



Department of  
Development

# **Program Year 2021 Ohio Consolidated Plan Annual Action Plan HOME- American Rescue Plan Act (ARPA) Allocation Plan Amendment**

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## Background

On March 11, 2021, President Biden signed the American Rescue Plan Act (ARPA) of 2021 in to law to address the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses. On April 8, 2021, HUD announced that the state of Ohio was allocated \$90,557,128 as part of the HOME-American Rescue Plan Act (HOME-ARPA) for homelessness assistance and assistance to other vulnerable populations to:

- Provide capital investment for permanent rental housing
- Upgrade available stock of shelter to include non-congregate shelter
- Provide tenant-based rental assistance and supportive services

## Consultation

HUD Notice CPD-21-10 issued on September 13, 2021, provided the list of HOME ARPA Allocation Plan requirements including the citizen participation and consultation processes for public engagement. On November 22, 2021, the Office of Community Development held the HOME-ARPA Allocation Stakeholder Group Meeting via Webex to discuss the various eligible activities and funds available to begin the process of planning the allocation plan. The HOME-ARPA Stakeholder Group was comprised of persons representing statewide homeless organizations, local government, veterans, mental health and addiction services providers, housing developers, fair housing groups along with various non-profit organizations and state agencies that deal specifically with support services and housing as noted in the table below. The Ohio Domestic Violence Network was consulted separately.

Based on the Stakeholder Group meeting, consensus was reached with regards to identifying priorities for the use of HOME-ARPA funds throughout the state, with permanent supportive housing type projects discussed as one of the top priorities.

The Stakeholder Group meeting identified possible partners for collaboration with the Ohio Housing Finance Agency (OHFA) a key partner as part of the development of affordable housing through the Housing Development Assistance Program (HDAP). Following the Stakeholder Group meeting participants were asked to provide the OCD with comments in order to help development the HOME-ARPA Allocation Plan. Additional feedback was received through direct consultation from a number of organizations that have been summarized in the following table.

**Table 1: HOME ARPA Consultation Table**

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Ohio Municipal League	Local Government Representative	Virtual stakeholder meeting	The OHAC participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.

Coalition on Homelessness and Housing in Ohio (COHHIO)	Homeless Service Providers. Balance of State Continuum of Care	Virtual stakeholder meeting, direct phone calls, email	Bill Faith and Douglas Argue from the Coalition on Homelessness and Housing in Ohio representing homeless groups throughout the state indicated at the virtual stakeholder meeting held on 11/21/21 that there is a need to focus on the development of affordable housing as opposed to TBRA. COHHIO was also consulted on 4/7/22 to discuss the proposed activities and budget included in the plan. They were in agreement that less funds be directed towards non-congregate shelter activity from the initial amount of \$30 million. If a significant amount of funds were to be directed towards non-congregate language in the plan should be added that allows for unspent funds to be directed towards the development of rental housing. In addition, they added that support services is an important component as part of the development of affordable rental housing that should be included as a stand-alone activity in the plan.
Ohio Housing Finance Agency (OHFA)	Public agencies that address the needs of the qualifying populations including mainstream benefit systems	Virtual stakeholder meeting, direct phone calls, email	Karen Banyai from OHFA indicated at the virtual stakeholder meeting held on 11/21/21 that there is strong need for permanent supportive housing projects. They added that funding for support services as part of the permanent supportive housing projects is needed. OHFA was integral in the development of the affordable rental housing development activity, through consultation efforts between the initial stakeholder meeting and final draft of the document.
Ohio Department of Health	Public agencies that address the needs of the qualifying populations including mainstream benefit systems	Virtual stakeholder meeting	The OHAC participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Community Housing Network	Affordable housing developer	Virtual stakeholder meeting, email	Ryan Cessell from CHN agreed at the 11/21/21 stakeholder meeting that there is a strong need for permanent supportive housing projects. They added that funding for support services as part of the permanent supportive housing projects is needed.
Ohio Housing Authorities Conference	Public Housing Agencies (PHAs)	Virtual stakeholder meeting	The OHAC participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
CAA of Columbiana County	Homeless Service Providers, Veterans's Groups, Balance of State Continuum of Care representative (Region 6 Lead)	Virtual stakeholder meeting	The HfH participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Buckeye Hills Regional Council	Housing services provider, Balance of State Continuum of Care representative (Region 2 Lead)	Virtual stakeholder meeting	The HfH participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Great Lakes Community Action Partnership	Housing services provider	Virtual stakeholder meeting	The HfH participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.

