

Executive Summary

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

1. Introduction

The Consolidated Plan is an assessment of the City of Canton's housing and community development needs that helps determine how the City will expend funding from various HUD Programs, including the Community Development Block Grant (CDBG) Program, the Emergency Solutions Grant (HESG) Program, and the HOME Investment Partnerships (HOME) Program. The City of Canton receives funding directly from HUD. The City's Consolidated Plan covers FY 2014-2018. The 2016 Action Plan represents the City's assessment of how its resources will be used in the third year of the five year plan.

As an entitlement community, the City of Canton is responsible for the preparation of a local strategic plan for community development, as well as the Consolidated Plan and Annual Action Plans that describe the housing and community development activities to be carried out with the City's CDBG, ESG, and HOME funding resources to address the determined needs. The City submitted and HUD has approved its 2015 Fair Housing Annual Action Plan. This Plan's actions extend through 2016 and are being used in the needs assessment process.

Fair Housing Action Plan Letter

The letter was intended to memorialize the City of Canton's commitment to Affirmatively Furthering Fair Housing.

The City of Canton prepared and submitted a Substantial Amendment to the FY 2015 Annual Action Plan to include Fair Housing (FH) as a Public Service Activity allotting \$35,000 or approximately 1.5% of the budget. The City also used administrative funds as they are available. The City hired a Fair Housing Manager and a Fair Housing Intake/Outreach Specialist. The City addressed the following Impediments as stated in its commitment letter.

Public Sector Impediment A, part 1:

The Southeast area of the City, which consists nearly exclusively of areas of Black concentration, is becoming increasingly isolated from amenities and services.

Recommended Action Step #1: The City should continue to invest in its neighborhoods.

- In 2015, the City will provide additional outreach to the Southeast residents. Outreach will be accomplished through articles and ads in the local newspaper, flyers to Southeast residents, information distributed to our partners and on the City website. During PY 2013, the City of Canton established two Neighborhood Revitalization Strategy Areas: the Eastside and Central NRSA areas. The Southeast quadrant of the City is part of this designated strategy area. Within these neighborhoods, approximately \$1.4 million of CDBG funding was provided to undertake projects. The plan for 2015 and 2016 is to continue a concentrated effort of revitalization.

- o Recommended Action Step #2: The City should increase efforts to provide Black residents of

Southeast Canton with access to fair housing within the City.

- In 2015, the City will make residents of the Southeast aware of the City's Housing Programs, such as the Emergency Program, the Furnace Program and the Repair Maintenance Program, and rental units that are available in non-impacted areas of the City through our housing partners. Homes available for sale will be offered to residents of the Southeast with down payment assistance and gap financing to those who qualify. We will work with SMHA to re-establish the TBRA Program in 2015. The DOD will continue to collaborate with SMHA to be better informed about Housing Choice Vouchers, Section 8 Programs and fair housing training. We have established monthly meetings to work together to create more housing opportunities.

Public Sector Impediment A, part 2:

The City should continue to work with SARTA to evaluate the adequacy of public transit service for residents of Canton's Southeast area and advise SARTA on improvements that would more fully connect residents to opportunities in other neighborhoods.

SARTA provides a multitude of services for everyone in the county including students, employees, seniors, veterans, individuals with disabilities and many more. For the last two years, they have set record highs in the amount of people that they serve in Stark County and continue to look for ways to improve their services. Some of SARTA's key services include:

- Travel Training
- Proline
- MedLine
- Medicaid Services
- Veteran Services
- Student Services
- SARTA has two routes that service residents in Southeast, Canton:
 - Route 114 - Services residents from 2nd Street SE to 14th Street SE and Cherry Avenue SE. The Corner Stone Transfer Center provides access to other routes throughout the City and County.
 - Route 110 - Services the remaining Southeast quadrant from East Tuscarawas Street to 17th Street SE. The Corner Stone Transfer Center provides access to other routes throughout the City and County.

Points of interest in the Southeast include:

- Allen School
- Canton Urban League
- Downtown Canton
- Gateway Homes
- Harford Middle School
- SARTA Main Offices & Garage
- Skyline Terrace Apartments
- Queen Ester Village

All routes are online. Prices for tickets and passes for the year 2015 are as follows:

- 1 Ride Ticket (Regular) is \$1.50

- 1 Ride Ticket (Proline) is \$2.25
- 1 Ride Ticket (Cleveland) is \$2.50
- All Day Pass is \$3.00
- 10 Ride Ticket (Regular) is \$15.00
- 10 Ride Ticket (Proline) is \$22.50
- 31 Day Pass (Regular) is \$45.00
- 31 Day Pass (Proline) is \$63.00

Public Sector Impediment B, part 1:

It is unclear whether the City currently provides adequate access of information and services to its growing foreign-language populations.

Recommended Action Step #1: The City should conduct the four-factor analysis outlined at www.lep.gov to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency (LEP) in accessing County programs and services.

- Since Canton has a growing population of Spanish-speaking residents, we have begun outreach efforts which include language assistance, such as oral interpretation and written translation services, as well as notices to staff and recipients of the availability of LEP services and referrals to community liaisons proficient in the language of LEP persons.
- Since applications for housing are considered to be “vital” documents, the City entered into an agreement with the Latino Business Group in October of 2014 and these documents have been translated. As a part of the Language Access Plan (LAP), the City will continue to determine over time and across its various activities, which documents are vital to the meaningful access of the LEP populations they serve, and implement the translations. Activities being undertaken by the Latino Business Group on behalf of the City of Canton include:
 - Review materials that are written in Spanish and determine if they are written in a manner that is easily understood by Latino populations. The Department of Development (DOD) will provide materials to be reviewed.
 - Make corrections to existing documents written in Spanish and/or create/convert documents into Spanish. Provide DOD with revised documents and explain changes that were made.
 - Provide outreach, such as meetings, pamphlets, flyers, etc., to Latino populations to advise them of the City of Canton, and DOD programs, including housing, emergency solutions, public services and also job opportunities through our rehab programs and various MBE, WBE and Section 3 requirements. Also, the City will provide an abbreviated version of its Annual Action Plan and the CAPER in Spanish upon request.
 - Provide interpreting services for DOD when needed, such as assisting Latino applicants who may want to apply for housing or other assistance and assisting DOD at meetings where non-English speaking Latinos are present.
 - The City will develop and implement a complete Language Access Plan (LAP) by June 30, 2016, which will include:

- identifying LEP persons who need language assistance and the specific language assistance that is needed;
- identifying the types of contact the agency/staff has with LEP persons;
- outreaching effectively to the LEP community and training staff;
- determining which documents and materials are vital;
- translating informational materials in identified language(s) that detail services and activities provided to beneficiaries;
- providing appropriately translated notices to LEP persons;
- providing interpreters for large and small one-on-one meetings;
- developing community resources, partnerships, and other relationships to help with the provision of language services; and
- making provisions for monitoring and updating the LAP, including seeking input from beneficiaries and the community on how it is working and on what other actions should be taken.

Public Sector Impediment B, part 2:

- The City has also entered into contract with Triad Deaf Services to provide services for approximately 2,000 hearing/visually-impaired persons in the community. The areas that need developed are necessary in growing community awareness are interpreting, advocacy, leadership and support services. *Interpreting* - American Sign Language (ASL) will be offered throughout the year for the hearing community. Currently there are 110 monthly assignments for interpreting. Community interpreting of mainstream services for the deaf community will also be offered. Also a summer program aimed at ages 8 to 18 years old to assist them in maintaining their ASL grammar skills. *Advocacy* - Retaining a social worker for deaf, hard of hearing, and deaf/blind. Provide monitoring and leadership of mainstream services for adults and youth ages 14 to 22. Providing emergency needs for indigent deaf. *Marketing* - Developing a monthly newsletter, establishing a web page and promotional materials to ensure that housing and public service information is distributed.

Public Sector Impediment C:

The City's Affirmative Marketing Policy (AMP) could be broadened to further ensure that City-supported affordable housing opportunities are made available to members of the protected classes.

- o Recommended Action Step #1: The City should revise its Affirmative Marketing Policy (AMP) to apply to all City-supported housing with 5 or more units and also address outreach to persons with limited English proficiency (LEP).
 - The AMP has been revised to make it clear that ALL housing units offered for sale or rent that are federally-funded will follow the AMP. This action was put into effect June 1, 2015. Projects with 5 or more units that are City-supported (non-federally funded) will follow the AMP (will take effect by January 1, 2016). Additionally, the revised AMP will include that vital documents will be available in Spanish and that we will provide outreach for LEP and hearing-impaired residents.

Public Sector Impediment D:

The amount of land available and zoned for the development of multi-family housing in Canton is limited.

- o Recommended Action Step #1: The City should amend the zoning ordinance and map for the City's future land use plans to ensure that opportunities are provided for the development and redevelopment of affordable housing, particularly multi-family rental units.
- The Fair Housing Department and the DOD will participate in the development of the Comprehensive Plan for the City of Canton, which includes changes to the zoning ordinance. The City is meeting with the contractor who is developing the Comprehensive Plan to assist in incorporating the changes identified in the Analysis of Impediments. A draft of the Comprehensive Plan will be available by mid-July, 2015.

