

## 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:***

The City of Cleveland consultation process included reviewing system-level data as well as seeking input from community partners regarding their identification of needs and gaps. Cuyahoga County Office of Homeless Services (CCOHS) is the City/County Continuum of Care’s lead agency, HMIS lead, and collaborative applicant. CCOHS provided information from the 2021 Point-In-Time count as well as monthly point in time counts. From this analysis, they also provided information they shared with CoC partners – requesting additional funding for certain interventions. The City also reach out to 30+ organizations in order to collect a diverse viewpoints to create an accurate assessment of the needs and priorities that these resources could

address. The consultation survey was released on April 1, 2022 and available for 14 days. The draft plan was not developed and published on the City's website until April 20, 2022.

*List the organizations consulted:*

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>Cuyahoga County Office of Homeless Services</b>	<p>County Government</p> <p>Homeless Service Provider</p> <p>Public Agency Address Needs of Qualified Populations: Including  -- 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, as defined by HUD in the Notice  -- 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</p> <p>Continuum of Care (CoC)</p>	Survey Response	<p>As the CoC lead agency, I would respectfully suggest the City of Cleveland join Cuyahoga County in partnership in priorities for our homeless community. Our focus on the rehab and development of shelter and housing. Coordination and partnership will be imperative in order to provide the resources needed for these efforts. Capital funding is not always available and these effort provide longstanding impact for our community.</p>
<b>Eden Housing</b>	<p>Nonprofit Housing Developer</p> <p>Homeless Service Provider</p> <p>Domestic Violence Service Provider</p>	Survey Response	<p>I think using an approach to prioritize activities that don't always qualify for funds would be helpful. Flexibility is also important to keep in mind as eligibility criteria can be a major barrier to using funds. Tenant Based Assistance is needed but we need Landlords who will accept the vouchers. Funds need to be invested to help maintain PSH units- budgets are tight and not</p>

			<p>enough in reserves to meet capital needs.</p> <p>Improve and increase the number of affordable units with 2+ bedrooms to serve families.</p> <p>Support non-congregate shelter development. Flexible funds to help people stay in current units or no-barrier funds for security deposits and a few months of rent if relocating.</p>
<b>Cuyahoga ADAMHS</b>	<p>County Addiction and Mental Health Board</p> <p>Homeless Service Provider</p> <p>Public Agency Address Needs of Qualified Populations: Including</p> <ul style="list-style-type: none"> <li>-- Homeless as defined in 24 CFR 91.5</li> <li>At Risk of Homelessness as defined in 24 CFR 91.5</li> <li>-- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice</li> <li>-- 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</li> </ul> <p>Address Needs or Persons with Disabilities</p>	Survey Response	<p>There is a great need for Permanent Supportive Housing and Affordable Housing Unit expansion. There is also a need for tenant based rental assistance, however it has become increasingly difficult to locate landlords who are willing to rent to this population.</p> <p>Many client with addictions are need of housing when they complete treatment</p> <p>Need to incentive landlords to accept the population as many do not want to accept vouchers as if it is a stigma. Also need assistance via these funds for utilities as day to day support.</p>
<b>The NRP Group</b>	For-profit Affordable Housing Developer	Survey Response	With record-high construction costs, the City should focus a majority of its funds on supporting

			new affordable housing construction.
<b>US Department of Veterans Affairs</b>	<p>Veteran's Groups</p> <p>Healthcare Non-Profit</p> <p>Address Needs or Persons with Disabilities</p>	Survey Response	Housing needs for veterans. Need affordable housing. VA established a nationwide goal to house 38,000 homeless Veterans during calendar year 2022.
<b>United Way of Greater Cleveland</b>	<p>Nonprofit</p> <p>Address Needs or Persons with Disabilities</p>	Survey Response	High Need for new PSH and Affordable Housing Units. Also a high need for housing assistance to prevent homelessness.
<b>Cuyahoga Metropolitan Housing Authority</b>	Public Housing Agency	Survey Response	Many of my clients may have a voucher from Section 8, Eden, or HUD but still cannot find housing because there even less landlords that are willing to work with these programs that have a vacancy. If there was a way to cut through red tap and long applications to get people housing when they need it versus months down the line that would be helpful. Lastly, there are many people are in danger of being homeless and only get assistance if they are in a homeless shelter. Seems to me like it would save some money if we help them sooner or later while they have a couch to lay on for the night versus waiting to help until they are actually homeless.
<b>See appendix for addition consultations</b>	<p>For-profit Affordable Housing Developer- 1</p> <p>Healthcare Non-Profit- 3</p> <p>Domestic Violence Service Provider- 3</p> <p>Address Civil Rights and Fair Housing- 4</p>	Survey Response	The image below is a word cloud of the most frequently uses terms from consultations



## 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: 4/20/2022*
- *Public comment period: start date - 4/20/2022 end date - 5/6/2022*
- *Date(s) of public hearing: 5/5/2022*

### *Describe the public participation process:*

The Public Comment period for the HOME-ARP Allocation Plan began on Wednesday, April 20, 2022 and concluded on Friday, May 6, 2022. A Public Notice was published in the Plain Dealer on April 20, 2022 and included information regarding the proposed plan as well as the scheduled Public Hearing. The Public Hearing took place on Thursday, May 5 at 1:30 p.m., as a part of the Community Development Council meeting held at City Hall, 601 Lakeshore Boulevard, 3rd Floor Room 320, Cleveland, Ohio 44114. Public comments were submitted by mail, phone, fax, or email to Assistant Director Michiel Wackers. 1 email comments were submitted; 0 participants made comment at the Public Hearing.

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

In addition to the Public Notice being published in the Plain Dealer, consultation email were sent requesting community stakeholders to respond via a survey comment on needs and priorities. This included social service organizations, homeless service providers, advisory boards, neighborhood associations, and other nonprofit organizations. A list of these organizations and the letter are attached to this plan. A copy of the Public Notice, draft HOME-ARP allocation plan, and PowerPoint presentation were also posted to the City of Cleveland website.

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

The City of Cleveland received a public comment from the Andrew Katusin of the Cleveland Foundation on behalf of the Homeless Services Taskforce (HST) of the Funders Collaborative on COVID Recovery. The comment was to receive additional information regarding the HOME-APRA survey and how the city might be considering the using these HOME funds/issuing RFPs. The City responded with the requested information.

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

All comments were accepted.

## **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.



**Template:**

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

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	375	123	941	941	0								
Transitional Housing	10	5	76	76	68								
Permanent Supportive Housing	2437	695	3122	3122	636								
Other Permanent Housing	#	#	#	#	#								
Sheltered Homeless						103	1108	90	59				
Unsheltered Homeless						0	84	3	0				
Current Gap										20	2000	50	4000

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

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

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	106,942		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	24,567		
Rental Units Affordable to HH at 50% AMI (Other Populations)	18,822		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		35,685	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		18,890	
<i>Current Gaps</i>			11,186

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

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

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

Population Experiencing Homelessness: Within the City of Cleveland, there are a total of 1,402 households that are currently experiencing homelessness as of January 28, 2020.

Approximately 106 households, or 7.5%, are family households (and are not veterans or victims of domestic violence). An estimated 1,315 households, or 93%, are adult only households (and are not veterans or victims of domestic violence). An additional 168 households, or 11%, are veterans. Approximately 63 households, or 4%, are victims of domestic violence.