U.S. Department of Veteran Services	Veterans' Groups	Virtual stakeholder meeting	The HfH participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Corporation for Supportive Housing	Non-profit technical assistance provider and supportive housing intermediary	Virtual stakeholder meeting	Based on one-on-one consultation on 3/31/22, as well as feedback provided as part of the comment period CSH has voiced support for the development of affordable rental housing for all qualifying populations throughout the state. They have indicated that as part of these projects there is also a need for support services such as housing clinical staff and peer supporters. They also indicated that funding for non-profit capacity building would be very valuable for long-term sustainability.
Ohio Department of Veterans Affairs	Veterans' Groups	Virtual stakeholder meeting	The ODVA participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Habitat for Humanity	Rural affordable housing developer	Virtual stakeholder meeting	The HfH participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
County Commissioners Association	Local Government Representative	Virtual stakeholder meeting	The CCA participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Ohio Department of Mental Health and Addiction Services	Public agencies that address the needs of the qualifying populations including mainstream benefit systems	Virtual stakeholder meeting, direct phone calls, email	Based on one-on-one consultation on 3/31/22, phone calls/emails, as well as feedback provided as part of the 11/21/21 stakeholder group meeting, OHMAS has voiced support for the development of affordable rental housing for all qualifying populations throughout the state. They have indicated that as part of these projects there is also a need for support services such as housing clinical staff and peer supporters, but understand that the timing of the grant could make this difficult as part of program implementation.
Ohio Civil Rights Commission	Organizations that address civil rights, fair housing, and needs of people with disabilities	Virtual stakeholder meeting	The Ohio Civil Rights Commission participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
ODJFS, Office of Workforce and Development	Public agencies that address the needs of the qualifying populations including mainstream benefit systems	Virtual stakeholder meeting	The ODJFS participated in the virtual stakeholder meeting on 11/21/21. No feedback was received during or following the meeting. The draft plan was distributed to them for review.

Ohio Domestic Violence Network	Victim Services Providers	Direct phone calls and email	The Ohio Domestic Violence Network (ODVN), a statewide organization that provides services for domestic violence services was consulted 3/23/22 outside of the stakeholder group meeting. The ODVN discussed the projects that are eligible, specifically why Development’s initial HOME-ARPA proposal included significant funds for non-congregate shelters, not enough funding for housing development for survivors and why funding was not dedicated for TBRA and supportive services. It was brought to ODVN’s attention that no preferences will be placed on any of the eligible projects as outlined in the HOME-ARPA Allocation Plan, so there are funding options for independent housing developments for survivors of domestic violence. Development suggested that ODVN discuss these proposals with OHFA to understand the process.
Sunday Creek Horizons	Rural affordable housing developer	Direct phone calls and email	The Sunday Creek Development, a rural development group located in Appalachian Ohio was consulted 3/11/22 outside of the stakeholder group meeting. They expressed support for the development of affordable rental housing, but indicated that a local match commitment of the HOME-ARPA funds should be required for the development of affordable housing projects. They also added that as there are few non-profit developers in rural Ohio, particularly Appalachian Ohio, both non-profit and private developers should be eligible to develop affordable housing projects. In addition, they expressed a preference for HOME-ARPA to be utilized for 4% gap new construction development as opposed to 9% credits.
Findlay Hope House	Homeless Service Provider, Victim Service Provider, Balance of State Continuum of Care representative (Region 11 Lead)	Focus Group	Hope House participated in a focus group on 4/7/22 to learn more about the specific needs of homeless persons, victims of domestic violence and qualifying populations. The participants expressed support for utilizing HOME-ARPA resources for the development of additional affordable rental housing units as well as providing support services that can include transportation and financial management training.

## Public Participation

Following the HOME-ARPA Stakeholder Group Meeting, the draft HOME-ARPA Allocation Plan was prepared for public comment beginning on March 1, 2022. The draft HOME-ARPA Allocation Plan was posted online along with the memo announcing the HOME-ARPA Allocation Plan public comment process at <https://development.ohio.gov/wps/portal/gov/development/community/community-resources/ohio-consolidated-plan> for the 15-day public comment period. A direct email was sent to over 600 communities and organizations throughout the state along with notification made available at <https://development.ohio.gov/home/news-and-events/all-events/2022-0302-public-hearing-home-arpa>. As indicated in the HOME-ARPA memo, the public hearing for the draft HOME-ARPA Allocation Plan took place on March 2, 2022, at the Vern Riffe Center 19<sup>th</sup> Floor, Room 1932, 77 South High Street Columbus, Ohio 43215. As indicated on Development’s website, “the State of Ohio is an Equal Opportunity Employer and Provider of ADA services” along with the following information regarding website accessibility “the Department of Administrative Services has taken steps to ensure that sites on the InnovateOhio Platform

are at least minimally accessible to people with disabilities who use assistive technology to access the Internet. A total of thirty-three individuals attended the public hearing virtually with two individuals attending the public hearing. A total of three comments were received at the public hearing with ten written comments received during the public comment period, which are included in the appendix of the plan. A summary of the comments with responses are included below.

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

In addition to the stakeholder group the table above lists the organizations and stakeholders that were consulted through direct phone calls, emails, meetings and focus group to get feedback prior to development of the draft plan.

Based on feedback received during the draft HOME-ARPA Allocation Plan public comment period that took place from March 1, 2022 – March 16, 2022, the plan was amended and posted for an additional 15-day public comment period and public hearing to broaden public participation efforts. The 2<sup>nd</sup> public comment period took place from April 18, 2022 – May 3, 2022, with the Public Hearing taking place @10:30am April 20, 2022, at the Vern Riffe Center 19<sup>th</sup> Floor, Room 1932, 77 South High Street Columbus, Ohio 43215.

In addition to the public participation efforts outlined above, the availability of HOME-ARPA funds along with an overview of the eligible activities and program requirements were discussed as part of the Community Housing Impact and Preservation Program (CHIP) Advisory Group and Housing Development Assistance Program Advisory Group meetings that were held virtually on November 2, 2021, and December 2, 2021. The minutes of the CHIP meeting minutes can be found at <https://development.ohio.gov/wps/portal/gov/development/community/community-resources/ohio-consolidated-plan>.