Public Sector Impediment E:

The zoning ordinance places undue restrictions on the location of group homes for persons with disabilities, a policy that is inconsistent with the provisions of the Fair Housing Act.

- Recommended Action Step #1: The City should amend the zoning ordinance to allow group homes for persons with disabilities to function under single-family housing rules. Also, outdated terminology should be replaced. The Fair Housing Department and the DOD will participate in the development of the Comprehensive Plan for the City of Canton, which includes changes to the zoning ordinance. The City is meeting with the contractor who is developing the Comprehensive Plan to assist in incorporating the changes identified in the Analysis of Impediments. A draft of the Comprehensive Plan will be available by mid-July, 2015. The Fair Housing Department and the DOD will correct and replace any improper or discriminatory terminology in the fair housing ordinance and zoning ordinance by December 2015. A review of all other ordinances will be made over the next year to ensure that outdated or discriminatory terms are replaced in all City of Canton ordinances. Additionally, all contracts involving federal funds will be updated regarding Section 504, with revisions for updated language on new design and instruction requirements.

Public Sector Impediment F:

Some improvements could be made to City documents, from a Fair Housing perspective.

- o Recommended Action Step #1: The City should amend the Consolidated Plan to include a definition of areas of minority concentration. Carry the definition through each Annual Action Plan, using it as a frame of reference for balancing entitlement spending between the revitalization of impacted areas and the creation of new housing opportunities in non-impacted areas.
- The City will follow the guidance given by HUD regarding a substantial amendment of the Consolidated Annual Action Plan which will include a definition of areas of minority concentration and provide \$35,000 for fair housing public service activities. By the end of August, 2015, the City will create a definition of areas of minority concentration that will be carried through all future annual action plans.

- o Recommended Action Step #2: The City should identify fair housing actions undertaken during the program year in the context of addressing impediments identified in the A.I. in future CAPERs.
 - The Department of Development and the Fair Housing Department will work together in the preparation of the annual CAPERs to ensure the impediments stated in this plan are identified in the CAPERs and are being addressed by both departments for all federally-funded housing.

Private Sector Impediment A, part 1:

Patterns of mortgage lending discrimination evidently endure in Canton.

- o Recommended Action Step #1: The City should arrange housing counselors to provide credit repair advice on a public basis in order to ensure to the extent possible that members of the protected classes have access to means of improving their ability to obtain and maintain decent, affordable housing.
 - The City will partner with Community Building Partnerships and Fifth Third Bank to create a comprehensive home buying class and credit repair training program that will assist individuals who otherwise would not be able to finance a home. The framework is in place and the DOD is committed to assist with implementation and financial assistance in the way of DPA. This program will be in place by September 2015.
 - The City should continue educational and outreach efforts to broaden awareness of rights and responsibilities under the Fair Housing Act.
 - To accomplish educational and outreach efforts, the City plans to hire two positions in the Fair Housing Department within the next sixty to ninety days. The Fair Housing Manager will be responsible for the day-to-day operations, which will be overseen by the Department of Development. The Fair Housing Department will also have a Fair Housing Investigator and an Intake/Outreach Specialist.
 - The City will be developing a tracker by the end of August, 2015, that illustrates the new and/or increased number of complaints which will be submitted to HUD in final report form.
 - The City is in communication with Stark County Fair Housing and a Fair Housing Initiative Program (FHIP) agency. Our short-range goal is for Stark County Fair Housing to provide testers to the City of Canton. Our long-range goal is for a FHIP agency to train the City's testers. The City will advertise and solicit potential testers and enter into an agreement with the FHIP to hold a six-hour training workshop. Upon completion of the training, the City will identify a testing program on identified complexes.
 - The City is committed to furthering fair housing by running an ad in the local newspaper at least quarterly and participating in public service broadcasts describing why Fair Housing is important and what constitutes housing discrimination. For example, the City will discuss these matters on the Ron Ponder Show and other media outlets. The first ad will be featured by the end of the third quarter of 2015.

Private Sector Impediment A, part 2:

- The City is partnering with Domestic Violence Project, Inc. to reduce disparities in women, and will train the staff of the organization, as well as provide organizational materials to victims of domestic violence. The City has held one training session with Domestic Violence Project, Inc. to teach on protections against domestic violence, has produced informational brochures, and will hold quarterly

meetings at the local library.

- The City is partnering with a local Lesbian-Gay-Bisexual-Transgender (LGBT) organization to reduce disparities in those whom identify as LGBT. The City has undertaken one training session on LGBTQI Intimate Partner Violence, “Hurricanes within Rainbows,” to present service care providers with definitions of LGBTQI and the societal impact of homophobia and transphobia. The City is in discussions with the Law Department to assist us with changes to the City Ordinance to include language with regard to LGBTQI. The City is in the process of developing a pamphlet and other materials to be distributed throughout the community. The pamphlets will be available by the end of the third quarter of 2015. Meetings will be held quarterly at the local library.
- The City intends to contact the Stark County Board of Developmental Disabilities with the hope of entering into an agreement to provide training within the organization. We also intend to include developmental disability training as a part of our regular Fair Housing training initiatives. The City would like to partner with the Stark County Board of Developmental Disabilities, and will train the staff and provide training for providers so that they can identify when an individual is being discriminated against as a result of his or her disability. Meetings will be held quarterly at the local library.
- The City has already translated housing program information into Spanish and has partnered with Latino Business Group to help disseminate this information. ALL Fair Housing pamphlets will be translated into Spanish and will be on the City’s website by October 1, 2015. Meetings will be held quarterly at the local library.
- The City will contact Legal Aid in an effort to educate and form a collaboration, and discuss fair housing, by the end of December 2015.
- The City will work to extend its outreach to solicit input from citizens from the southeast quadrant of the City through direct mailings or pamphlets that will be delivered to residents of that area. The City will require our partners to provide pamphlets and surveys to the people that they serve.
- The City will work with its IT Department to develop surveys that can be completed on the City’s website. The target date of completion will be March of 2016.

The City of Canton is committed to affirmatively furthering Fair Housing as indicated by the actions that we have taken, and those that we have planned for the future.

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 Canton's Consolidated Plan and Annual Action Plans describe the City's priority community development needs eligible for assistance under the CDBG, ESG and HOME Programs, including an assessment of housing, homelessness, public facilities, infrastructure improvements, public services, accessibility, historic preservation, economic development, and planning needs. The Annual Plan includes the City's short-term community development objectives that have been developed to address the national goals of the CDBG, ESG and HOME Programs, which are:

1. The provision of decent housing that is affordable to low and very low income households.

2. The provision of a suitable living environment, improving the safety and livability of neighborhoods, increasing access to quality facilities and services, improving housing opportunities, and revitalizing deteriorated neighborhoods.
3. The expansion of economic opportunities, creating jobs that promote long term economic and social viability and that are accessible to low and very low income persons.

This Annual Action Plan has identified the following priority needs that will be the programming focus in 2015:

- Maintain and improve the quality of existing affordable housing;
- Expand affordable housing opportunities;
- Reduce housing cost burden;
- Address homelessness issues;
- Provide Canton's special needs and low-income residents with services to improve their self-sufficiency; and
- Removal of blight and blighting influences in residential neighborhoods.

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 Canton has been a direct recipient of CDBG, HOME, and ESG 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 and community development and homeless assistance programs and builds upon the foundation set forth in prior periods' Consolidated and Strategic Plans.

At the end of each program year, the City of Canton 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.

Overall, the City of Canton continues to strive for success in the implementation of housing and community development and homeless assistance programs and services in order to meet the goals and objectives established in the Consolidated Plan.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

In the development of this Action Plan, the City of Canton carried out a Request for Proposal (RFP) and citizen participation process to expand public input into the process and obtain comments, suggestions and feedback from a variety of local agencies and organizations, as well as the general public. An informational meeting regarding the RFP was held October 14, 2014 to provide information about the range of activities eligible for funding under the 2016 Action Plan, and to provide technical assistance to and receive input from agencies interested in applying for funding. Representatives from 20 agencies

attended the meeting. In addition, Department of Development staff members met with and provided assistance by phone to answer questions and help agencies as they developed their applications. The City made its proposed Action Plan budget available for citizen review and comment for a 30-day period beginning December 8, 2014. The proposed budget and contact information were publicized in a legal ad that ran in The Repository on December 1, 2014 and on the City website. This information was also posted at the Stark County District Library Main Branch, Madge Youtz Branch, North Branch and Dehoff Branch; Stark Metropolitan Housing Authority; Stark County Job and Family Services; and Stark County Community Action Agency.

A public hearing on the Plan was held on December 18, 2015. The 2014-2018 Consolidated Plan and a list of agencies being recommended to Council for funding were available to review and four Department of Development staff members were present to answer questions.

In addition, the proposed budget and the list of recommended agencies were submitted to City Council for approval. Council meetings are open to the public and a public comment period is offered at each meeting.

Three public hearings were held in connection with the Substantial Amendment. Details are included in the section AP-12, Participation.

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.

In reference to the Annual Action Plan, no comments were received.

Three public hearings were held in connection with the Substantial Amendment. Comments are included in the section AP-12, Participation.

