARP Allocation Plan

December, 2022

Prepared with the assistance of



## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Consultation

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

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

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### Template:

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

On August 29, 2022 a Brochure announcing an initial public/stakeholder meeting, with detailed information regarding the amount of HOME-ARP funding City of Mansfield had received, a summary of the purpose of the funding to reduce homelessness and increase housing stability and asking for their attendance was posted on the City of Mansfield website.

On August 29, 2022 an email invitation to the Public meeting was sent to 50+ Stakeholders that included the brochure and a description of what would be covered during the meeting. We emphasized the importance of their feedback and the value that they could bring in sharing what

they see as needs within the community, and activities that they feel would be helpful in meeting those needs. They were asked to verbally invite others, including members of the public, and to post the brochure, and send the meeting information electronically to others.

September 8, 2022 a Virtual Public and Stakeholder Meeting was held, as scheduled. The agenda included a presentation that included a look at the data that demonstrated potential needs for the funding, and a review of eligible activities that may be funded with HOME-ARP funds. Chat was provided for their comments and questions. The 14 attendees also participated in polling as a way of providing additional feedback to areas of need, what they thought the best uses would be, and areas that were not as important to fund. Questions were all based on eligible uses of funds. Questions, discussion, and comments continued through the end of the Meeting.

September 20 – 22, 2022 interviews were completed with 15 key Stakeholders. These individuals represented organizations serving one or more of the qualifying populations. All qualifying populations were covered within this group. Interviewees were provided ahead of time with all the eligible uses of funds. As a part of the interviews, they were asked to describe their organization and goals. How the funding could help them achieve their goals. They were then asked to think outside of their organization and to discuss needs within the community relative to the HOME-ARP funding, and about the best use of the funding in their communities.

This information was very valuable in identifying needs. This information was compiled in a document listing each organization and their confirmed areas of coverage and services. The information was then reviewed, and four key areas of focus were identified and discussed as a part of recommendations.

On November 14 and 18, 2022 four additional interviews were conducted with organizations that could potentially develop housing and/or provide Supportive Services to better flesh out the types of housing that is needed, constraints that could drive preferences relative to the qualifying populations, and other activity delivery and funding details.

**List the organizations consulted:**

<i>Agency/Org Consulted</i>	<i>Type of Agency/Org</i>	<i>Method of Consultation</i>	<i>Feedback</i>
<b>Catholic Charities</b>	Homeless service provider, working through the local Continuum of Care, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Interview, 2 <sup>nd</sup> interview with potential housing providers	Most significant needs – 1) Availability of housing for homeless. 2) Wrap around services – mental health services, need transportation to get to appointment. Rising inflation is impacting lower income households. A lot more homeless and more people at food pantry. A lot of nontraditional homeless – elderly, families. Work on preventing people from becoming homeless, there is already funding for homeless.
<b>Mansfield Metropolitan Housing</b>	Public Housing Agency (PHA's), Public agencies that address the needs of all four of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Public Meeting, Interview, 2 <sup>nd</sup> interview with potential housing providers, Public Hearing	Need matching dollars for Turtle Creek 120 units. Vision to keep building units. 80% toward affordable housing and agree that there is a need for services. They have Voucher's, but not developing housing. They are lacking in housing capacity. A lot of opportunities have been lost, and improvements to housing are much needed. Both the quality and the quantity of housing is poor.
<b>Safe Program – Mansfield City Schools</b>	Homeless service provider, working through the local Continuum of Care, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Interview	11 <sup>th</sup> 12 <sup>th</sup> graders, college students – a lot of homelessness at this level. Transportation, housing, lots of evictions, renting homes that are not decent, safe, and sanitary. Significant needs: High housing cost, and a lack of affordable housing. Need services and transportation is really important. Programming for kids after school. HOME-ARP Funding should be centered around housing. Families are living in unsuitable housing. Make sure that public transportation is taken care of. Ensure enough activities for children in the town. We don't want to put all of the poor people in the same place. Break the cycle of human poverty.

			<p>Landlords – calls almost every day where people are getting evicted for minor reasons, and places are not kept up. People are locked out for raising concern about living conditions.</p> <p>Transportation is a big problem. Legal counsel is also an issue. Unsuitable homes, evictions, etc. non-working refrigerator, black mold.</p> <p>Everyone wants to address the homeless situation, but they don't realize the extent that children are involved.</p> <p>Need more CHW's or case workers.</p>
<b>Catalyst Life Services</b>	Homeless service provider, working through the local Continuum of Care.	Interview	<p>Would like a facility that is mobile and can provide showers, food, etc. A shelter with a place where people can sleep, eat, and then go out and walk around.</p> <p>One of the primary barriers is the current cost of housing. A larger amount of available and affordable housing is needed. Permanent housing. A little development of tiny homes. A lot of people need their own space.</p> <p>Those who have mental health issues end up having guest who cause problems, causing them to get evicted.</p> <p>City as a whole should be addressed.</p> <p>They are getting homeless from neighboring Counties brought to them.</p> <p>Need funding for severely mentally ill to get people connected with housing. Money down, housing supplies, etc.</p> <p>Get people connected to work.</p>
<b>Mansfield Police Department</b>	Public agencies that address the needs of all four of the qualifying populations.	Interview	<p>Have created a homeless team of police officers who are working overtime to identify true homeless and those in need of mental health assistance.</p> <p>Have people coming from Mount Vernon, Norwalk to Richland County because they know services are here. More problems with congregating. Almost too many services.</p> <p>HOME-ARF Funding should be used for housing – lack of housing. Get people on the</p>

			<p>right track, they need somewhere to go. Group homes, assisted living, and standard housing.</p> <p>Best geographic target area in the City of Mansfield- put a pin in square and draw a circle out a mile. North end and South end.</p>
<b>North End Community Improvement Collaborative (NECIC)</b>	Homeless service provider, working through the local Continuum of Care.	Public Meeting and Interview, Public Hearing	<p>Need to continue to strengthen the food insecurity within the north end.</p> <p>Transportation is still a huge barrier. There are too many restrictions on funds that are provided.</p> <p>HOME-ARP Funding – Housing - Increase on rent has soared. Use dollars to truly help everyone. Places to live that are livable, setting some type of standards for landlords that addresses slum lords. Hold landlords accountable. Make sure housing is up to code and the rent is at a decent price. Help with timely housing assistance programs.</p> <p>Landlords will false advertise, house in person does not look like anything in picture. Not only that a lot of them (form of bullying), having the crazy application fee and purposely not renting out the property. Nonrefundable application fees charged to see house.</p> <p>North End is most vulnerable area. West Side in Saint Pete District (they are working on this), All sides of town – a lot of 2-bedroom housing. Need housing for families – HUD funds require boy girls to have separate bedrooms and after a certain age (vouchers, etc. foster care qualifying). Need 3 bedroom and up - 1 and 1.5 bathrooms. A lot of families have several children.</p> <p>NECIC is interested in the provision of supportive services.</p>
StrongerXChoice	Homeless service provider, working through the local Continuum of Care.	Interview	<p>Need shelter space. Not enough emergency overnight shelter space. A lot of abandoned houses. A lot of people going in the houses. Copper stolen for money. Fires started. Garages are slept in, or abandoned cars. Not safe for residents or person themselves.</p>

			<p>Need affordable housing, so they can have a place to send people when they have jobs and are doing well and ready to find homes. They get a job and still can't find a place to live. They start going to homeless shelters. They start bunking up again, which leads to other problems. They often can get an apartment and start moving in together which sounds good at first, but they get back into their old issues. Often keep repeating process.</p> <p>They are 100% community funding. They are unsure of any funding that can help supplement, have been told they do not qualify. They are a 501C3 and could really use additional funds for <u>operating costs</u>.</p>
<b>The Shelter</b>	Domestic violence and homeless service provider, working through the local Continuum of Care.	Public Meeting, Interview, 2 <sup>nd</sup> Interview with potential housing providers.	<p>Need housing case manager – was covered by another grant that ended. Trying to get more funding for this.</p> <p>Most significant need for these funds is housing. Need about 1,000 units of affordable housing. Sharrod Brown visited about 5 years ago – said biggest issue is affordable housing. Last summer there was an influx of people experiencing homelessness that arrived downtown and started camping out in gazebo area and other public places. Got attention of city officials. Not a lot of other resources. Harmony House is always full.</p> <p>Should be a continuum of care assess point that we are all using. Data base, document daily number of unmet needs. Have the tool. Harmony House is access point and Catholic Charities. Whole intent is when someone calls for services, they are entered into data base. Called the VISPDAT. However, screening tool has what appears to be invasive questions for someone experiencing homeless. Like 35 questions. Not really practical, but on other hand when used properly it gives the city opportunity to prioritize who needs it most. Need more organizations to use it.</p>

			<p>Need support for operating and administrative costs, especially since we are expanding space. Could use more funding for rental assistance.</p> <p>Could be beneficial for us to have a centralized person who is not from Harmony House or Catholic Charities that could be housing coordinator. Maybe a shared person employee that could help coordinate, working with community partners.</p>
<b>First Call 211</b>	<p>Homeless and domestic violence service provider, and veterans group service provider working through the local Continuum of Care. Representative of Richland County Coalition on Housing and Homelessness. Also, a representative for Richland County to the Region 2 Balance of State continuum of care.</p>	Public Meeting, Interview	<p>Coordinated entry access point is broken in Richland County. Two access points are Harmony House and Catholic Charities. If someone calls Harmony House and asks for shelter, they don't have the ability to capture diversion data. Funding could be used for a central clearing house of available units. Right now, we have put together a list of landlords, apartment buildings, and complexes. We run into a lot of individuals that need more one on one assistance to locate available housing and completing applications. One of the potential outcomes could see be to have a clearing house of available units as well as potential tenants who need housing. There are multiple community health workers in multiple organizations that are working one on one with clients, but it is still a decentralized system.</p> <p>There is a new system called Unite Ohio, they need more funding.</p> <p>If we had a housing coordinator in their department, salary, and wages to fund that position. Right now, our services are 24/7, and contracted with an outside entity another 211 center to take overnight calls. If they could bring that data 24 hours would need payroll dollars. Could fund a pilot project.</p> <p>No coordination with the Street project – Richland mental health and police. Data needs captured. i.e., streets project. How many people do we truly have on the streets?</p>



			If John Smith is being evicted from a permanent supportive housing project. No one knows that to pick him up and connect him to another supportive housing.
<b>COOHIO</b>	State Co-Applicant for the Balance of State CoC serving the jurisdiction's geographic area.	Interview	There is a significant need for investment in affordable housing for the qualifying populations.  Data provided relative to needs and capacity.
<b>Harmony House</b>	Homeless service provider, working through the local Continuum of Care.	Interview, 2 <sup>nd</sup> Interview with potential housing providers	The need for housing for homeless in our community is so great. We have a lot more people calling that need shelter. Need services in-house and transportation is a huge issue. Housing stock is desperately needed. Homes are old and in poor condition. We need affordable housing. There are gaps in funding for staffing and basic operations. Geographic target area would be closer to downtown. Funding should be put towards housing-transitional and permanent supportive.

