



2026 Action Plan

CITY OF MANSFIELD, OHIO

Adrian Ackerman

PERMITTING AND DEVELOPMENT, CITY OF MANSFIELD | 30 N. DIAMOND ST MANSFIELD, OHIO 44902

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Mansfield receives funding annually from the United States Department of Housing and Urban Development (HUD) for implementation of the Community Development Block Grant Program (CDBG) and the HOME Investment Partnerships Program (HOME). As a requirement of receiving HUD program funds, the City of Mansfield must develop a five-year Consolidated Plan that guides funding decisions, project selection, and program development within individual Action Plans over a five year period. The FY2024-FY2028 Consolidated Plan will cover the period from July 1, 2024- June 30, 2029. This Action Plan represents year 3, covering July 1, 2026- June 30, 2027.

The consolidated planning process serves as the framework for community- wide dialogue that fosters a comprehensive, integrated approach to formulate goals and strategies and to identify housing and community development priorities. Through the Citizen Participation Process, the Annual Action Plan affirms these goals to prioritize resources based on existing need.

The Consolidated Plan is guided by three overarching goals, which align with CDBG and HOME program goals and requirements:

1. Providing decent housing by preserving affordable housing stock, increasing affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
2. Providing a suitable living environment through safer, more livable neighborhoods, greater integration of LMU residents throughout the city, and increased housing opportunities and reinvestment in deteriorating neighborhoods; and
3. Expanding economic opportunities through the creation/retention of livable- wage jobs, workforce training programs, homeownership opportunities, and development activities that promote long-term community viability and the empowerment of LMI persons to achieve self-sufficiency.

The primary objective of the Community Development Block Grant (CDBG) program is to develop communities by providing decent housing, a suitable living environment, and economic opportunities, principally for LMI persons and households. CDBG funds can be used for a variety of activities including housing rehabilitation and construction, public facilities and infrastructure, public services, and loans to

grants or businesses. The 2026 Action Plan will seek to utilize funding across a broad spectrum to maximize impact with limited funds.

The HOME Investment Partnership (HOME) program provides funds for the development and rehabilitation of affordable rental and owner-occupied housing for LMI households. HOME funds can be used for activities that promote affordable rental housing and homeownership by LMI individuals and households. These activities can include rehabilitation, construction, homebuyer assistance, and tenant based rental assistance. The 2026 Action Plan will seek to utilize funding across these categories to maximize impact with limited funds.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Mansfield's Consolidated Plan describes the City's priority community development needs eligible for assistance under the CDBG and HOME Programs, including an assessment of housing, public facilities, infrastructure improvements, public services, accessibility, economic development, and planning needs.

The City of Mansfield has identified the following goals for the FY 2024 – 2028 Consolidated Plan:

- Improve, Maintain, and Expand Affordable Housing
- Increase Economic Opportunities
- Neighborhood Revitalization
- Provide Needed Public Services
- Homelessness Prevention
- Planning and Program Administration

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City of Mansfield has been a direct recipient of CDBG and HOME grant funds since the inception of these programs. As such, the preparation and development of the current Five Year Consolidated Plan and Annual Action Plan represents a logical continuation of the City's past housing assistance and community development programs and builds upon the foundation set forth in prior Consolidated Plans.

At the end of each program year, the City of Mansfield prepares the Consolidated Annual Performance and Evaluation Report (CAPER), which describes the City's progress in meeting its identified needs, priorities and goals as set forth in the Consolidated Plan and Annual Action Plan. Through the monitoring of performance measures, the City is able to identify operational improvements, resource allocation issues, and policy questions to be addressed in future years.

The 2025 Program Year is difficult to evaluate, due to the timing of receiving both the CDBG and HOME grants. Funding was not available for use until the last week in December, 2025, putting payment processing approximately 4 months behind traditional schedule. To date, roughly 50% of public services have been expended, marking success in those programs. The West End Infrastructure project, which was originally set to begin construction in early 2026, will likely not start work until May 2026, but will be expended over the 12-18 months following.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City of Mansfield encouraged public participation through public meetings and a public hearing. The notification for the application period, and the planning timeline were published on December 19, 2025 with the website address to locate all information that was published on the City's website for the duration of the process. The first public meeting was held on January 14, 2026 at 5pm at the Mansfield Richland County Public Library. This meeting had 9 participants, and included representatives from City Council, Housing Developers, existing sub-recipients, public service agencies with interest, and the general public. The second public meeting was held on January 15, 2025 at 2:00pm in Mansfield City Council Chambers. This meeting had 1 attendee. Notifications about each meeting were e-mailed to City elected officials, and sub-recipients to encourage public participation. The public hearing was held on March 3, 2026 at 6:30pm to discuss applications for funding and gain additional public input.

ADDITIONAL INFORMATION REGARDING THE REMAINDER OF THE CITIZEN PARTICIPATION PROCESS WILL BE ADDED ONCE THE MEETINGS/EVENTS HAVE BEEN COMPLETED.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

TO BE ADDED PRIOR TO SUBMISSION

6. Summary of comments or views not accepted and the reasons for not accepting them

TO BE ADDED PRIOR TO SUBMISSION

7. Summary

TO BE ADDED PRIOR TO SUBMISSION

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MANSFIELD	Permitting and Development
HOME Administrator	MANSFIELD	Permitting and Development

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency responsible for the development of this Action Plan 2025 is the City of Mansfield's Division of Permitting and Development. The Division of Permitting and Development is also responsible for the administration of the City of Mansfield's CDBG and HOME funds.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Mansfield carried continual discussions with local partners, agencies, and non profits throughout the year in preparation for the 2026 Action Plan.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Mansfield has consulted with many organizations to enhance services and identify need.

The City fosters relationships with other agencies including the local housing authority, apartment complexes and citizens in seeking solutions to fair housing issues within the jurisdiction.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Mansfield participates in the Mansfield-Richland County Housing Consortium and Continuum of Care (COC) to coordinate between government, mental health, and other service agencies, the Annual Action Plan reflects the same goals and objectives.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Mansfield does not receive ESG funds.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Mansfield Metropolitan Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Mansfield Metropolitan Housing Authority is a continual partner with the City of Mansfield in identifying and creating solutions for housing needs.
2	Agency/Group/Organization	CATHOLIC CHARITIES
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Employment
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Catholic Charities is a continual partner is identifying and finding solutions for housing needs, food instability, financial education, and fair housing. The City of Mansfield will continue this partnership to address the communities needs.
3	Agency/Group/Organization	City of Mansfield
	Agency/Group/Organization Type	Other government - Local

What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Economic Development
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Mansfield is a regular participant in committees across departments and organizations which regularly work to identify and create solutions for needs within the community. Elected officials, and residents are encouraged to participate in the planning process.

Identify any Agency Types not consulted and provide rationale for not consulting

The 3 listed agencies were the top providers of coordination throughout the 2025 planning process, and identifying needed programs throughout the City of Mansfield as well as looking for solutions. The City of Mansfield regularly coordinates efforts with other local agencies across various topics. Additional agencies include Wayfinders, NECIC, and The Shelter.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Erie County Continuum of Care Region 3	Continuum of Care goals are reflected in housing and service activities within the Annual Plan. Erie County Continuum of Care is the Region 3 Homeless Crisis Region lead agency.
Richland County Housing Needs Assessment	Richland County Regional Planning	https://www.rcrpc.org/housing The data and recommendations in this plan identify affordable housing as a need within the community. Specific data and needs for the City of Mansfield is incorporated into the Assessment.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

The City of Mansfield notifies the public in December of the upcoming planning process. Two public meetings are held, one during business hours, and one after hours, in January to inform the public of the processes, eligibility, and timeline of the remainder of the planning process. This also provided interested applicants the opportunity

A public hearing is scheduled with Mansfield City Council to allow City Council and the public to hear specific application requests for the use of HUD funds.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	Initial ad was a Notice of Funding Availability and Request for Proposals. This notice included information on anticipated funding, website information available, and public meeting information.	No comments were received regarding the NOFA/RFP		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	E-Mail	Non-targeted/broad community	E-mail notification was sent to current and prior sub-recipients as well as City Council and elected officials regarding the planning process, timeline, public meetings, and included the NOFA/RFP and instructions on application.	No comments were received regarding the process, on request for additional guidance on the process which was provided.		
3	Public Meeting	Non-targeted/broad community	The first of two public meetings was held on January 14, 2026 at the Richland County Public Library. There were 9 attendees from various organizations and the general public.	The participants primarily raised questions about process and eligibility of potential programs.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Public Meeting	Non-targeted/broad community	The second of two public meetings was held on January 15, 2026 in City Council Chambers at the City of Mansfield. One person attended that meeting.	The participant asked general program questions during the meeting.		

5	Public Hearing	Non-targeted/broad community	<p>The City of Mansfield held a public hearing adjacent to a regular City Council meeting on March 3, 2026. Notice of the hearing was provided by Mansfield City Council via publication. The City also provided notification to all applicants via e-mail, and provided notice to local media and various other community recipients. The hearing was well attended and included City Council, Elected officials, local media, City department representatives, and the general public. Applicants for 2026 funds presented information</p>	<p>Comments were from City Council, in support of programs being presented as well as expressing appreciation for those organizations. Housing Development proposals received some questions regarding timing and funding. City Council also raised question about committing funds to rehabilitation activities prior to them being completely funded. The question was answered by stating that the approval of rental development applications would only provide a</p>		
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			regarding their applications to City Council and the public.	conditional reservation of funds to both organizations, and that both had multiple additional steps prior to a full commitment of funds.		
6	Public Affairs Committee/ City Council	Non-targeted/broad community	The City of Mansfield held a public affairs committee meeting on March 17, 2026. The Committee discussed the recommendations for funding the various applicants and programs presented. Council was advised how to participate in the allocations process by making recommendations.	No public comments were recieved.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	City Council- Vote	Non-targeted/broad community	The City of Mansfield held a council vote on the recommendations provided by City Council members. CDBG allocations were tabled until April 21, 2026 due to voting constraints. HOME allocations and plan passed unanimously.	No public comments received.	N/A	
8	Newspaper Ad	Non-targeted/broad community	The publication for the required comment period was posted on the City Website on April 13, 2026. Newspaper publication was available on April 15, 2026. The notice for the comment period was sent via e-mail to all of City Council, and applicants and interested parties.			

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Mansfield anticipates activities near the end of 2025 and throughout 2026 to expend the majority of available HOME and CDBG funds. Under CDBG the West End Target Area will expend approximately \$1,800,000 throughout 2026, with project completion expected summer 2027.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	860,332.00	211,411.00	1,612,472.00	2,684,215.00	1,700,000.00	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	304,958.81	80,000.00	1,736,557.00	2,121,515.81	600,000.00	

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City will need to continue find ways to better leverage scarce resources to support affordable and decent housing at the scale necessary to make real gains on the housing challenges. This includes working with local partners to develop capacity, and also seeking resources and development capacity beyond the City to include Low Income Housing Tax Credit and the newly established Single Family Tax Credit Program through OHFA (Ohio Housing Finance Agency). The City will need to support the development of local partner capacity, including the creation of at least one local CHDO. In addition, the City needs to attract outside developers by creating RFPs with targeted goals and the putting up of funds to be leveraged by significant dollars from outside the City to develop housing at a larger scale.

The Richland County Land Reutilization Corporation is being leveraged as a tool for economic development. North Central State College, which shares the campus of The Ohio State University, provides on-demand, customized training through their Workforce and Community Development Division. NCSC’s Kehoe Center is a regional training center located in Shelby, Ohio. The Center provides advanced

manufacturing integrated skills training, including tool and die technology, computer numerical control (CNC) technology, information technology, and more. These potential funding collaborations provide opportunity for increased educational attainment, job skills training, and workforce development.

The Richland County Foundation has an expressed interest in funding development projects, having pledged one million dollars to the Imagination District along Park Ave West, bordering LMI census tracts 5, 6 and 31. Additionally, the Foundation funds many needed public services and activities each year within the community and represents a large stakeholder for the area. The same census tracts are designated as federal Opportunity Zones. Through tax incentives, investors are encouraged to reinvest their unrealized capital gains into the Opportunity Zones of distressed communities.

The Mansfield Housing Needs Assessment suggests the larger Landbank owned properties could be leveraged to support non-competitive tax credit development. The leverage of funding potentials identified throughout the planning documents provides impactful opportunities for CDBG and HOME contributions.

For 2026, the City of Mansfield has 2 rental development projects seeking assistance. Both seek to leverage OHFA funding, with one providing leverage funds through the Richland County Foundation, private dollars, and deferred development fees. The City of Mansfield is also leveraging funding for the West End Target Area infrastructure project, by utilizing City funds to support the project. Funds provided through the Richland County foundation will also support construction. The City of Mansfield completed the design for the project utilizing City and Richland County ARPA funds.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Mansfield, along with the Richland County Land Reutilization Corporation (Land Bank) through its activities owns and maintains several tracts of vacant land. The City, in partnership with the Land Bank, will continue to identify strategies for vacant properties and properties that have a high probability of becoming vacant. The goal is to identify areas where the City or Land Bank can assemble properties to create developable sites and market them for residential and/or economic development, as well as look at existing structures for rehabilitation.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve, Maintain, and Expand Affordable Housing	2024	2028	Affordable Housing Homeless	City-Wide	Housing and Homelessness	CDBG: \$309,432.76 HOME: \$1,931,019.93	Rental units constructed: 10 Household Housing Unit Homeowner Housing Rehabilitated: 8 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 5 Households Assisted
2	Increase Economic Opportunities	2024	2028	Non-Housing Community Development	City-Wide	Economic Opportunities	CDBG: \$211,411.00	Businesses assisted: 1 Businesses Assisted
3	Neighborhood Revitalization	2024	2028	Non-Housing Community Development	West End Neighborhood	Public Improvements West End Neighborhood	CDBG: \$1,862,255.04	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted Housing Code Enforcement/Foreclosed Property Care: 50 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Provide Needed Public Services	2024	2028	Non-Homeless Special Needs Non-Housing Community Development	City-Wide	Public Services	CDBG: \$129,049.80	Other: 300 Other
5	Homelessness Prevention	2024	2028	Affordable Housing Homeless	City-Wide	Housing and Homelessness	HOME: \$101,652.62	Tenant-based rental assistance / Rapid Rehousing: 5 Households Assisted
6	Planning and Program Administration	2024	2028	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	City-Wide	Planning	CDBG: \$172,066.40 HOME: \$30,495.88	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Improve, Maintain, and Expand Affordable Housing
	Goal Description	The City will administer several programs in an effort to improve access, condition, and to increase choices of affordable housing. These activities may include acquisition and disposition, relocation, emergency home repairs, full home rehabilitation, and new construction to address safety and health issues and/or ensure properties are brought up to local building code and property maintenance standards including the removal of blight, historic preservation, fair housing, and financial assistance to improve housing conditions. Provision of housing for the homeless, housing for special populations, new rental development, rental rehabilitation, housing accessibility, improved energy efficiency, rental assistance and other related eligible activities.
2	Goal Name	Increase Economic Opportunities
	Goal Description	The City's goal in utilizing any eligible economic development activity option for expanding economic opportunities include public infrastructure improvements to attract and retain employers, young professionals and other talent, provide programs to improve the accessibility of skilled labor training that will benefit unemployed or underemployed LMI adults, and a revolving loan fund program. Planning and development activities will include review and updates to local zoning and building codes to support land reuse and economic development benefiting low and moderate income residents.
3	Goal Name	Neighborhood Revitalization
	Goal Description	Funds will be used to foster healthy, stable, and attractive neighborhoods, access to quality public facilities, and blight removal by funding neighborhood revitalization activities such as senior centers, youth centers, childcare centers, community centers, parks and recreation facilities, libraries, education centers, centers for those with disabilities, neglected/abused children centers, healthcare facilities, parking facilities, solid waste disposal improvements, water/sewer improvements, flood drain improvements, street improvements, sidewalks, tree planting and streetscaping.
4	Goal Name	Provide Needed Public Services
	Goal Description	No more than 15% of CDBG funds will be used to assist residents with a broad spectrum of public service activities to improve their quality of life and enhance their living environment. Provision of public services include crime prevention, child care, mental health services, health services, youth services, domestic violence services, substance abuse services, services for the elderly and educational services. The public service will be either a new service or a quantifiable increase in the level of an existing service.