Data from the 2020 Point-In-Time Count, the racial/ethnic background for persons experiencing homelessness is as follows:

**GENDER**

- Male: 71%
- Female: 28%
- Transgender: less than: 1%

**RACE**

- Black, African-American, or African: 71%
- White: 27%
- Asian or Asian American: less than 1%
- Native Hawaiian or Pacific Islander: less than: 1%
- American Indian, Alaska Native, or Indigenous: less than: 1%
- Multi-Racial: 1%

**ETHNICITY**

- Hispanic: 5%
- Non-Hispanic: 95%

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

While there a number of characteristics that may identify an individual at-risk of homelessness, a few of them include:

- Income that is at or below 30% Area Median Income (AMI)
- Insufficient support networks (i.e., family, friends)
- Living in overcrowded housing (1.5+ individuals per room)
- Living unassisted in a motel or hotel
- Exiting a (mental) health care facility, foster care, or corrections
- Living in another family's home due to economic hardship
- Having moved 2+ times in the last 60 days

- Having been notified of termination of lease within the next 21 days

According to 2015-2019 CHAS data, 55,470 households (HHs) were living on an income of 30% or less of AMI (Area Median Income) in Cleveland. 43,025 were renters, while 12,445 were homeowners. This represents 32.5% of all households in Cleveland.

#### Overcrowding/Doubled-up Count:

According to the 2015-2019 CHAS data, 0.4% of all occupied housing units are overcrowded, at 1.51 or more occupants per room. This breaks down to 65 owner-occupied and 640 renter-occupied households.

#### Corrections:

In 2020, the average daily releases from jail ranged from 10-15 people a day from January to March, and then tapered off to an average of two or less for the remainder of the year.

#### Youth Transitioning Out of Foster Care:

Youth transitioning out of foster care are also considered to be at-risk of homelessness. Youth transition out of foster care anywhere from the age of 18 to 21 (21 with a court order). According to the State of Ohio, 108 people exited foster care in Cuyahoga County in the 2019.

#### Hotels/Motels:

It is unclear how many individuals are living unassisted in motels or hotels.

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

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

The 2021PIT Count identified 70 sheltered domestic violence (DV) persons. In the City of Cleveland, the police respond to 4,500 domestic disturbance calls, which can include domestic violence. Many cases of domestic violence go unreported in Cleveland. The City of Cleveland Violence & Injury Data Report 2017-2021 reported there was a 256% increase in emergency hospital visits for domestic violence between 2019 and 2020. According to the National Coalition Against Domestic Violence, 38% of Ohio women and 33.0% of Ohio men experience intimate partner physical violence, intimate partner rape and/or intimate partner stalking in their lifetimes.

##### Human Trafficking

In 2020, the State of Ohio identified 683 victims of human trafficking. As defined in the federal Trafficking Victims Protection Act of 2000, trafficking in persons is:

- a) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age, (22 USC §7102 (9)(A)).
- b) The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery, (22 USC §7102 (9)(B)).

***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 category of “other populations” contains a number of characteristics that overlap with the earlier “at-risk” category. The unique characteristics include:

- Need housing assistance to stay housed
- Severe cost burden at 30% or less AMI
- 50% or less AMI

According to 2015-2019 CHAS data, 28,525 renter and owner households have income at or below 30% AMI and have a housing cost burden exceeding 50%. According to 2015-2019 CHAS data, 85,355 households in Cleveland have a household income at or below 50% AMI.

***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):***

Sheltered and unsheltered homeless

The 2021 Housing Inventory Count (HIC) identified 2,488 year-round beds in Cuyahoga County. This includes the emergency shelter, transitional housing, rapid re-housing, and permanent supportive housing beds summarized below. Of these, 422 are specifically for veterans.

The City of Cleveland is committed to a Housing First approach, which is an evidence-based practice to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements (National Alliance to End Homelessness).

The local City/County Continuum of Care (CoC) receives and allocates approximately \$7 million annually towards efforts to end homelessness.

***At risk of housing instability***

Those who are at risk of housing instability are often low-income, earning less than 30% or 50% of the area median income (AMI) and experience cost burden or severe cost burden. Having a sufficient supply of affordable housing units is essential to ensuring housing stability. Public housing and voucher programs can provide housing affordability for those at risk of instability.

The Cuyahoga Metropolitan Housing Authority (CMHA) is the public housing authority (PHAs) that serves the residents in the City of Cleveland.

CMHA serves over 24,000 households through public housing and housing voucher programs. Housing voucher programs are classified into two types: project based and tenant-based vouchers. Project-based vouchers are tied to a particular housing development or unit. Tenant-based vouchers are issued to individual households to be used anywhere that accepts vouchers, offering families and individuals greater opportunity to find housing that meets their needs.

There are more than 15,000 additional affordable rental units within the City of Cleveland. These units were developed using Low Income Housing Tax Credits, HUD financing, and other sources of funds. Many of these projects also receive a tax abatement from the City.

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

To explain the present unmet housing needs among qualifying populations, it is important to start at the beginning – a lack of affordable housing options. According to 2015-2019 CHAS data, 55% of households in Cleveland expend more than 30% of their income on housing costs. In the Cleveland 2030: A Housing Equity Plan, the City of Cleveland has identified that the City will need to develop 16,300 affordable housing units over the next decade in order to meaningfully address the housing cost burden and housing inventory challenges facing Cleveland.

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

There is an unmet need to 16,300 new affordable housing units in the City of Cleveland to allow the homeless to transition to a stable housing environment. There is also a need to being investing in the creation of non-congregate shelter options for those experiencing homelessness. Unmet service needs include transportation to meet basic needs, such as food, health care, and employment assistance.

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

There is an unmet need to 16,300 new affordable housing units in the City of Cleveland to address those at-risk of homelessness. Unmet service needs include transportation to meet basic needs, such as food, health care, and employment assistance.

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

There is also a need to being investing in the creation of non-congregate shelter options for those experiencing fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking. Unmet service needs include transportation to meet basic needs, such as food, health care, and employment assistance.

***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 development of 16,300 new affordable housing units in the City of Cleveland to address those severely housing cost burdened or having low income, 80% AMI or below. Unmet

service needs include transportation to meet basic needs, such as food, health care, and employment assistance.

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

The City/County Continuum of Care have two gaps:

- 1) Need for additional non-congregate shelter facilities, and
- 2) Need for greater availability of affordable housing rental units, especially for very low income households, family units and units for youth/young adults.

There is a gap within the current shelter and housing inventory of 16,300 new affordable housing units in the City of Cleveland to allow the homeless to transition to a stable housing environment.

Other identified gaps include:

- The current shelter system does not adequately accommodate those suffering from severe mental illness. More space is required to separate families and single people. The needs of the two groups may be very different. There are also not enough supports in place for the severely mentally ill who are homeless. There is a segment of the population that is willing to seek shelter, but once there, they require additional space and support that may be lacking in a shared space.
- There is a lack of shelter for people who have pets, a lack of shelter for couples, a lack of shelter for families with adult children, and a lack of shelter for the disabled and medically fragile. More housing is required for intact homeless families, homeless couples, homeless multi-generational households, and families in recovery.
- More options for people to be sheltered until permanent housing is available, such as a hotel or transitional shelter, are needed. Individuals require space as well as intensive case management to navigate the housing process.