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

The feedback received through meetings, and individual interviews covered a broad scope, but there was consistency of need expressed in these four areas: 1) The need for more quality affordable housing. People are coming out of shelters with nowhere to go and not enough units for those with vouchers. Often rental units are substandard, landlords don't want to rent to them, cost of rent is increasing. 2) Permanent Supportive Housing (PSH) and supportive services. Need a safe place to go, that provides resources for a variety of needs to create a better chance of

success in life for families and individuals. This will provide for better outcomes and not as many people that will end up starting the cycle all over again through homelessness and in need of recovery services. 3) Expand homeless shelters, services, and resources. There are a lot more homeless and people at food pantries. Too many are homeless due to lack of affordable housing, or mental health problems. Homeless shelters need expanded services and increased capacity i.e., transportation, case management, and counseling. 4) A centralized data system. Continuum of care access point that everyone is using. This would help with unmet needs and collaborative coordination between providers.

Data was reviewed that supported these focus areas of need. Additional interviews with service providers were scheduled and completed to discuss partnering of resources to cover more of the needs in these areas with the HOME ARP funding. Resulting in focus areas of development of affordable rental housing, supportive services, non-profit capacity building, and non-profit operating.

## **Public Participation**

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

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

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

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

### **Template:**

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

- ***Date(s) of public notice: 12/1/2022***

- **Public comment period: start date – 12/1/2022 end date – 12/16/2022**
- **Date(s) of public hearing: 12/6/2022**

**The City of Mansfield Community  
Development Department  
Substantial Amendment Notice 2021  
AAP  
HOME-ARP Plan Public Hearing**

The City of Mansfield is announcing a public hearing in reference to the 2021 HOME-ARP Plan. The public hearing will be held on December 6, 2022 @ 4:45pm in City Council Chambers. Copies of the proposed plan will be available on our website at <https://ci.mansfield,oh.us/community-development-home-arp/> or in our office at 30 N. Diamond St Fl. 8 Mansfield, Ohio 44902 on or before November 30, 2022. Comments regarding this plan must be submitted in writing to [acke-man@ci.mansfield,oh.us](mailto:acke-man@ci.mansfield,oh.us) or via mail to 30 N. Diamond St Fl 8 Mansfield, Ohio 44902. Comments must be received on or before December 15, 2022 @ 4:00 PM to be considered.  
(MNI Dec1, '22#5503478)

Order Confirmation for Ad #: 0005503478



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**Address:** 30 N DIAMOND ST  
MANSFIELD OH 44902 USA  
**Acct. #:** MCO-M8318  
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**Email:**  
**Fax:** CITY OF MANSFIELD - COMM DE  
**Ordered By:** Adrian Ackerman

Order/Start Date: 12/01/2022      Order End Date: 12/01/2022      PO #  
Year Sheets    Articles    Blind Box    Promo Type    Materials    Special Pricing  
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Net Amount    Tax Amount    Total Amount    Payment Method    Payment Amount    Amount Due  
\$108.25            \$0.00            \$108.25            Invoice            \$0.00            \$108.25  
  
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Product	# Ins	Start Date	End Date	Placement	Position
MCO-Man-Mansfield News Journal	1	12/01/2022	12/01/2022	MCO-Legal's	Legal Notices
MCO-Man-Mansfield Online	1	12/01/2022	12/01/2022	MCO-Legal's	Legal Notices

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

The public participation process was started in August 2022 by including an additional public meeting at the beginning, beyond that required. Our objective was to create as much public, organizational awareness, and opportunities for feedback as possible to increase the possibility of determining the best recommendations for use of funds. A virtual public meeting was scheduled, flyers were distributed physically to several City and Public Offices, which included Council Chambers, Community Development, Mayor's office, Library, Crossroads, Harmony House and other downtown businesses. Electronically information was provided (which included a QR code) and posted on the City of Mansfield website. Emails were sent to approximately 51 Stakeholders that included Police department, and members of the Homeless Coalition. Detailed information in regard eligible activities that may be funded with HOME-ARP funds were included.

December 1 - December 16, 2022 – Draft of plan will be reviewed and made available to the public, Public Hearing and Comment Period.

December 6, 2022 at 7:00 PM a Public Hearing was held with prior publications and notices in newspapers, through verbal and electronic communication. Stakeholders Alan Mitchell, NECIC commented that they are interested in and available to provide supportive services as it relates to housing. Steve Andrews, Mansfield Metropolitan Housing Authority provided comments supporting the significant need for additional housing in the community. These organizations were part of interview process prior to the Public Hearing.

In the Public Hearing attendees were reminded of the opportunity of the public comment period ending on December 16. There were no comments from the public during the public comment period.

There were no comments from the public at the Public Hearing, Tuesday, December 6.

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

August 29, 2022 - A Brochure announcing initial public meeting, with detailed information regarding the amount of HOME-ARP funding the City of Mansfield had received, a summary of the purpose of the funding to reduce homelessness and increase housing stability and asking for their attendance was posted on the City of Mansfield website, emailed to 50+ stakeholders, and hard copies provided to several City and Public Businesses.

We emphasized the importance of their feedback and value they provide in sharing what they are seeing as needs and activities they feel would be helpful in meeting those needs. They were asked to verbally invite others, post brochure, and send the meeting information electronically to others.

September 8, 2022 - A Virtual Public Meeting was scheduled and held. The agenda included a presentation that included a look at the data that showed possible needs for the funding, reviewed eligible activities that may be funded with HOME-ARP funds. Chat was provided for their comments and questions. The 14 attendees participated in polling as a way of providing additional

feedback to areas of need, what they thought the best uses would be, and areas that were not as important to fund. Questions were all based on eligible uses of funds. Questions, discussion, and comments continued through the end of the Public Meeting.

December 1 – 16, 2022 – Draft of plan reviewed and made available to the public, Public Hearing and Comment Period.

December 6, 2022 – Public Hearing held, which included a presentation of the draft plan outlining goals and plans, seeking to further educate the public on the contents of the plan. We also encouraged comments from the public at the meeting or through the public comment period that would end December 16.

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

There were no comments from the public at the Public Hearing or during the Public Comment period.

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

There were no comments from the public at the Public Hearing or during the Public Comment period.

## **Needs Assessment and Gaps Analysis**

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

**Table 2: Homeless Needs Inventory and Gap Analysis Table**

Homeless										
	Current Inventory			Homeless Population				Gap (Surplus) Analysis		
	Family	Adult	Adult	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 beds	# of units	# of beds
Emergency Shelter <sup>1</sup>	40	12	40							
Transitional Housing										
Rapid Rehousing <sup>1</sup>	-	6	2	25	69					
Permanent Supportive Housing <sup>3</sup>	40	20	69							
Total emergency and transitional housing	40	12	40							
Total Long-term housing with supportive services <sup>1</sup>	46	22	94							
Total Numbers <sup>2,3</sup>				3	49	1 <sup>4</sup>	9 <sup>3</sup>			
Number in emergency shelter <sup>2</sup>					58					
Number in transitional housing <sup>2</sup>					0					
Number unsheltered <sup>2</sup>					9					
<b>Current Gap</b>										
Temporary housing, including emergency shelter, transitional housing, and rapid rehousing options								7 <sup>5</sup>	9 <sup>5</sup>	8 <sup>5</sup>
Permanent supportive housing options <sup>6</sup>								7 <sup>5</sup>	3	41 <sup>5</sup>

<sup>1</sup> From Continuum of Care Housing Inventory Count (HIC) for 2021, the most recent available.

<sup>2</sup> Numbers are based upon the 2022 HUD Annual Performance Report for Richland County, and the 2022 and 2019 (more detailed) Point in Time Count captured through the Balance of State Continuum of Care, and are the most recent available.

<sup>3</sup> Number is based upon the 2010 Health Policy Institute of Ohio, profile of Family Violence in Richland County, each year there are 2,001 reports of abuse or neglect filed with children's services; 147 children placed into custody; 134 reports filed of abuse, neglect or exploitation of seniors; an estimated 980-1,300 adults physically abused by a current or former intimate partner; 295 people filing petitions for civil protection orders, and 73 adults and 55 children seeking shelter in Richland County domestic violence shelters. Therefore, the need is likely greater than what is represented by the number of persons seeking shelter here.

<sup>4</sup> This is a double count of persons already counted in the other categories.

<sup>5</sup> Assumes 2.2 persons per household for families with children, and 1.2 persons per household for adults only households.

<sup>6</sup> These numbers assume that the current permanent supportive housing units are already occupied by households and unavailable to the current homeless population.

**Table 3: Housing Needs Inventory and Gap Analysis Table**

Non-Homeless Housing Gap Analysis			
	Current Inventory	Level of Need	Gap Analysis
	# of units	# of households	# of households
Total Rental units <sup>1</sup>	9,541		
Rental units affordable to Extremely Low Income (ELI) households <sup>1</sup>	3,884		
Additional Rental Units Affordable to Very Low Income Households (at or below 50% AMI) <sup>1</sup>	8,621		
Number of ELI households <sup>2</sup>		4,645	
Number of ELI households estimated to be renting based upon % of households that rent vs. own for those below poverty level in the City of Mansfield <sup>3</sup>		3,670	
Number of Low Income Households (Between ELI limit and 50% AMI) <sup>2</sup>		7,674	
Number of Low Income households estimated to be renting based upon % of households that rent vs. own for those below poverty level in City of Mansfield <sup>3</sup>		6,062	
Number of affordable rental units to ELI households in the City above the number of ELI households that rent <sup>4</sup>			+214 (Surplus of homes, but see note <sup>4</sup> )
Number of affordable rental units to Low Income households in the City above the number of Low Income households that rent <sup>4</sup>			+2,559 (Surplus of homes, but see note <sup>4</sup> )

<sup>1</sup> Numbers of rental units at various contract rents is from the American Community Survey (ACS) five-year data for 2020. Numbers are approximations based upon the data.

<sup>2</sup> Numbers of households at various income levels is from the ACS five-year data for 2020. ELI and Low-Income Limits by family size are from HUD 2022 Income Limits. Family size for determining affordability of contract rents was based upon the average renter-occupied household size for the City of Mansfield, which is 2.21 persons. Numbers are approximations based upon the data.

<sup>3</sup> Rental unit demand was based upon the percentage of households that are below the poverty level that rent rather than own their home (79%).