5	Goal Name	Homelessness Prevention
	Goal Description	Activities regarding homelessness may include but are not limited to outreach, emergency shelter and transitional housing, permanent supportive housing, rapid re-housing, and prevention activities.
6	Goal Name	Planning and Program Administration
	Goal Description	Planning activities include in-house planning at the Community Development Office, work with other departments, individual consultants or consultant entities to work on projects, conduct studies, develop plans, and execute reports for neighborhoods to best assist the City with the execution of projects and neighborhood improvements. The City of Mansfield will execute general planning and overall management of HUD-funded activities to be undertaken during the 5-Year Consolidated Plan Period, including affirmatively furthering fair housing in the community.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City will use CDBG and HOME funds to carry out the selected projects as provided for through HUD’s FY25 allocation. During the implementation of the projects, the following financial requirements will be met:

- No more than 20% of CDBG funds will be expended on Planning and Administration.
- No more than 15% of CDBG funds will be expended on public service activities.
- No less than 70% of the aggregate expenditures of CDBG funds will benefit low and moderate- income persons.
- No more than 10% of HOME funds will be expended on Planning and Administration.
- No less than 15% of HOME funds will be expended on CHDO activities, once a CHDO has been established.

Projects

#	Project Name
1	CDBG Administration
2	Targeted Code Enforcement
3	Emergency Repair
4	West End Target Area
5	Economic Development RLF
6	Public Services
7	HOME Administration
8	CHDO Set-Aside
9	Homeowner Rehabilitation
10	TBRA
11	Rental Development

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

AP-38 Project Summary
Project Summary Information

1	Project Name	CDBG Administration
	Target Area	City-Wide
	Goals Supported	Planning and Program Administration
	Needs Addressed	Planning
	Funding	CDBG: \$2,684,215.00
	Description	Administration of the CDBG program, 20% of 2026 allocation
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This is for Planning and Program Administration
	Location Description	This is for Planning and Administration of programs offered City Wide
	Planned Activities	Planning and Administration
2	Project Name	Targeted Code Enforcement
	Target Area	West End Neighborhood
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	West End Neighborhood
	Funding	CDBG: \$2,684,215.00
	Description	Targeted code enforcement within census tract 5 is funded with 1.21% of the 2026 grant allocation for \$10,428.27
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated 1000 households will benefit from targeted code enforcement, by eliminating blight throughout the census tract
	Location Description	Census Tract 5
	Planned Activities	Targeted Code Enforcement for Census tract 5
3	Project Name	Emergency Repair
	Target Area	City-Wide
	Goals Supported	Improve, Maintain, and Expand Affordable Housing
	Needs Addressed	Housing and Homelessness

	Funding	CDBG: \$2,684,215.00
	Description	Emergency Repair funding % of 2026 grant allocation and prior year remaining funds. Total funding
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	The City of Mansfield estimates we can complete approximately 15 emergency repairs with this funding
	Location Description	Emergency repair assistance is available City-Wide to income eligible homeowners
	Planned Activities	The City will offer Emergency Repair services to individuals and families in owner occupied residences.
4	Project Name	West End Target Area
	Target Area	West End Neighborhood
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	West End Neighborhood
	Funding	CDBG: \$2,684,215.00
	Description	West End Target Area Infrastructure 2026 grant allocation 54.55% \$469,290.77, Prior year allocations \$1,382,536 Total- \$\$1,851,826.77
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	The West End Neighborhood is located in Census Tract 5, which is a qualified census tract. It is estimated that the majority of beneficiaries will be low-moderate income.
	Location Description	Census Tract 5, West End Neighborhood
	Planned Activities	Infrastructure improvements including streets, sidewalks, landscaping, lighting, crosswalks, and traffic signal improvements.
5	Project Name	Economic Development RLF
	Target Area	City-Wide
	Goals Supported	Increase Economic Opportunities
	Needs Addressed	Economic Opportunities

	Funding	CDBG: \$2,684,215.00
	Description	Economic Development 100% of RLF available- Approx \$211,411
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This amount of Funding provided as business assistance would require a minimum of 6 retained or created jobs.
	Location Description	Assistance is available City Wide for eligible businesses and uses.
	Planned Activities	Business loans and grants to create and retain jobs
6	Project Name	Public Services
	Target Area	City-Wide
	Goals Supported	Provide Needed Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$2,684,215.00
	Description	Provide needed public services through various local agencies, costs not to exceed 15% of 2025 grant allocation \$
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	The City of Mansfield has 4 public services applicants provided food assistance, child care services, elder services, and transit services. It is estimated those programs could assist as many as 300 total individuals and families.
	Location Description	Public Services will be available City Wide.
Planned Activities	Pantry assistance, child care subsidy, transit services, and elder services	
7	Project Name	HOME Administration
	Target Area	City-Wide
	Goals Supported	Planning and Program Administration
	Needs Addressed	Planning
	Funding	CDBG: \$2,684,215.00
	Description	HOME Program administration not to exceed 10% of 2025 grant allocation \$32,909.24
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	This funding is for planning and administration
	Location Description	This funding is for planning and administration
	Planned Activities	Planning and Administration
8	Project Name	CHDO Set-Aside
	Target Area	City-Wide
	Goals Supported	Improve, Maintain, and Expand Affordable Housing
	Needs Addressed	Housing and Homelessness
	Funding	CDBG: \$2,684,215.00
	Description	Required CHDO set aside, 15% of 2026 grant allocation \$45,743.82 plus remaining prior year CHDO set aside of \$180,320 Total- \$226,063.82
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Rental development of 65 units, primarily affordable units. Approximately 3 units would be HOME assisted
	Location Description	Eligible city-wide.
	Planned Activities	Assist in the development of 65 housing units, primarily affordable including 3 HOME assisted units
9	Project Name	Homeowner Rehabilitation
	Target Area	City-Wide
	Goals Supported	Improve, Maintain, and Expand Affordable Housing
	Needs Addressed	Housing and Homelessness
	Funding	CDBG: \$2,684,215.00
	Description	Homeowner Rehabilitation 33% of 2025 grant allocation \$108600.48
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	This funding can assist one eligible homeowner with full housing rehabilitation
	Location Description	Available City Wide
	Planned Activities	Full Home Rehabilitation
10	Project Name	TBRA
	Target Area	City-Wide
	Goals Supported	Homelessness Prevention
	Needs Addressed	Housing and Homelessness
	Funding	CDBG: \$2,684,215.00
	Description	Tenant Based Rental AssistanceThe Shelter- Award 33.33% of 2026 grant allocation \$101,652.62
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This funding will assist 5-7 individuals and families who are victims of Domestic Violence
	Location Description	Available City Wide to residents
	Planned Activities	Tenant Based Rental Assistance
11	Project Name	Rental Development
	Target Area	City-Wide
	Goals Supported	Improve, Maintain, and Expand Affordable Housing
	Needs Addressed	Housing and Homelessness
	Funding	CDBG: \$2,684,215.00
	Description	Rental Development Activities- Entitlement funding for rental development activities \$1,515,881.65
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated this will provide for approximately 10 HOME assisted unites and 185 total units developed

	Location Description	City Wide- Primary applicant locations are 300 James Avenue and Third/Benton
	Planned Activities	2 Rental Development projects on Conditional Reservation of Funds

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City has a 60% low-to-moderate income population, qualifying the City as LMI. The need for citywide efforts is evident in the survey results received, public meetings held and stakeholder interviews conducted. There are 21,555 housing units in the City. Of these units, 49.8% are rental units and 50.2% are homeowner units. The housing stock is a concern with 87% of owner-occupied housing and 75% of renter occupied housing being built prior to 1980. Much of the housing stock is in need of rehabilitation and some are in need of demolition. There is a 12% vacancy rate of housing units.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Eligible Census Tracts	
Mansfield City Corridors	
City-Wide	33
West End Neighborhood	67

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

During the development of the Consolidated Plan, a variety of information was researched, reviewed and taken into consideration to assist in determining the priority needs, goals, and geographical priorities. The Needs Assessment and Market Analysis provided a wealth of data and information gleaned from various City and regional documents contributed to a comprehensive review of goals and priorities throughout the City, County and region. Public and stakeholder meetings were held, interviews were taken and surveys were distributed to stakeholders and the general public.

Discussion

The City of Mansfield will allocate a significant portion of the 2026 allocation to the West End Neighborhood, in an effort to construct phases 2 and 3 during the program year. The remainder of 2026 funds will be for various eligible uses City-Wide.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Mansfield will provide emergency repair, targeted code enforcement, homeowner rehabilitation, tenant based rental assistance, and rental development with the FY26 funding to eligible families within the City limits. These programs are described in detail under Section AP-35 "Projects".

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	150
Special-Needs	0
Total	150

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	5
The Production of New Units	10
Rehab of Existing Units	10
Acquisition of Existing Units	0
Total	25

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The City of Mansfield will provide emergency and full home rehabilitations with the allocated monies from this year's plan to eligible families within the City limits. The HOME program will provide incentives to developers for the production of units for LMI populations for Rental activities.

AP-60 Public Housing – 91.220(h)

Introduction

Mansfield Metropolitan Housing administers a total of 1,911 vouchers comprised of Housing Choice, Project Based, VASH, and Mainstream. Project based vouchers, utilized at Turtle Creek, currently have a waitlist of 21. Housing Choice Voucher waitlist has 801 families, who were all added to the list between 10/28/25 and 10/30/25. Out of the 801 families waitlisted, 88 are considered Mainstream vouchers and have priority. 41 families require accessibility features, or 5.1%. Mansfield Metropolitan Housing Authority anticipates \$13 million in rental costs to be paid to landlords across Richland County in 2026.

Actions planned during the next year to address the needs to public housing

There are no public housing units in the City of Mansfield.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

There are no public housing residents. The Mansfield Metropolitan Housing Authority does utilize a Resident Advisory Board from residents receiving housing choice vouchers that meets periodically throughout the year. They are granted an opportunity to comment on the Five Year and Annual Plans submitted by the Mansfield Metropolitan Housing Authority to the Department of Housing and Urban Development.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The Mansfield Metropolitan Housing Authority is not designated as a troubled agency.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Continuum of Care is a partnership of the City, County and nonprofit agencies purposed to end chronic homelessness, provides oversight for service agencies and shelters, and coordinates efforts to reduce duplication of homeless services. They are an independent body that promotes solution-oriented planning and coordination of services, development of performance based strategic planning and evaluation, and development of service partnerships to increase linkages.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Continuum of Care has been managing many of the region’s homeless related activities and programs. Through First Call 211 at the Richland County Library and Catholic Charities, there is a broad effort to bring numerous agencies together to increase the effectiveness of the group, including regular monthly meetings. Richland County 211 provides an intake process and performs the initial centralized screening to determine primary and urgent needs.

The City has a “Homeless Response Team” where officers team up with mental health professionals weekly to do outreach in the streets to help ensure those experiencing homelessness are connected to appropriate resources. Richland Public Health provides various medical services and administers the WIC program. The Richland County Mental Health and Recovery Services Board, through its affiliates, provides a number of alcohol, drug addiction, mental health and related services.

Providing assistance for Rental Development activities in 2026, will also expand affordable housing options for the long term and provide stability for individuals and families which will prevent homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

The four agencies providing housing for the homeless population in the City of Mansfield are the Catholic Charities Diocese of Toledo, the Mansfield Metropolitan Housing Authority, the Domestic Violence Shelter, and Wayfinders Ohio, Inc. There is a shortage of temporary housing options in the City, in particular transitional housing for adults without children. The Homeless Needs Inventory and Gap Analysis Table found in MA-30 indicates 9 additional beds are needed to meet current demand. There is a need for additional permanent supportive housing units for both families and single adults. The same Homeless Needs Inventory and Gap Analysis Table shows a need for 7 additional family beds (3 units), and 49 additional adult only beds (41 units). Wayfinders Ohio is currently under renovations for a new

location to increase capacity for emergency shelter.

The Mansfield City Schools have been a partner in identifying children that are homeless through the Safe Program and are members of the Continuum of Care. Agencies partner with one another to address housing needs and provide other services to these households. The goal is to break the cycle. Case managers try to help the individuals develop a goal plan and get them connected with whatever services they need. If they need employment, they do a weekly job readiness training. They also do life-skills training and have a program that can help pay their first month's rent and deposit if they qualify. A lack of sufficient decent, safe, affordable housing in the community contributes to the pipeline of homelessness, with many housing cost burdened households in the community.

In 2021, the American Rescue Plan was signed into law for the HOME Investment Partnerships Program (HOME) to address the need for homelessness assistance and supportive services. Congress appropriated \$5 billion in ARP funds to be administered through the HOME program for activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or other vulnerable populations. The City of Mansfield will be utilizing over \$1 million dollars of HOME-ARP funding to assist in the goal of developing additional permanent supportive housing. Quite simply, the first priority is housing and the second priority is services and case management. Twelve units of permanent supportive housing units are estimated to be built with HOME-ARP funds being used as 'gap' funding not to exceed 20% of the total project cost. HOME-ARP funds will also be used to fund supportive services to approximately 120 people as well as provide operating and capacity building funds to support the non-profit organizations who are working with individuals and families who are homeless, at risk of homelessness, or other vulnerable populations.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Homeless persons and those at risk of homelessness have a number of services available to them in the effort to obtain and sustain permanent housing. Richland Public Health provides various medical services and administers the WIC program. The Richland County Mental Health and Recovery Services Board, through its affiliates, provides a number of alcohol, drug addiction, mental health and related services. Richland County 211 provides an intake process and performs the initial centralized screening to determine primary and urgent needs. Emergency shelter services and transitional housing are provided, as available, to homeless persons with the goal of re-housing. Our local homeless shelter also provides programming to assist individuals and families become self-sustainable through job placement

assistance, navigation of other public resources, and seeking permanent housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

There are a number of services to assist persons returning from mental and physical health institutions, and to ensure they receive appropriate housing. The Richland County Mental Health and Recovery Services Board provides through its affiliates a number of alcohol, drug addiction, mental health and related services, such as vocational rehab; crisis intervention, including a hotline; peer support services; programs for adolescents and youth; suicide prevention education; programs for Deaf and Hard-of- Hearing; programs for ex-offenders; behavioral health assessments; counseling for trauma, sexual abuse, addiction, depression and anxiety; and physical, occupational, and speech therapy.

