

**City of Canton  
Department of Development**



**2017 Annual Action Plan  
SF424s & Certifications**

Mayor, Thomas M. Bernabei  
Rollin Seward, Community Development Director



# 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 2017 Action Plan represents the City's assessment of how its resources will be used in the fourth year of the five-year plan.

As an entitlement community, the City of Canton is responsible for the preparation of a local comprehensive 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 2017 Fair Housing Action Plan is included in the appendix of this Plan.

### 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 2017:

- Maintain and improve the quality of existing affordable housing;

- Expand affordable housing opportunities;
- Reduce housing cost burden;
- Address homelessness issues;
- Improve public facilities serving low and moderate income (LMI) neighborhoods;
- Improve streets and sidewalks in LMI areas;
- Remove barriers to accessibility;
- Expand economic opportunities; and
- 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. One citizen input meeting was held on June 22, 2017 at 10:00 am.

The City made its proposed Action Plan budget, along with a brief summary regarding the Action Plan, available for citizen review and comment for a 14-day period beginning in June of 2017. The proposed budget and contact information were publicized in a legal ad that ran in The Repository on June 13, 2017 and appeared 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. The 10-day pre-submission legal ad outlining the 2017 Action Plan summary of fund allocations was publicized in a legal ad that ran in The Repository on July 24, 2017.

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

## **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, some comments were received regarding the City's RFP process. These comments are noted in another section of the Action Plan.

## **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.

## **7. Summary**

The City is researching other means of soliciting public participation, such as surveys on its website as well as mailings, particularly in City utility bills.

The Department of Development hired a consultant to design publications on the 2016 CAPER and on the 2017 Action Plan highlighting our HUD grant allocations, important statistics, and our funded programs and partners. These publications were professionally printed in the form of both booklets/handouts and posters, and distributed to the Mayor, Councilmembers and other city-wide partner agencies for review in July 2017. In addition to the printed publications, e-mails containing the same information seen on the handouts and posters were distributed to all City employees, city-wide partner agencies and other interested parties utilizing a listserv. Feedback received has been positive and encouraging.

**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.

| <b>Agency Role</b> | <b>Name</b> | <b>Department/Agency</b>  |
|--------------------|-------------|---------------------------|
| 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 (DOD) is also responsible for administration of the City of Canton's CDBG, HOME, and ESG Program.

**Consolidated Plan Public Contact Information**

Community Development & Planning, (330) 489-3258,  
Rollin Seward, Director, [rollin.seward@cantonohio.gov](mailto:rollin.seward@cantonohio.gov)  
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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **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.

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

The City of 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.

Two years ago, the City has partnered with Mercy Hospital, Stark County Community Action Agency, Canton City Schools and Stark Community Foundation to apply for a grant, Invest Health, through the Robert Wood Johnson Foundation. The grant will provide the City with opportunities to partner with many prestigious organizations for future funding opportunities. The focus of the application is the need to address the alarming fact that the City of Canton has the highest infant mortality rate in the nation. These statistics show that the same area identified in the Analysis of Impediments has the highest infant mortality rate.

### **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 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 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 through Central Intake and System Performance meetings. 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 | <b>Agency/Group/Organization</b>                               | CANTON   |
|   | <b>Agency/Group/Organization Type</b>                          | Housing<br>Services-Children<br>Services-Elderly Persons<br>Services-Persons with Disabilities<br>Services-Victims of Domestic Violence<br>Services-homeless<br>Services-Education<br>Services-Employment<br>Service-Fair Housing<br>Other government - Local<br>Planning organization<br>Grantee Department   |
|   | <b>What section of the Plan was addressed by Consultation?</b> | Housing Need Assessment<br>Public Housing Needs<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Market Analysis<br>Economic Development<br>Anti-poverty Strategy<br>Lead-based Paint Strategy |



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|---|---|--|
|   | <p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> | <p>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 internally and with its subrecipients and grantees with a goal of better coordination of resources and improved efficiency. In addition, Department of Development staff members meet regularly with the Mayor, his Chief of Staff, Service Director, Safety Director and the Building and Code, Civil Engineering, and Health Departments. The City has partnered with Mercy Hospital, Stark Community Action Agency, Canton City Schools and Stark Community Foundation to apply for the Invest Health grant which is discussed in detail elsewhere in the Plan.</p> |
| 2 | <p><b>Agency/Group/Organization</b></p>   | <p>Habitat for Humanity of East Central Ohio</p>   |
|   | <p><b>Agency/Group/Organization Type</b></p>  | <p>Housing<br/> Services-Children<br/> Services-Elderly Persons<br/> Services-Persons with Disabilities<br/> Services-Education<br/> Regional organization</p>   |
|   | <p><b>What section of the Plan was addressed by Consultation?</b></p>   | <p>Housing Need Assessment<br/> Market Analysis<br/> Economic Development<br/> Anti-poverty Strategy<br/> Lead-based Paint Strategy</p>  |

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|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The City of Canton and Habitat for Humanity East Central Ohio (Habitat) meet regularly to discuss programs and community needs, particularly housing needs for low income families and neighborhood revitalization issues. Habitat is a vital partner is providing new affordable housing for low income residents throughout the City.  |
| 3 | <b>Agency/Group/Organization</b>   | Stark County Community Action Agency   |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Children<br>Services-Elderly Persons<br>Services-Persons with Disabilities<br>Services-Health<br>Services-Education<br>Services-Employment<br>Other government - County  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Non-Homeless Special Needs<br>Market Analysis<br>Economic Development<br>Anti-poverty Strategy  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | 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. The SCCAA is also a partner on the Invest Health application team. |

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| 4 | <b>Agency/Group/Organization</b>   | Stark Metropolitan Housing Authority  |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>PHA<br>Services-Children<br>Services-Elderly Persons<br>Services-Persons with Disabilities<br>Services-Education<br>Services-Employment<br>Other government - Federal<br>Regional organization                             |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Public Housing Needs<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Non-Homeless Special Needs<br>Market Analysis<br>Economic Development<br>Anti-poverty Strategy |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The City is working with SMHA to help public housing residents to become home owners.   |

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| 5 | <b>Agency/Group/Organization</b>   | STARK COUNTY REGIONAL PLANNING   |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-homeless<br>Service-Fair Housing<br>Other government - County<br>Regional organization<br>Planning organization  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy<br>Anti-poverty Strategy   |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | 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. The City and SRPC also discuss CDBG and HOME program issues. |