<sup>4</sup> Even though the data shows a surplus of rental units. What we see in the data is that many of these rental units are older. What we heard from the many housing providers in the area was that the quality of the housing was much of the problem. Many of the houses are not decent, safe, and sanitary. Also, there is demand from higher income renters for many of these same units, making the reality on the ground more complex. **Based on 2013 CHAS data in the City's 2019-2023 Consolidated Plan, there are 1,215 renter households and 370 owner households below 30% AMI that are paying more than 50% of their income on housing. This means that many of our most vulnerable have little income left for groceries, medicine, and other life necessities. This is more representative of the true gap, and especially highlights the need for affordable housing that is earmarked specifically for this population.**



**Table 4: Additional information on the City of Mansfield homeless population**

Other Homeless Population Characteristics				
	Gender	Race/Ethnicity	Age	Other
Of the 67 homeless persons identified in the point in time count <sup>1</sup>	31, or 46%, identified as Female (22% of unsheltered)	44, or 66% identified as White (56% of unsheltered)	17, or 25%, identified as under 18 years old (0% of unsheltered)	7, or 10%, identified as having a mental illness
	35, or 52%, identified as Male (67% of unsheltered)	17, or 25% identified as Black/African American (0% of unsheltered)	3, or 5%, identified as 18-24 (0% of unsheltered)	2, or 3%, identified as having a substance abuse disorder
	For 1 person, the gender information was missing (11% of unsheltered)	3, or 4%, identified as Native American (33% of unsheltered)	39, or 58% identified as between the ages of 25 and 64 (56% of unsheltered)	9, or 13% were unsheltered
		1, or 1%, identified as more than one race	6, or 9% identified as over 65 years old (22% of unsheltered)	58, or 87% were in emergency shelters
		3 identified as Hispanic (22% of unsheltered)	Note that for the unsheltered, for 2 persons, or 22% of the total, age information was missing	37, or 55%, were single at the time (44% for unsheltered)
		For 2 persons race/ethnicity information was missing		30, or 45%, were in a household with at least one other person at the time (56% for unsheltered)
Of the 104 homeless persons engaged by the Homeless Response Team in May, 2022... <sup>2</sup>	33% identified as Female	64% identified as White	19% identified as 18-24	
	67% identified as Male	33% identified as Black/African American	27% identified as 25-34	

			1% identified as more than one race	20% identified as 35-44	
			For 1% race/ethnicity information was missing	16% identified as 45-54	
				17% identified as 55+	
In comparing the numbers from the two counting methodologies, we note the following:	There are more homeless males than females, but a significant number of both. The percentage of females is lower for those unsheltered	The race/ethnicity of both the sheltered and unsheltered homeless seems to be mixed, The percentage of the homeless population that identified as black is higher than the percentage of the general population. 22.6% of the population is Black/African American (2017 ACS)	A smaller percentage of the unsheltered homeless population appears to be children, than for the sheltered population.	The number of unsheltered homeless appears to be fairly consistent.	

<sup>1</sup> Numbers are based upon the 2019 Point in Time Count captured through the Balance of State Continuum of Care, and are the most recent detailed count data available. This includes a count of both sheltered and unsheltered homeless. Estimates from local service providers indicate that these numbers may be growing, and were exacerbated by Covid. In an article in the Mansfield News Journal, a local newspaper, titled "New pilot program aims to help Mansfield's homeless - Local officials finalizing plans to provide outreach, info, services", by News Correspondent Al Lawrence, published on Feb. 5, 2022, the following was noted:

"Rebecca Owens, the Regional Director of Catholic Charities in Mansfield, was quoted as saying that "the most recent annual count of homeless, which is required to receive funding from the U.S. Department of Housing and Urban Development, turned up about 100 sheltered and unsheltered individuals." Owens also was quoted as saying that "the Mansfield City School District's SAFE program has between 350 and 400 students who are considered homeless because they're living in a shelter or living with a relative or neighbor and could become homeless at any time." The article went on to indicate that "a number of people who have never been homeless before have become homeless because of COVID and other circumstances over the last three years."

<sup>2</sup> Percentages and numbers are based upon Homeless Response Team data for May 2-31, 2022. During this time frame 12 visits were made to areas around the City looking for homeless persons to connect with and assist. An average of 8.67 persons were encountered per visit. The focus here is on unsheltered homeless. In the program, behavioral health professionals from Catalyst Life Services will start partnering with law enforcement officers during three, 4-hour shifts per week to contact homeless residents, and seek to connect them with needed services.

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

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

According to the 2019 Point in Time Count captured through the Balance of State Continuum of Care, which is the most recent available information, there were 3 homeless family households with at least one child, and 49 homeless adult households. As shown on Table 4, these numbers include people across all of the age groups, with 17, or 25%, identified as under 18 years old, and 6 persons over the age of 65 identified.

For the January 22, 2019 Point in Time Count, there are approximately 58 persons residing in emergency shelters, and 7 persons that are unsheltered. 7 persons (10% of the total) were identified as diagnosed with a mental illness, and 2 (3% of the total) were identified as diagnosed with a substance abuse disorder.

from the January 22, 2019 Point in Time Count, there are approximately 3 American Indian/Alaskan Native, 17 Black/African American, 44 White, and 2 with missing race information. There are also 3 Latino/Hispanic persons experiencing homelessness. Compared with the balance of State, a larger percentage of the homeless population had the following characteristics: More of the population were female (+12%); a greater proportion of the population were Black/African American (+12%); and a smaller percentage of the population were unsheltered (-20%).

These distinctions are worth noting. It should, however, be noted that the overall percentage of the population in the City of Mansfield that is Black/African American (22.6%) is more than for the State of Ohio (14.1%), providing a context for the higher-than-average percentage of the homeless population that is Black/African American. 25.4% of the total homeless population were Black/African American.

A couple of other groups that need to be called out are the following:

The first is veterans: 9.5% of the population are veterans, who also typically have higher rates of disability. There was 1 identified homeless veteran, in a single person household.

The second is formerly incarcerated persons: Richland County has multiple correctional facilities. A report by Lucius Couloute of the Prison Policy Initiative, *Nowhere to Go: Homelessness among formerly incarcerated people*, finds that formerly incarcerated people are nearly ten times more likely to be homeless than the general public.

**Table 5: Number of Households paying more than 50% of their income on housing**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	525	105	0	630	145	90	25	260
Large Related	85	50	0	135	60	10	20	90
Elderly	250	120	35	405	125	85	70	280
Other	355	90	15	460	40	95	15	150
Total need by Income	1,215	365	50	1,630	370	280	130	780

**Cost Burden > 50%**

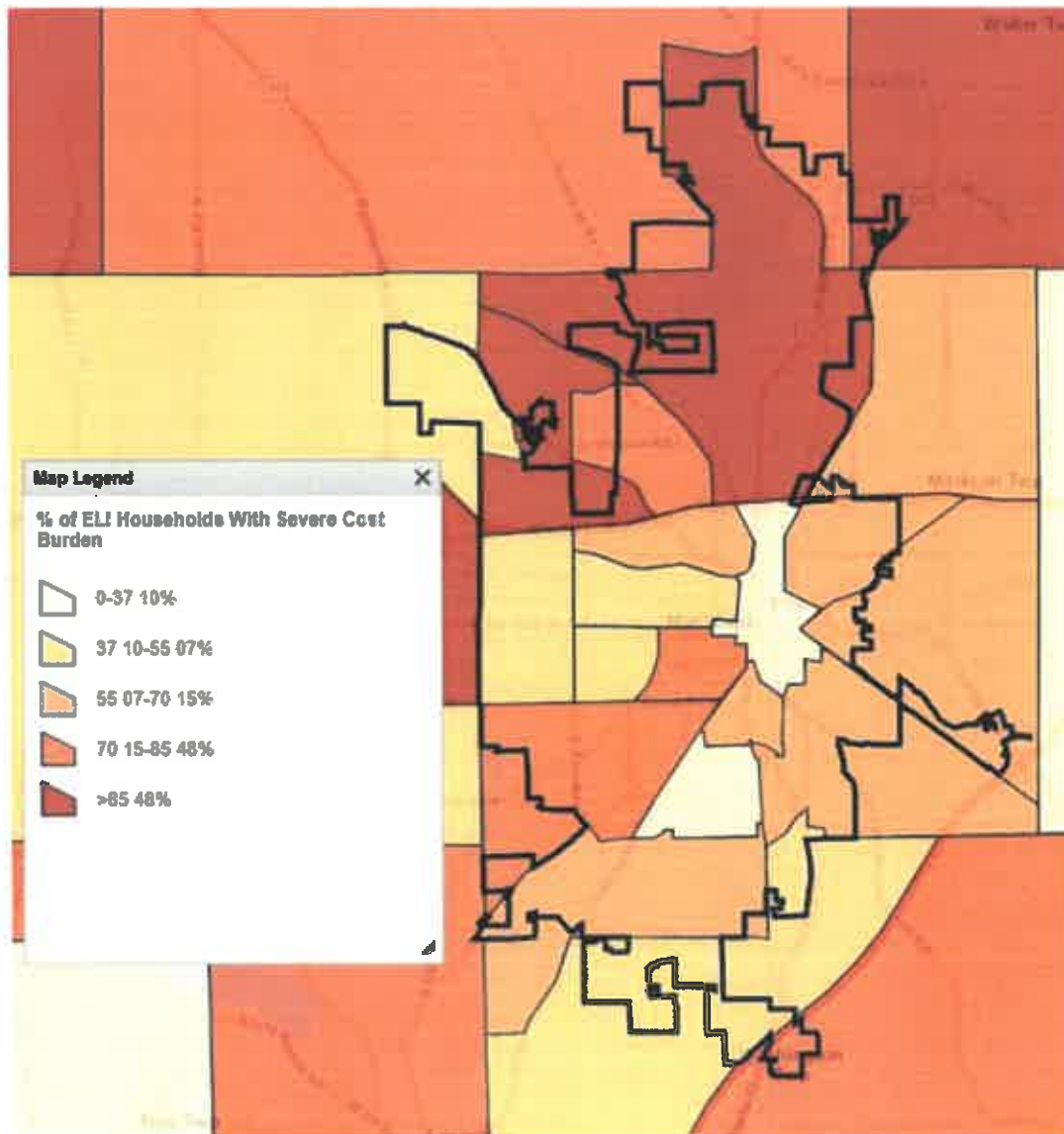
Data 2009-2013 CHAS

Source:

**Table 6: Current 2022 Income Limits for Richland County**

FY 2022 Income Limit Area	Median Family Income <a href="#">Click for More Detail</a>	FY 2022 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Mansfield, OH MSA	\$70,700	Very Low (50%) Income Limits (\$) <a href="#">Click for More Detail</a>	25,950	29,650	33,350	37,050	40,050	43,000	45,950	48,950
		Extremely Low Income Limits (\$)* <a href="#">Click for More Detail</a>	15,600	18,310	23,030	27,750	32,470	37,190	41,910	46,630
		Low (80%) Income Limits (\$) <a href="#">Click for More Detail</a>	41,550	47,450	53,400	59,300	64,050	68,800	73,550	78,300

**Map 1: Geographic Distribution of ELI Households with Severe Housing Cost Burden**



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

As identified in the City of Mansfield's current Consolidated Plan, there are 2,765 households in the City of Mansfield that are in the extremely low- income category. According to the 2020 American Community Survey (ACS) 5-year estimate data profiles (2020 ACS), 2,154 households (11.6% of total households) earned less than \$10,000 a year. Also, according to the 2020 ACS, 11,380 people, or 24.5% of persons in the City of Mansfield were below the poverty level. It is also noteworthy that 3,281 children, or 36.2% of all children in the City were also below the poverty level.