***Summarize the comments and recommendations received through the public participation process:***

**Summary of Comments Received on the First Opportunity to Comment on the Draft HOME-ARPA Allocation Plan**

The Office of Community Development held the 15-day public comment period beginning on March 1, 2022, along with a Public Hearing that took place on March 2, 2022. A summary of the comments received along with responses prepared have been included below:

Comment #1

A number of organizations expressed concern with the overall budget, particularly the amount dedicated for affordable housing developments. All comments that addressed the funding for affordable housing development indicated that the majority of funding should be directed to developing housing as that activity has the greatest need across the state. On average, the comments indicated that they would like to see the development of housing included at the full \$60 million, with a few comments indicating that the entire HOME-ARPA allocation could be spent on housing development.

Response

A mechanism has been built into the plan to allow for any unexpended funds to be reallocated to affordable housing development.

Comment #2

A number of organizations expressed concern with the amount of funding dedicated for non-congregate shelter projects. All comments indicated that there isn't a demonstrated need for the amount of funding budgeted for non-congregate shelter projects. On average, the comments indicated that they would like to see non-congregate shelters funded at \$3-5 million,

Response

OCD has received funding requests for non-congregate shelters indicating there is a need in the state. A mechanism has been built into the plan to allow for any unexpended funds to be reallocated to affordable housing development.

#### Comment #3

A number of comments requested funding specifically for supportive services in the areas of case management, counseling, services and resource linkage as many supportive housing programs operate with insufficient funding. The comments recommended a portion of the HOME-ARPA funds between \$15-18 million be dedicated specifically for supportive services.

#### Response

The HOME-ARP Grant with HUD ends on 9/30/2030. For projects awarded funding, the units would not be placed in service until at least 2025. Given the rarity of the capital resources for PSH and ES a priority was placed on projects like those. Additionally, those projects are more likely to be sustained after funding ended. If funds for supportive services is needed for HOME-ARP projects, Development intends to commit a portion of the OHTF budget to provide such services. Plans for self-sustaining those services must be submitted for long-term stability after the OHTF dollars expire.

#### Comment #4

Public testimony indicated that preference on affordable housing developments should be on projects located in the rural parts of the state, particularly the Appalachian region of the state.

#### Response

A scoring element will be implemented to prioritize projects located in Ohio's Appalachian counties (excluding HUD Entitlement Communities and Non-entitlement Participating Jurisdictions); HUD Non-entitlement Communities and Non-Participating Jurisdictions. In addition, OHFA has had a non-PJ set aside in the Bond Gap Financing program and will continue to give preference to projects located in non-PJs.

#### Comment #5

HOME-ARPA funds dedicated for affordable housing development should be used to fill the gaps in 4% new construction developments in order to increase affordable housing stock throughout the state. HOME-ARPA funding for 9% Low-Income Tax Credits should be ineligible.

#### Response

Development would like to allocate less than \$2.5 million of HOME-ARP to 9% PSH projects. This would simply replace the allocation of OHTF or HOME. Even though these projects will receive 9% tax credits, gap financing is still necessary since PSH projects do not have the capacity to generate cash flow like typical 9% LIHTC properties. Since 100% of the units will serve Qualified Populations, it behooves us to use this more restricted source of funds and then use the amount of OHTF/HOME that would have been allocated in a less restricted way i.e., the BGF round.

#### Comment #6

The Department of Development should work with OHFA to create three funding rounds: 9% (fund quality applications for Supportive Housing that come through OHFA's 9% round; 4% bonds (fill capital gaps for projects that apply in 4% rounds); and single source for small scale whether through HDAP or a stand-alone competition.

#### Response

OHFA plans to use HOME-ARP in 2022 9% round, 2022 BGF round, and 2022 HDGF (non-tax credit) round. HOME-ARP will fall under the HDAP umbrella.

#### Comment #7

The HOME-ARPA Allocation Plan does not target populations at or below 30% area median income as stated in HUD CPD Notice 21-10.

#### Response



Units funded through OHFA's HDAP program (i.e., assisted units) must serve Qualified Populations.

Comment #8

A local match commitment of the HOME-APRA funds should be required for the development of affordable housing projects.

Response

If local match is required, it would exclude potential projects that do not have access to local match. Local leverage is part of the scoring criteria, so there will be a preference to projects that can demonstrate leveraged funds, but it will not be a requirement.

Comment #9

Incentivize communities to invest in home rehabilitation programs to improve the quality of housing stock available in communities.

Response

Private Home Rehabilitation is not an eligible activity under HOME-ARP. Rental Rehabilitation would be eligible however the qualifying populations criteria would have to be met.

Comment #10

As there are few non-profit developers in rural Ohio, particularly Appalachian Ohio, both non-profit and private developers should be eligible to develop affordable housing projects.

Response

Nothing in the plan excludes for profit developers. They are not eligible for grants, but they are eligible for cash flow loans.

Comment #11

The limits placed on affordable housing projects at \$600,000 for CHDO sponsor projects and \$300,000 when combined with the 9% LIHTC program are too low based on a number of factors. Permanent supportive housing development projects should be able to request up to \$1,000,000 in HDAP to offset reduction in other funds and increase in construction costs. Increasing the amount available for permanent supportive housing projects will allow for projects of more than 40 units.

Response

This is the limit for 9% projects only. OHFA will increase the per project limits for the HOME-ARP HDAP programs to ensure projects are financially feasible with the inclusion of units set-aside for HOME-ARP Qualified Populations.

Comment #12

The amount budgeted for affordable housing would only allow for the funding of \$58,000 per unit based on the outcomes projected.