Additionally, the following providers and services are targeted to individuals to meet their supportive housing needs:

- Abraxas Ohio, located in Shelby, Ohio provides residential treatment services to adolescent males and outpatient treatment services to adolescents and adults. Services are provided to address conditions such as substance use and mental health disorders, family dysfunction, trauma and abuse histories.
- Catalyst Life Services offers mental health and crisis services including a 24 hour stabilization unit and helpline. Catalyst also provides addiction, vocational, audiology and deaf services. Services include peer support, case management, crisis intervention, medical care, and a variety of programs and treatments for both adults and children. Housing for those in residential treatment programs is also included.
- Richland County Community Alternative Center is an OhioMHAS certified drug and alcohol treatment program that provides concurrent intensive counseling services within safe and secure housing for adult men and women. It provides an alternative to jail for adult offenders.
- Foundations for Living is a secure Residential Treatment Facility for males and females ages 11 to 18 offering treatment for mental health, addiction, survivors of human trafficking, pregnant teens, and self-injurious behavior.

It is also noted that during the Consolidated Planning process, agencies identified a need for housing opportunities for ex-offenders returning back to the community. This again highlights the importance of

affordable housing options tied to available services.

Discussion

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City of Mansfield is currently developing a Comprehensive Plan, in conjunction with Richland County. This plan will incorporate plans such as our economic development plan, a plan for the local university, a downtown plan called Mansfield Rising, and a plan that covers the North end of the City and The Richland County Housing Needs Assessment. The housing assessment that includes the City of Mansfield has identified a need for improved and comprehensive revitalization planning Citywide at the neighborhood level, with unique and appropriate strategies for each neighborhood type. These plans should include not only housing, but parks, safety, blight removal, infrastructure, amenities – a comprehensive approach to addressing neighborhood needs. The City should set housing goals and develop implementation strategies for both subsidized housing and private investment. The City has a facilitation role in housing and needs to support rather than seek to supplant private development.

The Richland County Housing Needs Assessment and Action Plan identifies a substantial gap of developers and contractors, especially those who are certified to work on HOME and other HUD-funded projects and identifies improvements to public transportation as a barrier to housing due to the limitations of the service areas and hours of service. Stakeholders especially noted that the lack of late-night transit service complicates those seeking 2nd shift (can't get home) and 3rd shift (can't get to work). The Richland County Housing Needs Assessment and Action Plan noted opportunities for additional collaboration among several agencies to streamline service delivery of various rental subsidy and utility assistance programs.

The zoning for the City has a mix of uses, including a number of areas that allow for multifamily housing. There are not unreasonable required building sizes in the zoning code. There are no locally levied impact fees attached to new developments. City building codes follow standards and practices established by the State of Ohio, which is largely modeled after national codes. The City recently adopted International Property Maintenance Code (c) and manufactured housing requirements are regulated by State and Federal requirements. The permit application process has been improved with new software, although adjustments for additional quality of life improvements are still needed. Alignment of codes and permitting across the Richland County housing market is another area identified in the housing assessment that could help to attract both developers and contractors and facilitate additional needed housing development.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The Community Development Office will continue to work closely with housing and community development providers to implement the Consolidated Plan and most effectively meet the housing

needs within the community. In addition to representing the City at area meetings, the Community Development Office will look to:

1. Be the catalyst for an improved and comprehensive revitalization planning Citywide at the neighborhood level with unique and appropriate strategies for each neighborhood type.
2. The City will look to set housing goals and develop implementation strategies for both subsidized housing and private investment. The City will have a facilitation role in housing and will support rather than seek to supplant private development.
3. The City will actively seek to find or develop a Community Housing Development Organization (CHDO). For local agencies who support the City's housing goals and are interested in becoming a CHDO, the City will make technical assistance available to assist the organization in building capacity.
4. Develop and implement an outreach plan to attract developers and contractors who are certified to work on HOME and other HUD-funded projects. For interested contractors and developers who lack the expertise, the City will make technical assistance available to build capacity for such contractors and developers.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The City plans to undertake the following actions to address the City's housing and community development needs and reach the goals established in the 2024-2028 Consolidated Plan.

Actions planned to address obstacles to meeting underserved needs

The City will work towards an improved and comprehensive revitalization planning Citywide and at the neighborhood level, a greater coordination of programs throughout community providers, and in establishing a Community Housing Development Organization (CHDO). The City will continue to work with local units of government, a variety of housing providers, social service organizations, neighborhoods groups, homeless assistance providers, economic development organizations, housing agencies, and public service providers to remove barriers to affordable housing, assist the homeless population, reduce the number of families experiencing poverty, and other efforts identified in the Strategic Plan.

Actions planned to foster and maintain affordable housing

The City of Mansfield will provide emergency repair, targeted code enforcement, homeowner rehabilitation, tenant based rental assistance, and rental development with FY26 funding to eligible families within the City limits. Detailed information about these activities and one year goals can be found within the AP-55 Section of the Action Plan.

Actions planned to reduce lead-based paint hazards

The City of Mansfield has established guidelines for dealing with lead-based paint hazards in homes being rehabilitated under its HUD-funded programs. A Lead Risk Assessment is undertaken early in the process once rehab specifications have been drafted by City inspectors. All rehab contractors working on projects involving surfaces that contain lead must be certified as Lead Safe Renovators in order to participate in the City's housing rehabilitation and repair/maintenance programs. The City provides literature about lead based paint to all applicants to the program and the general population on the City web site and the information desk in the entrance to the local residents, homeowners, and agencies. It is required by the Mansfield Board of Realtors to disseminate information regarding the proper disclosure of lead hazards upon selling or renting a housing unit for lead paint hazards. Through home rehabilitation, home repair, and even demolition, the affected housing is being renovated or removed. The City has outlined a more detailed strategy in SP-65 of the Strategic Plan.

Actions planned to reduce the number of poverty-level families

The City has allocated RLF Income funds to continue an Economic Development Revolving Loan Fund

(RLF) Program to help meet the goal of reducing the number of poverty-level families. There is a collective regional effort to bring residents out of poverty. Housing cost burden is a significant problem in the City of Mansfield. Housing affordability will be addressed with a two-prong approach, consisting of figuring out ways to make housing for both owners and renters less expensive, and by developing strategies to increase incomes of households within the City. Greater economic opportunities will help to provide more choices to LMI residents about the housing and neighborhood in which they live. The City has outlined a more detailed strategy in SP-70 of the Strategic Plan.

Actions planned to develop institutional structure

The City will continue to work closely with local human service, housing, and community development providers to implement the Consolidated Plan to most effectively meet the needs within the community with the limited federal, city, non-profit, and for-profit resources available. In addition to representing the City at area meetings, the Community Development Office continues to work with local neighborhood organizations and reinforces collaboration between government agencies and local service and housing providers. The City will dedicate CDBG and HOME funding to a wide variety of housing and service related activities and be intentional about targeting the funds and projects for the greatest impact and leverage opportunities. Since there are local organizations geared to provide housing and supportive services, it will be imperative to form partnerships on these initiatives from both a collaborative and financial perspective. Forming and fostering these additional partnerships going forward is one way that the City plans to address this gap as further detailed in SP-40 of the Strategic Plan.

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to partner with the Continuum of Care (CoC), County and nonprofit agencies purposed to end chronic homelessness, provide oversight for service agencies and shelters, and coordinate efforts to reduce duplication of homeless services. The CoC is an independent body that promotes solution-oriented planning and coordination of services, development of performance based strategic planning and evaluation, and development of service partnerships to increase linkages. Additional information on the Continuum of Care and the strategies for enhanced coordination can be found in SP-40 and SP-60 of the Strategic Plan.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

The City of Mansfield has an application for a certified CHDO in 2026. The CHDO is not a local organization and CHDO assistance may be limited to specific activities. The City continues to search for viable CHDO organizations which can provide regular housing development and redevelopment.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Due to field constraints, The City of Mansfield's Recapture / Resale Policy is provided as an attachment to the Plan.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Due to field constraints, The City of Mansfield's Recapture / Resale Policy is provided as an attachment to the Plan.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

N/A

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

The City of Mansfield provides funding to the Domestic Violence Shelter for tenant based rental assistance.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR

92.253(d)(3) and CFR 91.220(l)(2)(vii). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

Attachments

2024-2028 MANSFIELD CITIZEN PARTICIPATION PLAN

INTRODUCTION

The 2024-2028 Consolidated Plan is a collaborative process through which the community identifies its housing, homeless and community development needs; and establishes a vision, goals and strategies for achieving these needs. The plan also pinpoints how the money received from the *U.S. Department of Housing and Urban Development (HUD)* will be utilized over the upcoming program year—taking into account the regulations governing these programs—to meet locally recognized needs.

The City of Mansfield is required by law to have a detailed Citizen Participation Plan that contains the City’s policies and procedures for public involvement in the *Consolidated Plan process*, and the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and any other community development need monies granted to the City by *HUD*. The Citizen Participation Plan must be available to the public.

Citizen participation is a vital part of the *Consolidated Plan* process. Citizens, non-profit organizations and other interested parties must be afforded adequate opportunity to participate in the planning process. This includes:

- Access to meetings
- Access to information
- Technical assistance as required
- Opportunity to comment on plans
- Public hearings to identify housing, community development needs and a review of proposed expenditures of funds, and
- Timely response to complaints and grievances.

The following describes the guiding principles for citizen participation by the *City of Mansfield* in the implementation of the *HUD Consolidated Plan*.

Encouraging Public Participation

The law requires that our *Citizen Participation Plan* both provide for and encourage public involvement, emphasize involvement by low to moderate-income people—especially those living in low to moderate-income neighborhoods, and provide the opportunity for involvement at each planning stage. Also, the *U.S. Department of Housing and Urban Development (HUD)* anticipates that the City of Mansfield will take actions that are appropriate to encourage participation by minorities, non-English speaking individuals, and people with disabilities.

Copies of this *Citizen Participation Plan*, as well as summaries of basic information about *CDBG* and *HOME*, and the *Consolidated Planning* process may be made available in the languages of residents who comprise a significant portion of the low to moderate income population. Currently, the City of Mansfield has materials in English only. Residents needing resources in other languages are welcomed to contact City staff.

The Purpose of Participation

The primary purpose of the programs covered by this *Citizen Participation Plan* is to improve communities by providing:

- Decent Housing
- Suitable living environment
- Economic growth opportunities

Because of the amount of federal *CDBG* and *HOME* program monies the City of Mansfield receives each year is mostly based upon the severity of both *poverty* and *substandard housing conditions* in Mansfield; it is necessary that low to moderate-income residents who experience these conditions get involved with the planning process. Genuine involvement by these residents must take place at all stages of the process, including:

- Identifying needs
- Setting priorities among these needs, suggesting how much money should be allocated to each high-priority need, and suggesting the types of programs to meet high-priority needs
- Overseeing the way in which programs are carried out

The Various Stages of the Consolidation Plan Process

The policies and procedures in the *Citizen Participation Plan* relate to several stages of actions mentioned in law or regulation. In general, these stages or events include:

- Identification of housing and community development needs
- Preparation of a draft usage of funds for the upcoming year called the proposed "*Annual Action Plan*" or the development of a proposed new "*Consolidated Plan*"
- Formal approval by elected officials of a final "*Annual Action Plan*" or "*Consolidated Plan*"
- On occasion during the year, it might be essential to change the use of the money already budgeted in an "*Annual Action Plan*", or to change the priorities established in the "*Consolidated Plan*". In that case, a formal "*Substantial Amendment*" will be proposed, considered and acted upon.
- After a program year is complete, the "*Consolidated Annual Performance and Evaluation Report (CAPER)*" must be drafted for public review, commented and then sent to HUD

The Programmed Year

The Program year selected by the City of Mansfield is July 1st through June 30th.

Mansfield Citizen Participation Activities

The City of Mansfield Citizen Participation activities may include:

- Community Outreach
- Public Meetings
- Public Hearing
- Access to Information
- Technical Assistance
- Timely response to Complaints and Grievances

Community Outreach

In order to assure that all citizens have ample opportunity to participate in the planning process, the City of Mansfield will conduct a community outreach on the development of the strategic plan. The purposes for the outreach will be to:

- Obtain views of citizens, public agencies and other interested parties.
- When applicable, announce the availability of technical assistance and funds.
- Respond to proposals and comments at all stages of the Consolidated Plan submission process, including:
 - Identifying housing and community development needs
 - Reviewing proposed uses of funds
 - Reviewing program performance

Public Meetings for the Annual Action Plan process will be held via zoom and in person.

Public Meetings/ Hearings

The City of Mansfield will host two (2) public meetings each year. Typically, one of these meetings may consist of either: 1) a meeting to announce the availability of technical assistance and funding for current program year; 2) a meeting to review program performance; or 3) one of the city council meetings, where legislation regarding either the strategic plan or the annual action plan is read and/or considered for approval. Also, each year, a final public comment period will be held once the draft plan is complete, to solicit comments on the strategies and proposed use of funds. Public Meetings will be conveniently and located for people who will benefit from program funds, and will be accessible to persons with special needs.

One public hearing will be held during City Council, they may be held via zoom, and broadcast on the City of Mansfield's Facebook page and website. Agencies with proposals may also attend City Council in person. City Council will also hold a Public Affairs Committee meeting during the planning process to discuss recommendations for use of funding, and the Action Plan. Citizens

are able to comment during City Council, and to Community Development staff during the planning process.

Access to Information

Citizens, public agencies and other interested parties, including those most affected will have the opportunity to receive information, review and submit comments on any proposed submission concerning any of the following documents:

- The proposed and final “*Annual Action plans*”
- The proposed and final “*Consolidated Plan*”
- Proposed and final Substantial Amendments to either an “*Annual Action Plan*” or the “*Consolidated Plan*”
- Annual Performance Reports
- The Citizen Participation Plan
- Analysis of Impediments / Affirmatively Furthering Fair Housing

Interested parties may access these documents at no cost through the internet, at the *Community Development* section of the City of Mansfield’s website:

<https://ci.mansfield.oh.us/community-development/> or by contacting staff. The city will make every attempt to provide these materials in a form that is accessible to persons with disabilities and individuals that are Non-English speaking, when requested.

Involved citizens will be provided a 15 day period to comment on the City’s CAPER, prior to HUD submittal around September 15th of each year depending on HUD’s requirements, and CAPER completion date.

Technical Assistance

City staff will work with organizations and individual representatives of low to moderate-income people who are interested in submitting a proposal to obtain funding for an activity. All potential applicants for funding are encouraged to contact city staff for technical assistance. Additionally, city staff will work with individuals and organizations receiving “*Consolidated Plan*” monies to ensure that funds are being spent for their intended purpose and within the rules and regulations of the federal government.

Timely Response to Complaints and Grievance

City staff will provide timely, written response to written complaints and grievances within the fifteen (15) day period of receipt, where practical.

Substantial Amendments

Prior to the submission of any substantial change in the use of funds, citizens will have thirty (30) days to comment on the proposed amendment using the citizen participation methods outlined in this plan and/or other methods that result in effective notice and commenting. All changes in use of funds will be subject to Mansfield City Council approval.