In its 2018 Final Quarterly Performance Report covering the period 1/1/18 to 12/31/18, the Continuum of Care for the Balance of State in Ohio identified facilities operating as shelters, providing permanent housing solutions, and conducting rapid rehousing in Richland County. These facilities had a total of 489 households exiting to all destinations. Of those, 277 households (56.6%) were able to locate to permanent destinations. This left 212 households (44.4%) in need of a permanent housing solution (see table 8).

Though this methodology may allow for some double counting, there is still a significant number of households at risk of losing housing and needing a permanent housing solution each year in Richland County.

As shown in Table 7 the impact of housing problems and housing cost burden had an impact across various racial groups. It is also worth noting that the risk of homelessness has a geographic component. This is illustrated by maps 1 and 2 showing the distribution of ELI households with Severe Housing Cost Burden, and the dispersion of the Black/African American population in the community. Notice that in both cases, the North end of the City is disproportionately impacted.

**Table 7: Races/Ethnicities that are disproportionately impacted by housing cost burden, paying more than 30% of their income on housing**

	Percentage of general population	Number of ELI households with housing cost burden	Percentage of ELI households with housing cost burden	Statistically significant Disproportionate impact?
<b>Jurisdiction as a whole</b>	100.0%	12,195		
<b>White</b>	79.1%	10,040	82.3%	No*
<b>Black / African American</b>	22.6%	1,650	13.5%	No
<b>Asian</b>	0.7%	75	0.6%	No
<b>American Indian, Alaska Native</b>	4.0%	25	.2%	No
<b>Pacific Islander</b>	0.1%	0	0%	No
<b>Hispanic</b>	2.8%	140	1.1%	No

Data is from the current Consolidated Plan for the City of Mansfield.

\* The White population, which at 79.1% of the general population, has 82.3% of the population that is housing cost burdened in the 0 to 30% of area median income population group. For it to be considered to be a statistically significant impact, HUD requires that the



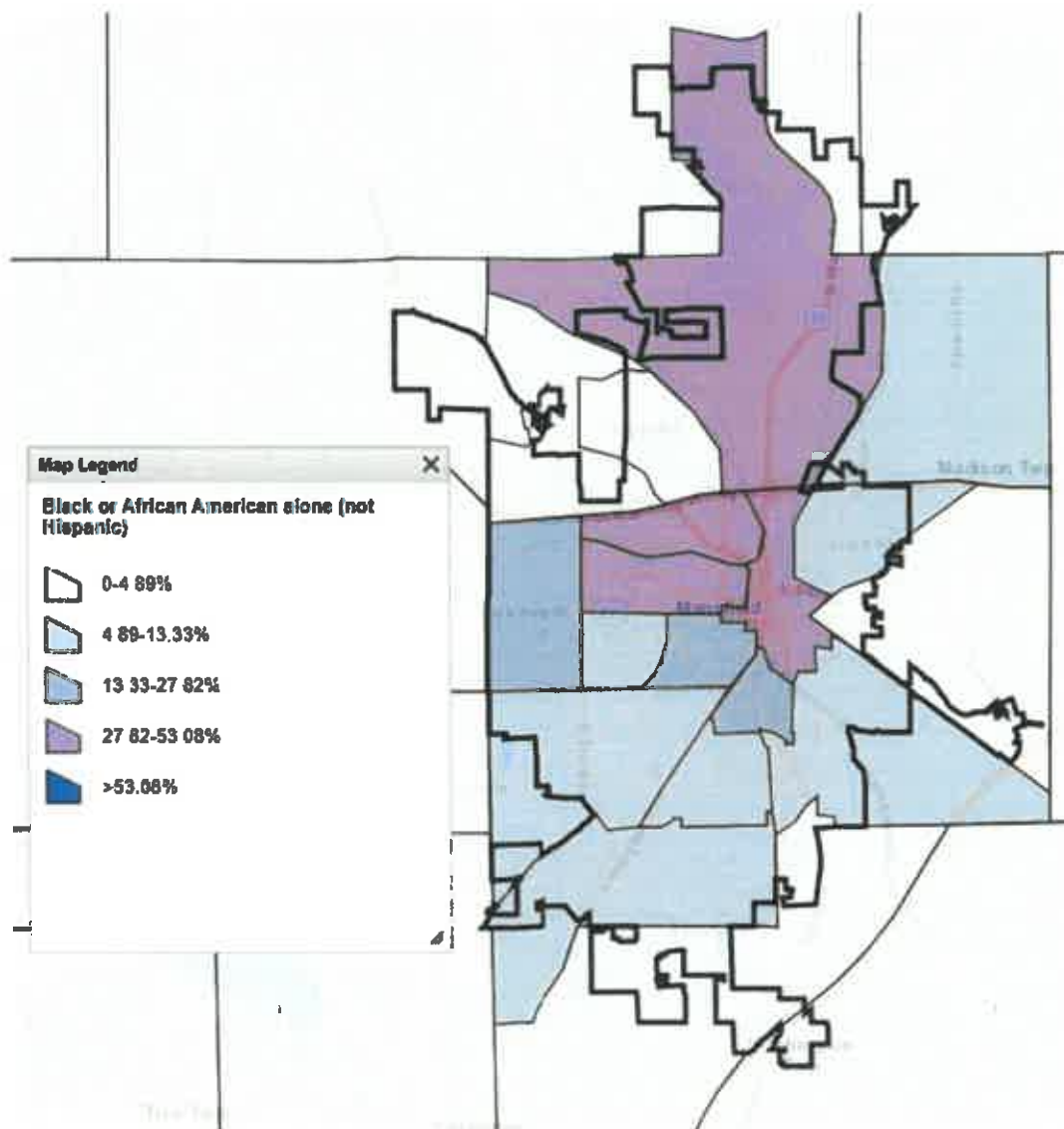
percentage of persons with severe housing problems be at least 10 percentage points higher than the percentage of persons in the racial/ethnic category as a whole. Therefore, this is not considered to be a statistically significant disproportionate impact.

**Table 8: Households Exiting from Shelters and Rapid Rehousing to Permanent Housing**

Provider	Households exiting (all destinations)	Permanent Destinations - # of exits	Permanent Destinations - % of exits
<b>Emergency Shelter</b>			
Harmony House	433	229	52.9%
<b>Rapid Rehousing</b>			
Harmony House	17	17	100%
Catholic Charities Diocese of Toledo	39	31	79.5%
<b>Total</b>			
	489	277	56.6%

Data is from the Ohio BOSCO – 2018 Quarterly Performance Report

**Map 2: Geographic Distribution of the Black/African American Population in the City of Mansfield.**



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

Based upon the 2010 Health Policy Institute of Ohio, profile of Family Violence in Richland County (see Graph 1), 73 adults sought shelter in domestic violence shelters in the County. However, also according to this profile, each year there are 2,001 reports of abuse or neglect filed with children's services; 147 children placed into custody; an estimated 980-1,300 adults are physically abused by a current or former intimate partner; 295 people that file petitions for civil protection orders; 134 reports filed of abuse, neglect, or exploitation of



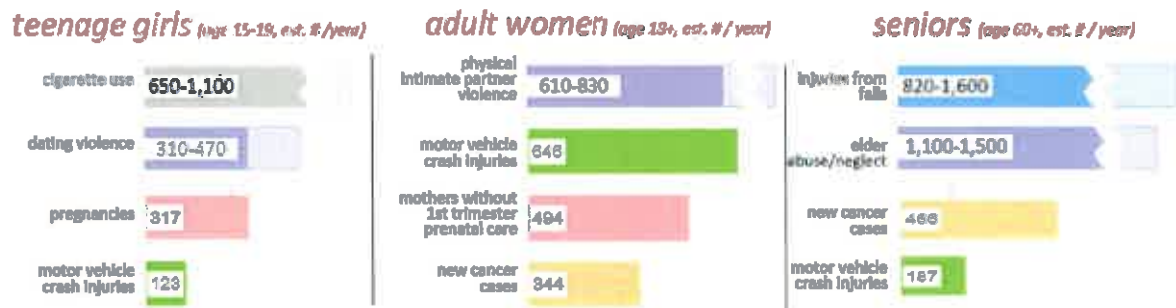
seniors. Therefore, housing needs are likely greater than the 73 adults seeking shelter annually.

As defined by the Victims of Trafficking and Violence Protection Act of 2000 (otherwise known as the Trafficking Victims Protection Act [TVPA]), human trafficking involves the use of force, fraud, or coercion to exploit another person through commercialized sex or involuntary labor. In cases involving minors, however, the use of force, fraud or coercion does not have to be present for the offense to be classified as sex trafficking because a minor cannot legally consent to commercial sex.

Obtaining Data on human trafficking at the County level has been challenging, but based upon estimates at the State level from various sources, the numbers could be significant. For example, the Ohio Network of Children's Advocacy Centers identified 242 victims who were minors in 2019; the Ohio Attorney General reported 307 victims in 2019; and according to The Ohio Human Trafficking Prevalence Study, Anderson, V. et.al. 2019. <https://www.humantrafficking.ohio.gov/data-reports.html>, there were 1,078 American-born Ohio youth (aged 12 to 17) that were estimated to have been trafficked for sex over a one-year period.

### Graph 1: Information from Richland County Profile from the Ohio Family Violence Protection Project

*In Richland County, how does family violence compare to other threats among ...?*



• For example: each year in our county between 610 and 830 adult women experience physical intimate partner violence; in comparison, 646 adult women are injured in motor vehicle crashes.

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

HUD's definition of other populations requiring services or housing assistance to prevent homelessness is as follows -

Households (i.e., individuals and families) who:

- have previously been qualified as "homeless" as defined in 24 CFR 91.5

- are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and
- need additional housing assistance or supportive services to avoid a return to homelessness.