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| 6 | <b>Agency/Group/Organization</b>                               | Homeless Continuum of Care of Stark County   |
|   | <b>Agency/Group/Organization Type</b>                          | Housing<br>Services - Housing<br>Services-Children<br>Services-Elderly Persons<br>Services-Persons with Disabilities<br>Services-Victims of Domestic Violence<br>Services-homeless<br>Services-Health<br>Services-Education<br>Services-Employment<br>Regional organization<br>Planning organization<br>Business and Civic Leaders<br>Foundation |
|   | <b>What section of the Plan was addressed by Consultation?</b> | Housing Need Assessment<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Anti-poverty Strategy   |

|   |  |  |
|---|--|--|
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | 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 | <b>Agency/Group/Organization</b>   | City of Canton Fair Housing Department   |
|   | <b>Agency/Group/Organization Type</b>  | Service-Fair Housing<br>Other government - Local<br>Grantee Department   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Non-Homeless Special Needs<br>Non-Homeless Individuals & Families with Children  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The City's Fair Housing office has been moved from oversight of the Department of Compliance to the oversight of the Department of Community Development by ordinance 161-2015 dated August 24, 2015. This took place in order to coordinate the efforts between the two departments (offices) more efficiently.   |
| 8 | <b>Agency/Group/Organization</b>   | Canton City Board of Health  |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Health<br>Health Agency<br>Other government - Local  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Non-Homeless Special Needs<br>Lead-based Paint Strategy  |

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|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The Health Department performs lead based paint inspections and clearances for rehab projects, as well as field investigations and oversight of contractors to ensure compliance with local, state and federal regulations. The Board of Health had been instrumental in providing information needed for the Invest Health grant. |
| 9  | <b>Agency/Group/Organization</b>   | Mental Health Services & Recovery Board of Stark County  |
|    | <b>Agency/Group/Organization Type</b>  | Services-homeless<br>Health Agency<br>Publicly Funded Institution/System of Care   |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy<br>Non-Homeless Special Needs   |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | 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 sub-grantees.   |
| 10 | <b>Agency/Group/Organization</b>   | CANTON CITY SCHOOLS  |
|    | <b>Agency/Group/Organization Type</b>  | Services-Education   |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Non-Homeless Special Needs   |

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|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The superintendent of Canton City Schools is a member of the Invest Health team.   |
| 11 | <b>Agency/Group/Organization</b>   | STARK COMMUNITY FOUNDATION   |
|    | <b>Agency/Group/Organization Type</b>  | Civic Leaders<br>Foundation  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Non-Homeless Special Needs   |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The president of the foundation is a member of the Invest Health team.   |
| 12 | <b>Agency/Group/Organization</b>   | Stark County Land Reutilization Corporation  |
|    | <b>Agency/Group/Organization Type</b>  | Housing<br>Other government - County<br>Regional organization<br>Planning organization   |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Economic Development<br>Elimination of slum and blight   |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The City has partnered with Stark County Land Reutilization Corp to apply for, and has received, \$4.2 million in state Neighborhood Initiative Program funds that target the demolition of vacant, blighted properties. The program recently awarded an additional \$500,000 for future projects. The program recently awarded Ohio \$97 million for the continuation of the program. Canton, through an award to Stark County Land Bank, has received approximately \$5 million. |



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| 13 | <b>Agency/Group/Organization</b>   | Mercy Medical Center  |
|    | <b>Agency/Group/Organization Type</b>  | Services-Health   |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Public Housing Needs<br>Non-Homeless Special Needs<br>Economic Development<br>Anti-poverty Strategy<br>Elimination of slum and blight  |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Mercy Medical Center has taken the lead in writing the Invest Health letter of intent and grant application. They are a crucial partner in action to bring vital services, particularly health care, to the City's isolated southeast area.   |
| 14 | <b>Agency/Group/Organization</b>   | Ohio Department of Health   |
|    | <b>Agency/Group/Organization Type</b>  | Services-Health<br>Other government - State   |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Lead-based Paint Strategy<br>Asbestos, elimination of slum and blight, housing   |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The Ohio Department of Health oversees the areas of lead and asbestos and provide consultation on interpretation of regulations and proper procedures to control contamination. They also assist in the oversight of contractors through field support and on-sight visits. The City is planning to work with the Lead Hazard Control Grant Program to assist homeowners with additional funding to address lead issues in their homes. |

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| 15 | <b>Agency/Group/Organization</b>   | Ohio Environmental Protection Agency, Northeast District   |
|    | <b>Agency/Group/Organization Type</b>  | Other government - State<br>Environmental  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Lead-based Paint Strategy<br>Asbestos, elimination of slum and blight, housing  |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The Ohio EPA oversees the areas of lead and asbestos and provides consultations on interpretation of regulations and proper procedures to control contamination. They also assist in oversight of contractors through field support and on-sight visits. |

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

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

| <b>Name of Plan</b> | <b>Lead Organization</b>                   | <b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>   |
|---------------------|--|---|
| 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)**

The City has increased its efforts to consult with other City departments and outside entities to coordinate DOD efforts with other actions in the community.

The DOD is heading a series of collaboration meetings with the Stark County Community Action Agency and Stark Metropolitan Housing, specifically to address concerns in the southeast area of Canton such as housing, employment, segregation, and a lack of vital amenities. This area of town is part of our NRSA, has been designated a blighted area, and was identified in the Analysis of Impediments as an area of concern. These collaboration meetings led to the creation of the Invest Health Team, which is discussed in more detail in other sections of this Plan.

One of the groups involved in consultation is the Canton City Planning Commission. The Planning Commission is comprised of a diverse selection of eleven members, eight of which are from the general citizenry. This commission considers proposals involving land use and general platting of the municipality. They also consider and adopt any plans for the municipal corporation as provided in Ohio Revised Code.

At the February 29, 2016 meeting of the Canton City Planning Commission, the City of Canton's Comprehensive Plan was unanimously recommended for adoption by Canton City Council. During the drafting of this plan, nine public meetings were held throughout Canton to elicit input from the community. A representative steering committee of eighteen residents and business stakeholders met regularly to ensure the plan was reflective of the community's concerns and aims. The creation of the Plan involved many hundreds of hours of work on the parts of the professional consultants, city officials and staff, citizen volunteers, area non-profit agencies, affordable housing organizations, philanthropic foundations, and other community leaders.