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

There were no comments or views that were not accepted.

Three public hearings were held in connection with the Substantial Amendment. Details are included in the section AP-12, Participation.

7. Summary

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	CANTON	Department of Development
HOME Administrator	CANTON	Department of Development
ESG Administrator	CANTON	Department of Development

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency responsible for the development of this Action Plan is the City of Canton Department of Development. The Department of Development is also responsible for administration of the City of Canton's CDBG, HOME, and ESG Program. However, the City has subcontracted administration of its ESG Program to the Stark County Regional Planning Commission (SRPC). The SRPC works closely with the Homeless Continuum of Care of Stark County (HCCSC), also known as the Stark CoC. The City of Canton has subcontracted its ESG administration with SRPC to improve coordination and management of homeless programs and services in the Canton and Stark County area.

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Canton recognizes the need to consult with local agencies as part of the Consolidated Planning process. This consultation is being done on an ongoing basis through periodic meetings with the City's many subrecipient agencies. Because the City of Canton partners with a number of local housing and community development agencies, these partnerships result in ongoing consultation regarding area needs. This ongoing consultation is particularly important with regard to implementation of the City's Neighborhood Revitalization Strategy Area Program.

The City has begun regular collaboration meetings with Stark County Community Action Agency (SCCAA), Stark Metropolitan Housing Authority (SMHA), Stark Area Regional Transit Authority (SARTA) and Mercy Medical Center to address the needs in the southeast section of the city as identified in the Analysis of Impediments.

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(l))

The City of Canton contracted with a local community development activist and housing professional to develop and implement a formal consultation and citizen participation process that was carried out as part of the City's Consolidated Plan development. Working with the Department of Development, the consultant developed a Housing and Community Development Needs Survey. The consultant represented the City in meetings with a number of local housing, homeless, community development, and civic organizations to present and discuss the Needs survey, and to tabulate, analyze and report survey results. Agencies that have been consulted include housing providers, SMHA, CHDO's, area public service agencies, as well as local civic organizations.

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 recognizes the importance of coordinating with the Continuum of Care process, particularly in the allocation of ESG funding. Canton is a designated direct grantee for ESG funding. The Stark County Continuum of Care, administered by staff with the assistance of the Stark Regional Planning Commission, is responsible for the Continuum of Care process in the County. Both the City of Canton and Stark County are responsible for developing and implementing their separate 5-Year Consolidated Plans. To ensure sound planning and a coordinated, comprehensive approach to homeless issues, the two governments are working together to prepare a unified plan to identify homeless needs, set priorities and goals, and develop a strategy to provide needed programs and services to address homelessness. The City's Director of Community Development and Planning serves as a Board Member with the Stark Continuum of Care in working to develop this coordinated homeless strategic plan.

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

As described above, the City of Canton, in cooperation with the Stark County Regional Planning Commission, has been working together to coordinate with the Homeless Continuum of Care of Stark County (also known as the Stark CoC), to develop a strategy to identify needs, set priorities and goals, and implement programs and activities to address homelessness in Stark County. In addition, the City of Canton has contracted with the Stark RPC to administer the City's ESG Grant. Stark RPC has prepared a Request for Proposals (RFP) for local non-profit emergency shelter, street outreach, and homeless prevention providers to use when applying for ESG funding. The City of Canton also participates directly in the Stark CoC which manages and administers the continuum of process, including the allocation of funding, development of performance standards, and program evaluation for Stark County homeless and homelessness prevention programs.

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	Stark County Community Action Agency
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Development Department has had multiple meetings and discussions with the Executive Director and staff of the Stark County Community Action Agency (SCCAA) to review City housing and community development programs as well as discuss the range of programs and services offered by SCCAA. As a result of these meetings, the City and SCCAA are now working more closely together than they have in the past and are collaborating on housing weatherization and youth training and employment programs. In addition, the DOD is working with SCCAA to find a location in the Eastside NRSA to operate a Head Start program. Preliminary plans are to be able to use the location to operate service programs for the whole family, and will possibly include a healthcare component. To this end, the SCCAA is a partner on the Invest Health application team.</p>
2	<p>Agency/Group/Organization</p>	<p>CANTON</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing Services-Children Services-Elderly Persons Services-Education Service-Fair Housing Grantee Department</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Lead-based Paint Strategy Non-Housing Community Development Needs</p>

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Department of Development staff meets regularly to discuss the Consolidated Plan as it relates to housing and non-housing community development needs. Staff continually monitors activity and project progress. In addition, Department of Development staff members meet regularly with various local agencies, including the local Continuum of Care.
3	Agency/Group/Organization	HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development 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?	The City of Canton and Habitat for Humanity of Stark and Carroll Counties (Habitat) meet regularly to discuss programs and community needs, particularly housing needs for low income families and neighborhood revitalization issues. Habitat is a subgrantee under the City's Neighborhood Revitalization Strategy Program.
4	Agency/Group/Organization	Stark Metropolitan Housing Authority
	Agency/Group/Organization Type	Housing PHA Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis Economic Development 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?	The City of Canton and the Stark Metropolitan Housing Authority (SMHA) meet regularly to discuss programs and services, particularly with regard to housing needs and public housing issues, identifying gaps in housing programs and services, and fostering a spirit of cooperation.
5	Agency/Group/Organization	STARK COUNTY REGIONAL PLANNING
	Agency/Group/Organization Type	Housing Service-Fair Housing Other government - County Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City and the Stark County Regional Planning Commission (SRPC) meet to review programs and services on an area-wide basis. The SRPC is the agency that works with the Stark CoC on the Continuum of Care and the 10-Year Plan to end homelessness. In addition, Canton has subcontracted with SRPC for administration of the City's ESG Program. This will improve coordination and delivery of services, housing, and shelter to the area homeless and those threatened with homelessness. The City and SRPC also discuss CDBG and HOME program issues.

6	Agency/Group/Organization	Homeless Continuum of Care of Stark County
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City and the Homeless Continuum of Care of Stark County (HCCSC, also known as the Stark CoC) work closely together dealing with homeless needs, priorities, and goals. This coordination will result in both the City's and County's individual Consolidated Plans providing a coordinated and unified strategy for dealing with homeless issues and allocating funding for homeless shelter, housing, and services.
7	Agency/Group/Organization	Canton City Board of Health
	Agency/Group/Organization Type	Services-Health Health Agency Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through telephone conversations and email, the City obtained feedback on lead abatement activities, obstacles and future direction.

8	Agency/Group/Organization	Mental Health Services & Recovery Board of Stark County
	Agency/Group/Organization Type	Services-homeless Health Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through group meetings and quarterly reporting the agency helps to identify gaps in homeless housing and services, identify gaps in the City's housing and business development activities, and obtain feedback on the City's performance with subgrantees.
9	Agency/Group/Organization	City of Canton Fair Housing Department
	Agency/Group/Organization Type	Service-Fair Housing Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City's Fair Housing Department has been moved to the Department of Development in order to coordinate the efforts of the two departments more efficiently.
10	Agency/Group/Organization	Stark County Regional Transit Authority
	Agency/Group/Organization Type	Service-Transportation
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City is collaborating with SARTA in its efforts to focus available resources where they are most needed, and to avoid duplication of efforts.

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

Not applicable.

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	Homeless Continuum of Care of Stark County	The Strategic Plan goals support the goals of the HCCSC 10-Year Continuum of Care Plan to end homelessness. Canton and Stark County have worked together to develop a strategic plan that supports the continuum of care. In addition, the City's homeless strategic plan was submitted to the CoC for review, comment, and approval prior to its finalization.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

During the implementation of its Neighborhood Revitalization Strategy Area program in 2013, the City of Canton realized the need to expand its partnership with local agencies in order to carry out housing and neighborhood improvement projects more effectively and efficiently. Bringing additional agencies into this effort has increased the level of local commitment to community development and neighborhood revitalization. This collaborative process was carried forward into the planning and development of the 5-Year Consolidated Plan for 2014-2018. The City is continuing its dialogue with local housing agencies and service providers to evaluate the community needs, priorities, goals, and programs implemented under the Consolidated Plan. Also, the City has become more involved in the Continuum of Care process and homelessness issues through its collaboration with Stark County and the Stark CoC in the development of the homeless portion of the Consolidated Plan. As a result, the City has since decided to improve the delivery of homeless programs by subcontracting administration of its ESG Program to the Stark Regional Planning Commission. All these efforts document the City's efforts at collaboration and consultation in development of the Consolidated Plan.

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**

An informational meeting regarding the City's RFPs was held ~~October 14, 2014~~. Applications awarded are limited to goals set in the Consolidated Plan. A public hearing will be held ~~December 8, 2014~~ to provide information and obtain feedback about the 2016 proposed budget and activities. The City is working with the Latino Business League to translate documents, promote development activities in the Latino community, and provide interpretation services.