This population is difficult to capture. However, we have identified the following populations that appear to be a fit for this category:

- In its 2018 Final Quarterly Performance Report covering the period 1/1/18 to 12/31/18 (the most recent information available), the Continuum of Care for the Balance of State in Ohio identified facilities operating as shelters, providing permanent housing solutions, and conducting rapid rehousing. These facilities had a total of 489 households exiting to all destinations (Table 8). Of those, 277 households (56.6%) were able to locate to permanent destinations. This left 212 households (44.4%) in need of a permanent housing solution. We recognize that this methodology allows for some double counting of households who entered and exited the shelter system more than once over the course of a year.

HUD's definition of other populations at greatest risk of housing instability is as follows - At Greatest Risk of Housing Instability means a household that has:

- Annual income  $\leq$  30% of area median income and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

OR

- Annual income  $\leq$  50% of area median income and meets one of the conditions of "At risk of homelessness".

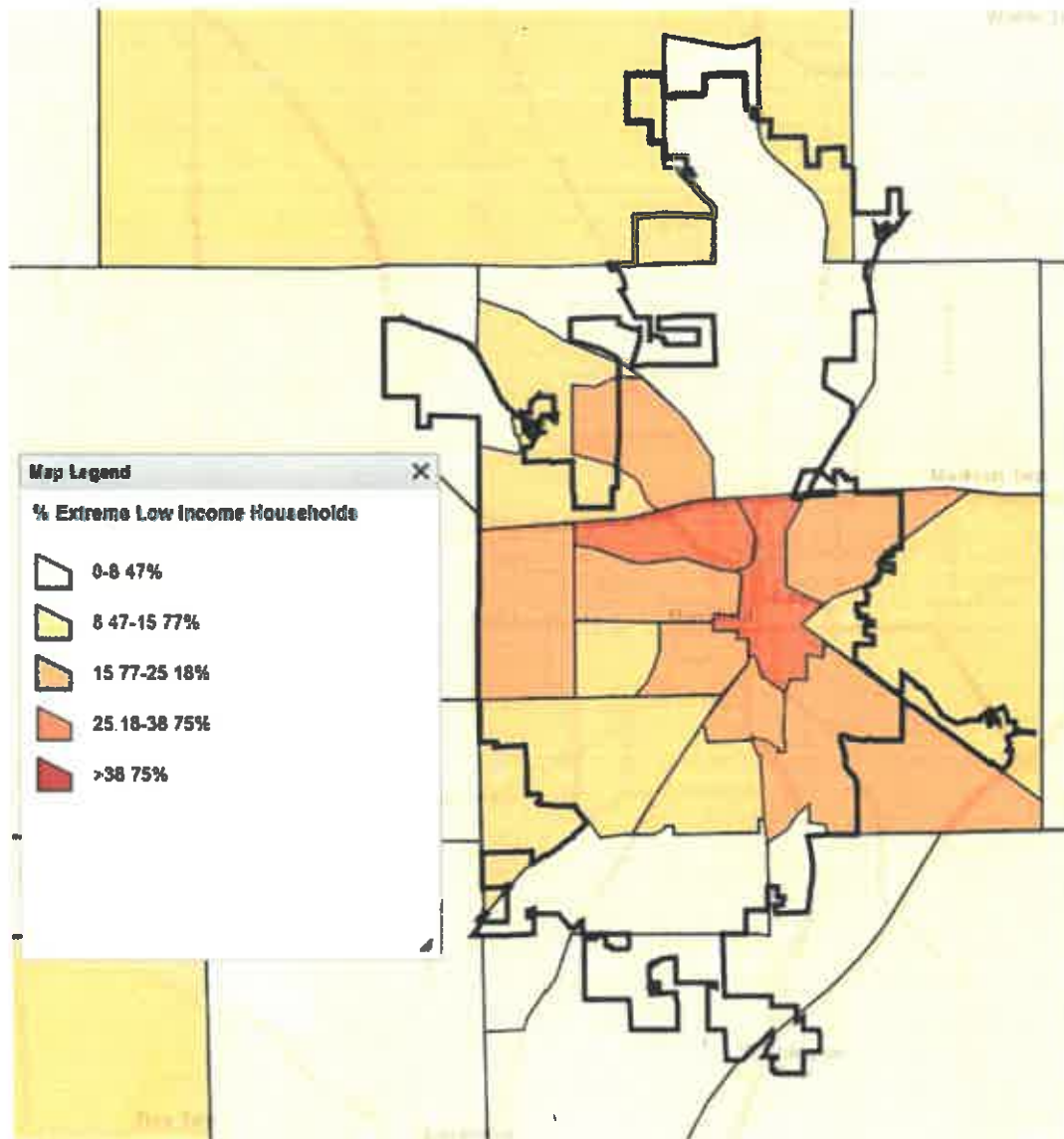
As identified in the City of Mansfield's current Consolidated Plan, there are 2,765 households in the City of Mansfield that are in the extremely low- income category. According to the HUD 2015 to 2019 Comprehensive Housing Affordability Strategy (CHAS) Data (the most recent available), 1,865 (67.5%) Extremely low Income (ELI) households were severely housing cost burdened, paying more than 50% of their income on housing. 1,475 of these households were renters, and 390 were owners.

For the second definition, we have no hard data to put into numbers, but we refer back to the numbers of people that enter shelters each year (around 500) as an indicator that there is a significant population at risk of homelessness.

Finally, we mention several other groups that should be considered here, as members of these groups certainly meet the qualifying population criteria:

- The first is veterans: As identified in the City's current Consolidated Plan, 9.5% of the population are veterans, who also typically have higher rates of disability.
- The second is formerly incarcerated persons: Richland County has multiple correctional facilities.
- The third is those with disabilities: Based upon the 2017 ACS, 20.1% of the population of the City of Mansfield have a disability. This is high. For example, this compares to 13.8% for the State of Ohio.
- The fourth is persons with a mental health disorder: According to the Richland County Mental Health and Recovery Services Board, there are 6,359 persons experiencing mental illness in Richland County, including 2,947 children.
- The fifth is persons with an addiction disorder: According to the Richland County Mental Health and Recovery Services Board, there are 4,627 persons with a drug/alcohol addiction in Richland County, including 904 children.
- The sixth is older persons: In addition, 14% (52,872) of the total population are 65 and over. This population is particularly vulnerable, since they are more likely to have a low income, and the need for accessible housing further limits their housing choices. 17.9% of all households in the City are Householders over the age of 65 and living alone. As people within this age category are more likely than the general population to have financial constraints, physical disabilities, reduced cognitive functioning, and challenges with daily living tasks.
- The seventh is female householders with no husband present: According to the 2020 ACS, 39.6% of all households in this category were below the poverty level, compared with 24.5% of the general population. Even more pronounced, for families with a female householder, no husband present, with related children under 18 years, 54.2% were below the poverty level.

**Map 3: Concentration of extremely low-income households in the City**



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

There are a number of organizations addressing housing and service needs of these qualifying populations in the City of Mansfield and Richland County. For example, the Continuum of Care for the Balance of State shows data for each of the facilities providing shelter for homeless persons (see Table 9). According to the City's current Consolidated Plan, the Mansfield Metropolitan Housing Authority administers a total of 1,855 Housing Choice Vouchers to the

City of Mansfield and Richland County. The Housing Choice Voucher program allows assisted families a choice on where they would like to reside. There is no public housing within the City of Mansfield. There are, however, a number of multi-family Low Income Housing Tax Credit, and HUD Multi-family Housing Properties located within the City, as identified in Map 4.

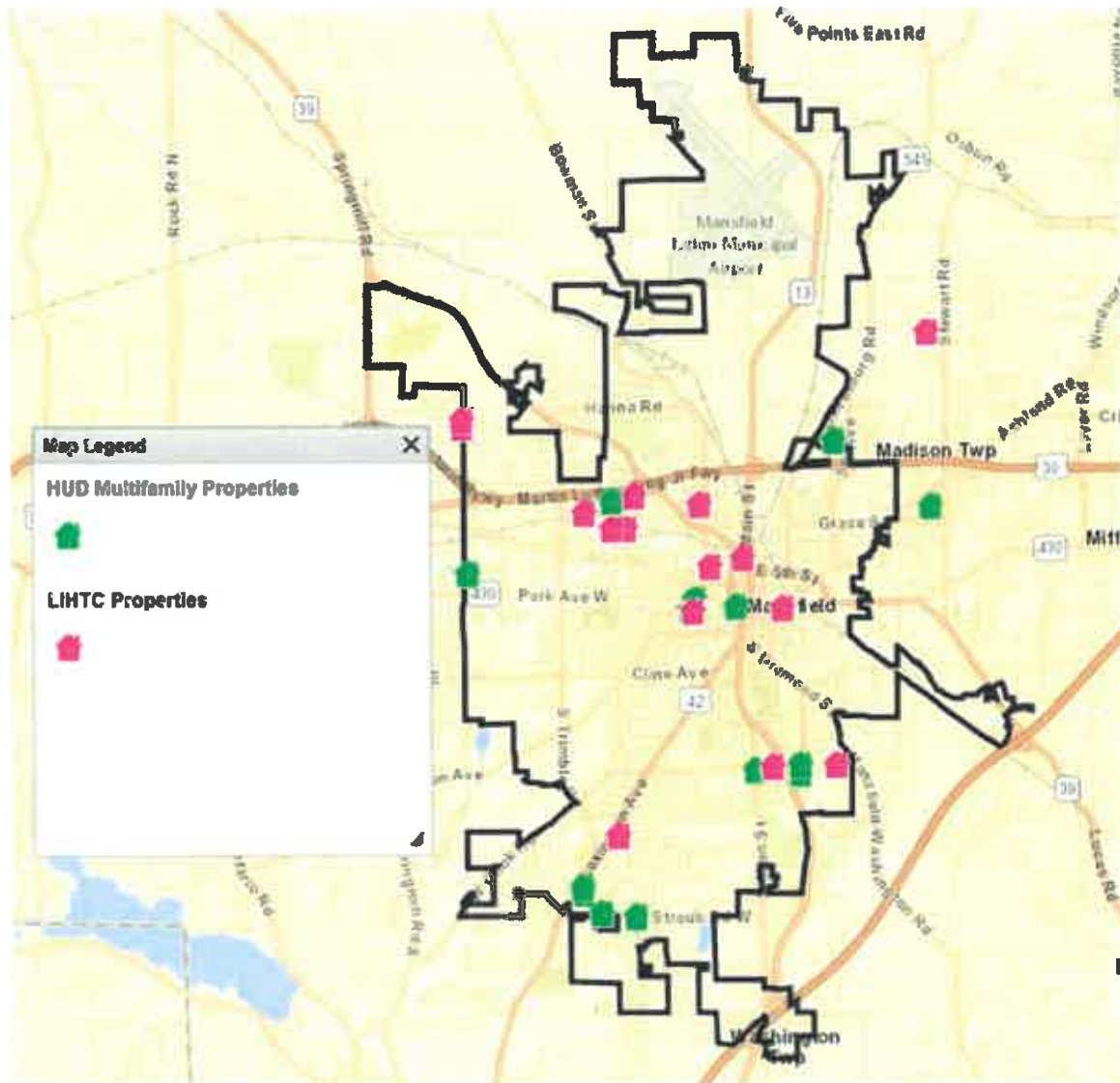
Several organizations provide services to these populations, and there are a variety of affordable and supportive housing resources. For further details on these organizations and the services that they provide, refer to the “Consultation” section of this Allocation Plan.