The Comprehensive Plan recommends three key actions. The first recommendation is to protect the City's five most important community and employment assets. The second is to take parts of the City out of service because they are flood-prone or contain properties where people should not live and businesses are not likely to use. The third recommendation is to improve neighborhoods by acting on decisions made by citizens.

## **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**

One public hearing was held Thursday, June 22, 2017, at 10:00 am to provide information and receive feedback on the proposed 2017 budget and activities.

The meeting was attended by Director Seward and three Development staff members. One citizen, a 2017 RFP applicant, attended the public hearing.

The Fair Housing Office participates in a number of outreach events which are further described within the 2017 Fair Housing Action Plan.

**Citizen Participation Outreach**

| Sort Order | Mode of Outreach  | Target of Outreach           | Summary of response/attendance  | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|-------------------|------------------------------|---|------------------------------|--|---------------------|
| 1          | Newspaper Ad      | Non-targeted/broad community | The City published an ad in The Repository Tuesday, June 13, 2017 advertising the proposed budget, date and time of the public hearing and inviting the public to view and comment on a draft amendment and a summary of the proposed budget. | No comments were received.   | No comments were not accepted.               |                     |
| 2          | Internet Outreach | Non-targeted/broad community | The Department of Development is currently in the process of updating the City webpage and has formed a Webpage Committee comprised of three staff members to aid in that endeavor.   | No comments were received.   | No comments were not accepted.               |                     |

| 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) |
|------------|------------------|--|---|------------------------------|--|---------------------|
| 3          | Public Notices   | Minorities<br><br>Non-targeted/broad community<br><br>Residents of Public and Assisted Housing | Notices were placed in four library branches, two public agencies and the public housing authority offices. | No comments were received.   | No comments were not accepted.               |                     |

| Sort Order | Mode of Outreach | Target of Outreach   | Summary of response/attendance  | Summary of comments received   | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|--|---|--|--|---------------------|
| 4          | Public Hearing   | Minorities<br>Non-targeted/broad community<br>Residents of Public and Assisted Housing | One public hearing was held in City Council Chambers on June 22, 2017. The meeting was attended by one former RFP applicant and four DOD staff members. | One citizen, a 2017 RFP applicant denied CDBG funding, attended the hearing and desired to gain more information about the City's RFP process and how to obtain a house for a particular furniture program. The citizen did not like how the City's RFP process favors agencies that are well-established and have capital. This citizen voiced concern for the City's homeless population and said the City is not doing enough to help the homeless. | No comments were not accepted.               |                     |

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

This section of the 2017 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.

#### Anticipated Resources

| Program | Source of Funds  | Uses of Funds  | Expected Amount Available Year 1 |                    |                          |           | Expected Amount Available Remainder of ConPlan \$ | Narrative Description  |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|---|--|
|         |                  |  | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$ |   |  |
| CDBG    | public - federal | Acquisition<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 2,365,450                        | 200,000            | 627,363                  | 3,192,813 | 0   | CDBG Funds will leverage private funding, as well as other public funding from local, state and 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<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA                      | 467,069                          | 0                  | 0                        | 467,069   | 0   | HOME Funds will leverage private funding, as well as other public funding from local, state and federal funding sources  |
| ESG     | public - federal | Conversion and rehab for transitional housing<br>Financial Assistance<br>Overnight shelter<br>Rapid re-housing (rental assistance)<br>Rental Assistance Services<br>Transitional housing | 213,023                          | 0                  | 0                        | 213,023   | 0   | ESG Funds will leverage private funding, as well as other public funding from local, state, and 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. The City does not award funding for 100% of any project. Applicants must provide proof of financial capacity to complete their projects. CDBG funds are awarded to provide gap financing especially for projects in NRSA and other target areas. 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 exempt from providing local match, as the City is considered by HUD to be severely distressed. Habitat projects are matched approximately 60/40 from Habitat funds, donations and sweat equity.

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. Applicants are required to state the sources of their match funds. The City will require documented expenditure of funds and will reimburse 50% of all verified expenditures up to the maximum award.

**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 (SECC), located at 1400 Sherrick Avenue SE. This facility is located within the boundaries of the City’s Eastside Neighborhood Revitalization Strategy Area.

**Discussion**

As discussed previously, the City expects to receive additional Neighborhood Initiative Program funds that will target the demolition of vacant, blighted properties.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

| Sort Order | Goal Name   | Start Year | End Year | Category   | Geographic Area  | Needs Addressed   | Funding  | Goal Outcome Indicator   |
|------------|---|------------|----------|--|--|---|--|--|
| 1          | Expand, Maintain & Improve Affordable Housing     | 2014       | 2018     | Affordable Housing   | Target Area<br>Census Tracts<br>City-Wide  | Maintain Affordable Housing Supply<br>Expand Affordable Housing Opportunities   | CDBG: \$1,423,142<br>HOME: \$400,000<br>ESG: \$0 | Rental units constructed: 14<br>Household Housing Unit<br>Homeowner Housing Added: 3<br>Household Housing Unit<br>Homeowner Housing Rehabilitated: 110<br>Household Housing Unit   |
| 2          | Improve the Safety & Liveability of Neighborhoods | 2014       | 2018     | Affordable Housing<br>Non-Housing<br>Community Development | Target Area<br>Census Tracts<br>Eastside<br>Neighborhood<br>Central<br>Neighborhood<br>City-Wide | Maintain Affordable Housing Supply<br>Public Facilities and Improvements<br>Public Services<br>Removal of Blight and Blighting Influences | CDBG: \$825,000<br>HOME: \$0<br>ESG: \$0         | Public service activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted<br>Facade treatment/business building rehabilitation: 2<br>Business<br>Homeowner Housing Rehabilitated: 30<br>Household Housing Unit<br>Buildings Demolished: 10<br>Buildings |

| Sort Order | Goal Name                      | Start Year | End Year | Category  | Geographic Area  | Needs Addressed                   | Funding                                     | Goal Outcome Indicator  |
|------------|--------------------------------|------------|----------|---|--|-----------------------------------|---|---|
| 3          | Reduce Homelessness            | 2014       | 2018     | Homeless<br>Non-Homeless<br>Special Needs   | Target Area<br>Census Tracts<br>Eastside<br>Neighborhood<br>Central<br>Neighborhood<br>City-Wide | Address<br>Homelessness<br>Issues | CDBG: \$0<br>HOME: \$0<br>ESG:<br>\$213,023 | Homeless Person Overnight<br>Shelter: 500 Persons Assisted<br>Homelessness Prevention:<br>1000 Persons Assisted |
| 4          | Provide Needed Public Services | 2014       | 2018     | Affordable<br>Housing<br>Non-Homeless<br>Special Needs<br>Non-Housing<br>Community<br>Development | Target Area<br>Census Tracts<br>City-Wide  | Public Services                   | CDBG:<br>\$369,500<br>HOME: \$0<br>ESG: \$0 | Public service activities other<br>than Low/Moderate Income<br>Housing Benefit: 550 Persons<br>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       | Maintain Affordable Housing Supply<br>Expand Affordable Housing Opportunities<br>Address Homelessness Issues<br>Public Facilities and Improvements<br>Expand Economic Opportunities<br>Public Services<br>Removal of Blight and Blighting Influences | CDBG: \$451,670<br>HOME: \$46,707<br>ESG: \$0 | Other: 1 Other         |