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	Public Meeting	Potential applicants				
2	Newspaper Ad	Non-targeted/broad community				
3	Internet Outreach	Non-targeted/broad community				
4	Public Hearing	Non-targeted/broad community				
5	Public Notices					

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

This section of the 2016 Action Plan identifies the federal, state, local, and private resources expected to be available to the City of Canton to address priority needs and specific objectives identified in the Strategic Plan. The City of Canton is a direct entitlement community for the following HUD-funded programs: the Community Development Block Grant (CDBG) Program, the HOME Investment Partnership (HOME) Program, and the Emergency Solutions Grant (ESG) Program. Canton receives an annual allocation of Federal funding from the U.S. Department of HUD for CDBG, HOME, and ESG. Below is a breakdown of these anticipated funding resources.

Priority Table

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	2,368,198	200,000	0	5,068,198	4,376,372	CDBG Funds will leverage private funding, as well as other public funding from local, state, federal funding sources.

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	447,238			477,238	555,562	HOME Funds will leverage private funding, as well as other public funding from local, state, federal funding sources.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	212,400	0	0	212,400	383,037	ESG Funds will leverage private funding, as well as other public funding from local, state, federal funding sources.

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

CDBG Program – CDBG funding allocated to subrecipients can leverage additional private, local, state, or federal funding for housing and community development activities. CDBG funding allocated for economic development can leverage private investment.

HOME Program – HOME funding allocated to subrecipients can leverage additional private, local, state or federal funding for affordable housing development. In particular, HOME funding can leverage affordable housing tax credits for Canton housing projects. Although the HOME program has a matching requirement, the City of Canton is not required to provide local match because the City is considered by HUD to be severely distressed. As a community with a low per capita income and high percentage of families living in poverty, Canton is exempt from HOME Matching Requirements.

ESG Program - ESG funding allocated to subrecipients can leverage additional private, local, state, or federal funding for homeless assistance and homelessness prevention programs and services.

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 Canton owns and operates the Edward “Peel” Coleman Southeast Community Center, located at 1400 Sherrick Avenue SE. This facility is located within the boundaries of the City’s Eastside Neighborhood Revitalization Strategy Area.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand, Maintain & Improve Affordable Housing	2014	2018	Affordable Housing	Target Area Census Tracts City-Wide	Expand Affordable Housing Opportunities Maintain Affordable Housing Supply	CDBG: \$847,726 900,500 HOME: \$774,018 350,000	Rental units constructed: 10 Household Housing Unit Homeowner Housing Added: 6 Household Housing Unit Homeowner Housing Rehabilitated: 100 Household Housing Unit
2	Improve the Safety & Liveability of Neighborhoods	2014	2018	Affordable Housing Non-Housing Community Development	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide	Expand Economic Opportunities Maintain Affordable Housing Supply Public Services Removal of Blight and Blighting Influences	CDBG: \$1,211,352 2,000,000	Public service activities other than Low/Moderate Income Housing Benefit: 700 Persons Assisted Homeowner Housing Rehabilitated: 30 Household Housing Unit Buildings Demolished: 25 Buildings

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Reduce Homelessness	2014	2018	Homeless Non-Homeless Special Needs	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide	Address Homelessness Issues	ESG: \$214,860 212,400	Homeless Person Overnight Shelter: 500 Persons Assisted Homelessness Prevention: 1000 Persons Assisted
4	Provide Needed Public Services	2014	2018	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide	Public Services	CDBG: \$28,500 40,000	Public service activities other than Low/Moderate Income Housing Benefit: 1800 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Planning and Program Administration	2014	2018	Planning, Administration, Fair Housing	City-Wide	Address Homelessness Issues Expand Affordable Housing Opportunities Expand Economic Opportunities Maintain Affordable Housing Supply Public Facilities and Improvements Public Services Removal of Blight and Blighting Influences	CDBG: \$471,894 513,639 HOME: \$43,202 67,085	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Expand, Maintain & Improve Affordable Housing
	Goal Description	The City of Canton will utilize CDBG and HOME funds to carry out activities designed to expand, maintain, and improve affordable housing. The City will undertake these housing activities, utilizing programs carried out by the Department of Development. In addition, the City will provide funding to subrecipient organizations for affordable housing activities.
2	Goal Name	Improve the Safety & Livability of Neighborhoods
	Goal Description	The City of Canton will utilize CDBG funding to carry out activities designed to improve the safety and livability of neighborhoods. Activities will be concentrated within the City's Neighborhood Revitalization Strategy Areas and Target Area Neighborhoods.

3	Goal Name	Reduce Homelessness
	Goal Description	The City of Canton will provide ESG funding to various local organizations to carry out activities designed to reduce homelessness in the community. These ESG-funded projects will help to complement the Continuum of Care activities being funded through the Homeless Continuum of Care of Stark County.
4	Goal Name	Provide Needed Public Services
	Goal Description	The City of Canton will provide CDBG funding to various local non-profit organizations to provide needed public services in the community. Public services include programs for youth, elderly assistance, nutrition, job training, and neighborhood safety.
5	Goal Name	Planning and Program Administration
	Goal Description	The City of Canton will utilize CDBG and HOME funds for the planning and overall management of its Annual Action Plan, including activities to affirmatively further fair housing.

Table 7 – Goal Descriptions

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

Housing estimates and details regarding them can be found in the AP-20 Annual Goals and Objectives, AP-35 Projects, and AP-50 Geographic Distribution sections.

AP-35 Projects – 91.220(d)

Introduction

This section lists and describes the projects that the City of Canton will carry out during the FY 2015 Annual Action Plan. These projects reflect a thorough process that determined Canton's priority needs to be addressed during the second year of the 2014-2018 Five-Year Strategic Plan. The City of Canton will utilize CDBG, HOME, and ESG funding to undertake the projects that comprise the City's FY 2015 Annual Action Plan, described below as follows.

#	Project Name
1	CDBG Rehabilitation - Single Family Residential
2	CDBG Rehabilitation Administration
3	Public Facilities and Improvements
4	Clearance and Demolition
5	Public Service Activities
6	Central Neighborhood Revitalization Strategy Area
7	Eastside Neighborhood Revitalization Strategy Area
8	Planning
9	CDBG General Management
10	HOME General Management
11	HOME New Housing Construction
12	HOME Single Family Residential Rehabilitation
13	HOME Tenant Based Rental Assistance
14	ESG 15 Canton
15	Fair Housing

Table 8 – Project Information

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

The City of Canton recognizes the need for improvement in the implementation of its housing and community development activities, particularly to more effectively address underserved needs in the community. To address this issue, the City has undertaken a two-step approach: 1) the City is continually evaluating the Development Department and the Standard Operating Procedures governing the management and administration of its HUD-funded programs; and 2) the City has established two Neighborhood Revitalization Strategy Areas in order to concentrate its efforts to the revitalization of its most underserved and neediest neighborhoods.

Programs that are income qualified will be open to all areas of the City, and programs that are area qualified will be directed to only those projects that take place in the low-mod areas of the City. The City estimates that 75% of its Consolidated Funds will be expended within the target areas.

CDBG, HOME and ESG funds are allocated primarily on a competitive basis through a Request for

Proposal (RFP) process. Limited direct allocations are also made with these funds.

RFP's are made available to all developers, subrecipients, and CHDOs on the City's website for CDBG, HOME and ESG project submissions, or in the Department of Development office. Returned applications are submitted to the Department of Development Scoring Committee for evaluation through an established scoring process. Recommendations are submitted to Canton City Council for review, comment and approval.

The City will continue to work with the community to plan for future funding applications. When additional funding becomes available, activities that address underserved needs will be examined and reviewed for possible funding.

DRAFT

Projects

AP-38 Projects Summary

Project Summary Information

Table 9 – Project Summary

1	Project Name	CDBG Rehabilitation - Single Family Residential
	Target Area	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing Improve the Safety & Livability of Neighborhoods
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Removal of Blight and Blighting Influences
	Funding	CDBG: \$550,000
	Description	The City of Canton's housing repair and maintenance, roof furnace and emergency rehabilitation programs are designed to assist low and moderate income homeowners to correct housing conditions, which if neglected, will adversely affect the health, safety and welfare of the homeowner. Repair and maintenance work may include roof, furnace, electric, plumbing, flooring, code violations, sewage backup, water line breaks, exterior improvement, and other qualifying repairs.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The following activities are planned to be carried out as part of this project: <u>City of Canton CDBG Housing Repair and Maintenance Program and Roof Program - \$350,000</u> , assisting LMI homeowners with rehab assistance to correct housing conditions, which if neglected, will adversely affect the health, safety, and welfare of the homeowner. 80 LMI housing units to be rehabbed. <u>SCCAA Furnace Repair Program - \$100,000</u> , providing CDBG funding to the Stark County Community Action Agency (SCCAA) to operate a furnace replacement program to help maintain 30 LMI housing units.