As identified in Table 2, there are 12 family housing units for emergency shelter, and 40 emergency shelter housing units for adults; there are 20 permanent supportive housing units for families, and 69 permanent supportive housing units for adults.

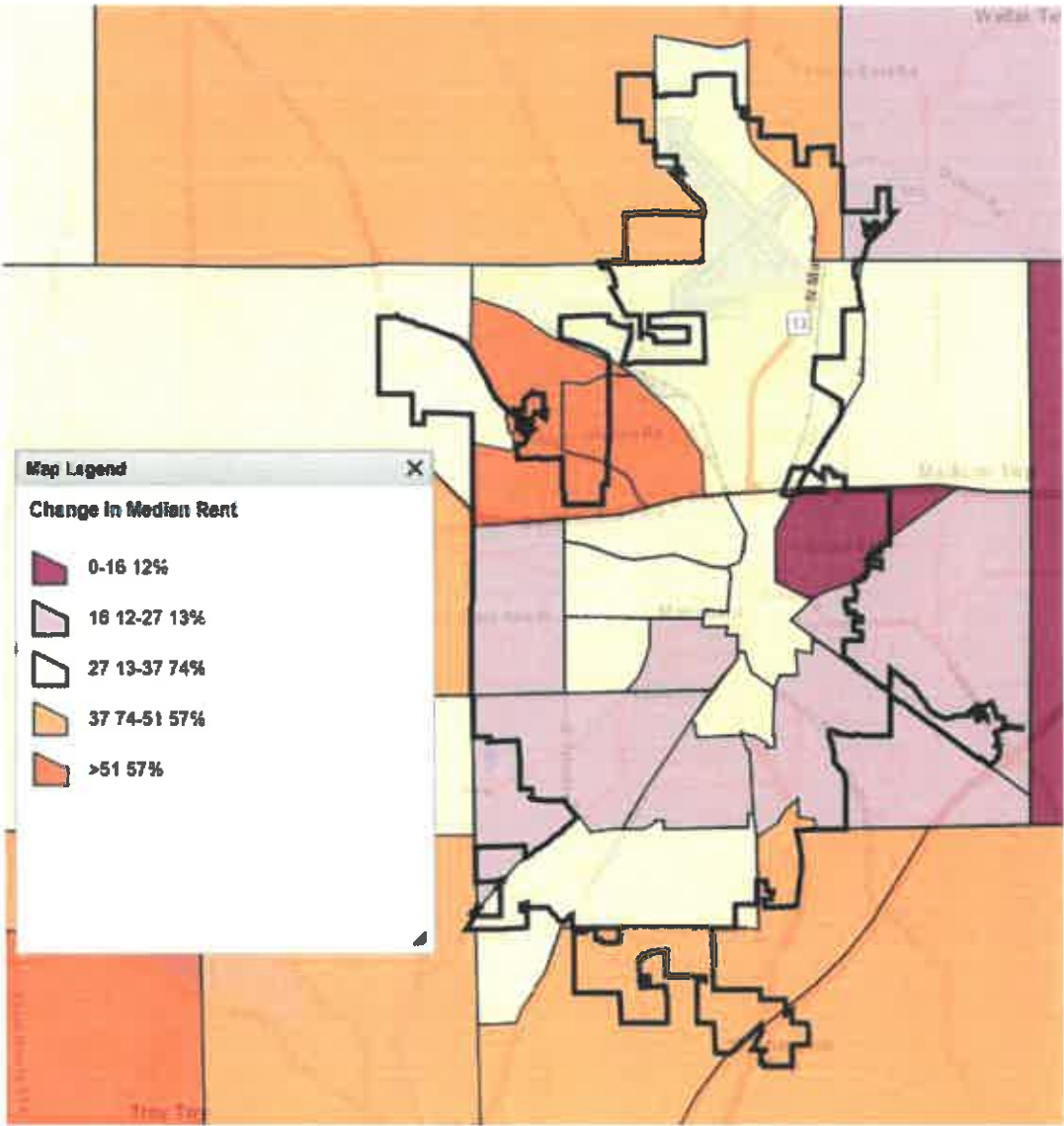
**Table 9: Average length of stay in shelters.**

Name of Facility	Average Length of Stay in Days	Median Length of Stay in Days
Harmony House (Emergency Shelter)	24.44	18
Catholic Charities Diocese of Toledo (Rapid Rehousing)	121.49	112
Harmony House (Rapid Rehousing)	59.54	53
Average across facilities	68.49	61

**Map 4: LIHTC and HUD Multi Family Properties within the City of Mansfield**

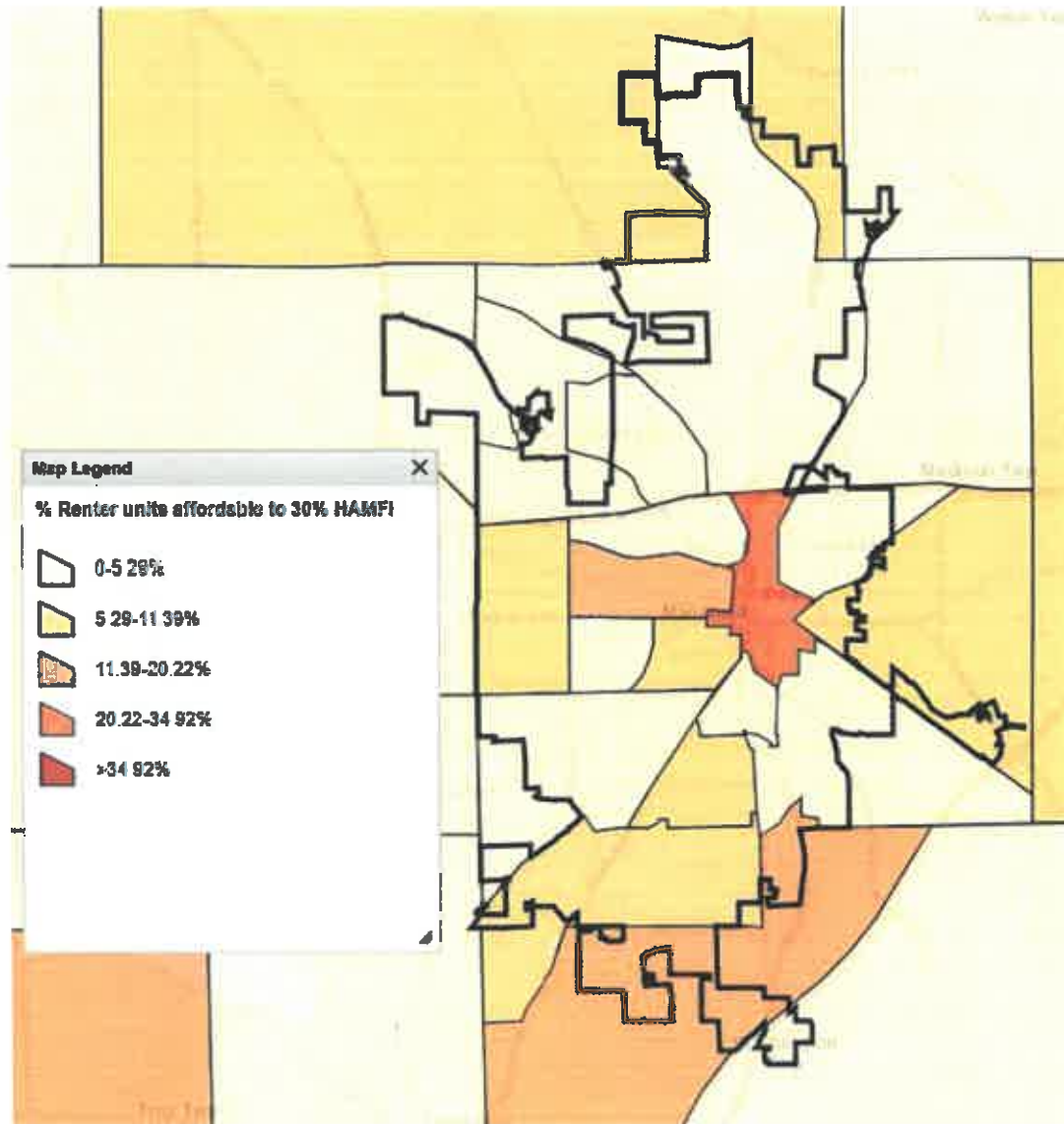


**Map 5: Change in median rents across the City**





**Map 6: Dispersion of rental units affordable to very low income households.**



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

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

As shown on Table 2, there is an identified gap of 8 housing units (9 beds) for temporary housing for adults. One of the challenges is that people that are in temporary facilities time out, because there are limits to how long they can remain in a given facility. This is exacerbated by the fact that there are inadequate beds to house everyone in need. Some of the



persons that are in the shelters could be moved into permanent supportive housing if it was available. This would free up the beds for those needing temporary housing.

Regarding services, the service providers identified a significant need for case managers to assist person's with navigating a range of life circumstances. Service providers also noted that because there are specific requirements around those who qualify for services, that many people fall through the cracks, and there is a need to address the needs of this population too.

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

As shown on Table 2, there is an identified gap of 3 supportive housing units (7 beds) for families, and 41 housing units (49 beds) for adults only. As described in the narrative under homelessness, moving some of the people in the shelters and other facilities into permanent supportive housing could help to open up beds for those without shelter.

Once again, case management has been identified by the service providers as an important need. Adequate services need to be tied to the housing that will be provided, to ensure the success of those being housed. For example, they may need assistance with employment, childcare, transportation, counseling, and mental health and/or addiction services.

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

There is an unmet need for additional housing units. The County has experienced an uptick in domestic violence during and since the Covid pandemic. While it is difficult to estimate the number of units needed, the need appears to be significant, and growing.

This population also has a need for services such as employment, childcare, transportation, counseling, etc., including services associated with the organization providing the housing, in order for a more seamless coordination of needs.