A substantial amendment to the *Consolidated Plan* is when one of the following decisions is to be made:

- A change in the use of *CDBG* and *HOME*, money from one project* to another, and a change to increase or decrease funding or cost of a project by more than \$50,000. (This does not include projects that are completed under budget by more than \$50,000, but the use of the unspent funds will require City Council Approval, with comment opportunity given to the public)
- The addition of a project not originally described in the *Consolidated* or *Annual Action Plan*.
- A change in the purpose of a project, such as a change in the type of activity or its ultimate objective- for example, a change in a construction project from housing to commercial.

*(*The term "project" refers to a budget line item—often called a "program"—as delineated in the yearly action plan.)*

For more information regarding the *2024-2029 Consolidated Plan* or to submit your comments, please contact Adrian Ackerman at aackerman@ci.mansfield.oh.us or call 419-755-9793, or write to City of Mansfield, Department of Community Development, 30 North Diamond St. Mansfield, Ohio 44902 or visit the City's website at: <https://ci.mansfield.oh.us/community-development/>.

Amended- 7/19/22

Mansfield City Council Approval – 8/16/22

Public Comment Period- 8/22/22- 9/26/22

**HOME Investment Partnership Program
Policy and Procedure Guide**



**City of Mansfield
Community Development Department**

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Introduction

The purpose of the guide is to introduce the City of Mansfield's HOME Program. This guide is designed to assist staff, developers, and sub-recipients in assessing the appropriateness of applying HOME funds. The programs principal features are described here, and applicants are advised to become acquainted with detailed requirements of the HOME program as set forth in the Regulations at 24 CFR Pars 91 and 92, and new HOME final rule published July 24, 2013 with an effective date of August 23, 2013.

HOME Program Purpose

The purpose of the City of Mansfield HOME program is to:

- Expand the supply of affordable, decent, safe and sanitary housing for very low and low income residents;
- Preserve and improve the existing residential areas through rehabilitation of existing housing;
- Strengthen public-private partnerships to further affordable housing development;
- Promote the development of Community Housing Development Organizations (CHDOs) and their role as affordable housing developers;
- Provide gap financing that will make housing development feasible with costs affordable to low-income residents.

Appropriation Plan

Funding Availability

City of Mansfield HOME funds are available for rehabilitation of existing residential properties, conversion of buildings to residential use or new construction in accordance with HOME program guidelines. HOME funds may also be used for Tenant Based Rental Assistance in accordance with HOME program guidelines.

Eligible Organizations

Public or private entities who are housing developers, sponsors or owners and that have project management control capacity are eligible to apply for HOME funds. Refer to "Selection Criteria and Priorities" section for additional information. Examples of eligible entities include:

- Community Housing Development Organizations (CHDO's)
- Not-for Profit organizations
- Housing Authorities
- For-Profit Organizations

Timing Requirements

1. Any project in which the applicant is requesting HOME Investment Partnerships Program funds should not begin until an Environmental Review has been completed, and the Historic Preservation Commission concurrence is received (if applicable) by the City of Mansfield's Community Development Department. Any physical work or construction activity that begins prior to the completion of these requirements may result in HOME Investment Partnerships Program funds being denied.
2. All funds, including CHDO set-aside HOME funds, for a given program year must be committed for specific housing projects within two (2) years or twenty-four (24) months of receipt of the City's allotment (e.g. 2019 program year funds must be committed by July 1, 2021). If this deadline is not met, HUD can reduce or recapture the uncommitted HOME funds. [HOME statute and 2013 HOME Final Rule 24 CFR Part 92.500 (d) (1) (i)]
3. All funds, except CHDO set-aside HOME funds, from a given program year must be expended within four (4) years of receipt of the City's allotment (e.g. 2019 Program Year funds must be expended by July 1, 2023). [24 CFR Part 92.205 (e) (2)]
4. CHDO set-aside HOME funds must be expended within five (5) years of the City's fund allocation. [24 CFR 92.500 (d) (i) and (iii)]
5. HOME projects must be completed within four (4) years of commitment. If this deadline is not met, all HOME funds drawn will need to be repaid. [24 CFR Part 92.205 (e) (2) and Part 92.2]
6. Construction work must commence within twelve (12) months of executed HOME agreement and a partial withdraw of project HOME funds must occur or the project commitment will be cancelled and the HOME funds repaid to HUD. These regulations apply to both new construction (with or without acquisition) and rehabilitation projects. For projects requiring property or housing acquisition, title transfer must occur within six (6) months of acquisition. [24 CFR Part 92.503 (b) (2) and (3) and Part 92.2]
7. Construction work must be completed within eighteen (18) months from the date of execution of a HOME Agreement, unless otherwise stated.

8. **Rental Projects-** Lease up of all HOME- assisted units must be completed within six (6) months of “project completion” (24 CFR Part 92.252) (see “project completion” below).

NOTE: Lease up time frame should be noted in the Project’s Development Schedule and Marketing Plan. If HOME- assisted unites are not leased within six (6) months of project completion, The City of Mansfield must notify HUD regarding current marketing efforts. If units are not leased within eighteen (18) months of project completion, HUD will require repayment of HOME funds for the unoccupied/vacant units. [24 CFR Part 92.252]

Project Completion (24 CFR Part 92.2)- Project completion occurs when construction work has been performed, certificate of occupancy has been issued, title transfer has occurred, final drawdown of HOME funds has been disbursed for the project, project completion and beneficiary (tenant) information for all HOME –assisted units has been entered into IDIS, as established by HUD.

9. **HOME Ownership Projects-** 2013 HOME Final Rule states that a qualified/eligible homebuyer must have a ratified sales contract within nine (9) months of construction completion. If the deadline is not met, the project must be either converted into a HOME rental unit, or repayment of the full HOME investment is made to HUD. [24 CFR Part 92.254 (a) (3)]
10. **For ALL HOME Projects-** A ten percent (10%) HOLD back of project HOME funds will be held by the City of Mansfield until all tenant/ homebuyer/ beneficiary information is provided to and approved by the City of Mansfield.
11. The City must enter all project completion information into IDIS, as established by HUD, within one-hundred twenty (120) days of the final drawdown/disbursement for all activity types. [24 CFR Part 92.502 (d)]

HOME Activities

Eligible Activities

HOME funds may be used for rehabilitation, conversion of non-residential buildings to residential, reconstruction, new construction of non-luxury housing, and TBRA activities as allowed by HUD and approved by the City of Mansfield.

Eligible Uses of Improved Properties

1. Rental of units to low/mod income families or individuals
2. Sale to low-income homebuyers

Eligible Project Costs (24 CFR Part 92.206)

The City of Mansfield HOME funds may pay for the following costs in association with an eligible activity:

Development Hard Costs

Actual cost of construction or rehabilitating housing.

Rehabilitation

1. Correction of substandard conditions (most importantly health and safety deficiencies) ;
2. Essential improvements including energy related improvements/ repairs;
3. Accessibility improvements to permit use by persons with special needs;
4. Lead-based paint hazard abatement;
5. Repair or replacement of major housing systems in danger of failure.

New Construction

6. Actual costs of construction to meet state and municipal codes, ordinances, zoning requirements, and HUD requirements.

Rehabilitation and New Construction

7. Acquisition of real property;
8. Demolition of existing structures;
9. Site improvements in keeping with surrounding, standard properties;
10. Utility connections, including off-site connections.

Acquisition Costs

Costs of acquiring improved or unimproved real property, including acquisition by homebuyers.

Related Soft Costs

Other reasonable and necessary costs incurred by the owner associated with financing and/or development of new construction, rehabilitation or acquisition of housing assisted with HOME funds. These costs are subject to approval by the City of Mansfield and **may** include:

1. Pre-development and/or development costs for architectural, engineering or related professional services to prepare plans, drawings, specifications or work write-ups;
2. Costs to process and settle financing: origination fees, credit reports, fees for title evidence, recordation and filing of legal documents, building permits, attorney fees, appraisal fees, costs estimates, builders or developers fees;

3. Project audit costs;
4. Affirmative marketing and fair housing information services to prospective tenants and homebuyers;
5. Relocation expenses for displaced persons, families, businesses or organizations, where assistance is required by program regulations or determined appropriate by program administrators. The City of Mansfield may only reimburse these expenses if incurred up to twelve (12) months prior to the City's commitment of HOME funds.
6. Cost of funding initial operating deficit reserve to cover project operative expenses, scheduled payments to replace reserve and debt service shortfalls for a period not to exceed twelve (12) months;
7. Impact fees for both new construction and rehabilitation projects;
8. Environmental review costs and release of funds directly related to project per 24 CFR Part 58;
9. Training for first-time home buyers if the individuals become the owners of one of the projects' HOME-assisted units.

Community Housing Development Organization (CHDO) Costs

Eligible and Allowable costs of project-specific assistance are set forth in 24 CFR Part 92.301 (a) (2). These costs are subject to approval by the City of Mansfield, and **may** include:

- Project feasibility (initial feasibility study);
- Consulting fees;
- Legal fees;
- Architectural and engineering fees;
- Development team engagement;
- Property acquisition option;
- Site Control;
- Title Clearance.

Ineligible Project Costs (not reimbursable with HOME funds) in accordance with HUD Regulations at 24 CFR part 92 and/or City of Mansfield Policy.

1. HOME funds will not be used to refinance existing debt in and manner or form or to create capital by transferring properties between related or interrelated organizations or corporate affiliates;
2. Costs will not be reimbursed if found to be excessive or unnecessary to the creation of decent, safe, sanitary and affordable housing units;
3. HOME funds will not be used for activities that do not result in the creation of new affordable housing units, or do not provide rental assistance (TBRA).
4. HOME funds will not be used for any other activities prohibited by Federal Regulations at 24 CFR Part 92.

The City of Mansfield may at any time establish more stringent criteria than required by HUD in order to reflect the City's priorities.

Program Benefit/ Income Targeting

All HOME funds must benefit low/mod – income households at or below eighty percent (80%) of the area median income as published by HUD.

Not less than ninety percent (90%) of the units in rental projects must benefit low/mod income households at or below eight percent (80%) of the area median income as published by HUD.

In rental projects with five (5) or more units, at least twenty percent (20%) of the units must be occupied by very low-income households at or below fifty percent (50%) of the area median income as published by HUD. These units are Low HOME rent units. [24 CFR Part 92.252 (b)]

The remaining HOME-assisted units in each rental project may be occupied by low income families at or below eighty percent (80%) of area median income as published by HUD. These are High HOME rent units.

The annual gross income of the household in each rental unit must be certified as eligible prior to occupancy and recertified annually. In accordance with HOME program regulations, 24 CFR Part 92.203 (b) (1), the City of Mansfield defines "annual income" as provided for under the Section 8 Housing Assistance Payments programs in 24 CFR Part 5, for the City of Mansfield. The annual gross household income of homebuyers must be certified as eligible within the requirements set forth in 24 CFR Part 92.203 for the City of Mansfield at the time they are occupying the unit. Income limits are established by the United States Department of Housing and Urban Development (HUD) for the City of Mansfield and published annually.

Affordability

All HOME- assisted units must qualify as affordable housing and remain affordable for a specified period. Affordability will be assured by a deed restriction and annual monitoring. To qualify as affordable, units must meet the guidelines for RENTAL HOUSING or HOME OWNERSHIP HOUSING PROJECTS as outlined below.

RENTAL HOUSING PROJECTS

Rent Limits

HOME- assisted rental units must be occupied by low/mod- income households (at or below 80% of the area median income) and must have rents that do not exceed High HOME rent limits. In projects where there are five (5) or more units, however, at least twenty percent (20%) of the units must be occupied by very low-income families. HUD will provide High and Low HOME rent limits charts annually for the City of Mansfield. HUD's HOME rent limits include

both rent and utility allowance so any utility allowance paid by the tenant should be subtracted from the HUD rent limit so the tenant's rent payment can be determined.

Periods of Affordability

The minimum period of affordability for rehabilitation, acquisition of existing rental housing, or homeownership assistance is determined by the amount of HOME funds invested per unit. New construction or acquisition of newly constructed housing carries a minimum affordability period of 20 years. [24 CFR Part 92.252 (e) and Part 92.254 (a) (4)] * The length of the affordability period is negotiated at the time of loan commitment.

Rental Housing Activity	Minimum Period of Affordability
Rehabilitation or acquisition of existing housing per unit amount of HOME funds: Under \$15,000.00	5 Years
Rehabilitation or acquisition of existing housing per unit amount of HOME funds: \$15,000.00- \$40,000.00	10 Years
Rehabilitation or acquisition of existing housing per unit amount of HOME funds: Over \$40,000.00 or rehabilitation involving refinancing	15 Years
New Construction or acquisition of newly constructed housing	20 Years

Useful Life of Major Systems

A Capital Needs Assessment is required for rehabilitation projects with twenty-six (26) or more total units per HUD's regulations [24 CFR Part 92.251 (b) (ii) and (ix)]. City of Mansfield policy requires a Capital Needs Assessment for ALL rehabilitation projects. New construction projects must be able to verify they can maintain the new units for the entire period of affordability. For rental housing, if the remaining useful like of one or more major systems is less than the affordability period, adequate replacement reserves must be established to repair or replace systems as needed. [24 CFR Part 92.251 (b) (1) (ii)]

Rents

The City of Mansfield must review rents charged to tenants residing in HOME- assisted housing units for compliance and approve/deny the rents annually. [24CFR Part 92.252 (f) (2)]

Monitoring

During the period of affordability, HOME-assisted housing activities will be required to submit yearly verification of tenants residing in the properties. This information should be submitted to the Community Development department no later than March 31 of each fiscal year. Each time a new tenant moves into a property, the information must be submitted immediately to verify the tenant is qualified.

HOMEOWNERSHIP HOUSING PROJECTS

Purchase Price

The purchase price of a homebuyer unit is considered affordable when the monthly cost (principal, interest, taxes, and insurance) does not exceed thirty-eight percent (38%) of the household's gross monthly income at the time of purchase. For the First-Time Homebuyer Program, a unit is considered affordable when the homebuyer can obtain a fixed-rate, conventional, FHA or RDA mortgage with the reasonable terms and conditions at an interest rate of not more than one-percent (1%) above the published weekly average for the State of Ohio.