Table 6 – Goals Summary

Goal Descriptions

|   |                         |  |
|---|-------------------------|--|
| 1 | <b>Goal Name</b>        | Expand, Maintain & Improve Affordable Housing  |
|   | <b>Goal Description</b> | 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 | <b>Goal Name</b>        | Improve the Safety & Liveability of Neighborhoods  |
|   | <b>Goal Description</b> | 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 | <b>Goal Name</b>        | Reduce Homelessness  |
|   | <b>Goal Description</b> | 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 | <b>Goal Name</b>        | Provide Needed Public Services   |
|   | <b>Goal Description</b> | 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 | <b>Goal Name</b>        | Planning and Program Administration  |
|   | <b>Goal Description</b> | 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.   |

# Projects

## 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 2017 Annual Action Plan. These projects reflect a thorough process that determined Canton's priority needs to be addressed during the fourth 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 2017 Annual Action Plan, described below as follows:

### Projects

| #  | 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  | Fair Housing                                       |
| 9  | Planning   |
| 10 | CDBG General Management                            |
| 11 | HOME General Management                            |
| 12 | HOME New Housing Construction                      |
| 13 | HOME New Rental Construction                       |
| 14 | ESG 17 Canton                                      |

**Table 7 - 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.

The City estimates that 75% of its Consolidated Funds will be expended within the target areas, however some programs will be open in all areas of the City for income qualified residents.

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 were made available to all developers, subrecipients, and CHDOs on the City's website for CDBG and HOME 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.

**AP-38 Project Summary**  
**Project Summary Information**

|   |  |   |
|---|--|---|
| 1 | <b>Project Name</b>  | CDBG Rehabilitation - Single Family Residential   |
|   | <b>Target Area</b>   | Target Area Census Tracts   |
|   | <b>Goals Supported</b>   | Expand, Maintain & Improve Affordable Housing   |
|   | <b>Needs Addressed</b>   | Maintain Affordable Housing Supply<br>Expand Affordable Housing Opportunities<br>Removal of Blight and Blighting Influences   |
|   | <b>Funding</b>   | CDBG: \$953,150   |
|   | <b>Description</b>   | 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.   |
|   | <b>Target Date</b>   | 3/31/2018   |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | The City estimates it will assist approximately 110 families through this activity. The City does not limit or target specific types of families. Assistance is provided to qualifying applicants as funding allows.  |
|   | <b>Location Description</b>  | Locations are determined as awards are made.  |
|   | <b>Planned Activities</b>  | The following activities are planned to be carried out as part of this project:<br><br><u>City of Canton CDBG Repair and Maintenance Program and Roof Program</u> : \$900,000, 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.<br><br><u>SCCAA Furnace Repair Program</u> : \$53,150, 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 | <b>Project Name</b>  | CDBG Rehabilitation Administration  |
|   | <b>Target Area</b>   | City-Wide   |
|   | <b>Goals Supported</b>   | Expand, Maintain & Improve Affordable Housing   |

|   |  |   |
|---|--|---|
|   | <b>Needs Addressed</b>   | Maintain Affordable Housing Supply<br>Expand Affordable Housing Opportunities<br>Removal of Blight and Blighting Influences   |
|   | <b>Funding</b>   | CDBG: \$469,992   |
|   | <b>Description</b>   | The City of Canton will allocate CDBG funding for staff and subrecipient costs directly involved in carrying out the City's housing rehabilitation programs.  |
|   | <b>Target Date</b>   | 3/31/2018   |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | This activity supports rehab projects.  |
|   | <b>Location Description</b>  |   |
|   | <b>Planned Activities</b>  | The activities to be undertaken as part of this Project include the following:<br><br><u>City Rehab Salaries</u> : \$429,992, providing CDBG funding for the City's Development Department staff directly involved in the delivery of housing rehabilitation program services.<br><br><u>City Rehab Support</u> : \$40,000, providing CDBG funding for other direct program delivery costs associated with the City's housing rehabilitation program. |
| 3 | <b>Project Name</b>  | Public Facilities and Improvements  |
|   | <b>Target Area</b>   | Target Area Census Tracts   |
|   | <b>Goals Supported</b>   | Improve the Safety & Liveability of Neighborhoods   |
|   | <b>Needs Addressed</b>   | Public Facilities and Improvements  |
|   | <b>Funding</b>   | CDBG: \$630,000   |
|   | <b>Description</b>   | CDBG funds will be used for improvements to public facilities.  |
|   | <b>Target Date</b>   | 3/31/2018   |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Beneficiaries will be low/mod persons, as well as elderly and handicapped persons.  |
|   | <b>Location Description</b>  |   |