Response

This amount will be revised as the initial amount considered the entire project and not just assisted units.

Comment #13

A number of comments requested that the amount of administration be reduced from the full 15% (\$13.5) to approximately \$8-10 million so that funds can be dedicated to other projects.

Response

Administration covers the implementation of the projects as well as the long-term compliance requirements for the affordability period of 20+ years. Long-term compliance requires annual income renewal for clients as site inspections every three years by OHFA. In addition, OHFA anticipates a considerable amount of training of compliance staff to implement HOME-ARP as well as monitoring for compliance.

Comment #14

There are no funds dedicated for TBRA, which is an important activity for persons exiting a shelter.

#### Response

TBRA funds can only be used for a maximum of 24-months. Other resources providing a long-term solution for person(s), is a better option. Currently the Department of Development has several programs with rental assistance funding. These include the Office of Community Assistance's Emergency Rental Assistance program and the Office of Community Development's Homeless Crisis Response Program. These funding sources have significant amounts of funding to both prevent individuals from entering homelessness and end homelessness quickly. Ohio Housing Finance Agency has also distributed additional homelessness service funding. Resources for capital funding for permanent supportive housing is limited and there is a demonstrated need for that resource. Capital funding for emergency shelter cannot be obtained elsewhere.

#### Comment #15

There were a few comments regarding the consultation process. The organizations that provided comments indicated that they would have liked to have additional opportunities to provide feedback following the Stakeholder Group meeting.

#### Response

The Office of Community Development understands that having multiple opportunities to provide feedback was helpful in the development of the plan. At the Stakeholder Group meeting, the Office of Community Development asked participants to provide feedback at any time following the meeting in order to begin preparing the draft HOME-ARPA Allocation Plan.

### **Summary of Comments Received on the Second Opportunity to Comment on the Draft HOME-ARPA Allocation Plan**

The Office of Community Development held a second 15-day public comment period beginning on April 18, 2022, along with a Public Hearing that took place on April 20, 2022. A summary of the comments received along with responses prepared have been included below:

#### Comment #1

A number of organizations expressed concern with the amount of funding dedicated for non-congregate shelter projects. All comments indicated that there isn't a demonstrated need for the amount of funding budgeted for non-congregate shelter projects. On average, the comments indicated that they would like to see non-congregate shelters funded at approximately \$5 million. Additional information regarding the specifics of the activity should be incorporated into the plan.

#### Response

The Office of Community Development has received funding requests for non-congregate shelters indicating there is a need in the state. A mechanism has been built into the plan to allow for any unexpended funds to be reallocated to affordable housing development.

#### Comment #2

A number of comments requested funding specifically for supportive services in the areas of case management, counseling, services and resource linkage as many supportive housing programs operate with insufficient funding. The comments recommended a portion of the HOME-ARPA funds be dedicated specifically for supportive services

#### Response

The HOME-ARPA Grant ends on 9/30/2030. For projects awarded funding, the units would not be placed in service until at least 2025. Given the rarity of the capital resources for the development of housing a priority was placed specifically on projects like those. Additionally, those projects are more likely to be sustained after funding ended. If funds for supportive services is needed for HOME-ARP projects, Development intends to commit a portion of the OHTF budget to provide such services. Plans for self-sustaining those services must be submitted for long-term stability after the OHTF dollars expire.

Comment #3

It has been recommended that OHFA raise the cap from \$2.5 million to \$3.5 million for New Construction projects only.

Response

The Draft OHFA BGF Guidelines have incorporated this recommendation.

Comment #4

It has been recommended that the amount of HCGF to be awarded to 2022 9% LIHTC developments be based on an updated underwriting of the development to be completed at Final Application.

Response

OHFA underwrites all tax credit projects at proposal application, final application, and 8609. If additional resources are needed at final application (i.e., due to unanticipated increases in construction costs), OHFA will consider additional subsidy.

Comment #5

It has been recommended that any unused and uncommitted funds following the 2022 HCGF and proposed BGF funding rounds be reserved for 2023 BGF, 2023 HDGF, and 2023 HCGF.

Response

Funds will be prioritized for BGF and HDGF. The 9% LIHTC program provides deeper subsidy, so any unused funds in 2022 will go to rounds needing additional subsidy.

Comment #6

A number of comments requested that the amount of administration be reduced to 10% of the total allocation so that funds can be dedicated to other projects. In addition, it has been requested that in order to determine that the admin. amount is reasonable the plan should incorporate the number of staff it will hire with these funds; the responsibility of each staff member; and, whether the staff will be from OHFA or Development.

Response

Administration covers the implementation of the projects as well as the long-term compliance requirements for the affordability period of 20+ years. Long-term compliance requires annual income renewal for clients as site inspections every three years by OHFA. In addition, OHFA anticipates a considerable amount of training of compliance staff to implement HOME-ARPA as well as monitoring for compliance.

Comment #7

A comment was received that requested that the HDAP scoring methodology be weighted to place priority on projects in impoverished counties, particularly in the Appalachian region.

Response

OHFA has had a non-Participating Jurisdiction set aside in the Bond Gap Financing program and will continue to give preference to projects located in non-Participating Jurisdiction's.

Comment #8

A comment was received that requested that the subsidy cap be raised for housing developments funded by HOME-ARPA to \$5 million in subsidy per development in rural and Appalachian Ohio.