Gaps in the service delivery system include transportation to meet basic needs, such as food, health care, and employment assistance.

There is also a need to begin investing in the development of non-congregate shelter options for those who are homeless. Improvements to existing shelters to transition them from congregate to non-congregate environments would be extremely beneficial.

***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:***

The City of Cleveland is not including any additional characteristics to “Other populations” qualifying populations.

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

For homeless populations, priority needs include rapid re-housing and supportive services to achieve housing stability.

For extremely-low income households, priority needs include the creation of additional rental units affordable to families with less than 30% of area median income and permanent supportive housing.

For low-income households and households at risk of homelessness, priority needs include increased homeless prevention, tenant-based rental assistance coupled with supportive services to help achieve housing stability.

In terms of supportive services, general needs for all types of qualifying populations include transportation to meet basic needs, such as food, and health care. The Continuum of Care also noted a need for more resources to treat mental health issues and substance abuse.

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

Based on the consultations, priority needs for homeless QP include:

- Creation of New Affordable Housing
- Housing Assistance to Prevent Homelessness
- Homeless Prevention Services
- Creation of New Permanent Supportive Housing
- Preservation of Existing Affordable Housing
- Tenant Based Rental Assistance
- Non-Congregate Shelter Capacity
- Preservation of Existing Permanent Supportive Housing
- Non-Congregate Shelter Improvements

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

Based on the consultations, priority needs for At Risk Homeless QP include:

- Creation of New Affordable Housing
- Housing Assistance to Prevent Homelessness
- Homeless Prevention Services
- Creation of New Permanent Supportive Housing
- Preservation of Existing Affordable Housing
- Tenant Based Rental Assistance
- Non-Congregate Shelter Capacity
- Preservation of Existing Permanent Supportive Housing

- Non-Congregate Shelter Improvements

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

Based on the consultations, priority needs Victims of Domestic Violence QP include:

- Creation of New Affordable Housing
- Housing Assistance to Prevent Homelessness
- Homeless Prevention Services
- Creation of New Permanent Supportive Housing
- Preservation of Existing Affordable Housing
- Tenant Based Rental Assistance
- Non-Congregate Shelter Capacity
- Preservation of Existing Permanent Supportive Housing
- Non-Congregate Shelter Improvements

***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***

Based on the consultations, priority needs for Other populations QP include:

- Creation of New Affordable Housing
- Housing Assistance to Prevent Homelessness
- Homeless Prevention Services
- Creation of New Permanent Supportive Housing
- Preservation of Existing Affordable Housing
- Tenant Based Rental Assistance
- Non-Congregate Shelter Capacity
- Preservation of Existing Permanent Supportive Housing
- Non-Congregate Shelter Improvements

***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 and gaps in housing inventory and service delivery systems were determined through careful review and analysis of Census and CHAS data. In addition, qualitative information was provided at all the consultations noted in this plan that assisted in determining the focus of the City of Cleveland's HOME-ARP funds.

## **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:***

Pending HUD approval of its HOME-ARP allocation plan, the City of Cleveland will issue a Request for Qualification (RFQ) for interested and experienced developers of permanent supportive housing, affordable housing and non-congregate shelter improvements. Applicants that meet the qualifications will be invited to apply and propose projects as subrecipients or developers. These applications will go through a similar scoring, underwriting and subsidy layering analysis as HOME projects.

The goal of the NOFA will be to develop at least 250 units of permanent supportive housing or affordable housing and one non-congregant shelter project. There will be a total of 4-6 qualified developers selected to complete HOME-ARP eligible projects within the HOME-ARP expenditure timeline requirements. Aside from HOME-ARP, there will be City HOME funds, state resources and potentially matching funds from local private foundations leveraged. To advertise the RFQ, the Department of Community Development will email homeless service agencies, housing authorities, affordable housing developers and Community Housing Development Organizations (CHDOs). Also, Department of Community Development will email all Continuum of Care partners. In addition, there will be a posted public notice in the local newspaper as well as on the City's website. The City of Cleveland Communications Office will also assist with marketing through other City public announcement outlets.

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

All HOME-ARP funds will be allocated to developers and subrecipients.

***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:***

Not Applicable.

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.

**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 5,000,000		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 12,500,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 235,408	1.3 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 17,735,408</b>		

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

The City of Cleveland believes that strategies for alleviating homelessness must be based on a housing first approach that creates accessible pathways, without prerequisites, to affordable permanent housing with supportive services. The needs assessment and gap analysis of the shelter and housing inventory reflect the City's 2021-2025 Consolidated Plan Priority Goals. The following are two priorities from the Consolidated Plan.

- 1) **Cleveland 2030: A Housing Equity Plan:** The goal of the Ten-Year Housing and Investment Plan is to foster a robust housing market that will ensure everyone has access to a decent home, provide a full range of housing choices for existing residents, and attract new residents to Cleveland's neighborhoods.
- 2) **Ending Poverty and Racial Disparities:** Ending systemic causes that allow poverty and racism to persist will continue the disparate outcomes that we see in Cleveland. Under this priority the City will invest in the following initiatives:
  - Support the City/County Continuum of Care;
  - Support the goal to End Chronic Homelessness;

Cleveland is dealing with the latent effects of the pandemic that have resulted in high inflation, reduced vacancy in rental housing, and soaring rent increases. These factors are driving households into housing instability, resulting in a surge of individuals falling into homelessness. The top three causes of homelessness are: 1) the lack of affordable housing, 2) health reasons, and 3) evictions.

The 2030 Cleveland: A Housing Equity Plan demonstrated the need to develop 16,300 affordable housing units over the next decade in order to meaningfully address the housing cost burden and housing inventory challenges facing Cleveland. The Continuum of Care has also identified the need to develop non-congregate shelter options with the CoC's inventory.

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

The current amount of unmet need is greater than the amount of resources available to meet those needs by several orders of magnitude. The historical average development cost for HOME assisted units funded by the City is approximately \$200,000, of which a quarter requires gap financing. Using this conservative number and the current gap identified above, the total cost to meet the gap financing in affordable housing totals \$559 million dollars, which is over 126 times the amount of funding available through HOME-ARP.

## **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:***

Based on the estimates provided above, the City estimates it can directly assist 250 households with HOME-ARP funding.

***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:***

Based on the current budget, the City will prioritize HOME-ARP funds for 250 affordable rental housing production.

This production goal will address the City's shortage of affordable housing. The shortage of affordable housing units is estimated at 16,300 units in the City of Cleveland. Reducing this shortage will allow more homeless to transition to a stable housing environment and reduce the burden on the Continuum of Care system.

As well as, devote a portion of HOME-ARP funds for 1 non-congregant shelter development in order to stabilize homeless and at-risk populations. There is also a need to be investing in the creation of non-congregate shelter options for those experiencing homelessness, in order to improve the quality of the experience of those in the homeless shelter system.

## 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:***

Affordable Housing

Upon further consultation with the interested parties who were interviewed during the course of the creation of this plan it became clear that the City of Cleveland needed to establish some preferences and limitations in order to support projects and initiatives happening within the local community. The following preferences are intended to support Qualifying Populations and sub-populations because of this consultation.