|   |  |   |
|---|--|---|
|   | <b>Planned Activities</b>  | <p>The activities to be undertaken as part of this Project include the following:</p> <p><u>Engineering Department</u>: \$325,000, providing curb cuts and sidewalk replacement to remove architectural barriers that restrict mobility and access of elderly and handicapped persons.</p> <p><u>Parks &amp; Recreation Department</u>: \$30,000, providing renovations to the Parks &amp; Recreation business office to remove architectural barriers that restrict mobility and access of elderly and handicapped persons.</p> <p><u>Canton Palace Theatre</u>: \$50,000, providing renovations to a nationally registered historic building in the downtown area.</p> <p><u>Project Development</u>: \$225,000, providing public facility improvement services for several projects that are currently undergoing evaluation and compliance.</p> |
| 4 | <b>Project Name</b>  | Clearance and Demolition  |
|   | <b>Target Area</b>   | City-Wide   |
|   | <b>Goals Supported</b>   | Improve the Safety & Liveability of Neighborhoods   |
|   | <b>Needs Addressed</b>   | Removal of Blight and Blighting Influences  |
|   | <b>Funding</b>   | CDBG: \$95,000  |
|   | <b>Description</b>   | 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.  |
|   | <b>Target Date</b>   | 3/31/2018   |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | The beneficiaries will be persons living in areas where blighting influences are removed.   |
|   | <b>Location Description</b>  | To be determined as demolitions are awarded.  |
|   | <b>Planned Activities</b>  | <p>The following activities are proposed to be undertaken as part of this Project:</p> <p><u>Demolition</u>: \$75,000, providing CDBG funding for the demolition and clearance of vacant and dilapidated buildings.</p> <p><u>Demolition Salaries</u>: \$20,000, providing CDBG funding to pay City Department of Development staff costs directly involved in carrying out demolition program activities.</p>  |

|          |  |   |
|----------|--|---|
| <b>5</b> | <b>Project Name</b>  | Public Service Activities   |
|          | <b>Target Area</b>   | Target Area Census Tracts   |
|          | <b>Goals Supported</b>   | Provide Needed Public Services  |
|          | <b>Needs Addressed</b>   | Public Services   |
|          | <b>Funding</b>   | CDBG: \$329,500   |
|          | <b>Description</b>   | 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.                         |
|          | <b>Target Date</b>   | 3/31/2018   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Beneficiaries will be low/mod persons. Activities include fair housing, prescription assistance, homeless hotline, mediation, homeowner maintenance training, and youth and adult services. |
|          | <b>Location Description</b>  |   |

|   |                           |   |
|---|---------------------------|---|
|   | <b>Planned Activities</b> | <p>The activities to be undertaken as part of this Project include the following:</p> <p><u>Fair Housing</u>: \$50,000, providing fair housing public services to residents.</p> <p><u>Canton Ex-Newsboys Association</u>: \$40,000, providing clothing assistance for youth.</p> <p><u>Coleman Mediation</u>: \$4,500, providing mediation/conflict resolution for qualified residents.</p> <p><u>Prescription Assistance Network of Stark County</u>: \$35,000, providing prescription assistance for uninsured/underinsured residents.</p> <p><u>Stark Mental Health &amp; Addiction Recovery</u>: \$50,000, providing a homeless hotline centralized intake and assessment program and a mandatory tracking system to assist homeless individuals.</p> <p><u>First Tee of Canton</u>: \$15,000, providing golf instruction and enrichment services for youth.</p> <p><u>Habitat for Humanity East Central Ohio</u>: \$30,000, for a homeowner maintenance training program for qualified residents.</p> <p><u>Stark Board of Developmental Disabilities</u>: \$5,000, providing an art training program to disabled residents.</p> <p><u>Workforce Career Pathways</u>: \$100,000, for Stark State College to provide workforce initiatives, including academic instruction, technical training services and job readiness skills to underserved residents seeking local apprenticeships and/or entry-level employment.</p> |
| 6 | <b>Project Name</b>       | Central Neighborhood Revitalization Strategy Area   |
|   | <b>Target Area</b>        | Central Neighborhood  |
|   | <b>Goals Supported</b>    | Improve the Safety & Liveability of Neighborhoods   |
|   | <b>Needs Addressed</b>    | <p>Maintain Affordable Housing Supply</p> <p>Expand Affordable Housing Opportunities</p> <p>Public Facilities and Improvements</p> <p>Expand Economic Opportunities</p> <p>Public Services</p> <p>Removal of Blight and Blighting Influences</p>  |
|   | <b>Funding</b>            | CDBG: \$80,000  |

|          |  |  |
|----------|--|--|
|          | <b>Description</b>   | 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.   |
|          | <b>Target Date</b>   | 3/31/2018  |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Beneficiaries will be low/mod persons. Activities include housing rehab and public service activities in the Central NRSA.   |
|          | <b>Location Description</b>  |  |
|          | <b>Planned Activities</b>  | The activities to be undertaken as part of this Project include the following:<br><u>SECC HVAC</u> : \$60,000, providing heating and cooling and other improvements for the Southeast Community Center (SECC).<br><u>SCCAA Furnace Program</u> : \$20,000, providing furnace repair/replacement services to qualified residents.   |
| <b>7</b> | <b>Project Name</b>  | Eastside Neighborhood Revitalization Strategy Area   |
|          | <b>Target Area</b>   | Eastside Neighborhood  |
|          | <b>Goals Supported</b>   | Improve the Safety & Liveability of Neighborhoods  |
|          | <b>Needs Addressed</b>   | Maintain Affordable Housing Supply<br>Expand Affordable Housing Opportunities<br>Public Facilities and Improvements<br>Expand Economic Opportunities<br>Public Services<br>Removal of Blight and Blighting Influences  |
|          | <b>Funding</b>   | CDBG: \$20,000   |
|          | <b>Description</b>   | 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. |
|          | <b>Target Date</b>   | 3/31/2018  |



|          |  |  |
|----------|--|--|
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Beneficiaries will be low/mod persons. Activities will include housing rehab in the Eastside NRSA.   |
|          | <b>Location Description</b>  |  |
|          | <b>Planned Activities</b>  | The activity to be undertaken as part of this Project include the following:<br><u>SCCAA Furnace Program</u> : \$20,000, providing furnace repair/replacement services to qualified residents.   |
| <b>8</b> | <b>Project Name</b>  | Fair Housing   |
|          | <b>Target Area</b>   | City-Wide  |
|          | <b>Goals Supported</b>   | Provide Needed Public Services   |
|          | <b>Needs Addressed</b>   | Maintain Affordable Housing Supply<br>Expand Affordable Housing Opportunities<br>Address Homelessness Issues<br>Public Facilities and Improvements<br>Expand Economic Opportunities<br>Public Services<br>Removal of Blight and Blighting Influences |
|          | <b>Funding</b>   | CDBG: \$40,000   |
|          | <b>Description</b>   | Payment of services provided by the City's Fair Housing program.   |
|          | <b>Target Date</b>   | 3/31/2018  |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Persons assisted will include low/mod City residents experiencing housing discrimination. Numbers and family types will depend on complaints received.   |
|          | <b>Location Description</b>  | Locations will depend on complaints received.  |
|          | <b>Planned Activities</b>  | The 2017 Fair Housing Action Plan is included as an appendix to this document. It is a continuation of the process begun in the 2015 Fair Housing Action Plan as approved by HUD.  |
| <b>9</b> | <b>Project Name</b>  | Planning   |
|          | <b>Target Area</b>   | City-Wide  |
|          | <b>Goals Supported</b>   | Planning and Program Administration  |