Response

Projects located in non-Participating Jurisdictions will be eligible for \$5 million in HOME-ARP Subsidy and must reserve at least 20% of affordable units for Qualified Households.

Comment #9

A comment was received that requested that the HDAP section that deals with the calculation of the potential additional 2022 HCGF HDAP does not take into account that for the Initial Application be

amended. This request is to allow OHFA staff to provide additional funds in cases where non-committed funds ultimately do not come to fruition by the Final Application.

Response

Language in the draft Plan and draft OHFA guidelines allows OHFA to provide additional funds if needed.

Comment #10

A comment was received that requested the HDAP BGF \$4.25 million cap be aligned with the 2021 9% projects \$5 million cap.

Response

This recommendation has been incorporated into the final plan.

Comment #11

A comment was received that requested that the 2022 HDAP MF BGF and 2022 HDGF application process be pushed back to allow for the strongest projects and to benefit Qualifying Households.

Response

We have committed to a later deadline than in past years. Applications will be due late summer 2022.

Comment #12

A comment was received that requested that the 2023 HCGF as an eligible use for unused funds in addition to 2023 BGF and HDGF.

Response

The 9% LIHTC provides deeper subsidy than the 4% LIHTC. If there are additional funds remaining, we will be utilizing them for our 4% round. OHTF and HOME will still be available for eligible developments in our 9% round.

Comment #13

A comment was received that requested clarification under the HDAP Funding Requirement Loans section for the available interest rate parameters. Providing a range of potential interest rates from 0% to a benchmark would help define the parameters that OHFA staff can use, and developers can anticipate.

Response

This is determined much closer to closing, up to 2% is consistent with what OHFA has done in the past.

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

There were a few comments received as part of the consultation process and public participation process (see above) that did not meet the requirements as stated in CPD-21-10 or were not considered a priority when developing the plan.

## Needs Assessment and Gap Analysis

The state of Ohio reviewed the existing [PY2020 – 2024 Consolidated Plan](#), Ohio Housing Finance Agency’s (OHFA) [Housing Needs Assessment](#), the OHFA Confronting Homelessness Report- Homelessness in Ohio 2012- 2018, [2014-2018 Comprehensive Housing Affordable Strategy \(CHAS\)](#) Ohio’s [2020 Point-in-Time Report](#), the Corporation for Supportive Housing (CSH) State Investment Response Estimator Tool Data, and the National Low-Income Housing Coalition (NHILC) [Shortage of Affordable Rental Homes](#) to help determine the needs that exist for the following qualifying populations:

- Homeless, as defined in 24 CFR 91.5
- At risk of Homelessness, as defined in 24 CFR 91.5
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking
- Other Populations:
  - Other families requiring services or housing assistance to prevent homelessness
  - At greatest risk of housing instability
  - Veterans and families that include a veteran family member

Upon examination of the data and plans discussed previously, Development was able to determine the gaps that exist for persons that fall under one of the qualifying population criteria as will be discussed later. The following provides an overview of how the information contained within the plans and data aligns with the mission of the HOME-ARPA. The following tables that provide a summary of the homeless needs inventory will be discussed as part of the section covering the size and demographic composition of qualifying populations within the PJ’s boundaries along with the section that addresses the gaps within the current shelter and housing inventory.

**Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	3,031	918	4,249	4,249	112								
Transitional Housing	848	308	947	947	394								
Permanent Supportive Housing	7,142	2,292	10,982	10,982	2,937								
Other Permanent Housing	48	25	161	161	24								
Sheltered Homeless						2,985	5,826	698	1,706				
Unsheltered Homeless						34	1,810	32	#				
<b>Current Gap</b>										1,276	425	1,885	1,885

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

## Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	1,582,850		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	297,090		
Rental Units Affordable to HH at 50% AMI (Other Populations)	210,160		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		302,870	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		215,470	
<b>Current Gaps</b>			518,340

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

### ***Describe the size and demographic populations within the Participating Jurisdiction's (PJ) boundaries:***

#### Homeless (McKinney Act definition at 24 CFR 91.5)

The data covering the size and demographics of the homeless population utilized aggregated data from local Homeless Management Information Systems, which captured information on individuals accessing services as reported in the OHFA Homelessness Report. Data in this report reflects information from the aggregated HMIS records maintained by Ohio's nine Continuums of Care, reflecting all 88 of Ohio's counties, from January 1, 2012, through December 31, 2018. If an individual obtained homelessness services prior to 2012, any such records are not included. In 2018, 76,478 unique individuals were served by Ohio's Continuums of Care. This means about one in every 15 Ohioans (or 6.7% of the population) accessed homelessness services in 2018. This is likely an undercount of the total Ohioans experiencing a housing crisis, as this data source cannot capture families doubling up, staying with family or friends, or staying in temporary locations such as a car or motel. There are also a number of non-HMIS participating homeless service providers that do not contribute to the HMIS.

The number of people experiencing homelessness each year has grown consistently over time. Between 2012 and 2018, the population experiencing homelessness grew 30.8%; during the same time Ohio's entire population grew by only 1.3%. In 2018, the average person accessing homelessness services was 31 years old. Excluding children under age 18, the average head of household was 39 years old. Age at first entry was unknown for 402 clients. Over time, the proportion of clients in each age group has shifted slightly. The largest increases in population served from 2012- 2018 have been in the age groups of 55 to 64 and 65 or older, which grew 85 and 208 percent respectively. The next largest increase in age group served is children aged 5 to 9 and 10 to 14, which increased 43 and 49 percent from 2012-2018.