2	Project Name	CDBG Rehabilitation Administration
	Target Area	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing Improve the Safety & Liveability of Neighborhoods
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Removal of Blight and Blighting Influences
	Funding	CDBG: \$350,500
	Description	The City of Canton will allocate CDBG funding for staff and sub recipient costs directly involved in carrying out the City's housing rehabilitation programs.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The activities to be undertaken as part of this Project include the following: <u>City Rehab Salaries</u> - \$300,000, providing CDBG funding for the City's Development Department staff directly involved in the delivery of housing rehabilitation program services. <u>City Rehab Support</u> - \$40,500, providing CDBG funding for other direct program delivery costs associated with the City's housing rehabilitation program. <u>SCCAA Furnace Program</u> - \$10,000, providing CDBG funding for staff salaries and program delivery costs associated with SCCAA's furnace program.
3	Project Name	Public Facilities and Improvements
	Target Area	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide
	Goals Supported	
	Needs Addressed	
	Funding	:

	Description	This project has been canceled as part of the City's Substantial Amendment.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
4	Project Name	Clearance and Demolition
	Target Area	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide
	Goals Supported	Improve the Safety & Liveability of Neighborhoods
	Needs Addressed	Removal of Blight and Blighting Influences
	Funding	CDBG: \$560,000
	Description	CDBG funding for the demolition and clearance of vacant, dilapidated, abandoned buildings that are a hazard to the public health, safety, and welfare, and that are blighting influences with neighborhoods.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The following activities are proposed to be undertaken as part of this Project: <u>Demolition - \$550,000</u> , providing CDBG funding for the demolition and clearance of vacant and dilapidated buildings. <u>Board Ups - \$2,000</u> , providing CDBG funding to board up and secure vacant and dilapidated buildings in anticipation of demolition. <u>Demolition Salaries - \$8,000</u> , providing CDBG funding to pay City Department of Development staff costs directly involved in carrying out demolition program activities.
5	Project Name	Public Service Activities

	Target Area	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide
	Goals Supported	Provide Needed Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$40,000
	Description	The City of Canton will provide CDBG funding to local non-profit organizations for needed public services assisting low and moderate income persons and households.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	Central Neighborhood Revitalization Strategy Area
	Target Area	Central Neighborhood
	Goals Supported	Expand, Maintain & Improve Affordable Housing Improve the Safety & Liveability of Neighborhoods Provide Needed Public Services
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Public Facilities and Improvements Public Services Removal of Blight and Blighting Influences
	Funding	CDBG: \$750,000
	Description	CDBG funding for project activities to be carried out in the City's Central Neighborhood Revitalization Strategy Area (NRSA). The City has previously prepared a detailed comprehensive plan for the revitalization of these two designated areas in Canton and is carrying out a wide ranging list of projects and activities designed to achieve the goals set forth in the NRSA Plan.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
7	Project Name	Eastside Neighborhood Revitalization Strategy Area
	Target Area	Eastside Neighborhood
	Goals Supported	Planning and Program Administration
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Public Services Removal of Blight and Blighting Influences
	Funding	CDBG: \$750,000
	Description	CDBG funding for project activities to be carried out in the City's Northeast Neighborhood Revitalization Strategy Area (NRSA). The City has previously prepared a detailed comprehensive plan for the revitalization of these two designated areas in Canton and is carrying out a wide ranging list of projects and activities designed to achieve the goals set forth in the NRSA Plan.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
8	Project Name	Planning
	Target Area	City-Wide
	Goals Supported	Planning and Program Administration
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Address Homelessness Issues Public Facilities and Improvements Public Services Removal of Blight and Blighting Influences
	Funding	CDBG: \$38,000

	Description	CDBG funding under this project will be used to pay Canton Department of Development staff costs associated with planning activities.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	CDBG funding under this Project will be used to pay Canton Department of Development staff expenses, operating costs and other expenses associated with the general management and administration of the City's CDBG Program.
9	Project Name	CDBG General Management
	Target Area	City-Wide
	Goals Supported	Planning and Program Administration
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Address Homelessness Issues Public Facilities and Improvements Public Services Removal of Blight and Blighting Influences
	Funding	CDBG: \$475,639
	Description	CDBG funding for the payment of Canton Department of Development staff and operating costs associated with CDBG administrative activities, including the overall management, coordination, reporting and record-keeping requirements of the CDBG Program.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	HOME funds under this Project will be used to pay for Canton Department of Development staff salaries, operating costs and other expenses associated with the planning and administration of the City's HOME Program.
10	Project Name	HOME General Management

	Target Area	City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	HOME: \$67,085
	Description	HOME funds are being allocated to pay for Canton Department of Development expenses associated with planning and administration of the City's HOME Program.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
11	Project Name	HOME New Housing Construction
	Target Area	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing Improve the Safety & Liveability of Neighborhoods
	Needs Addressed	Maintain Affordable Housing Supply
	Funding	HOME: \$250,000
	Description	HOME funds allocated by the City of Canton to local housing developers, either for-profit companies or non-profit agencies, to assist in the construction of new affordable homeowner housing for low and moderate households.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Under this Project, the City of Canton Department of Development will carry out single family housing rehabilitation activities designed to assist eligible low/moderate income homeowners in upgrading and improving their homes to applicable HOME housing standards.
12	Project Name	HOME Single Family Residential Rehabilitation

	Target Area	Target Area Census Tracts
	Goals Supported	Expand, Maintain & Improve Affordable Housing Improve the Safety & Liveability of Neighborhoods
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities
	Funding	HOME: \$100,000
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The City of Canton proposes to utilize HOME funding to carry out housing rehabilitation for owner occupied housing designed to assist low/moderate income households, correct code violations, improve exterior appearance, increase energy efficiency, and contribute to revitalization of neighborhoods. Units will be rehabilitated to applicable HOME housing standards.
13	Project Name	HOME Tenant Based Rental Assistance
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HOME: \$30,150
	Description	This project was canceled as part of the City's Substantial Amendment.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
14	Project Name	ESG 16 Canton
	Target Area	City-Wide
	Goals Supported	Reduce Homelessness
	Needs Addressed	Address Homelessness Issues
	Funding	ESG: \$212,400

	Description	The City of Canton will allocate ESG funding to local non-profit agencies to carry out homeless assistance/prevention activities, including homeless prevention, shelter operations, essential services, and HMIS.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
15	Project Name	Fair Housing
	Target Area	City-Wide
	Goals Supported	Planning and Program Administration
	Needs Addressed	
	Funding	CDBG: \$40,000
	Description	Administration of the City's Fair Housing program.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The City has submitted a Fair Housing Action Plan that has been approved by HUD and is in the process of carrying out the recommended actions.
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
	Description	
	Target Date	

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

Because the City of Canton is predominately low-mod income, the geographic area includes the entire city. The southern two-thirds of the city consists of census tracts that all have a majority of low-mod income residents, as well as a minority population concentration. The 20 targeted census tracts and block groups all exceed the 50% level for low-mod income with figures ranging from 52.5% to 87% of the population being low-mod.

In addition, as part of its FY 2013 Action Plan, the City of Canton established two Neighborhood Revitalization Strategy Areas, the Eastside Area and the Central Area. The Eastside Strategy Area covers much of the northeast and southeast sections of the city. The Central Strategy Area covers the downtown and nearby surrounding neighborhoods to the west. HUD encourages the establishment of Neighborhood Revitalization Strategy Areas (NRSA) as a means to create communities of opportunity in distressed neighborhoods. The goal of this program is to reinvest in human and economic capital, and economically empower low-income residents as part of an overall community revitalization strategy. The City of Canton's NRSA's encompass two of the city's most distressed areas. The City's Neighborhood Revitalization Strategy Area Plan was approved by HUD in 2013 and the implementation of NRSA began that same years. As part of the 5-Year Strategic Plan for 2014-2018, the City will allocate concentrated HUD-funding for a comprehensive revitalization program of projects and activities within each NRSA.

City of Canton Standards for Low-Income or Minority Concentrations - The United States Department of Housing and Urban Development (HUD) has generated a series of standards that can be used to determine if a Census Tract has a minority concentration or a concentration of low-income households. To determine if a low-income concentration exists, the Median Income of a Census Tract must be below 50% of the Area Median Income for the Metropolitan Statistical Area (MSA). The 2010 median income for the City of Canton is \$55,645. Therefore a Census Tract with a median income of less than \$27,822.50 would be considered to have a concentration of low-income households.

A geography is considered to have a high concentration of minority persons if the Census Tract's total percentage of minority persons is at least 10 percentage points higher than the total percentage of all minorities for the MSA as a whole.

Since 22.8% of the population in the Canton-Massillon MSA is non-white, then any Census Tract with at least 32.8% non-white people would have a concentration of minorities.

Census Tracts included are: 7001, 7003, 7005, 7015, 7018, 7021, 7023, 7124 & 7131.

Geographic Distribution

Target Area	Percentage of Funds
Target Area Census Tracts	45
Eastside Neighborhood	15
Central Neighborhood	25
City-Wide	15

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As described above, HUD census data on low and moderate income populations have reported that a majority of the residents of the City of Canton (56.3%) are considered to be low and moderate income. While this means that most HUD-funded activities that are City-wide in scope can be considered to meet the CDBG Program national objective of benefitting low and moderate income persons, it is also true that within the City there are specific areas of low -income and minority concentrations.

Discussion

As discussed in the Strategic Plan, the basis for the City's allocation of HUD funds on a geographic basis is as follows:

City-wide

According to HUD census data, 56.3% of residents within the City of Canton are low and moderate income. Because the City of Canton is a predominately low-mod income community, the geographic area for allocation of investment can include the entire city.