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

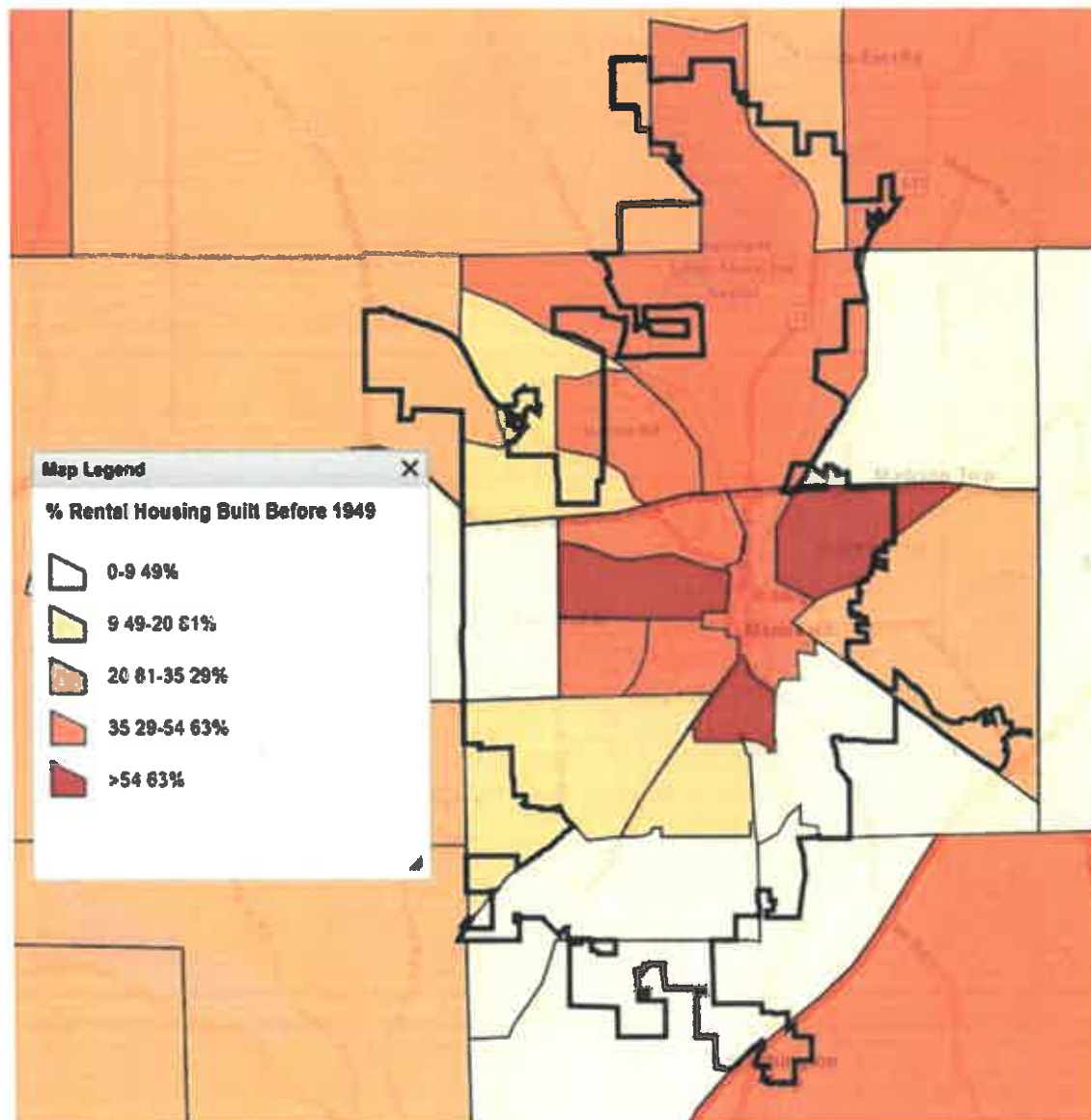
The needs of this group largely mirror the needs identified under "at risk of homelessness". As shown on Table 2, there is an identified gap of 3 supportive housing units (7 beds) for families, and 41 housing units (49 beds) for adults only. As described in the narrative under homelessness, moving some of the people in the shelters and other facilities into permanent supportive housing could help to open up beds for those without shelter.

Note that there is also a geographic component to the need, as identified in Maps 5, 6 and 7. In some cases there is a mismatch between identified need and availability of units in a given

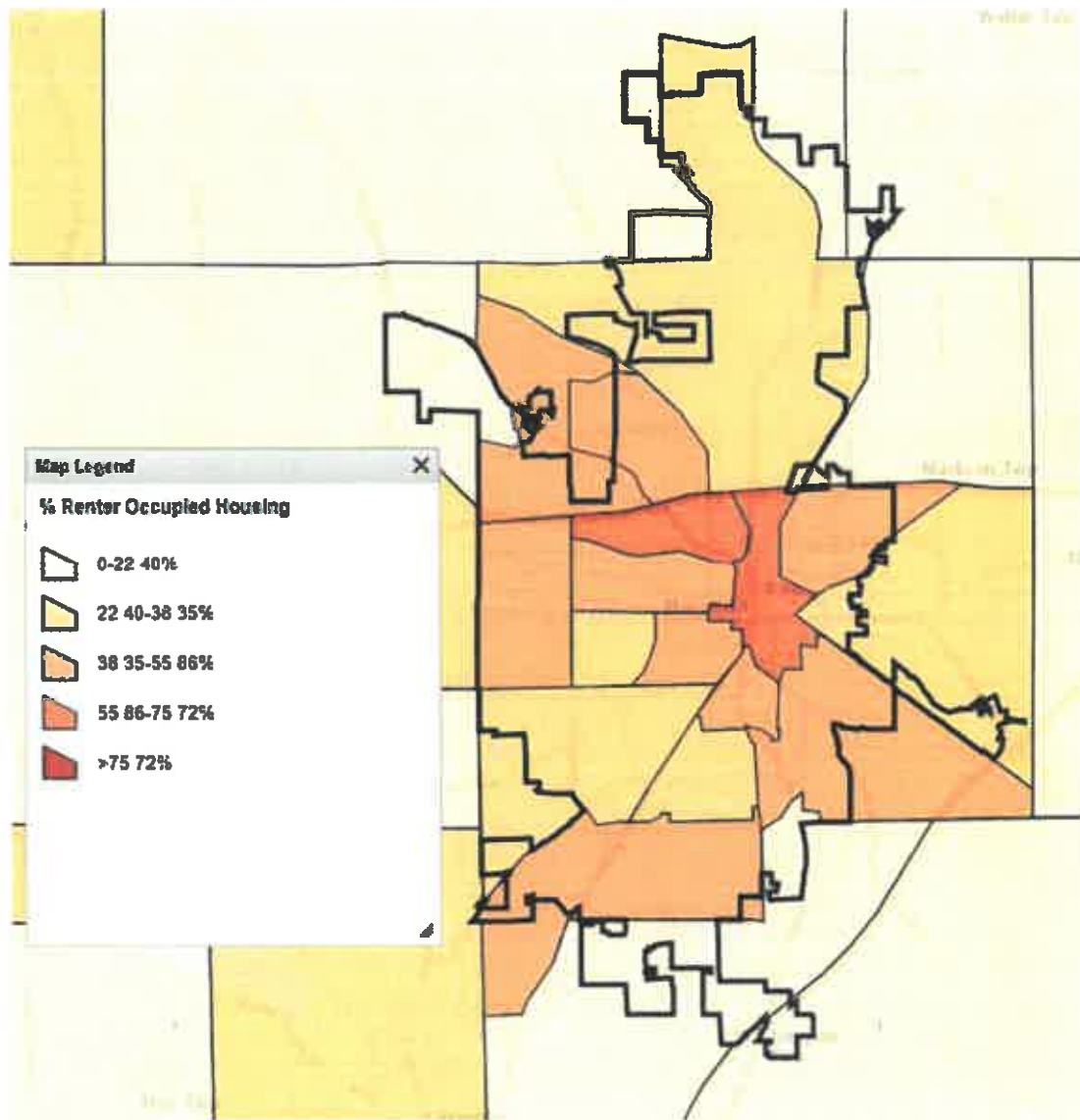
geographic part of the City. In addition, because much of the affordable housing stock is older (see map 7), the condition of the units also becomes an issue.

Case management has been identified by the service providers as a huge need. It is also important that there be adequate services tied to the housing that will be provided, to ensure the success of those being housed. For example, they may need assistance with employment

**Map 7: Geographic dispersion of older rental units**



**Map 8: Concentration of renter occupied housing**



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

For temporary housing, there is an identified gap of 8 housing units (9 beds) for temporary housing for adults. There is also a need for additional services for the homeless population, particularly case management, and assistance for those who may not qualify for existing services.

For permanent supportive housing, there is an identified gap of 3 supportive housing units (7 beds) for families, and 41 housing units (49 beds) for adults only, plus additional units needed for victims of domestic violence. There is also a need for services tied to these additional housing units.

In addition, there are 1,475 renter households and 390 owner households below 30% AMI that are paying more than 50% of their income on housing. This means that many of our most vulnerable have little income left for groceries, medicine, and other life necessities. This is more representative of the true gap, and especially highlights the need for affordable housing that is earmarked specifically for this population. In other words, we need about 1,900 decent housing units that are affordable to households at or below 30% of area median income.

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

N/A

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

The priority needs identified by the City are as follows:

1. Additional permanent supportive housing units to be developed, allowing for persons in all qualifying populations to move from current temporary or unfit housing into permanent supportive housing. This will free up the space in the shelters and other facilities for those who are in need of temporary housing solutions (Q1).
2. Services tied to this supportive housing, to ensure that needs of the occupants are met, so that they can successfully stay in this housing. Also, services specifically for the homeless population (Q1) and the domestic violence population (Q3), to meet the needs of those who may fall through the gaps, and to provide for additional case management.
3. Support for nonprofit agencies to assist with capacity building and operating costs. These agencies are stretched thin by the needs of the qualifying populations which they are working to serve.

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

The level of need was determined by a thorough review, including the following:

- First a quantitative analysis was done, using data from the US Census Bureau, the Balance of State Continuum of Care, the U. S Department of Housing and Urban Development CHAS, and local data from a variety of sources.

- Second, a qualitative analysis was done based upon a meeting with the public and local stakeholders, and multiple interviews with local service providers.

It is our view that the combination of the quantitative data and the qualitative data is vital to good decision making. We tried to both understand what the numbers were telling us about need, and sought to really hear what the housing and service providers, the public, and others who have a good understanding of the needs of this population were telling us. We think that this approach has led to some valid conclusions about priorities regarding need.

## **HOME-ARP Activities**

### **Template:**

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

In both cases, a competitive process will be followed:

For the housing component, Requests for Proposals will be provided to potential housing developers, and will be advertised on the City's website and in the local newspaper. The RFP will outline the requirements that must be met, and will be structured to ensure that high quality units are built in locations where they are needed. The RFP will outline the preferences that must be met. They will also outline the scoring criteria and the underwriting process that will be followed.