The City of Cleveland will not require any specific set-asides or preferences that must be applied to all applicants but may allow each individual project to utilize any one or more of the following preferences or limitations with approval from the City of Cleveland.

- Homeless Individuals or Families per 24 CFR 91.5, *Homeless* (1), (2), or (3) (QP 1)
- Individuals or Families who are At Risk of Homelessness per 24 CFR 91.5 (QP 2)
- Individuals who are Fleeing, Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD (QP 3)
- Other Populations who are families requiring services or housing services to prevent homelessness or are at Greatest Risk of Housing Instability (QP 4)
- Seniors (55 years or older and 62 years or older) who meet the definition of at least one of the QPs
- Young Adults aged 18-24, including young adults aged 18-24 with dependents, who meet the definition of at least one of the QPs
- Veterans or Families that include a Veteran Family Member that meet the criteria for one of the QPs
- Individuals or Families living with a Disability who meet the definition of at least one of the QPs
- Individuals who are suffering from Chronic Mental Illness who meet the definition of at least one of the QPs

At no point may any project violate the fair housing, civil rights, and nondiscrimination requirements

including but not limited to those requirements listed in 24 CFR 5.105(a). The City of Cleveland will require that Fair Housing Act language be implemented into each contract for HOME-ARP funding.

All projects funded by the City of Cleveland with HOME-ARP funding must provide access to its HOME-ARP Assisted Units for all Qualifying Populations without preference unless a preference from the above list is established.

Affordable Housing projects funded with HOME-ARP funding will be required either to run a project-specific wait list and/or use the COC's Coordinated Entry (CE). If a project chooses to use the CE, preferences established via the CE must be consistent with the preferences listed above. The CE's method of prioritization is described below.

#### Non-Congregate Shelter

Cleveland intends for all HOME-ARP non-congregate projects to receive direct referrals from the CoC's Coordinated Entry (CE). The existing Coordinating Entry employs the following method of prioritization, as identified in the Cleveland/Cuyahoga County Continuum of Care Coordinated Entry Manual:

1. Chronically Homeless (HUD Definition),
2. Homeless- Literally Homeless (HUD Homeless Definition Category 1),
3. Homeless- At Imminent Risk of Homelessness (HUD Homeless Definition Category 2),
4. Homeless- Homeless under the other Federal Statutes (HUD Homeless Definition Category 3), including Unaccompanied youth under 25 years of age, or families with children and youth,
5. Homeless- Fleeing domestic abuse or violence (HUD Homeless Definition Category 4), including dating violence, sexual assault, or human trafficking populations,
6. Transition Aged Youth (aka Young Adults),
7. All Other Qualifying Populations.

The Cleveland/Cuyahoga Coordinating Entry process will operate in a manner that promotes fair and open access to all available housing and services within Coordinating Entry. The system shall afford all eligible persons access to Coordinating Entry processes regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, marital status, immigration status, or limited English proficiency.

Additionally, Coordinating Entry processes ensure all people experiencing homelessness in different populations and subpopulations including people experiencing chronic homelessness, veterans, families with children, youth, persons involved with the criminal justice system, and persons who are fleeing, or attempting to flee, domestic violence, sexual assault, dating violence, stalking, or other dangerous or life-threatening conditions including human trafficking, will have fair and open access to the coordinated entry process.

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

#### Affordable Housing

The City of Cleveland lacks decent and quality affordable housing options for members of all populations. However, for those suffering with mental illness, Veterans and their families, Adult Youth aged 18-24, and senior individuals who are seeking safe and accessible housing, Housing options are limited. The above established preferences and limitations will help create housing opportunities for each of these sub groups of the four established Qualifying Populations. Allowing these preferences would enable the City to support projects that can target and provide this highly needed housing.

#### Non-Congregate Shelter

By granting top preference for available units or facilities developed through HOME-ARP projects to the populations and subpopulation, the City of Cleveland will help to meet the unmet needs of this growing population. Given that the City's current system operates at capacity and there is a shortage of beds and units that serve the homeless populations and subpopulations

***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.***

#### Affordable Housing

Many of the challenges currently faced by the City and its partners in providing affordable housing is related to coordination and public policy challenges. Through supporting further planning efforts to address these challenges, the HOME-ARP funds will indirectly benefit all qualifying populations served by the Continuum of Care and those low-income households affected by the lack of affordable housing.

Further, the City of Cleveland has identified additional projects that will serve all QPs without any preferences or limitations.

#### Non-Congregate Shelter

Many of the challenges currently faced by the City and its partners in providing affordable housing is related to coordination and public policy challenges. Through supporting further planning efforts to address these challenges, the HOME-ARP funds will indirectly benefit all qualifying populations served by the Continuum of Care and those low-income households affected by the lack of affordable housing.

## 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):***

Affordable Housing

The City of Cleveland will require all affordable housing projects to use either a project-specific wait list and/or utilize the COC's CE to identify tenants for all HOME-ARP assisted units.

Non-Congregate Shelter

Cleveland intends for all HOME-ARP non-congregate projects to receive direct referrals from the CoC's Coordinated Entry (CE) according to the process identified in the Cleveland/Cuyahoga County Continuum of Care Coordinated Entry Manual.

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

Affordable Housing and Non Congregate Shelter

All qualifying populations will have access to projects that do not have an established preference or limitation as described elsewhere in this document. All Qualifying populations are included in the established COC CE. If at the point of contract development, that is not clear, projects will be required to create and maintain a project specific waitlist.

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

The existing Coordinating Entry employs the following method of prioritization, as identified in the Cleveland/Cuyahoga County Continuum of Care Coordinated Entry Manual:

1. Chronically Homeless (HUD Definition),
2. Homeless- Literally Homeless (HUD Homeless Definition Category 1),
3. Homeless- At Imminent Risk of Homelessness (HUD Homeless Definition Category 2),
4. Homeless- Homeless under the other Federal Statutes (HUD Homeless Definition Category 3), including Unaccompanied youth under 25 years of age, or families with children and youth,
5. Homeless- Fleeing domestic abuse or violence (HUD Homeless Definition Category 4), including dating violence, sexual assault, or human trafficking populations,
6. Transition Aged Youth (aka Young Adults),
7. All Other Qualifying Populations.

The Cleveland/Cuyahoga CE process will operate in a manner that promotes fair and open access to all available housing and services within CE. The system shall afford all eligible persons access to CE processes regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, marital status, immigration status, or limited English proficiency. Additionally, CE processes ensure all people experiencing homelessness in different populations and subpopulations including people experiencing chronic homelessness, veterans, families with children, youth, persons involved with the criminal justice system, and persons who are fleeing, or attempting to flee, domestic violence, sexual assault, dating violence, stalking, or other dangerous or life-threatening conditions including human trafficking, will have fair and open access to the coordinated entry process.

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

Affordable Housing

Prioritization will be determined based on the individual project's needs.

## Non-Congregate Shelter

The City of Cleveland only intends to use the Coordinated Entry referral process for all HOME-ARP non-congregate projects.

## 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:***

Projects may limit eligibility for HOME-ARP rental housing or non-congregate shelters based on the Qualifying Populations or sub-populations listed below.

The City of Cleveland will not require any specific set-asides or preferences that must be applied to all applicants but may allow each individual project to utilize any one or more of the following limitations with approval from the City of Cleveland.