Properties developed for purchase must:

1. Have an estimated appraisal value after improvement that does not exceed the **HOME Homeownership Value Limits** established by HUD for the City of Mansfield [24 CFR Part 92.254 (a) (2) (iii)]
2. Have an initial purchase price that is affordable and does not exceed the *lesser* of the HOME Homeownership Value Limit or the total project cost (minus project specific grants if any); and
3. Be initially sold to a family who:
 - a. Qualifies as low income at the time of purchase; and
 - b. Will use the property as its principal residence.
4. A ratified sales contract with an eligible homebuyer must be in place within nine (9) months of construction or rehabilitation completion. If not, the project must be to converted to rental housing and rented to an eligible tenant. [24 CFR Part 92.254 (a) (3)]
5. Rehabilitated homeownership housing projects require that each of the major systems have a remaining useful life of at least five (5) years upon project completion. [24 CFR Part 254 (b) (1) (ii)]
6. Remain affordable for a minimum period determined by the amount of HOME fund Investment per unit based on the following chart:

Homeownership Assistance Housing Activity	Minimum Period of Affordability
Homeownership Assistance per unit amount of HOME funds: Under \$15,000.00	5 Years
Homeownership Assistance per unit amount of HOME funds: \$15,000.00- \$40,000.00	10 Years
Homeownership Assistance per unit amount of HOME funds: Over \$40,000.00 OR rehabilitation involving refinancing	15 Years

- *The length of the affordability period is negotiated at the time of loan commitment*

7. Subsequent Purchases:

- a. Requirements regarding subsequent purchases (resale provisions) are listed at 24 CFR Part 92.254 (a) (5) (i) for all properties in which direct homebuyer assistance has not been provided through either the City's First-Time Homebuyer Program or by lowering the purchase price from Fair Market Value to an affordable price.
- b. Requirements regarding subsequent purchases (recapture provisions) are listed at 24 CFR Part 92.254 (a) (5) (ii) for all properties in which direct homebuyer assistance has been provided through either the City's First-Time Homebuyer Program or by a discounted purchase price from Fair Market Value to an affordable price.

Down- Payment Assistance

The City of Mansfield's Community Development Department has implemented a First Time Homebuyer Down Payment Assistance program (FTBH Program) with the approval of Mansfield City Council.

The FTBH program was designed to meet specific goals established by the City of Mansfield that will

- Increase affordable housing opportunities in the City
- Provide households with the opportunity to become homeowners
- Stimulate private and public investment in the City
- Facilitate the resale of existing housing
- Strengthen the real estate industry

City Council has the final approval for all funds towards the FTBH program, and availability of assistance may vary from year to year.

This document provides a summary statement of Rules, Policies, and Procedures that will be used to implement this program. This information is intended to explain the City's FTBH program to interested parties, particularly to households who wish to become homeowners. This document may be modified at any time to ensure compliance with all applicable local, state, and federal regulation, particularly those imposed by the US Department of Housing and Urban Development (HUD).

The City of Mansfield will make public when assistance becomes available through notices required for the Annual Action Plan, and will be advertised on the City's website and posted in public locations throughout the City.

Program Requirements

The City of Mansfield intends to offer a First Time Homebuyer Program to qualifying households to assist with down payment and closing costs through forgiving loans with an affordability period of 5 years. The maximum investment per household is \$7,500.

Program eligibility is subject to income requirements, as well as other requirements imposed by private financing institutions.

First-Time Homebuyer Definitions

A First Time Homebuyer is defined as an individual or individuals and his or her spouse who have not owned a home during the three-year period prior to the purchase of a home with down payment assistance.

EXCEPTIONS to the definition-

- A displaced homemaker who, while a homemaker, owned a home with their spouse or resided in the home owned by the spouse. A displaced homemaker is an adult who has not, within the preceding year, worked on a full-time basis as a member of the labor force for a consecutive twelve-month period and who has been unemployed or underemployed, experiencing difficulty in obtaining or expanding employment, and worked primarily without compensation to care for their home and family
- A single parent who, while married, owned a home with their spouse or resided in a home owned by the spouse. A single parent is an individual who is unmarried or legally separated from a spouse and has one or more minor children for whom the individual has custody or joint custody or is pregnant.
- An individual or individuals who own or owned, as a principal residence during the three-year period before the purchase of a home with assistance, a dwelling unit whose structure is
 - Not permanently affixed to a permanent foundation in accordance with local or state regulations; or

- Not in compliance with state, local, or model building codes and cannot be brought into compliance with such codes for less than the cost of constructing a permanent structure.

Fair Housing

The City of Mansfield and participating lenders will not discriminate against any applicant of the FTHB Program in accordance with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, protected classes under the State of Ohio, and protected classes under the City of Mansfield ordinances. The City has certified to HUD that it will Affirmatively Further Fair Housing (AFFH) and take actions to overcome the effects of any impediments to fair housing.

Property Requirements

The City of Mansfield requires certain conditions of the property to be met, to be eligible for FTHB assistance. All properties must be in compliance with HUD Minimum Property standards as identified in 24 CFR 92.251 (c) (3) and may not violate 24CFR 5.703.

- The property must be located within Mansfield City limits.
- Eligible properties must be the purchaser's primary residence
- Homes purchased must be suitable for the size of household
- The property value may not exceed 95% of the area median purchase price for the type of housing. The value must be set in an appraisal by a qualified appraiser
- Eligible property types include-
 - Single Family Home
 - Condominium unit
 - Manufactured Home- *must be located on land that is owned by the manufactured housing unit owner, or land where the manufactured housing owner has a lease for at least the applicable affordability period*
- Purchased home must be on a permanent foundation
- Homes must be inspected to meet minimum HQS property requirements (this inspection does not substitute a professional home inspection)
- The property must pass a Lead Based Paint visual inspection
- Property must not be currently occupied by a tenant under a rental agreement. No persons should be displaced because of the sale or purchase of the home.

Applicant Requirements

- Applicants must meet current HOME income guidelines
- Applicants must be a first-time homebuyer as defined previously
- Applicants must be qualified through a lending institution
- Purchase may not be financed through a high-risk loan product
- Applicants must use the home as their primary/principal residence for five (5) years following assistance
- Applicants will be required to attend housing counseling classes, held by a HUD certified housing counselor/agency. The City of Mansfield will provide a list of currently eligible housing counseling agencies.

The City of Mansfield's Recapture/Resale Policy

Recapture

Recapture provisions established by The City of Mansfield follow guidance provided by HUD recapture requirements at 24 CFR Part 92.254 (a) (5) (ii). The HOME recapture provisions permit the original homebuyer to sell the HOME- assisted property to any willing buyer during the affordability period while enabling the City to recapture all of the HOME- assistance/subsidy directly provided to the homebuyer. Direct homebuyer subsidy includes down payment and any assistance that reduced the purchase price from Fair Market Value to an affordable price. The following provisions will be enforced for all HOME-assisted homebuyer units:

1. *First-Time Homebuyer Program*- The City of Mansfield's First-Time Homebuyer program provides down payment assistance (up to \$5,000.00). The recapture provision is enforced for the total loan amount during the affordability period and is reflected in recorded documents. The total amount of the down payment assistance is subject to the recapture provision upon sale of the home.
2. *HOME Developer Program*- Developer HOME-assisted units that are sold to a qualified homebuyer are subject to enforcement of the recapture provision when the original homebuyer receives either a subsidy created by a discounted sales price from the Fair Market Value and/or direct down payment assistance as offered through the City of Mansfield's First-Time Homebuyer Program.

The homebuyer shall sign a recorded deed restriction and/or any other documents by the City's legal counsel to ensure he/she understands the obligations and responsibilities upon sale of the HOME-assisted property. The affordability period is included in the deed restriction and the length of affordability is determined by the type of housing activity and the HOME assistance

per unit. Under recapture there is no requirement that the HOME- assisted homebuyer sell the unit to another low-income homebuyer.

Upon sale of the property, prior to satisfying the affordability period, the Recapture provision will be enforced as follows:

1. Owner investment returned first recapture. When the homeowner's mortgage lien has priority over the City's HOME loan lien, proceeds of the sale would pay the lien in full and any documented capital improvements and original down payment would be paid to the homeowner.
2. The HOME loan will be repaid based on the remaining net proceeds from the sale of the home. The amount recaptured cannot exceed the net proceeds. If there are no remaining net proceeds, the HOME loan will not be repaid to the City. The HOME loan will be forgiven.
3. Remaining net proceeds will be returned to the City on a Pro-Rata basis. The Homeowner will be given credit for time the unit remained affordable under the original provisions of the contract.
4. Upon receipt of recaptured HOME funds, if any, the affordability restrictions are lifted and HOME program requirements are no longer applicable.
5. Excess funds from the sale of the home will remain with the homeowner.
6. If the HOME- assisted unit is subject to foreclosure and no net proceeds from the sale of the property result, HOME program guidelines are met.
7. Upon satisfaction of the affordability period, the HOME loan may then be forgiven and the affordability deed restriction is released and any other recorded documents are discharged. The owner of the property is then eligible to sell the property at a Fair Market price.

Resale

The Resale option established by The City of Mansfield follows guidance provided by HUD resale regulations at 24 CFR Part 92.254 (a) (5) (i) and is enforced under the following circumstance:

1. Developer HOME-assisted units to be sold to a qualified homebuyer are subject to enforcement of resale provisions when the qualified homebuyer has not received any direct HOME subsidy,

If HOME assistance was only used to develop the unit, and the unit is sold at Fair Market Value, the resale provision(s) must be used.

The Resale provision ensures that the HOME-assisted property remains affordable for the entire affordability period which is enforced by an affordability deed restriction. Should the current homeowner desire to sell the property during the affordability period, the resale provision states:

1. The property must be sold as a principal residence to another low-income qualified homebuyer approved by the City. The City's approval of a new homebuyer ensures that the property remains affordable to income-qualified buyers for the entire affordability period.

In addition, the following Resale provisions apply:

2. The homebuyer received fair return on investment.
3. The property is sold at an affordable price for qualified low-income buyers.

Qualified Homebuyers should meet all of the following criteria:

1. Must be using the property as a primary residence;
2. Mortgage payments including taxes and insurance should not exceed 40% of the applicants gross income;
3. Qualified applicants will be at or below 80% of area median income.

Fair Return on Investment

Fair return on investment for Resale properties will be determined taking into account original purchase price, any down payment the homeowner had on the property, plus capital improvements for which the homeowner has proof of cost. The Federal Housing Finance Agencies Housing Price Index calculator will be used to determine average appreciation if the home has maintained its condition. <https://www.fhfa.gov/DataTools/Tools/Pages/HPI-Calculator.aspx>

Fair resale price will be determined based on the lower of these two calculations.

*If an appraisal was completed at the time of original sale, and a new appraisal will be completed upon resale, an appraisal can be used to determine appropriate resale price for fair return on investment.

At the end of the affordability period, and at the request of the homeowner, the HOME loan may be forgiven and the affordability deed restriction will be released and any other recorded documents will be discharged. Prior to forgiving the HOME loan and releasing/discharging the recorded documents, and in accordance with the provisions of the HOME Loan Agreement, the City of Mansfield may elect to enforce an additional affordability period in order to maintain the property in the City of Mansfield's affordable housing inventory.

The Recapture and Resale provisions pertain to the homebuyer of the HOME- assisted property only. The developer will be responsible for providing the City with documentation regarding the qualified new homebuyer for City approval, prior to execution of final sale of a HOME- assisted property. Resale/ Recapture provisions will be included in each written agreement, for each HOME- assisted property.

The following Resale provisions will be enforced for all HOME-assisted rental units:

1. Rental properties assisted with HOME funds must remain affordable for the entire length of the affordability period. This provision is enforced with a deed restriction placed on the property. If the property is sold prior to satisfying the affordability period, the affordability period remains.
2. At the end of the affordability period, and at the request of the property owner, the HOME loan may be forgiven and the affordability deed restriction will be released and any other recorded documents will be discharged.

Monitoring

Monitoring of Homebuyer units will be completed yearly by the City of Mansfield via “do not forward” letters. These letters will be sent on or about March 31 of each fiscal year, requiring the homeowner to make contact with the Community Development Department at the City of Mansfield. Additional verification for proof of residence may be required.

Property Requirements

Property Standards

Before occupancy, housing that is constructed or rehabilitated with HOME funds must meet all applicable local codes, rehabilitation standards, ordinances, and zoning ordinances in existence at the time of project completion. [24 CFR Part 92.251]

The housing must meet the accessibility requirements in the regulations referenced in 24 CFR Part 5.105 (a) and Part 8 which implement the Fair Housing Act and Section 504 of the Rehabilitation Act of 1973.

In addition, projects receiving HOME funding are subject to lead-based paint hazard reduction regulations promulgated pursuant to sections 1012 and 1013 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 and appearing within title 24 of the Code of Federal Regulations as part 35 (24 CFR Part 35).

Other Federal Rules

The following subjects are of importance in assessing possible use of HOME funds. HOME and HUD regulation references have been provided for more complete information.

Religious Organizations [24 CFR Part 92.257]

Additional HUD program information is available at 24 CFR part 5.109 and Part 92.257.

1. Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to participate in the HOME program. Neither the federal government nor a state or local government receiving funds under HOME programs

shall discriminate against an organization on the basis of the organization's religious character or affiliation.

2. Organizations that are directly funded under the HOME program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization, as part of the assistance funded under this part. If an organization conducts such activities, the activities must be offered separately, in time or location, from the assistance funded under this part, and the participation must be voluntary for the beneficiaries of the assistance provided.
3. A religious organization that participates in the HOME program will retain its independence from federal, state, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that it does not use direct HOME funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities, without removing religious art, icons, scriptures, or other religious symbols. In addition, a HOME-funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious bases, and include religious references in its organization's mission statements and other governing documents.
4. An organization that participates in the HOME program shall not, in providing program assistance, discriminate against a program beneficiary or prospective program beneficiary on the basis of religion or religious belief.
5. HOME funds may not be used for the acquisition, construction or rehabilitation of structures to the extent that those structures are used for inherently religious activities. HOME funds may be used for the acquisition, construction or rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under this part. Where a structure is used for both eligible and inherently religious activities, HOME funds may not exceed the cost of those portions of the acquisition, construction, or rehabilitation that are attributable to eligible activities in accordance with cost accounting requirements applicable to HOME funds in this part. Sanctuaries, chapels, or other rooms that a HOME-funded religious congregation uses as its principal place of worship, however, are ineligible for HOME-funded improvement. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition (24 CFR Parts 84 and 85).
6. If a state or local government voluntarily contributes its own funds to supplement federally funded activities, the state or local government has the option to segregate the federal funds or commingle them. However, if the funds are commingled, this section applies to all of the commingled funds.

Equal Opportunity and Fair Housing [24 CFR Part 92.350]/ Affirmative Marketing [24 CFR Part 92.351]

All funded applicants will be required to have a written EEO and Fair Housing policy, as well as affirmative marketing plans.

Affirmative Marketing (24 CFR Part 92.351)

Listed below is information that is primarily focused on the affirmative marketing plan. Refer to the regulation for complete information regarding the affirmative marketing process.

1. The affirmative marketing plan shall provide the following information:
 - a. The name and address of the project;
 - b. The number of units, including the number of sales and/or rental units;
 - c. The price of sales and/or rental units;
 - d. The name of the sales agent and /or rental manager;
 - e. A description of the selection method that will be used to select occupants of affordable housing;
 - f. Disclosure of required application fees.
2. The affirmative marketing plan shall describe the methods to be used in advertising and publicizing the availability of housing. In developing the plan, the administrative agent shall consider the use of language translations. The plan shall include the following:
 - a. The names of newspapers of general circulation within the housing region;
 - b. The names of specific radio and television stations broadcasting throughout the housing region;
 - c. The names of other publications circulated within the housing region, such as religious publications and organizational newsletters;
 - d. The names of employers throughout the housing region that will be contacted to post advertisements and distribute flyers regarding available affordable housing;
 - e. The names of specific community and regional organizations that will aid in soliciting low and moderate income applicants. Such organizations may include non-profit, religious, governmental, fraternal, civic, and other organizations; and
 - f. Other advertising outreach efforts to groups that is least likely to be reached by commercial media efforts.
3. The affirmative marketing process for available affordable units shall begin at least two (2) months prior to expected occupancy. In implementing the marketing program, the administrative agent shall undertake all of the following strategies, unless otherwise approved by the City of Mansfield:
 - a. Publication of one advertisement in a newspaper;
 - b. Broadcast of one advertisement by a radio or television station;
 - c. At least one additional regional marketing strategy using one of the sources listed above.