About a third of the population that experienced homelessness in 2018 were children under the age of 18 (28.5%). This includes 2,258 infants who had not yet reached the age of one. Compared to the state overall, children aged 0 to 4 were substantially overrepresented in the CoC population; 11.4% of CoC clients fell in this age range, compared with only 5.9% of Ohioans overall. Children aged 10 to 14 are also overrepresented in the CoC population. The total number of children under age 18 experiencing homelessness has increased steadily year over year. Since 2012, the number of children experiencing homelessness has increased 35%, reaching 21,827 in 2018.

Adult sub-groups between 25 and 54 make up about half of the total CoC client population in 2018. The largest sub-age group accessing CoC services is adults aged 35 to 44; this age group comprised 17.8% of the CoC client population and only 8.8% of the Ohio population in 2018. The increasing number of older adults accessing homelessness services may be related to two trends: the number of older Ohioans is increasing, and this population is uniquely susceptible to housing challenges. Demographers predict the percentage of Ohioans aged 55 and over will peak by 2030 at 32%. This increase in the number and proportion of older adults is not unique to Ohio and is happening at the national level as well.

Males made up just over half of the adults accessing homeless services: of clients aged 18 or older, 56.3% clients were male, 43.3% were female, and 0.3% identified as transgender, non-binary, or another gender identity. Gender at first entry was unknown for 93 clients. This ratio of male to female clients has stayed consistent over time. Of the population younger than 18, the gender gap is much smaller. Females account for 49.5% of the CoC youth population, males account for 50.5%, and those identifying as transgender or non-binary is .1%

The number of families accessing homelessness services has been steadily increasing since 2012. Between 2012 and 2018, the number of families (analyzed as adults entering with children) increased by 20.4%. More than 28,800 people entered as part of a family, 64.8% of whom were children under 18.

The racial composition of those accessing homelessness services differs drastically from the state's overall composition. White individuals were underrepresented in the homelessness population. White people made up 81% of the total state population in 2018 but comprised 45.4% of those served. By contrast, Black individuals were over-represented. Black individuals represented 12.4% of Ohio's population in 2018 but made up 48.8% of clients accessing services. Multiracial individuals were also over-represented, comprising 3.1% of Ohio's population, but 5% of persons receiving services. Race at first entry was unknown for 415 clients.

Regarding ethnicity, about 4% of clients reported that they were of Hispanic or Latino ancestry. Ohio's population is 3.9% Hispanic or Latino. Ethnicity at first entry was unknown for 249 clients.

#### At-risk of homelessness (McKinney Act definition at 24 CFR 91.5)

Per 24 CFR §91.5, an individual or family is considered at-risk of homelessness if their income is below 30% area median family income, do not have sufficient resources or support networks, and have experienced housing instability. Below is an analysis of 0-30% AMI renters.

As reported in the 2014-2018 CHAS dataset, there were a total of 586,490 households in the state of Ohio that had an annual income below 30 percent of median family income for the area as determined by HUD, which represents 12.6 percent of all households. Over a quarter of all renters and 5.8 percent of all owners in the state of Ohio had incomes at or below 30 percent of median family income. Development considers those living in rental housing with one or more problems who are Extremely Low Income (ELI) as meeting the definition of At Risk, according to the Census CHAS dataset. There are 302,870 renters with at least one housing problem whose income is in the ELI range as of 2018. There are thousands more people who are at risk of homelessness, including those exiting corrections, hospitals and treatment programs, without suitable housing for whom we cannot deduplicate datasets. Therefore, the CHAS data is used as a proxy measure.

The state of Ohio also considers all those living in poverty as At Risk, given the Ohio Data Warehouse's finding that half of Ohio's poverty stricken were engaged with programs available through the state's Continuum of Care. Given disproportionate representation of Black people in Ohio's homelessness population, and the growing rate of older homelessness, we expect older, Black household heads, especially those with disabling conditions to be at heightened risk of entering homelessness.

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

In 2021, Ohio's domestic violence agencies provided shelter to 9,118 individuals and 3,965 children fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking (hereafter abbreviated as survivors of domestic violence).

As reported in Ohio Domestic Violence Network's (ODVN) [16th Annual Domestic Violence Counts Report Ohio Summary](#), which provides a count on the domestic violence victims served on one day; a total of 2,456 victims were served in one day. Of that, 1,548 adult and child victims of domestic violence found refuge in emergency shelters, transitional housing, hotels, motels, or other housing provided by local domestic violence programs. A total of 908 non-residential adult and child victims received supportive services including counseling, legal advocacy, and support groups. A total of 770 hotline contacts were received. Domestic violence hotlines are lifelines for victims in danger, providing support, information, safety planning, and resources via phone, chat, text, and email. As reported by ODVN, hotline staff received 770 contacts, averaging more than 32 contacts per hour. 183 victims requested shelter and/or housing assistance but were denied due to a lack of resources that day.

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

As reported in the OHFA Homelessness Report, the number of families accessing homelessness services has been steadily increasing since 2012. Between 2012 and 2018, the number of families (analyzed as adults entering with children) increased by 20.4%. More than 28,800 people entered as part of a family, 64.8% of whom were children under 18. In particular, the number of females entering with children has increased. Despite making up only 43.4% of the adult CoC population, females represented 93.5% of the "single adult with children" population. Males, in contrast, made up 65.4% of the "single adult without children" population.