- Homeless Individuals or Families per 24 CFR 91.5, *Homeless* (1), (2), or (3) (QP 1)
  - Individuals or Families who are At Risk of Homelessness per 24 CFR 91.5 (QP

2)

- Individuals who are Fleeing, Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD (QP 3)
- Other Populations who are families requiring services or housing services to prevent homelessness or are at Greatest Risk of Housing Instability (QP 4)
- Seniors (55 years or older and 62 years or older) who meet the definition of at least one of the QPs
- Young Adults aged 18-24, including young adults aged 18-24 with dependents, who meet the definition of at least one of the QPs
- Veterans or Families that include a Veteran Family Member that meet the criteria for one of the QPs
- Individuals or Families living with a Disability who meet the definition of at least one of the QPs
- Individuals who are suffering from Chronic Mental Illness who meet the definition of at least one of the QPs

At no point may any project violate the fair housing, civil rights, and nondiscrimination requirements including but not limited to those requirements listed in 24 CFR 5.105(a). The City of Cleveland will require that Fair Housing Act language be implemented into each contract for HOME-ARP funding.

All projects funded by the City of Cleveland with HOME-ARP funding must provide access to its HOME-ARP Assisted Units for all Qualifying Populations without preference unless a limitation from the above list is established.

Affordable Housing projects funded with HOME-ARP funding will be required either to run a project-specific wait list and/or use the COC's Coordinated Entry (CE). If a project chooses to use the CE, limitations established via the CE must be consistent with the limitations listed above.

***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:***

Upon further consultation with the interested parties who were interviewed during the course of the creation of this plan it became clear that the City of Cleveland needed to establish some preferences and limitations in order to support projects and initiatives happening within the local community. The following limitations are intended to support Qualifying Populations and sub-populations because of this consultation.

#### Affordable Housing

The City of Cleveland lacks decent and quality affordable housing options for members of all populations. However, for those suffering with mental illness, Veterans and their families, Adult Youth aged 18-24, and senior individuals who are seeking safe and accessible housing, Housing options are limited. The above established optional limitations will help create

housing opportunities for each of these sub groups of the four established Qualifying Populations. Allowing these limitations would enable the City to support projects that can target and provide this highly needed housing.

#### Non-Congregate Shelter

By granting top preference for available units or facilities developed through HOME-ARP projects to the populations and subpopulation, the City of Cleveland will help to meet the unmet needs of this growing population. Given that the City's current system operates at capacity and there is a shortage of beds and units that serve the homeless populations and subpopulations

***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):***

While the City of Cleveland is establishing limitations in its HOME-ARP allocation plan, not all projects will have limitations. The City of Cleveland will ensure that additional projects are funded that are open to all Qualifying Populations.

## 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***

The City of Cleveland does not intend to use HOME-ARP funds to refinance existing debt.

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

Not Applicable

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

Not Applicable

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

Not Applicable

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

Not Applicable

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

Not Applicable

### Application for Federal Assistance SF-424

\* 1. Type of Submission:

☒ Preapplication  
☐ Application  
☒ Changed/Corrected Application

\* 2. Type of Application:

☒ New  
☒ Continuation  
☒ Revision

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

• Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

12/15/2021

10H391104 CLEVELAND

Sa. Federal Entity Identifier:

Sb. Federal Award Identifier:

10H391104

IM2 I-MP3 9 02 07

#### State Use Only:

6. Date Received by State:

17. State Application Identifier:

#### 8. APPLICANT INFORMATION:

\* a. Legal Name: City of Cleveland

\* b. Employer/faxpayer Identification Number (EIN/ffIN):

136-6000646

\* c. UEI:

IJL2EYRT4GNU8

#### d. Address:

\* Street1: 1601 Lakeside Avenue

Street2: Cleveland City Hall, Room 320

\* City: Cleveland

County/Parish: Cuyahoga County

\* State: Ohio

Province:

\* Country: usA: UNITED STATES

\* Zip / Postal Code: 144114-1015

#### e. Organizational Unit:

Department Name:

Division Name:

Inept. of Community Development

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

Prefix: Ms. \* First Name: Ayissa

Middle Name:

\* Last Name: Hernandez

Suffix:

Title: Inirector of Community Development

Organizational Affiliation:

City of Cleveland

\* Telephone Number: 1216-664-4000

Fax Number: 1216-664-4006

\* Email: lahernandez2@clevelandohio.gov



## Application for Federal Assistance SF-424

### • 9. Type of Applicant 1: Select Applicant Type:

le: 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:

U.S. Department of Housing and Urban Development

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

114.239

CFDA Title:

HOME Investment Partnerships Program (HOME)

### • 12. Funding Opportunity Number:

\*Title:

### 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:

2021-2025 Consolidated Plan and 2021-2022 Annual Action Plan for the City of Cleveland, OH Amendment for HOME-ARP

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 111,9

• b. Program/Project 111,9

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

Add Attachment 11 Delete Attachment 11 View Attachment

**17. Proposed Project:**

• a. Start Date: 109/20/2022,

• b. End Date: 109/30/2030

**18. Estimated Funding(\$):**

• a. Federal	17,735,408.001
• b. Applicant	
• c. State	
• d. Local	
• e. Other	
• f. Program Income	
• g. TOTAL	17,735,408.001

**• 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.

C8:J c. Program is not covered by E.O. 12372.

**• 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment)**

OYes C8:J No

If "Yes", provide explanation and attach

Add Attachment 11 Delete Attachment 11 View Attachment

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

C8:J \*\* 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: IMs. • First Name: Alyssa

Middle Name:

• Last Name: jhernandez

Suffix:

• Title: Director of Community Development

• Telephone Number: 1216-664-4000

• Fax Number: 1216-664-4006

• Email: lahernandez2@clevelandohio.gov

• Signature of Authorized Representative:

• Date Signed: 109/07/2022

## 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(9) 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
	Director of Community Development
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Cleveland - HOME-ARP	09/07/2022

## 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 Director of Community Development
APPLICANT ORGANIZATION City of Cleveland HOME-ARP	DATE SUBMITTED 09/07/2022

## 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

f7/2  
Date

AAA€  
Title



## CERTIFICATIONS

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

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**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 has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**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.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and **wi.wftJew,r6g** regulations at 24 CFR Part 75.

  
Signature of Authorized Official

re.Jcat G!Mtm'i) Ike, 'c-  
Title

HOME-ARP Consultation Continued

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Central Outreach Wellness Center	Healthcare Non-Profit  Domestic Violence Service Provider	Survey Response	Building more affordable housing for people of the LGBTQ+ community or funding agencies that want to do that kind of housing. It is a large need in the community for it. Central outreach Wellness Center is looking to create and develop housing with its own start up budget but would need help to maintain the housing long term.
Homeless Advocate	Address Civil Rights and Fair Housing	Survey Response	NEED Lead-FREE, Mould-FREE Housing for the Unhoused & the Working Poor to reverse the Health, Education, Criminal Justice Disparities in order to create the True community economic development
Northeast Ohio Coalition for the Homeless	Nonprofit  Homeless Services Providers  Address Civil Rights and Fair Housing	Survey Response	We could use these funds to end unsheltered homelessness in our community. i think we should develop a plan, goals and succeed to having no one unsheltered in our community. we could totally do it based on the learnings, data, and outcomes during cares funding.
The Haven Home	Nonprofit  Homeless Services Providers	Survey Response	The City of Cleveland should consider providing funding for the purchase of several multi-family units (2-3 BR) for families experiencing homelessness. The units should be eligible for rapid rehousing or Section 8 funds that allow the families to stay housed for 12 months while they stabilize and find jobs. Case management for the families could be provided by the existing family shelters or a healthcare provider such as CareSource or similar. It is impossible to de-congregate shelters when every time a bed becomes available, someone fills it.
Family Promise of Greater Cleveland	Nonprofit Homeless	Survey Response	Creation of New Affordable Housing Units is a HUGE need
Front Steps	Nonprofit  Homeless Services Providers	Survey Response	COVID-19 has left many families reeling such that the integrity of these families has been threatened to its core. This has been particularly prevalent among families that had been living in

