

**City of Canton
Department of Development**



Consolidated Plan 2019 – 2023

Annual Action Plan 2019

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



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Executive Summary

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

1. Introduction

The City of Canton is a federal entitlement community under the U.S. Department of Housing and Urban Development (HUD) As a HUD entitlement community, the City is required to prepare a Five-Year Consolidated Plan (CP) in order to implement any federal programs that fund housing, community development and economic development within the community. The Canton CP covers the period from FY 2019 through FY 2023 (April 1, 2019 through March 31, 2024).

This CP consolidates into a single document the planning and application requirements for the following federal programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships (HOME)
- Emergency Solutions Grant (ESG)

Funds are provided under the following programs:

- Community Development Block Grant (CDBG): The primary objective of the CDBG Program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, acquisition of existing housing or land, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, water and efficiency improvements, abatement of hazards such as lead based paint or asbestos, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- HOME Investment Partnerships (HOME): The HOME Program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including new construction, reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- Emergency Solutions Grant (ESG): The ESG Program supports outreach to and shelters for homeless individuals and families. ESG also supports programs that prevent homelessness or rapidly re-house homeless in Canton and may be used for certain Homeless Management Information System (HMIS) database costs.

The lead entity responsible for the preparation of the CP is the City of Canton's Department of Development.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

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.

The Consolidated Plan has identified the following priority needs that will be the programming focus in 2019:

- 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

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

In order to broaden citizen participation, the City of Canton used a multi-prong strategy that included public meetings, stakeholder interviews and an online survey. Attendees at the public meetings and stakeholder interviews were provided with the links to the online survey and urged to participate in the survey and to encourage others to participate as well. A total of 114 people participated in the survey.

In October 2018 a series of interviews were held with housing, community development, human services, government, economic development, and other stakeholders. Fair housing advocates and advocates for special needs populations were also interviewed. A total of 33 stakeholders participated in these interviews.

In October 2018, the City also conducted two public meetings to solicit input on the City's housing and community development needs. A total of 11 people attended these meetings.

In April 2019, the City placed its draft 2019-2023 Consolidated Plan and its 2019 Annual Action Plan on public display for 30 days (from April 30 to May 29), and the City held a public hearing on the proposed Consolidated Plan and Annual Action Plan on May 14, 2019. There were 3 attendees at the hearing.

5. Summary of public comments

Public comments were received from online surveys through SurveyMonkey and stakeholder interviews. The consultations primarily addressed the need for additional affordable housing, neighborhood revitalization, public services, and economic development. Other major areas were in regards to the need to provide assistance to homeless and extremely low income families.

Stakeholder Interviews – Major needs highlighted during these interviews were affordable housing and housing rehabilitation, homeless services, infrastructure improvements, social services, and economic development and downtown improvements.

- Affordable Housing
- Demolition
- Public Infrastructure Improvements: accessibility improvements (sidewalks, curbs), street improvements
- Support homeless efforts
- Public services: code enforcement and senior services; broadband connectivity
- Public Facility Improvements

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

This Consolidated Plan has identified the following priority needs that provide the programming focus over the next five years:

1. Maintain and improve the quality of existing affordable housing;
2. Expand affordable housing opportunities;
3. Reduce housing cost burden;
4. Address homelessness issues;
5. Improve public facilities serving low and moderate income (LMI) neighborhoods;
6. Improve streets and sidewalks in LMI areas;
7. Remove barriers to accessibility;
8. Expand economic opportunities;
9. Provide Canton's special needs and low-income residents with services to improve their self-sufficiency; and
10. Remove blight and blighting influences in residential neighborhoods.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	CANTON	Department of Development
HOME Administrator	CANTON	Department of Development
ESG Administrator	CANTON	Department of Development

Table 1 – Responsible Agencies

Narrative

The lead agency responsible for the development of this Consolidated Plan is the City of Canton Department of Development. The Department of Development is also responsible for administration of the City of Canton's CDBG, HOME, and ESG Program.

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Canton consulted with local housing and community development agencies as part of the Consolidated Plan process. The City conducts ongoing Consultation with those agencies and the City's main subrecipient agencies to keep current on housing and community development needs especially with regard to the City's Neighborhood Revitalization Strategy Areas.

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 community development consultant to develop and implement a consultation and citizen participation process for the Consolidated Plan. The consultation process included an online housing and community development needs survey. The consultant represented the City in meetings with a number of local housing, homeless, community development, human services, and civic organizations to present and discuss the City's various needs.

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

The City of Canton is a HUD ESG grantee and is an active participant in the Stark County Continuum of Care (CoC). Both the City of Canton and Stark County are responsible for developing and implementing separate 5-Year Consolidated Plans. To ensure sound CoC planning and a coordinated, comprehensive approach to homeless issues, the two governments work 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.

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

As described above, the City of Canton and Stark County work to coordinate their homelessness efforts through the Stark County Continuum of Care, including developing a strategy to identify needs, set priorities and goals, and implement programs and activities to address homelessness in Stark County.