Displacement/Relocation [24 CFR Part 92.353]

All reasonable steps should be taken to minimize the displacement of persons, businesses and organizations as a result of a project assisted with HOME funds. City policy prohibits assisting housing activities anticipated to result in permanent, involuntary displacement. Temporary relocation is an eligible HOME project cost when undertaken as required by the regulations.

Labor [24 CFR 92.354]

All HOME-funded projects consisting of twelve (12) or more HOME-assisted units must comply with Federal Labor Standards and Davis-Bacon Act prevailing wages for the area.

Lead-Based Paint [24 CFR Part 92.355]

Testing of lead-based paint is required for all HOME assisted activities. Lead-based paint hazards abatement is required if the HOME investment is equal to or greater than \$25,000.00.

Flood Insurance

The Flood Disaster Protection Act of 1973 (42 U.S.C. 4012a) requires that projects receiving federal assistance and located in an area identified by the Federal Emergency Management Agency (FEMA) as being within a Special Flood Hazard Area (SFHA) be covered by flood insurance under the National Flood Insurance Program (NFIP).

Community Housing Development Organizations (CHDOs)

A CHDO is a specific type of non-profit organization that is unique to the HOME program as defined at 24 CFR Part 92.2 of the HOME Final Rule. Many non-profit organizations may share common characteristics with CHDOs, however, not all non-profits qualify as CHDOs under the HOME program.

Only non-profit organizations that have been qualified and certified by The City of Mansfield as CHDOs can receive funds from the City of Mansfield's fifteen percent (15%) set-aside requirement to fund activities developed, owned or sponsored by CHDOs. The City must re-qualify an organization as a CHDO each time the CHDO receives additional HOME funds. Detailed definition of the CHDO roles can be found in HUD HOME regulation 24 CFR Part 92.300.

A CHDO that serves as a developer of rental housing must be in sole charge of all aspects of the development of the property, and must own the housing during development and throughout the affordability period [24 CFR Part 92.300 (a)(3)].

To qualify for the selection priority set for CHDOs, or to be considered for a special project start-up loan, an organization must meet the definition of CHDO described in the regulations under 24 CFR Part 92.2 and Part 92.3 (a). All types of assistance available to CHDOs are subject to approval by the City of Mansfield.

Project Start-Up Loans

No more than ten percent (10%) of the funds committed to CHDOs for ready-to-go projects can be available for project start-up loans. Therefore, start-up activities will be considered only if:

1. There is adequate funding available after other projects are selected; and
2. The project proposed for start-up funding will meet a priority stated in the selection criteria; and
3. There are no other resources available for the requested start-up expenses.

There are two types of project-specific loans: technical assistance and site control loans, and seed money loans. The loans are further described below.

Project-Specific Technical Assistance and Site Control Loans

Loans to assess feasibility and gain site control for a specific project may cover the following expenses: initial feasibility study, consulting fees, cost of preliminary applications, legal fees, property, site control and title clearance. General operating expenses of the CHDO are not allowable costs. [24 CFR Part 92.301 (a) (2)]

Project-Specific Seed Money Loans

Loans to cover customary and reasonable pre-construction costs for a specific project may include: cost of obtaining firm construction loan commitments, architectural plans, and specifications, zoning approvals, engineering studies and legal fees. To be eligible for this type of loan, the CHDO must have site control, a preliminary financial commitment and a capable development team. [24 CFR Part 92.301 (b)(1) and Part 92.301 (b) (2)]

Repayment

Project start-up and seed money loans must be repaid to the HOME Program from construction loan proceeds or other project income and terms will be determined on an individual project basis. [24 CFR Part 92.301 (3)]

APPLICANT/PROJECT SELECTION CRITERIA AND PRIORITIES

The following criteria and priorities will be applied to determine selection of applicants and projects:

General Criteria

The application is complete and the proposed project, as described in the application, clearly meets all HOME Program requirements; and

The proposed project is clearly financially feasible and the proposal does not request more HOME funding than necessary to create non-luxury housing that is affordable to very low and low-income households; and

The proposal clearly demonstrates that the project will be ready for a HOME funding commitment and can be completed within the timing requirements for the program year; and

The proposal has received a municipal acknowledgement; and

Based on the experience demonstrated in the proposal and a track record of successful similar accomplishments, the applicant has the capacity to assure:

- Project development (design, financial packaging, construction) in accordance with program requirements; and
- Long term property management and maintenance; and on-going control over occupancy for rental properties; or
- Compliance with the Fair Housing Act.

Rental housing projects will be selected to fulfill the income benefit requirements:

- For initial rent-up, ninety percent (90%) of funded units will assist households within eighty percent (80%) of area median income as published by HUD.
- For the life of the project twenty percent (20%) of rental units funded will be occupied by households at or below fifty percent (50%) of area median income as published by HUD.

Projects that will result in permanent displacement of any family, individual, business, non-profit organization or farm, or their personal property, from that property **will not** be selected for funding.

Priorities

Priorities may be amended from time to time to reflect the City of Mansfield's housing objectives and goals, however, the following priorities are generally in effect:

Priority will be given to viable projects to be developed, sponsored, or owned by Community Housing Development Organizations (CHDOs) with demonstrated capacity and fiscal soundness.

Priority will be given to viable projects developed, sponsored or owned by public or private non-profit organizations.

Priority will be given to projects that provide housing and, where appropriate, supportive services or physical accommodations for very low-income renters who are:

- Large families with children (3+ bedroom units)
- Persons with special needs (handicapped modified property)

- Frail elderly (modified property, supportive services), or
- Families that are homeless (supportive services)

Priority will be given to properties that are vacant at the time the application is submitted or where assistance will not necessitate relocation.

Priority will be given to projects most ready to start; and that create new (additional) affordable housing units; and for which the developer has site control.

Notwithstanding the above, any qualified project that is coupled with, or otherwise brings in, a HOME-matching contribution will be selected for funding before projects with no associated matching contribution.

“MATCH” Contribution

The City of Mansfield, as a participating jurisdiction, is required under the HOME regulations to provide “match” contributions to HOME funds. “Match” contributions are typically equal to twenty-five percent (25%) of HOME funds expended for projects. The City of Mansfield is currently under a “Match” waiver through HUD and is required to provide zero percent (0%) match dollars, subject to change at any time by HUD. The City may take credit for “match” contributions obtained through projects assisted by the City of Mansfield’s HOME Program or through other housing projects that comply with the HOME Program’s definitions for affordability. Priority will be given to proposals that carry eligible “match” contributions. Refer to 24 CFR Part 92.220 for additional matching contribution details.

FORMS OF CONTRIBUTION

Eligible:

1. Cash contributions from non-federal sources, funds must be contributed permanently to the City’s HOME program;
2. Grant equivalent of below- market interest rate loan to project not repayable to the County;
3. Foreboreance of fees- state and local taxes, charges or fees, waiver or abatement of taxes, charges or fees customarily imposed by public or private institutions associated with the ownership, transfer or development of real estate;
4. Appraised value of donated land or real property; appraisal prior to development minus debt burden, lien, or other encumbrance(s);
5. On-site and off-site infrastructure improvements required for HOME-assisted project and completed no earlier than twelve (12) months before HOME funds are committed to the project;

6. A portion of loans made from proceeds from multi-family affordable housing and single-family project bond financing validly issued by a state or local government and;
7. The reasonable value (or rental value) of donated site-preparation, and construction materials;
8. Value of donated or voluntary labor or professional services;
9. "Sweat" equity provided to a homeownership project;
10. Direct costs of supportive services (required to facilitate independent living or as part of a self-sufficiency program) to families residing in HOME-assisted units; and
11. Direct cost of homebuyer counseling services provided to families that acquire properties with HOME funds.

Ineligible:

1. Funds or resources derived from any federal sources;
2. Interest rate subsidy attributable to federal tax-exemption on financing or value attributed to Federal tax credits;
3. Owner equity or investment in a project; and
4. Cash or other forms of contributions from applicants for, or recipients of HOME assistance or contracts, or investors who own, are working on, or are proposing to apply for, assistance for a HOME-assisted project.

DEFINITION OF COMMUNITY HOUSING DEVELOPMENT ORGANIZATIONS (CHDOS)

A CHDO is a private non-profit, community-based, service organization that has, or plans to have, staff with the ability and capacity to develop affordable housing for the community it serves.

Additional information and regulations affecting CHDO's can be found in 24 CFR Subpart G-Community Housing Development Organizations.

CHDO set-aside HOME funds must be expended within five (5) years of the City's fund allocation. [24 CFR Part 92.500 (d)(i) and (iii)]

Legal Status

- Must be organized and certified by the City of Mansfield. Recertification is required upon application of a new project using HOME CHDO funds.
- No individual benefit: No part of a CHDO's earnings (profits) may benefit any member, founder, contributor, or individual.
- Non-profit status: CHDO must have a tax exemption ruling from the Internal Revenue Service (IRS) under Section 501 (c) (3) or (4) or Section 905 status of the Internal Revenue Code of 1986.
 - The HOME requirement for a 501 (c) tax exemption ruling can be fulfilled by having either a conditional or final designation from the IRS
 - Organizations that have applied for, but not yet received their conditional or final 501 (c) designation, do not meet this requirement.
- Purpose of organization: A provision of decent housing that is affordable to low- and moderate- income persons must be one of the purposes stated in the charter, articles of incorporation, by-laws or resolutions.
- Clearly defined service area: CHDOs need not represent a single neighborhood. Geographic areas vary slightly for urban and rural area CHDOs. In addition to serving a defined service area, the non-profit organization must also meet the other requirements of being a CHDO.
 - For urban areas: a service area "community" includes a neighborhood(s), city, county or metropolitan area.
 - For rural areas: a service area "community" includes a neighborhood(s), city, village, county or multi-county area (but not the entire State).

Organizational Structure

In order for a CHDO to respond to a community's needs, the CHDO must create a board of directors that will provide community control over the CHDO. The governing board composition must be as follows:

- **Low-income community representation:** At least one-third (1/3) of the board must include representatives of the low-income community (where fifty-one percent (51%) or more of neighborhood residents are low-income)
Representatives may include:
 - Residents of low-income neighborhoods in the community; and/or
 - Low-income residents of the community; and/or
 - Elected representatives of low-income neighborhood organizations (i.e., civic associations, church groups, block groups, etc.)
- **Public-sector limits:** No more than one-third (1/3) of the board may be representatives of the public sector. The public section includes individuals who are elected or appointed public officials of the County or State, public employees of the County or State and individuals appointed by a public official. Board members appointed by public officials cannot select other members of the board.
- **Remaining representation:** The remaining balance of the board is unrestricted and may include human and social service providers, lenders, individuals with philanthropic resources/connections or individuals with professional expertise.
- **Low-income input:** The CHDO must provide a formal process for low-income program beneficiaries to advise the organization on design, location of site, development and management of affordable housing.

Relationship to Public Bodies or Instrumentalities

CHDO's may not be public bodies or instrumentalities of public bodies. Examples of instrumentalities of public bodies include public housing authorities (PHAs), redevelopment authorities, and downtown development authorities.

Sponsored CHDOs

- Additional requirements and board limitations may apply to CHDOs that are sponsored by other non-profit organizations, charities, religious organizations, for-profit corporations, and government entities.
- Local or State government cannot qualify as a CHDO, but may sponsor or charter the creation (file papers of incorporation for) of CHDOs.

- NOTE: Government sponsored/ chartered non-profits that wish to be considered CHDOs are subject to all the other rules for CHDOs including the restrictions on the composition of the board.

Relationship to For-Profit Entities

- CHDOs may not be controlled by, or under the direction of, for-profit individuals or entities seeking profit from the organization.
- CHDOs maybe sponsored or organized by a for-profit if:
 - The primary purpose of the for-profit is not development or management of housing; a builder, developer, or real estate management firm may not spin off a CHDO;
 - The for-profit entity appoints no more than one-third (1/3) of the CHDOs governing board and the board members appointed by the for-profit do not appoint the remaining two-thirds (2/3) of board members; and
 - The CHDO is free to contract for goods and services from any vendor(s) it selects.
- Officers or employees of the parent organization are prohibited from serving as officers or employees of the CHDO.

Capacity, Experience and Fiscal Soundness

- **CHDO Capacity:** Demonstrated capacity to carry out HOME-assisted activities either with:
 - Experiences “CHDO key staff” who have successfully demonstrated development experience in projects of the same size, scope and level of complexity as the activities for which HOME funds are being requested; or
 - Inexperienced “CHDO key staff” but will utilize contracted individuals or consulting firms who have planning and development experience similar to projects being assisted with HOME funds and can train CHDO key staff.
 - “Key CHDO staff” may either be a full-time or part-time employee or a contracted employee. Key staff cannot include municipal, county or state employees or consultants who will not train CHDO key staff.
 - NOTE: HUD defines “CHDO key staff” as paid employees who are responsible for day-to-day operations of the CHDO. Staff does not include volunteers, board members, or consultants. Exception: Consultants may be utilized during the first year as a CHDO only to demonstrate capacity.
- **CHDO Experience:** Has a history of serving the community within which housing to be assisted with HOME funds is to be located. **A CHDO must be able to show one (1) year of experience serving the community prior to the date the CHDO receives HOME funds.** The year of service does not have to be directly related to housing.

- Newly created CHDOs formed by local churches, service organizations, or neighborhood groups can show service to the community if the parent organization has provided service to the community for at least one (1) year.
- Fiscal Soundness and Financial Standards: Conforms to the financial accountability standards of 24 CFR part 84.21 “Standards for Financial Management Systems”.
 - Must demonstrate financial stability confirming stable and adequate funding for operations.
 - Sufficient capital to sustain the CHDO’s housing efforts and operating needs is required.
 - Demonstrate compliance with past and current performance.
 - Financial soundness, good business planning, strong market/customer knowledge, technical expertise and strong leadership and staffing are critical to a CHDO’s capacity to undertake and complete projects within twelve (12) months of the executed HOME Agreement.