|           |  |  |
|-----------|--|--|
|           | <b>Needs Addressed</b>   | Maintain Affordable Housing Supply<br>Expand Affordable Housing Opportunities<br>Address Homelessness Issues<br>Public Facilities and Improvements<br>Expand Economic Opportunities<br>Public Services<br>Removal of Blight and Blighting Influences |
|           | <b>Funding</b>   | CDBG: \$35,000   |
|           | <b>Description</b>   | CDBG funding under this project will be used to pay Canton Department of Development staff costs associated with planning activities.  |
|           | <b>Target Date</b>   |  |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |  |
|           | <b>Location Description</b>  |  |
|           | <b>Planned Activities</b>  | CDBG 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 of the City's HUD Programs.   |
| <b>10</b> | <b>Project Name</b>  | CDBG General Management  |
|           | <b>Target Area</b>   | City-Wide  |
|           | <b>Goals Supported</b>   | Planning and Program Administration  |
|           | <b>Needs Addressed</b>   | Maintain Affordable Housing Supply<br>Expand Affordable Housing Opportunities<br>Address Homelessness Issues<br>Public Facilities and Improvements<br>Expand Economic Opportunities<br>Public Services<br>Removal of Blight and Blighting Influences |
|           | <b>Funding</b>   | CDBG: \$416,670  |
|           | <b>Description</b>   | CDBG funds are being allocated to pay for Canton Department of Development expenses associated with planning and administration of the City's CDBG Program.  |
|           | <b>Target Date</b>   |  |

|           |  |   |
|-----------|--|---|
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |   |
|           | <b>Location Description</b>  |   |
|           | <b>Planned Activities</b>  | CDBG 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 CDBG Program. |
| <b>11</b> | <b>Project Name</b>  | HOME General Management   |
|           | <b>Target Area</b>   | City-Wide   |
|           | <b>Goals Supported</b>   | Planning and Program Administration   |
|           | <b>Needs Addressed</b>   | Maintain Affordable Housing Supply<br>Expand Affordable Housing Opportunities   |
|           | <b>Funding</b>   | HOME: \$46,707  |
|           | <b>Description</b>   | HOME funds are being allocated to pay for Canton Department of Development expenses associated with planning and administration of the City's HOME Program.   |
|           | <b>Target Date</b>   |   |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |   |
|           | <b>Location Description</b>  |   |
|           | <b>Planned Activities</b>  | 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 administration of the City's HOME Program.              |
| <b>12</b> | <b>Project Name</b>  | HOME New Housing Construction   |
|           | <b>Target Area</b>   | City-Wide   |
|           | <b>Goals Supported</b>   | Expand, Maintain & Improve Affordable Housing   |
|           | <b>Needs Addressed</b>   | Expand Affordable Housing Opportunities   |

|           |  |  |
|-----------|--|--|
|           | <b>Funding</b>   | HOME: \$100,000  |
|           | <b>Description</b>   | 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. |
|           | <b>Target Date</b>   | 3/31/2018  |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Beneficiaries will be low/mod income families. Three (3) families will benefit from the proposed activity.   |
|           | <b>Location Description</b>  |  |
|           | <b>Planned Activities</b>  | The activities to be undertaken as part of this Project include the following:<br><br>Habitat for Humanity: \$100,000, to be used for the construction of three (3) new homes.   |
| <b>13</b> | <b>Project Name</b>  | HOME New Rental Construction   |
|           | <b>Target Area</b>   | City-Wide  |
|           | <b>Goals Supported</b>   | Expand, Maintain & Improve Affordable Housing  |
|           | <b>Needs Addressed</b>   | Expand Affordable Housing Opportunities  |
|           | <b>Funding</b>   | HOME: \$300,000  |
|           | <b>Description</b>   | 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 rental units for low and moderate households.      |
|           | <b>Target Date</b>   | 3/31/2018  |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Beneficiaries will be low/mod income families. Fourteen (14) families will benefit from the proposed activity.   |
|           | <b>Location Description</b>  |  |

|           |  |  |
|-----------|--|--|
|           | <b>Planned Activities</b>  | The activities to be undertaken as part of this Project include the following:<br><br><u>ICAN Housing</u> : \$300,000, to be used for the construction of fourteen (14) new rental units.  |
| <b>14</b> | <b>Project Name</b>  | ESG 17 Canton  |
|           | <b>Target Area</b>   | City-Wide  |
|           | <b>Goals Supported</b>   | Reduce Homelessness  |
|           | <b>Needs Addressed</b>   | Address Homelessness Issues  |
|           | <b>Funding</b>   | ESG: \$213,023   |
|           | <b>Description</b>   | 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.  |
|           | <b>Target Date</b>   | 3/31/2018  |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Beneficiaries will be persons and families who are homeless or at risk of becoming homeless.   |
|           | <b>Location Description</b>  |  |
|           | <b>Planned Activities</b>  | The activities to be undertaken as part of this Project include the following:<br><br><u>CommQuest Services</u> : \$106,554, providing rent and utility assistance for qualified residents.<br><br><u>Domestic Violence Project, Inc.</u> : \$69,190, providing assistance to victims of domestic violence.<br><br><u>Stark Mental Health &amp; Addiction Recovery</u> : \$21,302, providing homeless management information system services to support central intake and assessment activities.<br><br><u>ESG General Management</u> : \$15,977, will be used to pay for Canton Department of Development staff salaries, operating costs and other expenses associated with the administration of the City's ESG Program. |

## **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 year. 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.

In 2016, City Council passed legislation designating the two NRSA areas as blighted to prevent unnecessary delays in the demolition, clearance and redevelopment of blighted properties in these areas.

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 | 43                  |
| Eastside Neighborhood     | 16                  |
| Central Neighborhood      | 16                  |
| City-Wide                 | 25                  |

**Table 8 - 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

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.

In 2016 the two NRSAs were approved by City Council as designated blight areas to help prevent unnecessary delays in demolition, clearance and redevelopment activities.



## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Canton's FY 2017 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 subrecipient agencies, based on an RFP.

| One Year Goals for the Number of Households to be Supported |       |
|---|-------|
| Homeless  | 1,500 |
| Non-Homeless  | 123   |
| Special-Needs   | 0     |
| Total   | 1,623 |

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

| One Year Goals for the Number of Households Supported Through |     |
|---|-----|
| Rental Assistance   | 10  |
| The Production of New Units                                   | 3   |
| Rehab of Existing Units                                       | 110 |
| Acquisition of Existing Units                                 | 0   |
| Total   | 123 |

Table 10 - 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 will be determined through a Request for Proposal (RFP). 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, Stark Metropolitan Housing Authority (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, Stark Metropolitan Housing Authority (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 \$213,023 in ESG funding for 2017.

### **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. There are discussions regarding how the program could be

expanded to increase assistance to even more families and possibly to those who need 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 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 individuals 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; 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 City developed 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 City consults with the CoC's System Performance & Planning Committee on how programs fare in meeting HCCSC performance standards and target outcomes.

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

### **Introduction:**

The City of Canton has a wide variety of residential districts. Five R-1 districts (R-1, 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 and R-1 uses as well as multi-family dwellings less than 28 feet in height. R-4 allows all Residential 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 normally deter development of affordable housing. In Canton, zoning districts have been established to assist in right sizing efforts of a one-time larger city that has felt the effects of declining population over time. Lot sizes now are designed to control housing density within each district, with the density in R-1 districts being low density at five units per acre to the high density R-4 allowing fifty-eight units per acre. 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) and Emergency Solutions Grant (ESG) to carry out projects designed to address priority needs such as decent

affordable housing, safe neighborhoods, and access to needed services.

Canton has developed and City Council has adopted 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 Canton City Planning Commission has committed to approving an acceptable definition of the term "Family" in the City's Zoning Code that will be more congruent with HUD's definition and one that will allow groups of persons with disabilities to operate as a single family unit, thereby greatly expanding housing choice opportunities. Also, the Planning Commission is working to expand Multi-Family Zoning designations 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**

Fair Housing Office employees attend public events to make sure residents are aware of Fair Housing requirements as well as services available from public and private agencies.

Citizen lack of awareness of available services continues to be an obstacle the City seeks to overcome by providing information through a variety of formats, such as legal ads, newspaper articles, the City's website, pamphlets, talk shows, etc.

To further address underserved needs in the community, the City of Canton established two Neighborhood Revitalization Strategy Areas to provide a comprehensive approach to revitalization within central and eastside neighborhoods. Through this effort, the City is able to target public investment and encourage private investment to traditionally underserved neighborhoods.

The DOD works with and relies on the Ohio Environmental Protection Agency, Ohio Department of Health and Canton City Health Department to ensure contractor compliance with regulations concerning lead-based paint hazards and asbestos issues. The City consults with these agencies regarding practices, procedures and regulations pertaining to lead-based paint hazards and asbestos issues.

### **Actions planned to foster and maintain affordable housing**

Most experts agree that, in order to address the need to remove barriers to affordable housing, local zoning codes should be reviewed. Large minimum lot requirements, along with lack of suitable infrastructure (water, sewer, roads) can increase the cost of housing. These factors tend to restrict the opportunities for low income residents to live in many neighborhoods, impose higher costs of home ownership and maintenance, and reduce the range of housing types. Strategies to reduce these negative policy effects include improved community support services, closer to home job opportunities, and fair housing programs. The City's various HUD-funded housing programs are being carried out to address affordable housing needs for low income households. Public facility and infrastructure improvements, demolition and clearance, public service activities and economic development projects can all have a direct or indirect effect on removing barriers to affordable housing.

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) and



Emergency Solutions Grant (ESG) to carry out projects designed to address priority needs such as decent affordable housing, safe neighborhoods, and access to needed services.

Canton has developed and City Council has adopted 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.

As described in great detail in other 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 2017 allocations, the City has budgeted more than \$1.3 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, Stark County Community Action Agency and ICAN Housing. These affordable housing projects represent approximately 38% of the total amount of HUD funding allocated by the City for 2017.

### **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 rehabilitated using HUD funds.

Home Owner Rehabilitation Program: A Lead Risk Assessment/Lead-Based Paint Testing is undertaken early in the process, once rehab specifications have been drafted by City inspectors. The findings are then incorporated into the final rehab specifications draft. All rehab contractors must be licensed through the Ohio Department of Health as Lead Abatement Contractors in order to participate in this program.

Repair and Maintenance Program: A scope of work is written by City inspectors addressing health and safety issues. If any of the repairs require disturbing a painted surface, the contractor is to assume it contains lead. During the rehabilitation, the assigned Construction Coordinator, or inspector, will verify proper containment and lead safe work practices. All contractors working under this program must obtain an EPA Firm Certification and all workers are required to be licensed through the EPA as Lead Safe Renovators to participate in this program.

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

completed must be done 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 of whether they qualify for a HUD funded grant. 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. The City contracted with The Dell Group, an EPA and Ohio Dept. Of Health approved training provider, for Lead Consulting to improve program quality. Based on their recommendations, the City implemented the use of Lead Abatement Licensed Contractors instead of EPA RRP Certified Renovators for HOME funded housing rehabilitation. The City also implemented relocation of occupants to suitable, decent, and nearby lead-safe housing with re-occupancy not permitted until after clearance is achieved. Specifications of work for HOME rehab projects are written in such a way that no deteriorated paint remains after rehab. The same licensed Risk Assessor vendor performs the clearance examination, as performed in the initial Risk Assessment, if possible. The City has added a job spec line item for internal and contractor cost estimating to cover Worksite Preparation and Occupant Protection. The City added a job spec line for internal and contractor cost estimating to cover post hazard control HUD cycle cleaning. This informs the contractor that this element of work is not only required but represents costs that can be recouped. The City requires inspectors to evaluate the effectiveness of the worksite preparation and occupant protection during every weekly visit to the job in progress, and shut the job down if found deficient. The inspectors take photographs of the job set-up and containment at each weekly visit and The Housing Program Manager reviews the Risk Assessment for quality and completeness. The inspector ascertains that all Lead Hazards have been addressed with the designation added to the specification of work. The Housing Program Manager reviews the Lead Clearance report for quality and completeness utilizing ODH and HUD forms.