Targeted Census Tracts

The City of Canton generally allocates its HUD dollars to projects located in the southern two-thirds of Canton, where the census tracts all have a majority of low-mod income residents, as well as a minority population concentration. These targeted census tracts and block groups all exceed the 51% level for low-mod income with LMI percentages in some tracts exceeding 75%. The total LMI percentage within this targeted area of Canton is 65.6%, which includes 35,537 low-mod persons out of a total population of 54,159.

Neighborhood Revitalization Strategy Areas

As described above, the City of Canton established two Neighborhood Revitalization Strategy Areas: the Eastside Area and the Central Area. The Eastside Strategy Area covers much of the northeast and southeast sections of the city. The Central Strategy Area covers the downtown and nearby surrounding neighborhoods to the west. The City of Canton's NRSAs encompass two of the city's most distressed areas. Under the FY 2016 Action Plan, the City is proposing to allocate just under \$1.5 million for activities within these NRSA area neighborhoods.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Canton's FY 2016 Annual Action Plan programs will expand affordable housing opportunities and preserve existing affordable housing for the City's low and moderate income households. Projects that will be funded include single family housing rehabilitation, and housing maintenance & repair programs operated by the City's Department of Development. In addition, the City will contract with a number of sub recipient agencies, based on an RFP. These programs are described in detail under Section AP-35 "Projects".

One Year Goals for the Number of Households to be Supported	
Homeless	1,500
Non-Homeless	146
Special-Needs	0
Total	1,646

Table 11 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	16
Rehab of Existing Units	130
Acquisition of Existing Units	0
Total	146

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion

The housing rehabilitation programs to be carried out by the City of Canton Department of Development represent a continuation of many years of rehab assistance provided by the City. Funding for housing rehabilitation programs to be carried out by various subrecipients was determined through a Request for Proposal (RFP) described elsewhere in this Action Plan. All of these programs are being funded to address the need to expand and preserve affordable housing for low and moderate income households that was identified as a priority need in the City's Consolidated Plan.

AP-60 Public Housing – 91.220(h)

Introduction

This section describes activities for public housing during the Annual Action Plan.

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

In addition to minor and major renovations and general maintenance, SMHA is also committed to provide Reasonable Accommodations for approved requests and provide a percentage of units which fully comply with Uniform Federal Accessibility Standards (UFAS). By including vision, hearing and mobility accessible features in new development projects, SMHA will be in the position to satisfy the one hundred twenty-eight (128) units that are required by HUD to be mobility accessible.

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

SMHA has established a Resident Initiative Program designed to assist residents with achieving self sufficiency. This effort is accomplished through goal setting, intervention, advocacy and community collaboration. Residents can get assistance with seeking employment, job training, and educational opportunities. Possible financial assistance will be given to residents that meet eligibility requirements. A scholarship is also available for all SMHA public housing residents and Section 8 residents. Two awards are given each year in the amount of \$500 and applications are available in early March. SMHA also has a variety of programs and services at various SMHA sites for SMHA residents with children. These include, but are not limited to: after school tutoring, day-care, kindergarten readiness, health, safety, gang prevention programs, nature projects, etc. Other programs that SHMA offers include education classes, housing counseling and rent-buy programs.

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

At the present time SMHA is not designated as troubled.

Discussion

SMHA is committed to providing reasonable accommodations for approved requests and to satisfy the 128 units required to be mobility accessible by HUD. SMHA also provides some financial assistance to residents that meet eligibility requirements, as well as a variety of programs and services for SMHA residents with children.

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

Introduction

The City of Canton is an entitlement community for ESG funding with an allocation of \$212,400 in ESG funding for 2016. The City has contracted with the Stark County Regional Planning Commission (SRPC) for administration of its ESG grant. SRPC also works with the Homeless Continuum of Care of Stark County (HCCSC) for homeless and homeless prevention services under the Continuum of Care (CoC). One of the benefits of the City's contract agreement with SRPC is to improve coordination and administration of homeless programs and services on an area-wide basis.

Canton and SRPC are currently working together to prepare a Request for Proposals (RFP) soliciting ESG funding requests from local homeless services and agencies for Canton's FY 2016 ESG Grant.

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 Homeless Continuum of Care of Stark County (HCCSC) has established a Centralized Assessment Committee which is working to create and implement a Centralized Assessment System for the Stark County area. The current plan is to expand the role of the county's central intake phone system, the "Homeless Hotline" to include assessment for all clients seeking shelter, to offer diversion services and the most appropriate referrals. The Committee is working to identify and secure funding for the Central Assessment System, to develop timelines and then inform the community of the accessibility, location and purpose of the system, including the diversion portion of the system.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the assessment phase at the "Homeless Hotline", the clients' need for emergency shelter and / or transitional housing is determined. Emergency Shelters, under ESG, are being required to provide more case management and individualized case plans that detail how clients are being assisted in their exit plan to permanent housing. Transitional Housing programs are being encouraged to retool into a more "rapid re-housing" style of programming, focusing on individual service needs and providing services accordingly, limiting the time frame of assistance and pushing for exits to permanent housing within 12 months rather than 24 months.

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

Stark County's Rapid Re-Housing program is being facilitated through the YWCA and provides for individuals and families to transition directly into permanent housing, shortening the length of time that such households experience homelessness. This is currently a high performing program seeing many families and individuals housed monthly. This year there will be discussions regarding how the program could be expanded to increase assistance to even more families and possibly to those who need a little more than one month's assistance. There are currently strict income requirements to ensure that clients are able to maintain their housing after the rapid re-housing assistance is over; however, this can disqualify many of the neediest homeless from the program, such as those with no income. There are discussions around targeting that excluded population for transitional housing, unless they are more suitable for permanent supportive 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.

The HCCSC will meet with the primary funders of emergency assistance and homeless prevention this year to discuss the feasibility of using the initial screening that the Centralized Intake and Assessment System will be using, in order to further coordinate the Intake and Assessment System. This early detection of multiple system users will allow providers to identify warning signs of potential upcoming homelessness and provide access to earlier intervention.

Agencies providing Homeless Prevention, who are also part of the emergency assistance collaborative, will continue to review all new clients' history with receiving emergency assistance in order to determine how often this is occurring. The HCCSC will obtain periodic reports of these numbers through the CoC Planner's communication with Homeless Prevention agencies and will report to the Board and stakeholders of the Emergency Assistance Collaborative.

Representatives of our local hospitals' case management teams will be collaborating with the CoC to find alternatives to discharging their patients into homelessness. Other stakeholders who will be at the table will include representatives of the Homeless Hotline and representatives of all the CoC's emergency shelters. This group will work under the auspices of the System Performance & Planning Committee, and the CoC Planner will facilitate its meetings, ensuring, on behalf of the CoC, speedy outcomes from its discussions.

The CoC's Mental Illness and Addiction Subcommittee, which works under the auspices of the System Performance and Planning Committee, bears the primary responsibility for addressing the housing and supportive service needs of individual discharged from mental health institutions. The subcommittee includes representatives from Stark County Mental Health & Recovery Services Board; local mental health providers; and housing providers who serve the mentally ill. In addition, as reflected above, the

local state hospital for the mentally ill is a stakeholder and close collaborator.

The CoC has established a Youth Housing Task Force to (1) examine the challenges that young adults in the community face in securing stable housing and (2) identify ways of providing youth with more and better housing options. Although it will consider the housing problems of youth in general, this task force will also examine the special problems faced by youth being discharged from foster care.

Representatives of the following agencies have agreed to serve on the task force: PAL Mission; Latter Rain Associates; SCDJFS, Turnaround Community Outreach; Mental Health and Recovery Services Board; American Rescue Workers; Alliance for Children and Families; and Stark County Urban Minority Alcohol and Drug Addiction Outreach Project.

Stakeholders and collaborating agencies around the discharge planning for those exiting corrections programs and institutions include (1) the Ohio Department of Rehabilitation and Correction, the Stark County Sheriff's Office, and the Ohio Department of Youth Services and the case managers at those agencies who are involved with discharge planning; (2) the Homeless Hotline; (3) the Mental Health & Recover Service Board; and (4) Coleman Behavioral Health, which works with the Sheriff's office. The CoC staff member and committee that share responsibility for working with these collaborating agencies and stakeholders and developing strategies to avoid the discharge of individuals from corrections facilities into homelessness are the CoC Planner and the System Performance & Planning Committee.

Discussion

Stark County Regional Planning Commission (SCRPC) serves as the Collaborative Applicant for the CoC and has a part time staff member who is the CoC Planner. The CoC Planner works under the supervision of the Chief of Community Development of SCRPC to provide most of the administrative and collaborative tasks assigned to the CoC and delegated by the CoC Chair to the CoC Planner. The CoC Planner attends all committee meetings as well as the Homeless Services Collaborative and communicates the needs of homeless persons identified during the various meetings to the Board. The HCCSC expanded its membership to all interested individuals and organizations that serve or are concerned with the needs of Stark's homeless (housing, law enforcement, education, health care, faith community etc.). The HCCSC currently has over 90 members from a wide cross section of the community who are able to offer insight into the various needs of those at risk of homelessness, in the first stages of becoming homeless, fleeing domestic violence, or already literally homeless. Committees and focus groups have been established to get input from front line providers, those with "boots on the ground." The ESG jurisdiction, which is the City of Canton, has contracted with the CoC's Collaborative Applicant, Stark County Regional Planning Commission (SCRPC) to administer the ESG program. This enables the HCCSC, through SCRPC to consult with Canton on HSSCS goals and gaps and suggest best uses for City funds. The City and SCRPC worked together to develop policies and procedures relating to the solicitation, application, reviewing and scoring processes and allocation of ESG funding. These policies were also adopted by the HCCSC Board. The Board includes the City's Director of Development. The CoC's Recipient Evaluation and Review Committee assist SCRPC in reviewing and scoring ESG applications. Both the City and SCRPC consult with the CoC's System Performance & Planning Committee

on how programs fare in meeting HCCSC performance standards and target outcomes.