HOME-ARP

The City of Mansfield, Ohio



HOME-ARP Allocation Plan

December, 2022

Prepared with the assistance of



Amended 12.10.25 Due to HUD funding adjustment

1

Annual Action Plan
2026

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HOME-ARP Allocation Plan Template with Guidance

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

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

Consultation

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

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

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

Template:

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

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

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

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

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

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

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

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

List the organizations consulted:

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

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

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

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

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

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

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

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

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

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

Public Participation

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

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

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

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

Template:

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

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

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

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

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

Order Confirmation for Ad #: 005503478



Customer: CITY OF MANSFIELD - COMM DEV
Address: 30 N DIAMOND ST
 MANSFIELD OH 44902 USA
Acct. #: MCO-M5516
Phone: 419950793
EMail:
Payor: CITY OF MANSFIELD - COMM DEV
Ordered By: Adrian Ackerman

Order Start Date: 12/01/2022 Order End Date: 12/01/2022 PO #

Day Sheet	Alt Sheet	Print Run	Promo Type	Material	Special Pricing
10	1				

Net Amount	Tax Amount	Total Amount	Payment Method	Payment Amount	Amount Due
\$100.25	\$0.00	\$100.25	Invoice	\$0.00	\$100.25

Alt Order Notes:
Sales Rep: 0111111111 Order Taken: 12/01/2022

Product	# Ins	Start Date	End Date	Placement	Position
MCO-Mun-Mansfield News Journal	1	12/01/2022	12/01/2022	MCO-Legals	Legal Notices
MCO-Mun-Mansfield Online	1	12/01/2022	12/01/2022	MCO-Legals	Legal Notices

Describe the public participation process:

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

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

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

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

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

Describe efforts to broaden public participation:

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

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

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

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

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

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

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

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

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

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

Needs Assessment and Gaps Analysis

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

Table 2: Homeless Needs Inventory and Gap Analysis Table

Homeless											
	Current Inventory			Homeless Population				Gap (Surplus) Analysis			
	Family		Adult	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of beds	# of units	# of beds					# of beds	# of units	# of beds	# of units
Emergency Shelter ¹	40	12	40								
Transitional Housing											
Rapid Rehousing ¹	6	2	25								
Permanent Supportive Housing ³	40	20	69								
Total emergency and transitional housing	40	12	40								
Total Long-term housing with supportive services ¹	46	22	94								
Total Numbers ^{2,3}				3	49	1 ⁴	9 ³				
Number in emergency shelter ²				58							
Number in transitional housing ²				0							
Number unsheltered ²				9							
Current Gap											
Temporary housing, including emergency shelter, transitional housing, and rapid rehousing options								(7) ⁵	(9)	9 ⁵	8 ⁵
Permanent supportive housing options ⁶								7 ⁵	3	49	41 ⁵

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

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

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

⁴ This is a double count of persons already counted in the other categories.

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

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

Table 3: Housing Needs Inventory and Gap Analysis Table

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

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

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

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

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

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

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

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

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

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

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

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

Homeless as defined in 24 CFR 91.5

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

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

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

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

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

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

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

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

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

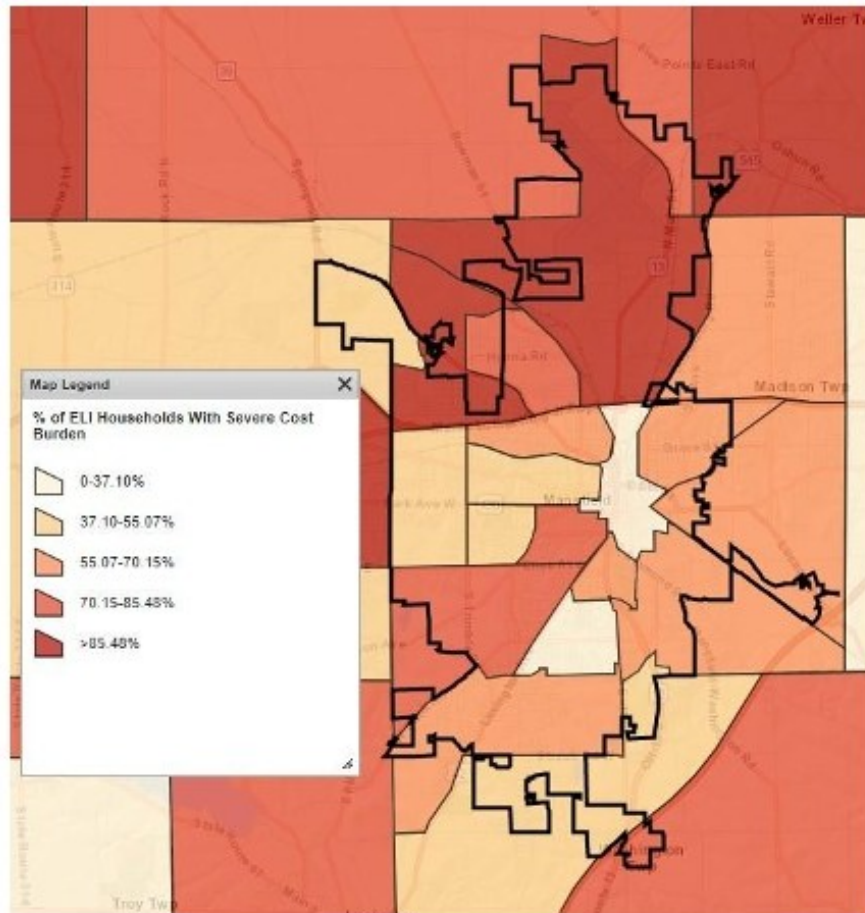
Cost Burden > 50%

Data: 2009-2013 CHAS
Source:

Table 6: Current 2022 Income Limits for Richland County

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

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



At Risk of Homelessness as defined in 24 CFR 91.5

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

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

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

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

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

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

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

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

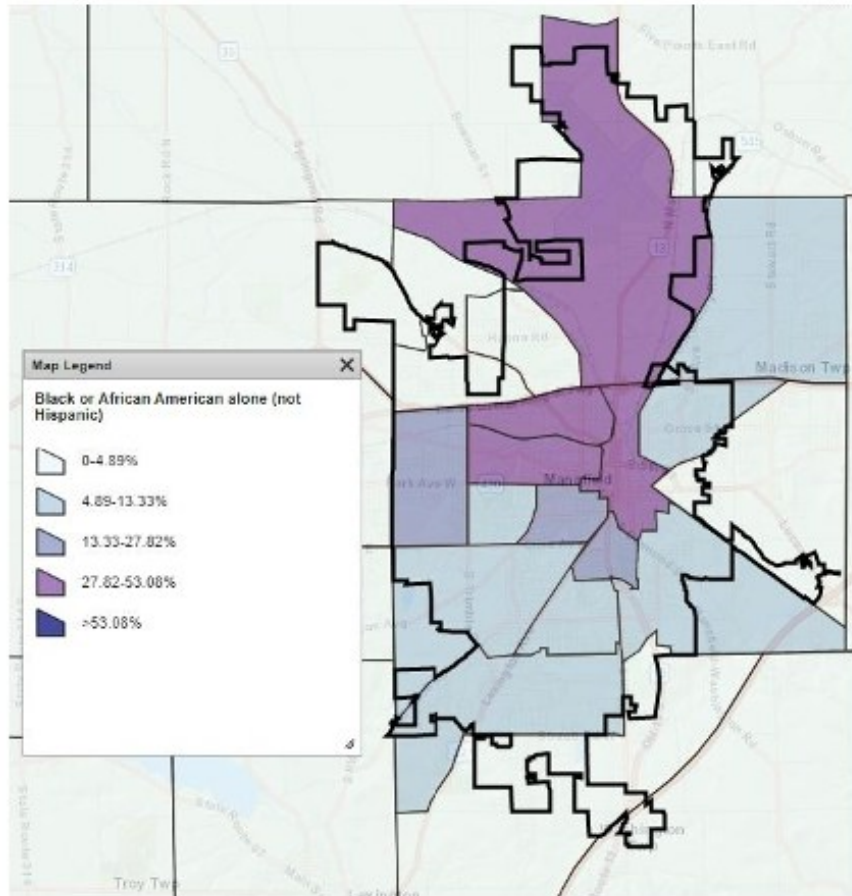
percentage of persons with severe housing problems be at least 10 percentage points higher than the percentage of persons in the racial/ethnic category as a whole. Therefore, this is not considered to be a statistically significant disproportionate impact.

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

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

Data is from the Ohio BOSCO – 2018 Quarterly Performance Report

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



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

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

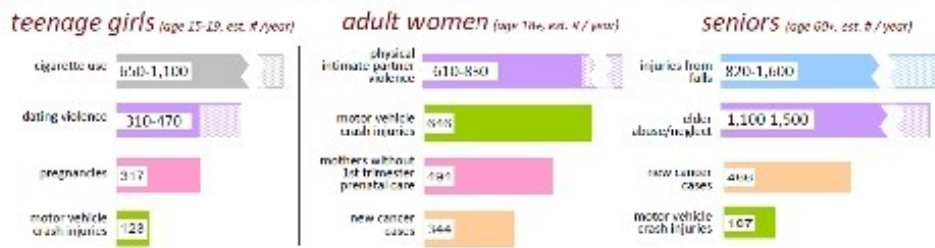
seniors. Therefore, housing needs are likely greater than the 73 adults seeking shelter annually.

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

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

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

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



* For example, each year in our county between 610 and 850 adult women experience physical intimate partner violence; in comparison, 646 adult women are injured in motor vehicle crashes.

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

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

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

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

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

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

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

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

- Annual income \leq 30% of area median income and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
- OR
- Annual income \leq 50% of area median income and meets one of the conditions of "At risk of homelessness".

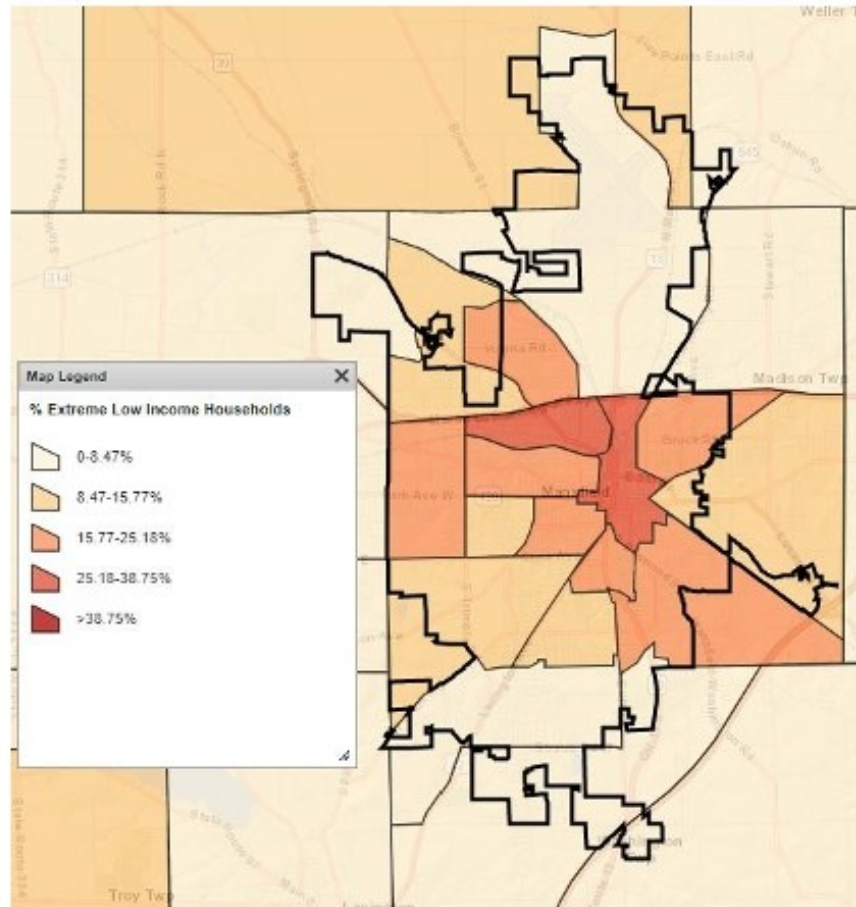
As identified in the City of Mansfield's current Consolidated Plan, there are 2,765 households in the City of Mansfield that are in the extremely low- income category. According to the HUD 2015 to 2019 Comprehensive Housing Affordability Strategy (CHAS) Data (the most recent available), 1,865 (67.5%)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

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

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

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

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



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

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

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

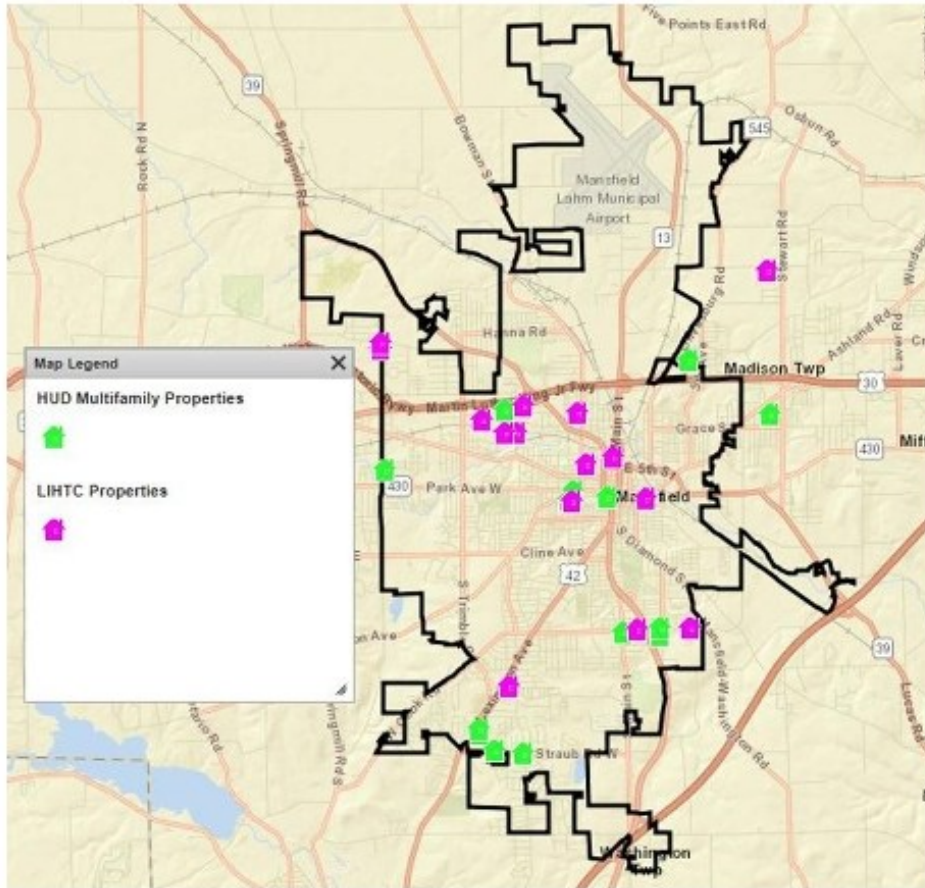
Several organizations provide services to these populations, and there are a variety of affordable and supportive housing resources. For further details on these organizations and the services that they provide, refer to the “Consultation” section of this Allocation Plan.