Of the roughly 14,400 children that entered with a single adult, the average child's age was six years old, and the average age of the adult was 32. More than 1,250 infants entered with a single adult. The increasing number of women and children accessing homelessness services highlights the challenges many women face throughout the state. The lack of affordable and available housing in Ohio is largest for homes with multiple bedrooms. While Ohio is nearly meeting the need for one bedroom units for very low-income renters, there is a sizable shortage of supply for affordable units with more bedrooms that can accommodate larger families – suggesting that adults with children may be even more vulnerable to housing instability.

Of clients entering programs in 2018, 7.4% were military veterans, with veteran status not reported for 1,046 people. During the study period, the average age for veterans entering the CoC system during the study period was 52 and more than 330 veteran households included children at entry.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, Tenant-Based Rental Assistance, and affordable and permanent supportive rental housing***

In Ohio, there are several programs funded with both federal and state resources that can assist qualifying populations with supportive services, along with affordable and permanent supportive rental housing. An overview of the housing programs offered by Development and OHFA are located on Development's website. These programs utilize Ohio Housing Trust Fund (OHTF), Community Development Block Grant (CDBG), CARES-Act, HOME Investment Partnership, Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA) and National Housing Trust Fund dollars to help conserve and expand the affordable housing stock; address the issue of homelessness in Ohio; and provide short-term, emergency assistance and other public services for low-income Ohioans and qualifying populations. In addition to the state and federal funds offered by Development and OHFA, Congress has recently approved a total of nearly \$1.5 billion of Emergency Rental Assistance (ERA) allocated to the State of Ohio, to pay up to 12 months of arrears and up to three months prospective rent



for people experiencing housing instability. The statute allows housing providers to initiate ERA applications with cooperation from their tenants.

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

Homeless (McKinney Act definition at 24 CFR 91.5)

The primary unmet need cited over and over again by Continuum of Care leaders, people experiencing homelessness, and other homeless system stakeholders consulted during the development of this plan is affordable and supportive housing. There are some specific counties that do not have adequate shelter, and some shelter programs that have capital needs, but the overwhelming response from participants was around the need for affordable and supportive housing.

Using HUD's State-Investment Resource Estimating Tool, some 1,885 units of supportive housing are needed and some 16,000+ affordable housing units are needed for the current population experiencing homelessness. Supportive housing requires, capital (no debt), operating subsidy, and supportive services that are adequately financed to promote tenants' wellbeing. Ohio has insufficient resources in all categories. Development notes that OHFA's Permanent Supportive Housing (PSH) pool in the 9% LIHTC program has helped add capacity for many years, generating over 200 new PSH units each year. However, we continue to fall well short of the need. In addition, an examination of recent point-in-time counts over the past few years indicates that the number of people counted as homeless exceeds the available beds across the state (see below). While PIT is the most reliable tool we have, it is a dramatic undercount of the actual number of people experiencing homelessness on any given night.

Housing Inventory Count (HIC) by State – Ohio

2021 Total Year Round ES/TH Beds – 8834

2020 Total Year Round ES/TH Beds – 9161

2019 Total Year Round ES/TH Beds – 9127

PIT Counts by State – Ohio

2021 – 6,469 (no unsheltered count was reported due to COVID)

2020 – 10,655

2019 – 10,345

At-risk of homelessness (McKinney Act definition at 24 CFR 91.5)

People experiencing homelessness, those who had been previously homeless, as well as those who work in the homeless system and work to help people avoid literal homelessness all cited the need for affordable housing and supportive housing as the most pressing challenge. OHFA estimates in the 2022 Needs Assessment that it will take 50 years to address the affordable housing need in the state at the current pace of development, and if no new households require affordable housing in the future.

The findings reported in the OHFA Needs Assessment help to understand what the housing conditions are like throughout the state, both in rural and urban areas for persons that meet one of the conditions discussed under 24 CFR 91.5:

- Ohio's foreclosure rate (0.6%), 90-day delinquency rate (2%) and negative equity share (4%) in December 2019 were all at record low levels, having fallen precipitously from the height of the Great Recession.
- In 2018, there were 105,265 eviction filings statewide, representing 6.6% of all renter households. Although consistently higher than the national rate, Ohio's eviction filing rate has fallen to the lowest level in decades, having peaked in 2005 at 8.6%.
- Ohio's public and community schools reported that 35,214 students (2% of enrollment) lacked a fixed, regular and adequate nighttime residence during the 2018–19 school year.
- In 2019, there were 32,362 beds in Ohio for homeless persons, including 9,231 in temporary housing and 23,131 in permanent housing.

- 76,000 Ohioans accessed homelessness services in 2018 from one of the state’s Continuums of Care. This represents a 30% increase from 2012.

The report states that in Ohio “More than 40% of mortgage holders aged 65 or over are housing cost-burdened. Out of this age group, one-in-six mortgage holders (17%) are severely cost-burdened. Black homeowners are twice as likely to be severely cost burdened as white homeowners (14% compared to 7%), meaning they spend at least half their income on housing.”