One year goals for the number of households to be provided housing through the use of HOPWA for:
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family
Tenant-based rental assistance
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds
Total

DRAFT

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

Introduction

The City of Canton has a wide variety of residential districts. Four R-1 districts (R-1a, R-1b, R-1c and R-1d) are single-family zones at various densities. The two-family R-2 district allows duplexes. The R-3 garden and townhouse apartment district allows R-2 uses as well as multi-family dwellings less than 28 feet in height. R-4 allows all R-3 uses and multi-family dwellings up to 45 feet high. Single-family dwellings are also permitted in the municipal agriculture district, and most residential uses are permitted in the City's business districts.

The vast majority of residential space in the City is zoned R-1, leaving only extremely limited developable land available for the construction of multifamily housing. Multi-family housing represents an important affordable housing option for lower-income households. A lack of affordable housing may impede housing choice for LMI households.

Excessively large lot sizes may deter development of affordable housing. In Canton, the minimum lot size in R-1 districts ranges from 6,000 square feet per family (R-1a) to 43,560 square feet per family. While larger lot sizes are considered excessive relative to the development of affordable units, the zoning map demonstrates that many smaller-minimum areas exist throughout the City. Considered as a whole, the variety of R-1 districts provides for a wide variety of neighborhoods accommodating a range of housing types and levels of affordability. The minimum lot sizes for multi-family districts are also not considered prohibitive.

Allowing alternative designs provides opportunities to expand the supply of affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while supporting the development of varied residential types. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for working and lower income households.

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

Housing choice can also be affected by the allocation of staff and financial resources to housing related programs and initiatives. The City of Canton receives Federal funding from the U.S. Department of HUD under the Community Development Block (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG) and Neighborhood Stabilization Program (NSP) to carry out projects designed to address priority needs such as decent affordable housing, safe neighborhoods, and access to needed

services.

In addition, Canton has developed an Affirmative Marketing Policy. Under this policy, the City has obligations which include community outreach and education, while also requiring developers to advertise availability of HUD-assisted units with local newspapers and with applicable social service and housing agencies. The City annually assesses the effectiveness of the Affirmative Marketing Policy and the efforts taken by the City and HOME/CHDO participants.

The City is committed to expanding housing choice by funding new construction projects in non-impacted areas of the City. The City identifies its southern two-thirds in the Consolidated Plan as an area of investment of entitlement funds for existing housing by virtue of predominantly low- and moderate-income households and minority concentration.

Discussion

With regard to zoning issues, the City Planning Department is responsible for subdivision review and approval as well as zoning recommendations. The Planning Commission will approve a change in the Zoning Code with regard to the definition of "Family" to permit persons with disabilities to operate as a single family unit, thereby greatly expanding housing choice opportunities. Also, the Planning Commission is working to expand R4 designation throughout the City, thereby also expanding housing choice opportunities for multi-family unit housing. Consideration of any changes to zoning will bear in mind the consequences it may have on affordable housing. In addition, as described in the preceding section, allowing alternative residential developments can provide opportunities to expand the supply of affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative design models can be considered as a way to produce and preserve affordable housing options for working and lower income households.

In addition, as described above, the City of Canton will continue to administer and enforce its Affirmative Marketing Policy as a positive to remove or ameliorate barriers to affordable housing. The City also recognizes the need to expand housing choice by providing opportunities for the development of affordable housing in neighborhoods that do not have concentrations of low income or minority households.

To implement this strategy, the City of Canton understands the need to educate the community, as well as policy makers, about the City's affordable housing needs Fair Housing Laws, and Disability Act (ADA) requirements including education and training to residents, developers, property owners, landlords, and homeowner associations.

AP-85 Other Actions – 91.220(k)

Introduction

Through this section, the City of Canton addresses a number of items to strengthen the community and the implementation of projects and activities of this Annual Action Plan as described below.

Actions planned to address obstacles to meeting underserved needs

The biggest obstacle facing the City in trying to meet underserved needs is financial, resulting from the continuing decrease in HUD funding for CDBG and HOME programs over the years. In the last ten years, Canton's CDBG entitlement grant has decreased from \$3,512,000 in FY 2004 to 2,410,452 in FY 2014, a decrease of 31%. Likewise, the City's HOME grant has decreased from \$775,150 in FY 2004 to \$489,048 in FY 2014, a decrease of 37%. To overcome this obstacle, Canton, when soliciting program proposals through its RFP Process, requires a local match whenever possible, provided through other grant programs, foundations or local funds. In this way, the City is able to leverage its HUD dollars to attract additional funding for needed housing and community development activities.

Actions planned to foster and maintain affordable housing

As described in great detail in the sections of this Annual Action Plan, the City of Canton has allocated a large portion of its CDBG and HOME dollars to projects designed to expand and preserve affordable housing for low and moderate income households. Under its combined CDBG and HOME FY 2014 allocations, the City has budgeted over \$2.3 million for affordable housing projects. These projects include housing rehabilitation programs carried out by the Department of Development, as well as housing rehabilitation/new housing construction programs carried by subrecipients such as Habitat for Humanity, Hammer & Nails, Stark County Community Action Agency, and Rebuilding Together. These affordable housing projects represent approximately 53% of the total amount of HUD funding allocated by the City for 2014.

Actions planned to reduce lead-based paint hazards

The City of Canton has established guidelines for dealing with lead-based paint hazards in homes being worked on under its HUD funded programs.

Home Owner Rehabilitation Program – A Lead Risk Assessment is undertaken early in the process, once rehab specifications have been drafted by City inspectors. The Lead Risk Assessment findings are then incorporated into the final draft rehab specifications. All rehab contractors must be a licensed Lead Abatement Contractor in order to participate in the City's Home Owner Rehabilitation Program.

Repair and Maintenance Program – A scope of work is written by City inspectors addressing health and safety issues. If any of these repairs require disturbing a painted surface, the contractor is to assume it contains lead and perform lead safe work practices for that particular repair. All contractors working under this program must be a licensed Lead Safe Renovator to participate in the City's Repair and Maintenance Program.

Regardless of which specific HUD funded program a home is listed under, all rehab or repair work

completed as part of the project must be completed in a lead safe work manner. Further, all rehabbed or repaired homes upon completion of the work must pass a final lead clearance. If the lead clearance test fails, the home must be re-cleaned and re-tested until it passes the lead clearance test.

The Department of Development, as part of its initial interview process of potential grant recipients, distributes a copy of the EPA brochure “Protect Your Family From Lead In Your Home” to every homeowner regardless if they qualify for a HUD funded grant or not.

The Department of Development also facilitates training seminars to assist contractors to become Lead Safe Renovators and Lead Abatement Contractors. The Department will only work with contractors who have the proper State of Ohio required licenses and certifications.

In addition, the Canton City Health Department offers testing for lead based paint and lead based paint hazards through its Lead Poisoning Prevention Program to City homeowners. It also educates the public about the hazards of lead based paint, symptoms of lead based paint poisoning, and how to avoid exposure to lead based paint.

Actions planned to reduce the number of poverty-level families

Collaborative efforts among agencies in Stark County work to encourage the development of unified service systems, which work with families, and individuals to empower them to meet their physical, emotional, intellectual and social needs.

The programs that currently fall under the jurisdiction of the City of Canton include CDBG, HOME and ESG. The HOME program will continue to address activities which will assist persons to remain in their homes, keep their homes decent, safe and sanitary and providing affordable housing opportunities for low- and moderate-income persons. The same goals will be addressed through some CDBG programs. The City will provide grants for housing rehabilitation, allowing low- and moderate-income persons to use their limited resources for other necessary items (i.e. clothing, food, etc.). ESG funding will be provided to agencies that provide housing, shelter, and supportive services to assist the homeless as well as those households at risk of becoming homeless

The City will continue to endorse SMHA’s programs for family self-sufficiency and economic development opportunities for public housing residents.

Actions planned to develop institutional structure

The City is continuing the process of restructuring the Department of Development based on retirements and other staff changes. In 2012, the City worked with technical assistance advisors provided by HUD to improve the department’s structure, policies, and programs. In 2016, the City will continue an increased focus on staff training and education.

In addition, the establishment of its Neighborhood Revitalization Strategy Area (NRSA) Program has resulted in the City increasing its coordination and collaboration with local non-profit service agencies, housing providers, neighborhood organizations, businesses, and local developers. The increase in program activities resulting from NRSA projects and RFP’s for the implementation of neighborhood revitalization programs has resulted in improved consultation and cooperation between the City and

local organizations.