### **Actions planned to reduce the number of poverty-level families**

Through its citizen participation process and through its cooperation with other local governments in Stark County, the City of Canton has worked to develop a structure to enhance coordination between local government and social service organizations serving the community. Because the continued existence of poverty is due to a complex combination of factors - some economic, some social, including housing, education, and personal problems - there needs to be strong coordination between local government and various agencies that deal with poverty issues.

The City carries out a comprehensive system of activities and programs designed to address these poverty issues:

- Housing rehabilitation and homeownership assistance programs to provide affordable housing and improve housing opportunities.
- Public facility and public improvement projects, along with housing code enforcement, to improve low

income neighborhoods and the facilities serving low income residents of these areas.

-Public service activities to meet the social, economic, health, and educational needs of low income persons, including the homeless and those threatened with homelessness.

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**

In regard to the City's Department of Development, staff training and attending classes and seminars to gain a greater knowledge of program requirements, is a priority. The Department has assembled a collection of resources that include useful websites, copies of Federal Regulations and OMB Circulars. Technical assistance consultants have played an important role in guiding the Department's efforts to ensure program compliance. The Department has developed Standard Operating Procedures (SOP's) to ensure that steps are followed and compliance is achieved. HUD staff are consulted regularly and the Internet is used for research, webinars and online meetings. Department officials have also become more active in the Ohio Conference of Community Development (OCCD), attending quarterly meetings, and interacting with HUD staff and officials from other communities.

The Department is responsible for administration of programs in the Consolidated Plan. The staff works with local organizations, non-profit agencies, area developers and various neighborhood associations to carry out program year activities. Department staff continues to be participants at community meetings and are members of City commissions including: Homeless Continuum of Care of Stark County, Stark Homeless Collaborative, Special Improvement District, the Planning Commission and the Fair Housing Commission.

The City has restructured the Department based upon retirements and other staff changes. The City continues to improve the Department's policies, procedures and programs through continuous

monitoring and assessment. In 2017, the City will continue to focus on staff training and education.

The City Administration and City Council are the lead generators for planning. Both parties have created a network allowing for open dialogue. City Council-members are the spokespersons of their respective wards. During Council meetings, time is set aside for public speak forums. The Department has established a good working relationship with Canton City Council, meeting and explaining how the programs function. Council better understands Fair Housing and the impact that it has for the citizens.

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 RFPs 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.

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

In carrying out its housing and community development strategy, the City of Canton utilizes CDBG, HOME and ESG entitlement funding which it receives directly from HUD. The City also has received NSP-1, NSP-3, CDBG-R, and HPRP funding to carry out housing, community development, and homeless assistance programs.

The City applied for, and was awarded, funds from OFHA for the Neighborhood Initiative Program in partnership with the Stark County Land Bank. \$4.7 million will be used for the demolition of blighted structures.

The City encourages partnerships between agencies providing similar services to prevent duplication of services and to build capacity. This strategy also allows for a more efficient use of available funds. The City is also researching and applying for funding from other sources to help with City funding issues and

to help area non-profits meet the needs of the residents they serve.

The City's collaboration with other agencies lead to the award of the Invest Health grant.

Additional opportunities to stretch Federal funds are created by cooperating with the City's CHDOs to provide decent affordable housing to low and moderate-income persons. CDBG public service grants leveraged a higher level of assistance from area non-profit agencies to provide services vital to helping residents in need obtain a higher standard of living. Programs funded include those that provided youth programs and services, programs that provided assistance to, educational and recreational programs, neighborhood centers, a food voucher program, youth development and training and others.

**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        |
| <b>Total Program Income:</b>   | <b>0</b> |

#### 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. | 76.00% |

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(I)(2)

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

as follows:

The City of 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:

If direct subsidy is given to a homebuyer HOME funds shall be subject to Recapture. If no direct subsidy is given to a homebuyer the purchase shall be subject to Resale.

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.

The Resale Provision restricts the homebuyer's ability to resell. If a homebuyer sells the home before the HOME affordability period has expired, the owner must resell the home to a low income buyer whose household income does not exceed 80% of area median income. If the house is in the NSP Program the homebuyer's income can go up to 120% of area median income.

Federal regulations for the HOME Program specify certain requirements for resale. The affordability period is based on total HOME investment in the property. The housing unit must be the principal residence of the household throughout the affordability period. To ensure affordability, the City has imposed the resale mechanism to keep the house affordable to low-income homebuyers 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 a willing buyer that meets HUD's low-income eligibility; (2) the seller must receive a "fair return" on original investment plus improvements.

A restrictive covenant will be placed on the property and recorded with the Stark County Recorder to assure the home remains affordable.

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 according to HUD regulations

A HOME Written Agreement titled "Recapture Agreement" or "Resale Agreement" 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. In signing the agreement, the owner agrees to the restrictions on the use of the property set forth in the document. The City 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. Recipients of HOME funds are required to maintain the unit as their principal residence during the deferred loan period.

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 the balance of the Loan or what is available out of net proceeds of sale. To determine what is available out of "Net Proceeds" the calculation shall be the sales price minus the superior non-HOME debt (1st mortgage) minus closing costs. The city shall split the net proceeds with the homeowner but not recoup more than the original investment. 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.

For the purpose of this section, "Resale Affordability Period" shall mean the applicable period based on the affordability standards. In the case of a sale, the buyer must meet HUD's income eligibility to not exceed 80% of area median income unless the home is in the NSP Program, in which income cannot exceed 120% of area median income. Fair return shall mean buyer's initial investment plus improvements at a minimum, if available, out of net proceeds. The City of Canton must approve the sales price

The City of Canton requires that a new buyer purchasing under the resale provision cannot have PITI exceeding 30%.

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).

A formal application process was developed under which homeless organizations applied for ESG Funding. The City prepared A Notice of Funding Available for 2017 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 applications for 2017 ESG Funds. The City reviewed the submitted applications for program eligibility. All projects were then evaluated and scored by the City's Scoring Committee. Based upon the scores, a ranking of programs and projects was reviewed 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.

**Housing Trust Fund (HTF)**  
**Reference 24 CFR 91.220(I)(5)**

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).
- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.
- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.
- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. **Performance Goals and Benchmarks.** The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and

Objectives screens.

**5. Rehabilitation Standards.** The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

**6. Resale or Recapture Guidelines.** Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

**7. HTF Affordable Homeownership Limits.** If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

**8. Limited Beneficiaries or Preferences.** Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or

preference is described in the action plan.

**9. Refinancing of Existing Debt.** Enter or attach the jurisdiction’s refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter “N/A.”

**Discussion:**