	2019	2010
Total housing units	5,202,304	5,107,273
Occupied housing units	4,676,358	4,552,270
Vacant housing units	525,946	555,003
Homeowner vacancy rate	1.4%	2.6%
Rental vacancy rate	5.3%	9.5%

Source:: 2015-2019 and 2006-2010 ACS 5-Year Estimates DP-04 Data

The housing affordability crisis is not limited to homeowners. As reported in OHFA’s Needs Assessment, renters in Ohio also face a tight market. “For every 100 extremely low-income renters in Ohio, there were only 44 rental units affordable and available to them in 2018. Ohio’s affordable housing gap has been gradually shrinking, but at the current net annual rate of around 5,000 units built or

made available for the lowest-income renters, it will take almost 50 years to close that gap. One-in-three Black renters in Ohio (33%) were severely rent burdened in 2018, compared to one-in-five white renters (22%).” The issue of housing being overcrowded, and housing cost burden significantly impacts rental housing with “One in four renters in Ohio (25%) experienced severe housing problems, as defined by HUD, including incomplete kitchen and plumbing facilities, severe overcrowding and severe housing cost burden.” In terms of housing availability, the following table shows how the vacancy rate has changed from 2010 – 2019 accordingly to the ACS 5-year estimates. The rental vacancy rate has decreased during that period from 9.5% to 5.3%, which provides another sign that the housing market in Ohio, particularly rental housing, has been significantly impacted since the 2008-2009 housing recession. Additional information regarding the total number of renter and owner households throughout the state experiencing housing problems, as well as housing cost burden can be found in the appendix. The Comprehensive Housing Affordability Strategy (CHAS) data included in the appendix provides a summary of the ACS data for the 2014-2018 period released on September 29, 2021, by Housing and Urban Development (HUD). It should be noted that nearly 43% of all renter households reported at least one of four housing problems, and 18.4% of owner households reported one of four housing problems.”

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

On one day in 2021 (September 9, 2021), DV agencies in Ohio had to deny services to 286 survivors due to a lack of resources, including housing, emergency shelter, transportation, childcare and legal representation. Housing is a huge obstacle for survivors and local victim service providers. For survivors and their children, it is imperative that they find affordable and safe housing as a means to live independently and free from violence from their abusive partners. The pandemic has had detrimental impacts on a survivor’s ability to find such housing. Ohio has seen an overall lack of independent housing options, rental costs at three times that of what it was pre-pandemic, as well as a lack of landlords willing to rent to survivors of DV. In addition, many survivors struggle with additional obstacles related to the DV they have experienced including prior evictions, back balances of rent and utilities and related transportation, and employment issues.

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.

OHFA’s 2021 Needs Assessment reports that “Challenges to secure and maintain affordable housing are particularly difficult for Ohio’s children and aging adults. Both children and older adults are more likely to live in cost burdened households and thus face potential housing insecurity. As Ohio’s population continues to age, a growing number of older adults are also vulnerable to high housing costs. One of

every nine households have a single adult aged 65 and over, making regular home maintenance challenging. Older Ohioans also have higher rates of disabilities: nearly two-thirds of homes in Ohio are inaccessible to someone in a wheelchair.”

It is important to note that the report includes data indicating where people went after exiting the homeless system, which highlights the lack of housing and services necessary to help extremely low-income Ohioans achieve housing stability. Below are key findings from the report:

- Only 21% of people exiting the homeless system entered a subsidized rental unit, while 45% moved into an unsubsidized unit;
- 27% moved in with family or friends, which often leads to future bouts of homelessness;
- 9% went to another emergency shelter;
- 7% exited shelter to a place not fit for human habitation.

The following data reported in the OHFA Confronting Homelessness Report, discusses veterans, which are classified as high-risk populations with regards to homelessness.

Of the veteran clients entering programs in 2018, 7.4% were military veterans, with veteran status not reported for 1,046 people. During the study period:

The average age for veterans entering the CoC system during the study period was 52.

- More than 330 veteran households included children at entry.
- The largest prior residence for veterans included temporary shelter (33%) and a place not fit for habitation (24%).
- The most common exit destinations were an unsubsidized home (35%), a subsidized home (21%), or moving with friends or family (18%).

***Identify the gaps within the current shelter and housing inventory as well as the service delivery system. Explain how the level of need and gaps in the shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:***

The Low-Income Housing Coalition’s most recent [Gap Report](#) indicates that there were only 184,584 rental units in 2019 that were affordable and available to Ohio’s 436,611 extremely low-income households. With national median rent prices increasing nearly 18% last year ([Apartment List](#)), we can assume that gap has grown much larger over the past two years. Another statewide dataset to understanding what housing gaps exist within the current shelter and housing inventory is the Corporation for Supportive Housing’s (CSH) State Investment Response Estimator Tool (S-IRET) (see appendix). The CSH S-IRET tool annualizes Ohio’s PIT and HIC to determine the level of need for three evidence-based interventions that end or prevent homelessness. The following is a summary of the housing gap for individuals and families:

- 1,885 gap in permanent supportive housing units for individuals
- 23,390 gap in rapid rehousing units for individuals and 2,068 for families
- 3,376 gap in units for homeless prevention for individuals and 1,331 for families.

The data included in the Homeless Needs Inventory and Gap Analysis Table was based on the CSH S-IRET tool, which provides the total number of beds and units that are needed for homeless families and adults to fill the gap. In terms of the shelter inventory gaps that exist throughout the state there are a total of 1,276 beds and 425 units need to fill the gap for families, with a total of 1,885 beds needed to fill the gap for adults only. The Housing Needs Inventory and Gap Analysis Table was also based on the CSH S-IRET tool and indicated that there are 302,870 renter households with one of more severe housing problems at 0% - 30% AMI and 215,470 renter households with one of more severe housing problems at 30% - 50% AMI in need of housing. This represents a housing gap of 518,340 households in need of housing.





