In regard to homeless programs and the Continuum of Care, The System Performance Committee of the HCCSC has developed sub-committees of providers targeting the various types of housing options to assist with the gaps/needs analysis for the homeless population of Stark County. The work of the sub-committees provides valuable insight on needs and challenges faced by providers. The HCCSC has an active collaboration with the HSC membership on identified gaps and ideas for solutions. The Homeless Hotline is currently being expanded to include an assessment tool in which special service needs will be identified and more appropriate referrals given to strengthen institutional structure. While they are limited, services need to be increased for: healthcare including non-traditional delivery sites, child care that is not restricted to TANF regulations, and greater countywide transportation. These issues will be raised at the HCCSC meetings to collaborate to address needs when there are few, if any new dollars available.

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

As described above, the RFP process used by the City of Canton in soliciting funding proposals under the City's CDBG, HOME, ESG, and Neighborhood Revitalization Strategy Area programs provides a framework through coordination is enhanced between public and provide housing and social service agencies. In addition, the consultation process that was part of the development of this Consolidated Plan provided an additional method for increasing discussion and communication between the City and local agencies. These are dynamic and ongoing processes, and as implementation of the Strategic Plan continues in this and future years, the City should see continuing cooperation and coordination on housing and community development programs.

In addition, the City of Canton, through its contract with the Stark Regional Planning Commission for ESG administration, is improving the coordination of area homeless and homeless prevention programs and services. The Homeless Continuum of Care of Stark County (HCCSC) is comprised of both public and private housing and social service agencies. Canton will continue to be an active participant in the HCCSC, working to coordinate with other agencies and to promote the implementation of the Consolidated Plan.

The City is participating with the County, and the cities of Alliance and Massillon, on a number of regional issues. The City also has regular ongoing discussions with the Stark Metropolitan Housing Authority.

Discussion

All of the foregoing issues serve to strengthen the City's efforts to carry out the goals and policies established in the Consolidated Plan, Five-Year Strategic Plan and Annual Action Plan.

Program Specific Requirements

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

Introduction

This section provides information regarding various program specific requirements for the CDBG, HOME, and ESG programs under which the City of Canton has been allocated funding by the U.S. Department of HUD for various community development, housing, and homeless assistance projects and activities to be undertaken in this Annual Action Plan.

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.	0.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
The City of Canton will not utilize any other forms of investment beyond those identified in Sec. 92.205. All City of Canton housing programs that involve acquisition are modest single-family houses that do not exceed 95% of the area median purchase price. In the case of acquiring and rehabbing, the house has an estimated after rehab value that does not exceed 95% of the area median purchase price. Section 92.203(b) limits are used for homebuyer assistance or rehab of owner occupied single-family housing. All homebuyers are low-income households who reside in the home.

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:
The amount of subsidy to recapture is limited to the direct homebuyer assistance that was provided. If a homebuyer sells the home before the HOME affordability period has expired, the owner must repay HOME funds in accordance with the City's program guidelines as follows:

Federal regulations for the HOME Program specify certain requirements for recapture provisions when HOME funds are used to assist with homeownership purchase. The housing unit must be the principal residence of the household throughout the affordability period. To ensure affordability, the City has imposed the recapture mechanism to collect all of the direct HOME funds when the recipient decides to sell the house within the affordability period or no longer resides in the home as their principal residence. The following is exercised: (1) the homebuyer may sell the property to any willing buyer; (2) the sale of the property during the affordability period triggers repayment of the direct HOME funds that the buyer received when he/she originally purchased the home. A lien will be placed on the property and recorded with the Stark County Recorder to assure the First Time Homebuyer Program deferred loan is repaid in the event of a default under the loan terms and conditions during the loan's affordability period. Full repayment of the HOME funds is required when a resale occurs during the affordability period or the homeowner no longer occupies the home as their principal residence. However, if there are no net proceeds or insufficient proceeds to recapture the full amount of HOME funds invested, the amount subject to recapture will be limited to what is available from net proceeds (net proceeds are the sales price minus superior loan repayments and any closing costs).

Once the HOME funds are repaid, the property is no longer subject to any HOME restrictions. Recaptured funds must be used to carry out HOME eligible activities in accordance with the HOME guidelines and are not considered proceeds.

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:
HOME project owners/buyers are required to maintain HOME funded properties as affordable for a

minimum affordability period based on the amount of HOME funds spent on the project. The guidelines are as follows:

- Under \$15,000 per unit - 5 years
- \$15,000 - \$40,000 per unit - 10 years
- Over \$40,000 - 15 years
- New construction or acquisition within one year of construction (for rental projects) - 20 years
A HOME Written Agreement will be prepared and must be signed by the owner/buyer. This agreement establishes the occupancy and affordability requirements for the property as well as the owner's obligations to the City of Canton Department of Development. In signing the agreement, the owner agrees to the restrictions on the use of the property set forth in the document. The city of Canton will provide an interest-free, deferred loan. Loans are forgivable upon demonstrated occupancy over the affordability period. The deferred loan shall be secured through a Mortgage and Promissory Note executed by the property owner at closing. The closing agent shall file said documents with the Stark County Clerk's office upon the completion of the first mortgage transaction. Recipients of HOME funds are required to maintain the unit as their principal residence for the duration of the deferred loan period.

As a condition of the provisions of the Deferred Loan, the Buyer agrees to repay the City the outstanding balance of the Loan upon the earliest to occur, within the applicable Recapture Period:

- a) a sale, refinance, conveyance, or other transfer of the Residence for consideration, excluding any sale, conveyance, or transfer (i) to a spouse upon a dissolution of a marriage; (ii) to the surviving spouse upon the death of a joint tenant Homeowner; (iii) by will, by foreclosure, or deed in lieu of foreclosure, or otherwise by operation of law; or (iv) as may be accepted by the City in writing; or
- b) the Residence is no longer the Buyer's principal place of residence or is converted in whole or in part to a rental unit; or
- c) there exists a default by the Buyer, beyond any applicable cure period, under the Promissory Note and Open-End Mortgage by and between the Buyers and the City or any other document evidencing the Loan.

For the purpose of this section, "Recapture Period" shall mean the applicable period based on the affordability standards. In the case of a sale, refinance, conveyance, or other transfer, the amount of repayment shall be initial principal balance of the Loan or net proceeds of sale if full amount of outstanding assistance is not available. If none of these events described in clauses (a), (b), or (c) above occurs prior to the expiration of the "Recapture Period", the Loan shall be forgiven in its entirety at the end of the affordability period.

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:

The City of Canton does not plan to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system. The Stark County CoC has a coordinated intake process in place through the Homeless Hotline with a strong partnership between the Hotline and United Way's 2-1-1 call center. Clients are referred between two call centers based upon need and eligibility for Homeless Services. The hotline is managed by the same staff that run the County's HMIS. This direct connection makes collecting data from callers increasingly beneficial for running reports and tracking trends based upon data. All CoC, ESG and HCRP funded programs complete the Hotline's "HMIS Intake form" when clients enter their program which serves as a direct cross reference to the HMIS Intake form completed by the Hotline. The HMIS is provided through the TERA system which is a locally developed software system designed with the needs of Stark County in mind. The Hotline is currently being expanded to include an assessment tool (SPDAT) in which special service needs will be identified and more appropriate referrals given.
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations). The City of Canton has contracted with the Stark County Regional Planning (SRPC) for ESG administration for the 2015 Program Year. A formal application process was developed under which homeless organizations applied for ESG Funding. SRPC prepared A Notice of Funding Available for 2015 ESG Funding. This Notice included the program guidelines described above. The Notice was made available through the newspaper and documents were available for download from the City's website. Organizations were invited to make formal application for 2015 ESG Funds. SRPC reviewed the submitted applications for program eligibility. All projects were then evaluated and scored by the HCCSC Recipient Approval and Evaluation Committee. Based upon the scores, a ranking of programs and projects was submitted to the City for final approval.
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City's ESG Guidelines state that all ESG subrecipients must involve homeless individuals and families in the maintenance and operation of facilities, and in the provision of services to residents

of these facilities to the maximum extent possible. Methods of achieving client involvement may include having a suggestion box; using chore lists and exit interviews; conducting regularly scheduled house meetings; encouraging clients to assist with children's programs, parenting classes or vocational training; or service as members of the Board.

5. Describe performance standards for evaluating ESG.

The City's ESG Guidelines states that all ESG subrecipients are required to submit Quarterly Status Reports to the Stark County Regional Planning Commission with the Quarterly Request for Disbursement Form. Reports shall include, but are not limited to, the following information:

- Receipt and expenditure of program funds, including back-up documentation;
- Receipt and expenditure of matching funds, including back-up documentation;
- Breakdown of services provided and demographic information on the homeless population served;
- Coordination activities with other local human service providers.

A Grant Closeout Report is required with the Quarterly Financial Reports when the final reimbursement is requested. All ESG subrecipients are required to submit Quarterly Financial Reports until the full amount of the funding award is expended. Subrecipients that provide transitional housing must submit an Annual Statistical Report to City of Canton. City of Canton staff will monitor the use of grant funds through a combination of a review of all quarterly reports, audit review, and site visits.

Discussion