			poverty with some form of mental illness and/or addiction(s). Homeless prevention services are desperately needed to reach out to families and individuals who have been devastated by COVID-19 and resulted in significant housing instability.
YWCA of Greater Cleveland	Nonprofit  Homeless Service Provider  Domestic Violence Service Provider	Survey Response	1) Renovation of Northpoint (where 50 beds are dedicated to young adults) 2) supportive services (operational dollars) for youth drop in center currently under development and design, possible capital dollars if county ARPA funds dont cover this- this is a service that will quickly link youth to resources and provide basic needs, especially for young families. the youth drop in center will be operated by Lutheran Metro Ministry- but A Place 4 Me is going to provide youth navigation services for youth experiencing housing instability, using a peer model that is working well for young people currently out of the YWCA on Prospect. 3) all of the flexible rental assistance, homeless prevention services for young adults to move them on from becoming part of the chronically homeless population 4) services for new transition age youth psh housing for youth experiencing homelessness ( these services will be delivered by Frontline Service- building will be co owned by EDEN and CHN. The building (ground breaking this summer of 22) will have 50 apartments and supportive services for 18-24 year olds.
Cleveland Mediation	Nonprofit  Homeless Services Providers  Address Civil Rights and Fair Housing	Survey Response	The City of Cleveland should consider allocating funds for pre-filing Eviction Prevention Mediation services for City of Cleveland residents. This program would keep community members in housing and would help them avoid having an eviction on their record which could impact their ability to get housing in the future. Pre-filing mediation is also helpful to landlords because they can resolve issues with non-payment of rent faster and be connected to funding for non-payment of rent faster.
Sisters of Charity Health System	Healthcare Non-Profit	Survey Response	Please coordinate with the county and its use of ARPA funds, as the priorities are

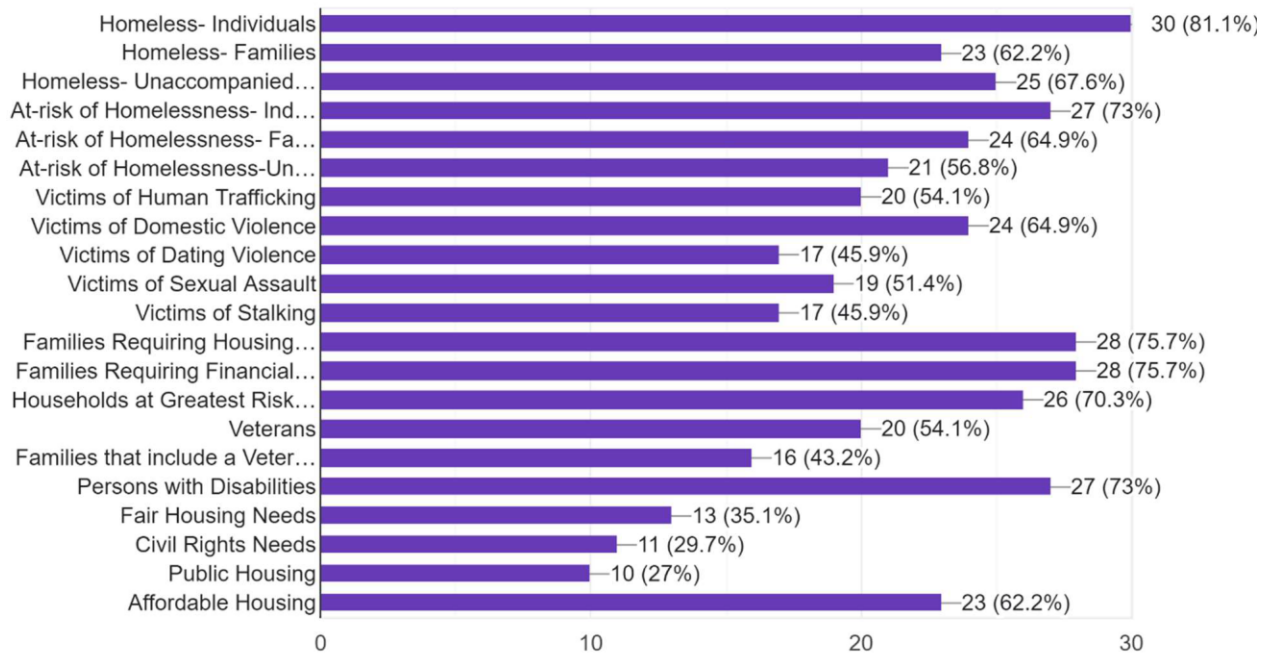
	Homeless Services Providers  Address Needs or Persons with Disabilities		aligned and require collaborative city-county investment to create impact.
Joseph's Home	Healthcare Non-Profit  Homeless Services Providers  Address Needs or Persons with Disabilities	Survey Response	These one-time dollars should be used to ensure that our shelter system is equitable, safe, non-congregate, well-staffed, trauma-informed and housing focused. We could make a tremendous difference in our system and enable us to safely shelter and permanently house those experiencing homelessness in our community.
Journey Center for Safety and Healing	Nonprofit  Homeless Service Provider  Domestic Violence Service Provider	Survey Response	Housing needs for those fleeing domestic violence
Salvation Army	Nonprofit  Homeless Service Provider	Survey Response	Support operational funding for existing homeless shelters.
Cleveland Metropolitan School District	Public Agency  Education	Survey Response	Families are in need of affordable housing and should not have to be "literally homeless" to qualify for it.
AIDS Taskforce	Nonprofit  Homeless Service Provider	Survey Response	Providing affordable/income based housing for people with limited income.
Enterprise Community Partners	Nonprofit  Affordable Housing	Survey Response	Our prioritization considers which needs are being addressed through County ARPA allocations or past federal relief funding, namely ERA1 and ERA2. Our prioritization also considers which purposes are best suited for the HOME program, foremost being one-time, income-restricted capital investments. Preservation of existing affordable housing is greatly needed and represents one-time, income-restricted capital investments.

The Legal Aid Society of Cleveland	Nonprofit Homeless Services Providers  Address Civil Rights and Fair Housing	Survey Response	City should should dedicate funds to broadening right to counsel and fund rent assistance to prevent homelessness Funds should be used to broad the population afforded a right to counsel in evictions (which has shown to be effective in keeping families housed and preventing evictions) and to continue to fund rent, utility, and security deposit assistance to prevent homelessness.
Frontline Services	Nonprofit Homeless Services Providers	Survey Response	The greatest community need is affordable housing AND engagement of landlords to accept housing vouchers and rental assistance.
CHN Housing Partners	Nonprofit Affordable Housing Developer	Survey Response	1 - Prioritize current projects with gaps in budgets, 2 - Focus on projects that have limited ability to support must-pay debt, 3 - Preservation of existing units with limited ability to pay must-pay debt.