The RFPs for service providers will follow a similar process. The RFP will be provided to potential service providers, and will be advertised on the City's website and in the local newspaper. The RFP will outline the requirements that must be met, and will be structured to ensure that high quality and needed services will be provided. The RFP will outline the preferences that must be met. They will also outline the scoring criteria and the underwriting process that will be followed.

***Describe whether the PJ will administer eligible activities directly:***

The City of Mansfield will manage the competitive Request for Proposal process, and will ensure oversight of selected developers and service providers throughout the grant period, but will not undertake any activities directly.

***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 – No subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant.**

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

**Table 11: Use of HOME-ARP Funding**

Activity Name	Anticipated Outcomes and Budget	Activity Description	Who will be Responsible to Administer Activity?	How will Organization Conducting Activity be Selected?	Eligible Population, Preferences <sup>2</sup>
Development of Affordable Rental Housing	12 units of permanent supportive housing <sup>1</sup>  \$650,000	Creation of additional housing units affordable to ELI HH, tied to services needed by tenants. Units and services may, or may not, meet formal HUD definition of PSH, but will be matched to identified needs within the City. HOME-ARP funds will be leveraged & not more than 20% of the total funding.	Organizations with capacity to develop and manage permanent supportive housing	Through a competitive RFP outlining the goals for the activity, the regulations governing it, the eligible population and allowable preferences, the submission requirements, the scoring criteria, and other activity elements.	ELI households, all Qualifying Populations (QPs)  No preferences.
Supportive Services	120 people assisted  \$150,000	Supportive services in three groupings: <ul style="list-style-type: none"> <li>One portion geared to meeting the needs of the homeless and domestic violence populations, and tied to the Non-Profit Capacity Building Activity. Includes supportive services such as housing search and placement, counseling, case management, and other services needed to support individuals and families seeking to stabilize their housing.</li> <li>The other portion to be tied to the proposed City affordable housing project(s), and geared to the needs of their respective tenants. Includes supportive services such as counseling, job placement assistance, transportation, case management, and other services needed to support households living in assisted housing units.</li> </ul>	Organizations with capacity to provide and manage needed supportive services	Through a competitive RFP outlining goals for the activity, regulations governing it, eligible population and allowable preferences, submission requirements, scoring criteria, and other activity elements.	ELI households, all QPs Preferences: \$75,000 for QP 1 and 3; \$75,000 tied to projects for all QPs (see note <sup>3</sup> )

Activity Name	Anticipated Outcomes and Budget	Activity Description	Who will be Responsible to Administer Activity?	How will Organization Conducting Activity be Selected?	Eligible Population, Preferences?
Non-Profit Capacity Building	n/a \$52,665	Develop the capacity of a local service provider to conduct case management, and to assist individuals and households with needs related to stabilization and housing. This would be an extension of a pilot project conducted by the City to identify and assist unsheltered homeless by conducting frequent outreach. These funds would pay for up to 50% of the salary of a case worker to provide services to the qualifying populations, up to the amount allocated.	Organizations seeking to further develop capacity to provide and manage needed supportive services	Through a competitive RFP outlining the goals for the activity, the regulations governing it, the population to be assisted, the submission requirements, the scoring criteria, and other activity elements. The qualifying service provider will need to provide a plan for continuing to provide case management for the qualifying populations, once grant funds are exhausted.	This funding is for agencies awarded supportive services funding.
Non-Profit Operating	n/a \$50,000	Provide non-profit operating support for one or more local agencies who are implementing HOME ARP supportive service activities.	Organizations willing and able to provide staffing for HOME-ARP supportive service activities.	Through a competitive RFP outlining the goals for the activity, the regulations governing it, the population to be assisted, the submission requirements, the scoring criteria, and other activity elements. The qualifying service provider will need to provide a plan for continuing to provide staffing for supportive services for the qualifying populations, once grant funds are exhausted.	This funding is for agencies awarded supportive services funding.
City of Mansfield Administration	n/a \$159,293	Admin., planning, program/ project oversight, closeout, & monitoring.	City Staff	n/a	n/a
<b>Total:</b>	<b>\$1,061,958</b>				



<sup>1</sup> *Leveraging of funds will be expected, and will be a scoring criteria for projects. Because of this, we anticipate that the total number of units will likely be significantly greater than the 12 units that can be funded with the funds allocated through this program. These could be new development or rehabilitation of existing units.*

<sup>2</sup> *Qualifying Populations (QPs) are as follows:*

- 1. Homeless*
- 2. At Risk of Homelessness*
- 3. Fleeing or attempting to flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking*
- 4. Other Populations, which includes Other Families Requiring Services or Housing Assistance to Prevent Homelessness OR At Greatest Risk of Housing Instability*

<sup>3</sup> *It is anticipated that supportive services funding will be split, with \$75,000 as a preference to those that are homeless, victims of domestic violence, and/or in shelters (QP1 and 3), and \$75,000 supporting those living in the housing being developed, with no preferences.*

**Note:** The funding from this program will be unable to completely fill the various needs identified in this plan. The City will need to determine how this gap can best be filled using other resources. This is beyond the scope of this plan.

**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 150,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 650,000		
Non-Profit Operating	\$ 50,000	4.71 %	5%
Non-Profit Capacity Building	\$ 52,665	4.96 %	5%
Administration and Planning	\$ 159,293	14.99 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,061,958</b>		

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

HOME-ARP funds will be targeted to meet the priority needs, as identified in the need assessment and gap analysis. The priority needs identified by the County are as follows:

1. Additional permanent supportive housing units to be developed, allowing for homeless persons (Q1), persons at risk of homelessness (Q2), persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking (Q3), and other populations (Q4) to move from current temporary or unsuitable housing into permanent supportive housing. This will free up the space in the shelters and other facilities for those who are in need of temporary housing solutions (Q1).
2. Services tied to this supportive housing, to ensure that needs of the occupants are met, so that they can successfully stay in this housing. Services specifically for the homeless population (Q1), to meet the needs of those who may fall through the gaps, and to provide for additional case management.
3. Support for nonprofit agencies to assist with capacity building and operating costs. These agencies are stretched thin by the needs of the qualifying populations which they are working to serve.

This parallels what we have laid out in our plan, budget, and activity allocation. Our first priority being housing, with some housing being developed for all four QP's

Our second priority is services and case management, with an emphasis on those who will reside in the housing, or who may not get served with existing funding.

***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:***

Because there was inadequate housing at all levels, but especially for the provision of permanent supportive housing solutions which addressed the needs of all QPs. This addresses another significant identified need, by allowing for those who would move from various facilities into the permanent housing solutions to free up the temporary housing for the Q1 (Homeless) population.

Also, in talking with the service providers, it became abundantly clear that any housing not tied to supportive services would likely be unsuccessful in meeting the needs of the population that is in need of this housing. These service providers also identified other gaps that needed additional funding in order to assist the homeless and other groups in navigating the system, and challenges brought on by the organizations providing the services being stretched thin, and needing support for their ongoing success.

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

### **Template**

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

12 units of affordable housing are estimated to be built, using \$650,000 in funding, which will be leveraged with other dollars.

***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 production goal that we seek to meet is 12 units. Because we only have limited HOME-ARP dollars, and because our need for additional units is substantial (1,900 additional housing units are needed), we knew that we could not meet all of the need. It is anticipated that units will cost over \$300,000 each to produce, and they will also require a variety of services to be tied to the housing throughout the affordability period, at an additional expense to the developer. For the City funded projects, we are seeking to find a balance, by requiring that the HOME-ARP funding not exceed 20% of the total project funding. This allows us to leverage funds, but also provide a meaningful contribution of gap funding to the project. It also allows us to make a meaningful contribution to addressing our local housing need.

## Preferences

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

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

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

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

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

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

**Template:**

***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:***

Yes, the supportive services activity will include a preference for one or more of the qualifying populations, as outlined in Table 11. The use of preferences will be as follows:

- Supportive Services will be split as follows: One portion, (\$75,000) of the funding will be with a preference to the homeless and domestic violence populations (QP1 and QP2), and will be geared toward meeting needs appropriate for this population. The remaining portion of supportive services (\$75,000) will be tied to the housing being developed, which will serve all qualifying populations with no 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:***

The service providers identified specific gaps relative to the provision services and case management for homeless (QP1) and domestic violence (QP2) qualifying populations. By splitting the funds for services, we can serve these populations and also help to ensure that households moving into housing to be developed will get the services that they need, thereby serving all qualifying populations.

***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 housing to be developed, along with the services to be offered to tenants of this housing will all be open to all of the qualifying populations, thereby ensuring that all QPs have access to this funding to address their needs.

### **Referral Methods**

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

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

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

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

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

### **Template:**

***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):***

N/A

***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):***

N/A

***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):***

N/A

***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):***

N/A

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

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

### **Template**

***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:***

N/A

***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:***

N/A

***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):***

N/A



## HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- *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*

N/A

- *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.*

N/A

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

N/A

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

N/A

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

N/A

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

N/A

**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:**

01/28/2023

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

34-6001795

**5b. Federal Award Identifier:**

M-21-MP-39-0212

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** City of Mansfield

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

34-600-1795

**\* c. UEI:**

GMQVEYZDWJP8

**d. Address:**

\* Street1: 30 North Diamond Street

Street2:

\* City: Mansfield

County/Parish: Richland

\* State: OH: Ohio

Province:

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 44902-1738

**e. Organizational Unit:**

Department Name:

Division Name:

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

Prefix: Mr.

\* First Name: Timothy

Middle Name:

\* Last Name: Theaker

Suffix:

Title: Mayor, City of Mansfield

Organizational Affiliation:

\* Telephone Number: 419-755-9626

Fax Number:

\* Email: ttheaker@ci.mansfield.oh.us

**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 and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

**CFDA Title:**

**\* 12. Funding Opportunity Number:**

HOME-ARP M-21-MD-39-0212

**\* Title:**

This is a HOME-ARP grant for the entitlement participating jurisdiction of Mansfield, Ohio

**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:**

This funding will assist the office of Community Development with funding of HOME-ARP projects and services in the amount of \$1,061,958

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

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

Add Attachment

Delete Attachment

View Attachment

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

* a. Federal	<input type="text" value="1,061,958.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="1,061,958.00"/>

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

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

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

If "Yes," provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

☒ \*\* I AGREE

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

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

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

\* Signature of Authorized Representative:

\* Date Signed:

## 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	DATE SUBMITTED
City of Mansfield	1-26-23

## **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

1.26.23  
Date

Mayor  
\_\_\_\_\_  
Title



## ASSURANCES - NON-CONSTRUCTION PROGRAMS

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




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

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE 
APPLICANT ORGANIZATION 	DATE SUBMITTED 