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

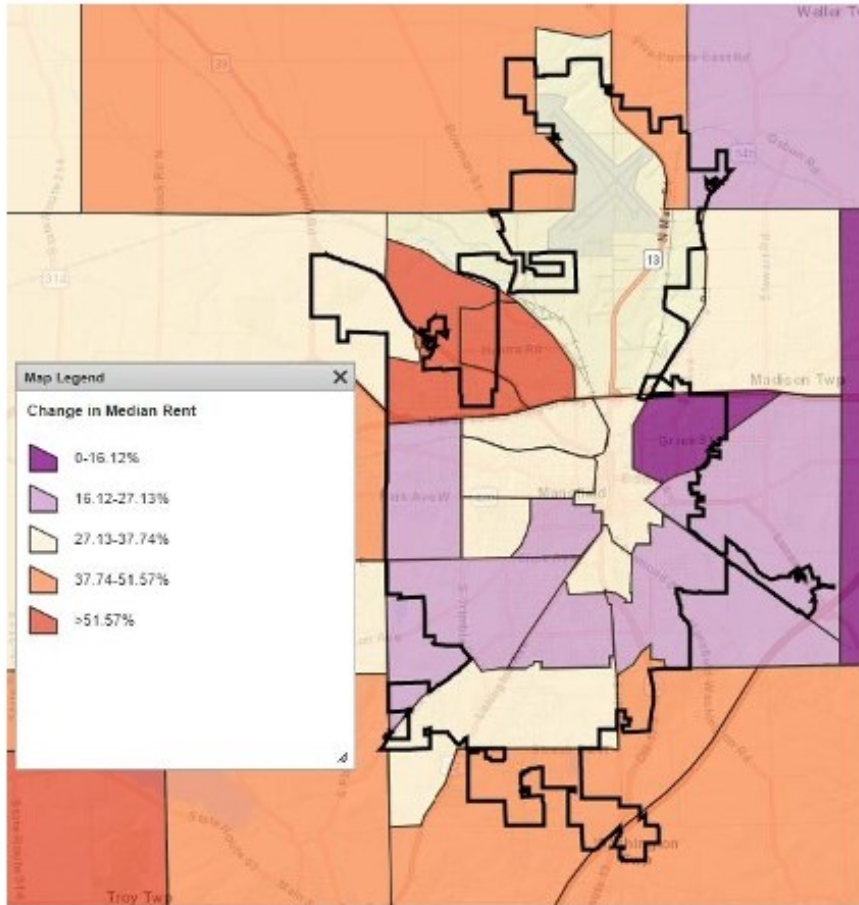
Table 9: Average length of stay in shelters.

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

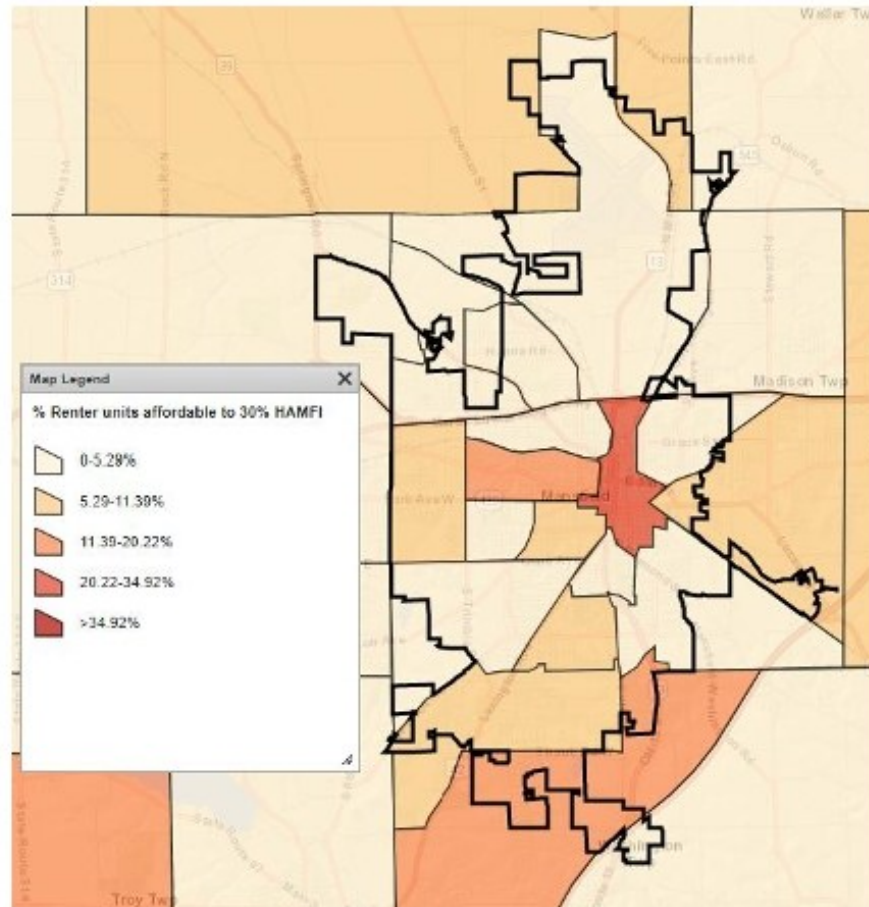
Map 4: LIHTC and HUD Multi Family Properties within the City of Mansfield



Map 5: Change in median rents across the City



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



Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

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

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

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

At Risk of Homelessness as defined in 24 CFR 91.5

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

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

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

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

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

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

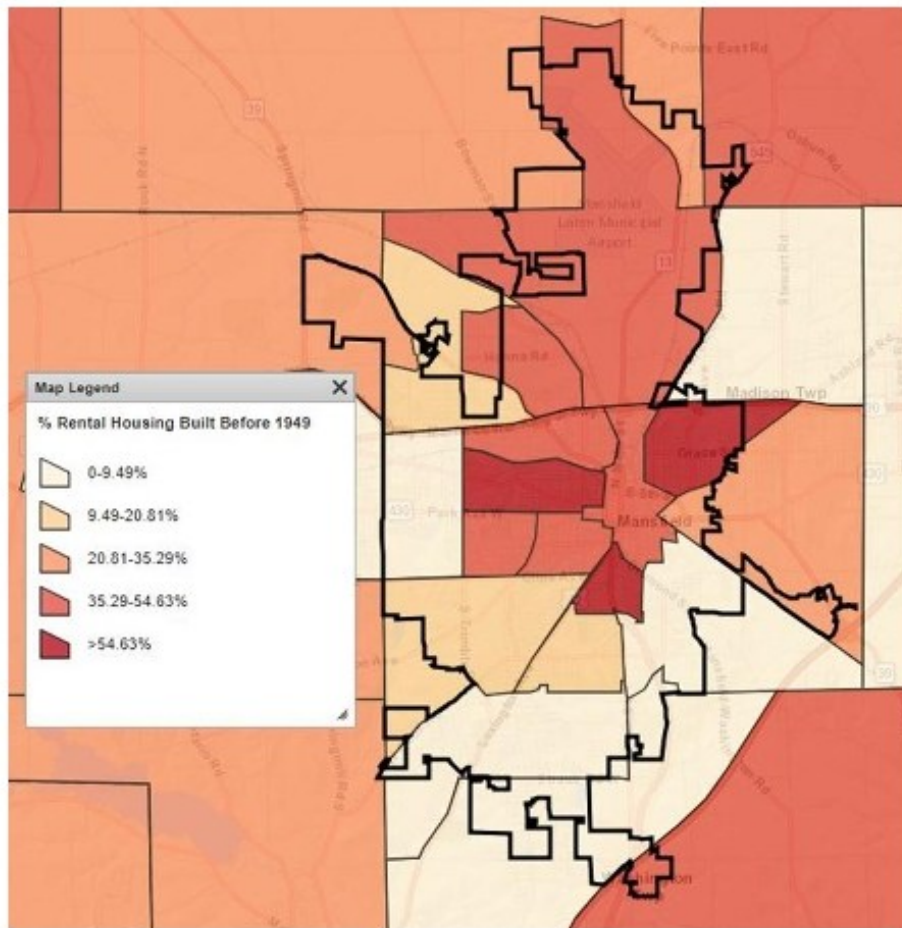
The needs of this group largely mirror the needs identified under "at risk of homelessness". As shown on Table 2, there is an identified gap of 3 supportive housing units (7 beds) for families, and 41 housing units (49 beds) for adults only. As described in the narrative under homelessness, moving some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

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

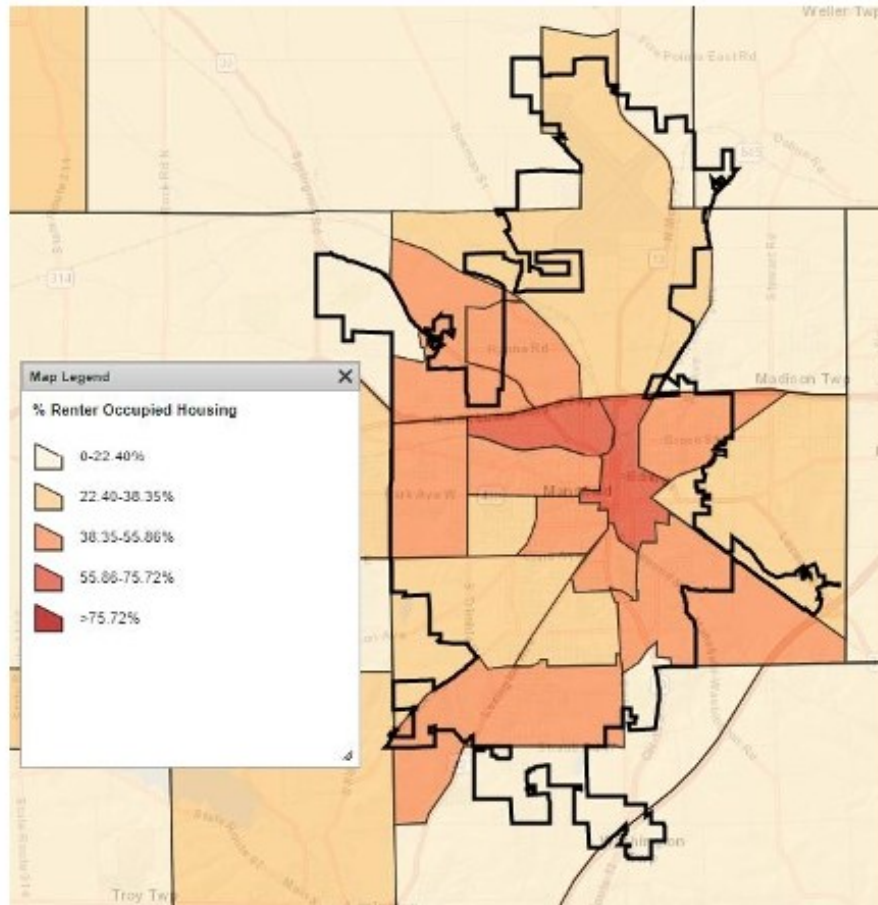
geographic part of the City. In addition, because much of the affordable housing stock is older (see map 7), the condition of the units also becomes an issue.

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

Map 7: Geographic dispersion of older rental units



Map 8: Concentration of renter occupied housing



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

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

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

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

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

N/A

Identify priority needs for qualifying populations:

The priority needs identified by the City are as follows:

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

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

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

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

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

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

HOME-ARP Activities

Template:

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

In both cases, a competitive process will be followed:

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

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

Describe whether the PJ will administer eligible activities directly:

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

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

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

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

Table 11: Use of HOME-ARP Funding

Activity Name	Anticipated Outcomes and Budget	Activity Description	Who will be Responsible to Administer Activity?	How will Organization Conducting Activity be Selected?	Eligible Population, Preferences ²
Development of Affordable Rental Housing	12 units of permanent supportive housing ¹ \$650,000	Creation of additional housing units affordable to ELI HH, tied to services needed by tenants. Units and services may, or may not, meet formal HUD definition of PSH, but will be matched to identified needs within the City. HOME-ARP funds will be leveraged & not more than 20% of the total funding.	Organizations with capacity to develop and manage permanent supportive housing	Through a competitive RFP outlining the goals for the activity, the regulations governing it, the eligible population and allowable preferences, the submission requirements, the scoring criteria, and other activity elements.	ELI households, all Qualifying Populations (QPs) No preferences.
Supportive Services	120 people assisted —\$150,000 \$151,204.00	Supportive services in three groupings: <ul style="list-style-type: none"> One portion geared to meeting the needs of the homeless and domestic violence populations, and tied to the Non-Profit Capacity Building Activity. Includes supportive services such as housing search and placement, counseling, case management, and other services needed to support individuals and families seeking to stabilize their housing. The other portion to be tied to the proposed City affordable housing project(s), and geared to the needs of their respective tenants. Includes supportive services such as counseling, job placement assistance, transportation, case management, and other services needed to support households living in assisted housing units. 	Organizations with capacity to provide and manage needed supportive services	Through a competitive RFP outlining goals for the activity, regulations governing it, eligible population and allowable preferences, submission requirements, scoring criteria, and other activity elements.	ELI households, all QPs Preferences: \$75,000 for QP 1 and 3; \$75,000 tied to projects for all QPs (see note ³)

Activity Name	Anticipated Outcomes and Budget	Activity Description	Who will be Responsible to Administer Activity?	How will Organization Conducting Activity be Selected?	Eligible Population, Preferences ²
Non-Profit Capacity Building	n/a \$52,665	Develop the capacity of a local service provider to conduct case management, and to assist individuals and households with needs related to stabilization and housing. This would be an extension of a pilot project conducted by the City to identify and assist unsheltered homeless by conducting frequent outreach. These funds would pay for up to 50% of the salary of a case worker to provide services to the qualifying populations, up to the amount allocated.	Organizations seeking to further develop capacity to provide and manage needed supportive services	Through a competitive RFP outlining the goals for the activity, the regulations governing it, the population to be assisted, the submission requirements, the scoring criteria, and other activity elements. The qualifying service provider will need to provide a plan for continuing to provide case management for the qualifying populations, once grant funds are exhausted.	n/a
Non-Profit Operating	n/a \$50,000	Provide non-profit operating support for one or more local agencies to provide staffing at coordinated entry points.	Organizations willing and able to provide staffing for coordinated entry points.	Through a competitive RFP outlining the goals for the activity, the regulations governing it, the population to be assisted, the submission requirements, the scoring criteria, and other activity elements. The qualifying service provider will need to provide a plan for continuing to provide staffing for coordinated entry points for the qualifying populations, once grant funds are exhausted.	n/a
City of Mansfield Administration	n/a \$159,293	Admin., planning, program/ project oversight, closeout, & monitoring.	City Staff	n/a	n/a

Activity Name	Anticipated Outcomes and Budget	Activity Description	Who will be Responsible to Administer Activity?	How will Organization Conducting Activity be Selected?	Eligible Population, Preferences ²
Total:	\$1,061,958 \$1,063,162.00				

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

² Qualifying Populations (QP)s are as follows:

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

³ It is anticipated that supportive services funding will be split, with \$75,000 as a preference to those that are homeless, victims of domestic violence, and/or in shelters (QP1 and 2), and \$75,000 supporting those living in the housing being developed, with no preferences.

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

Template:

Use of HOME-ARP Funding

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

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

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

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

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

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

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

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

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

HOME-ARP Production Housing Goals

Template

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

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

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

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

Preferences

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

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

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

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

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

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

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

Template:

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

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

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

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

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

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

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

Referral Methods

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

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

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

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

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

Template:

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

N/A

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

N/A

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

N/A

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

N/A

Limitations in a HOME-ARP rental housing or NCS project

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

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

Template

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

N/A

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in *the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:*

N/A

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

N/A

HOME-ARP Refinancing Guidelines

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

- **Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity**
N/A
- **Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.**
N/A
- **State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.**
N/A
- **Specify the required compliance period, whether it is the minimum 15 years or longer.**
N/A
- **State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.**
N/A
- **Other requirements in the PJ's guidelines, if applicable:**
N/A