# HOME-American Rescue Plan Program- Consultation Survey

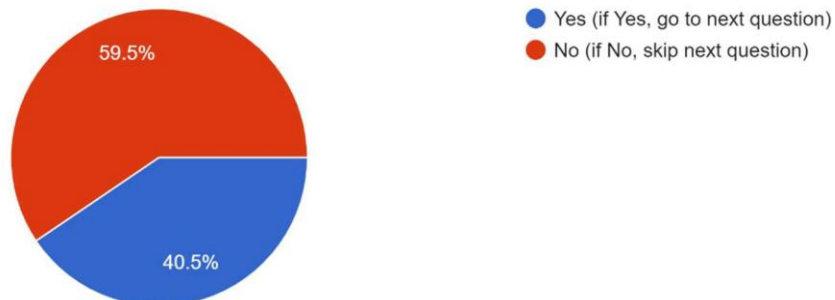
What following qualifying populations does your organization work with or represent?

37 responses



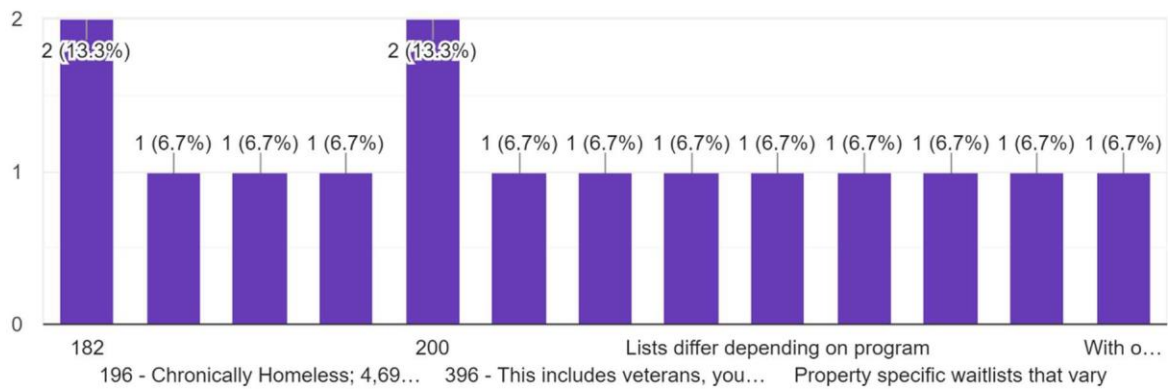
Does your organization have a waiting list or keep track of clients in need of housing?

37 responses



If, Yes, what is the estimated number of clients on your waiting list or tracking who need housing?

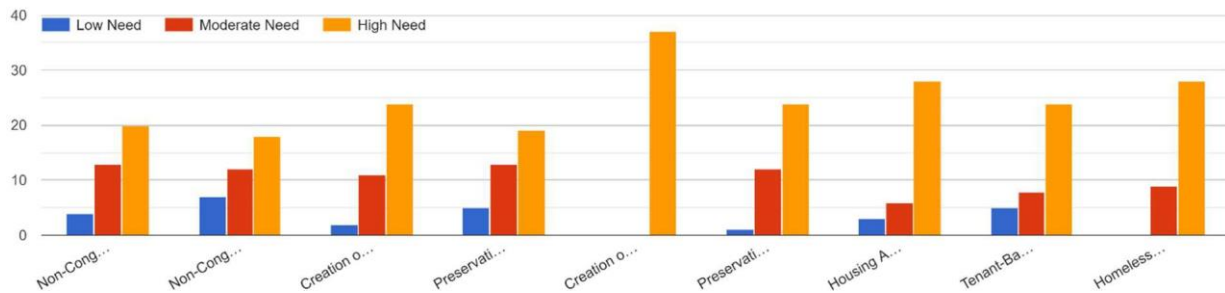
15 responses



Reported number of clients on waiting list or tracking in need of housing.

- 182 persons
- 1500 persons
- 196 - Chronically Homeless; 4,691 Homeless Persons
- 200 persons
- 1000 persons
- 396 - This includes veterans, young adults, and chronically homeless individuals
- 50- this is from the By Name List that our community is keeping to track housing needs for youth experiencing literal homelessness. Approximately 160 unaccompanied minors are tracked by CMSD.
- Lists differ depending on program
- N/A
- Property specific waitlists that vary
- We have multiple developments in the City of Cleveland. As one example, A Place For Us has a waiting list of over 9 months
- With our expansion, we serve about 100 persons annually who need housing.

Estimate the need for the following HOME-ARPA eligible activities?



	Low Need	Moderate Need	High Need
Non-Congregate Shelter Capacity	4	13	20
Non-Congregate Shelter Improvements	7	12	18
Creation of New Permanent Supportive Housing Units (PSH)	2	11	24
Preservation or Rehabilitation of Permanent Supportive Housing Units (PSH)	5	13	19
Creation of New Affordable Housing Units	0	0	37
Preservation or Rehabilitation of Affordable Housing Units	1	12	24
Housing Assistance to Prevent Homelessness	3	6	28
Tenant-Based Rental Assistance	5	8	24
Homeless Prevention Services	0	9	28

Please share any comments on what the City of Cleveland should consider in allocating HOME-APRA funds?

We could use these funds to end unsheltered homelessness in our community. i think we should develop a plan, goals and succeed to having no one unsheltered in our community. we could totally do it based on the learnings, data, and outcomes during cares funding.

Funds should be used to broad the population afforded a right to counsel in evictions (which has shown to be effective in keeping families housed and preventing evictions) and to continue to fund rent, utility, and security deposit assistance to prevent homelessness.



I think using an approach to prioritize activities that don't always qualify for funds would be helpful. Flexibility is also important to keep in mind as eligibility criteria can be a major barrier to using funds. Tenant Based Assistance is needed but we need LLs who will accept the vouchers. Funds need to be invested to help maintain PSH units- budgets are tight and not enough in reserves to meet capital needs.

As the CoC lead agency, I would respectfully suggest the City of Cleveland join Cuyahoga County in partnership in priorities for our homeless community. Our focus on the rehab and development of shelter and housing. Coordination and partnership will be imperative in order to provide the resources needed for these efforts. Capital funding is not always available and these effort provide longstanding impact for our community.

The greatest community need is affordable housing AND engagement of landlords to accept housing vouchers and rental assistance.

NEED Lead-FREE, Mould-FREE Housing for the Unhoused & the Working Poor to reverse the Health, Education, Criminal Justice Disparities in order to create the True community economic development, instead of building High-End Luxury development projects to only attract people outside of even the State of Ohio To Gentrify the Existing Neighbourhoods & their Residents!

Cuyahoga Metropolitan Housing Authority has ample tenant-based rental subsidies and there is not need for more. There is need to support the owners of affordable housing that are willing to lease to voucher holders and/or other vulnerable populations.

The City of Cleveland should consider allocating funds for pre-filing Eviction Prevention Mediation services for City of Cleveland residents. This program would keep community members in housing and would help them avoid having an eviction on their record which could impact their ability to get housing in the future. Pre-filing mediation is also helpful to landlords because they can resolve issues with non-payment of rent faster and be connected to funding for non-payment of rent faster.

Creation of New Affordable Housing Units is a HUGE need

There is a great need for Permanent Supportive Housing and Affordable Housing Unit expansion. There is also a need for tenant based rental assistance, however it has become increasingly difficult to locate landlords who are willing to rent to this population.

Prioritize current projects with gaps in the budget; focus on projects that have limited ability to support must pay debt; preservation of existing units with limited ability to pay must pay debt. These one-time dollars should be used to ensure that our shelter system is equitable, safe, non-congregate, well-staffed, trauma-informed and housing focused. We could make a tremendous difference in our system and enable us to safely shelter and permanently house those experiencing homelessness in our community.

Housing needs for those fleeing domestic violence

Providing affordable/income based housing for people with limited income.

Support operational funding for existing homeless shelters.

1 - Prioritize current projects with gaps in budgets, 2 - Focus on projects that have limited ability to support must-pay debt, 3 - Preservation of existing units with limited ability to pay must-pay debt.

With record-high construction costs, the City should focus a majority of its funds on supporting new affordable housing construction.

need to incentive landlords to accept the population as many do not want to accept vouchers as if it is a stigma. Also need assistance via these funds for utilities as day to day support.

Improve and increase the number of affordable units with 2+ bedrooms to serve families. Support non-congregate shelter development. flexible funds to help people stay in current units or no-barrier funds for security deposits and a few months of rent if relocating.

The need for non-congregate shelter space for women and women with children is extensive and addressing that need along with supportive services would go along way into providing this subset of the population with the tools needed toward more permanent housing.

City should should dedicate funds to broadening right to counsel and fund rent assistance to prevent homelessness

COVID-19 has left many families reeling such that the integrity of these families has been threatened to its core. This has been particularly prevalent among families that had been living in poverty with some form of mental illness and/or addiction(s). Homeless prevention services are desperately needed to reach out to families and individuals who have been devastated by COVID-19 and resulted in significant housing instability.

1) Renovation of Northpoint (where 50 beds are dedicated to young adults) 2) supportive services (operational dollars) for youth drop in center currently under development and design, possible capital dollars if county ARPA funds dont cover this- this is a service that will quickly link youth to resources and provide basic needs, especially for young families. the youth drop in center will be operated by Lutheran Metro Ministry- but A Place 4 Me is going to provide youth navigation services for youth experiencing housing instability, using a peer model that is working well for young people currently out of the YWCA on Prospect. 3) all of the flexible rental assistance, homeless prevention services for young adults to move them on from becoming part of the chronically homeless population 4) services for new transition age youth psh housing for youth experiencing homelessness ( these services will be delivered by Frontline Service- building will

be co owned by EDEN and CHN. The building (ground breaking this summer of 22) will have 50 apartments and supportive services for 18-24 year olds.

Ability to distribute rental assistance quickly and flexibly to meet the need.

Building more affordable housing for people of the LGBTQ+ community or funding agencies that want to do that kind of housing. It is a large need in the community for it. Central outreach Wellness Center is looking to create and develop housing with its own start up budget but would need help to maintain the housing long term.

Families are in need of affordable housing and should not have to be “literally homeless” to qualify for it.

The City of Cleveland should consider providing funding for the purchase of several multi-family units (2-3 BR) for families experiencing homelessness. The units should be eligible for rapid rehousing or Section 8 funds that allow the families to stay housed for 12 months while they stabilize and find jobs. Case management for the families could be provided by the existing family shelters or a healthcare provider such as CareSource or similar. It is impossible to de-congregate shelters when every time a bed becomes available, someone fills it.

Many of my clients may have a voucher from Section 8, Eden, or Hud but still cannot find housing because there even less landlords that are willing to work with these programs that have a vacancy. If there was a way to cut through red tap and long applications to get people housing when they need it versus months down the line that would be helpful. Lastly, there are many people are in danger of being homeless and only get assistance if they are in a homeless shelter. Seems to me like it would save some money if we help them sooner or later while they have a couch to lay on for the night versus waiting to help until they are actually homeless.

Many client with addictions are need of housing when they complete treatment

Our prioritization considers which needs are being addressed through County ARPA allocations or past federal relief funding, namely ERA1 and ERA2. Our prioritization also considers which purposes are best suited for the HOME program, foremost being one-time, income-restricted capital investments. Preservation of existing affordable housing is greatly needed and represents one-time, income-restricted capital investments.

Please coordinate with the county and its use of ARPA funds, as the priorities are aligned and require collaborative city-county investment to create impact.



CITY OF CLEVELAND  
Mayor Justin M. Bibb

**NOTICE OF PUBLIC HEARING  
SUBSTANTIAL AMENDMENT TO FY 2021-22 ANNUAL ACTION PLAN FOR  
HOME-ARP FUNDING  
CITY OF CLEVELAND  
DEPARTMENT OF COMMUNITY DEVELOPMENT**

NOTICE IS HEREBY GIVEN that the Department of Community Development has scheduled a public hearing to consider a Substantial Amendment to add HOME American Rescue Plan (ARP) funds to the FY 2021-22 Annual Action Plan (AAP). The hearing is conducted to receive public comments as part of the submission process to the U.S. Department of Housing and Urban Development (HUD).

**DATE OF HEARING:** Thursday, May 5, 2022

**TIME OF HEARING:** 10:00 a.m.

**LOCATION OF HEARING:** 601 Lakeside Avenue, Room 320, Cleveland, OH 44114

The public hearing may be attended in-person or virtually, by requesting a meeting link from [mwackers@clevelandohio.gov](mailto:mwackers@clevelandohio.gov).

On March 11, 2021, the American Rescue Plan (ARP) was signed into law, which included \$5 billion in ARP funds for the HOME-American Rescue Plan or "HOME-ARP." On April 8, 2021, HUD allocated HOME-ARP funds to 651 grantees using the HOME formula. The City of Cleveland was allocated \$17,735,408 in HOME-ARP funds.

A Substantial Amendment is required by HUD to add these funds to the City of Cleveland FY 2021-22 AAP.

**INVITATION TO BE HEARD:** Notice is hereby further given to provide the public a 15-day review period for the Substantial Amendment to the FY 2021-22 Annual Action Plan beginning April 21, 2022 through May 6, 2022 to submit any concerns and/or comments. All persons either favoring or opposing the Substantial Amendment are invited to present their views in writing or during the public hearing.

During the 15-day review and comment period, electronic links to the draft Substantial Amendment to the FY 2021-22 Annual Action are available on the City of Cleveland Department of Community Development's website at <https://www.clevelandohio.gov>. Upon request, copies will be made available at the Department of Community Development's office located at 601 Lakeside Avenue, Room 320, Cleveland, OH 44114, during normal business hours: Monday thru Friday (8:00 AM to 5:00 PM).

Written comments may be mailed to City of Cleveland, Department of Community Development, 601 Lakeside Avenue, Room 320, Cleveland, OH 44114, Attention: Assistant Director Michiel Wackers or e-mail [mwackers@clevelandohio.gov](mailto:mwackers@clevelandohio.gov). All written comments received will be considered by the City of Cleveland prior to the submission to HUD. For further information email or call Michiel Wackers at (216) 664-4143.