The City issues a Request for Proposals (RFP) for local non-profit emergency shelter, street outreach, and homeless prevention providers to use when applying for ESG funding. The City of Canton also participates directly in the Stark CoC, which manages and administers the continuum of care 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 jurisdictions consultations with housing, social service agencies and other entities

Draft

1	Agency/Group/Organization	Alliance for Children & Families, Inc.
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency participated in the Affordable Housing stakeholder interview and provided information on human services needed to restore lives of stability and enhancement to individuals and families.
2	Agency/Group/Organization	Canton Department of Development
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Employment Service-Fair Housing community development Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Non-Housing Community Development Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	<p>City Department of Development staff were interviewed to discuss the consolidated plan as it related to housing and non-housing community development needs. Staff roles and responsibilities in development and implementation of the plan were reviewed.</p> <p>Staff interviews resulted in re-examination of housing and community development goals and objectives and funding priorities.</p>
3	Agency/Group/Organization	Workforce Initiative Association
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Anti-poverty Strategy Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A representative of Workforce Initiative Association participated in the Economic Development stakeholder meeting. The agency presented information on the status of current job training and employment efforts and the gaps in such efforts, citing the need for better linkages between education and current and future job markets.
4	Agency/Group/Organization	Habitat For Humanity
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Anti-poverty Strategy Non-Housing Community Development Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Habitat for Humanity participated in several stakeholder interviews and a public meeting. Habitat is a subgrantee under the City's Neighborhood Revitalization Strategy Program and provides input on housing needs for low income families and neighborhood revitalization issues.
5	Agency/Group/Organization	Stark Metropolitan Housing Authority (SMHA)
	Agency/Group/Organization Type	Housing PHA Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	SMHA participated in a stakeholder interview and a public meeting. The City of Canton and SMHA meet regularly to discuss programs and services, particularly with regard to housing needs, public housing issues, and gaps in housing programs and services.
6	Agency/Group/Organization	STARK COUNTY REGIONAL PLANNING (SRPC)
	Agency/Group/Organization Type	Housing Service-Fair Housing Other government - County Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	SRPC representatives attended a public meeting and provided information on homeless assistance and services via phone and emails. The City and SRPC also discuss CDBG, HOME, and ESG program issues to improve coordination and delivery of services, housing, and shelter to the area homeless and those threatened with homelessness.
7	Agency/Group/Organization	Homeless Continuum of Care of Stark County
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City consulted with the Stark County Continuum of Care via phone and email correspondence with CoC agencies to produce the sections dealing with homeless needs, priorities, and goals. This coordination results 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.

8	Agency/Group/Organization	Stark County Mental Health & Addiction Recovery (StarkMHAR)
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	StarkMHAR was consulted via telephone and email correspondence to provide data and information on housing and service needs of persons with disabilities, and also on homelessness issues.
9	Agency/Group/Organization	ICAN, INC.
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	ICAN representatives participated in the Homeless Assistance/Human Services stakeholder interview and provided information on the housing, human service, education, and employment needs of the homeless. Through this consultation, ICAN helped identify gaps in homeless housing and services.

10	Agency/Group/Organization	StarkFresh
	Agency/Group/Organization Type	Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended several stakeholder interviews and a public meeting and provided input on food security and related matters – food gardens, mobile food markets, agricultural employment, food shipping habits, food banks, etc.
11	Agency/Group/Organization	Refuge of Hope
	Agency/Group/Organization Type	Housing Services-homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A Refuge of Hope representative participated in a stakeholder interview. Refuge of Hope provided valuable feedback on the City's housing and community development program needs.
12	Agency/Group/Organization	Stark Housing Network
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	SHNI was consulted via telephone and email correspondence to provide information on homeless issues and continuum of care functions.
13	Agency/Group/Organization	CANTON CITY HEALTH DEPARTMENT
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Canton City Health Department participated in several stakeholder interviews and attended a public meeting. The City's Community Development consultation consultant met with the United Way's Director of 2-1-1- information and referral services to make an in-person presentation on the City's Housing and Community Development Needs survey. Health Department staff provided valuable information on the City's housing and community development needs, especially health issues, e.g., infant mortality, unsanitary housing, eating habits, etc.
14	Agency/Group/Organization	Stark Area Regional Transit Authority (SARTA)
	Agency/Group/Organization Type	Regional organization Services – Persons with Disabilities Public Transportation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	SARTA representatives participated in the economic development stakeholder interview. SARTA provided input on the public transportation links between housing, jobs and college campuses.

15	Agency/Group/Organization	Domestic Violence Project
	Agency/Group/Organization Type	Housing Services-Children Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via phone and email regarding data on the housing needs of victims of domestic violence and dating violence. The agency provided data on the needs of domestic violence victims.
16	Agency/Group/Organization	Stark County Real Estate Investors Association (SCREIA)
	Agency/Group/Organization Type	Services - Housing Private sector – Real Estate
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A SCREIA representative participated in the Affordable Housing stakeholder meeting and provided valuable information on the City's housing market, i.e., residential disinvestment, homeownership obstacles, housing rehabilitation needs (especially rental rehabilitation), etc.
17	Agency/Group/Organization	Stark State College
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Economic Development

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Through a stakeholder interview, Stark State helped identify gaps in education services as well as an opportunity to discuss future areas of coordinated education and job training efforts.</p>
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Table 2 – Agencies, groups, organizations who participated

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

Not applicable.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Stark County Continuum of Care	The Strategic Plan goals support the goals of the Stark County Continuum of Care efforts to reduce and prevent homelessness. Canton and Stark County have worked together to develop a strategic plan that supports the continuum of care.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City consulted with other public entities in the development of the Consolidated Plan. Specifically, the City consulted with Stark County, including the Stark Regional Planning Commission, and the Stark Continuum of Care in the planning and development of the homeless portions of the Strategic Plan. Since both the City and the County are in the process of developing new 5-Year Consolidated Plans, both units of government have made a concerted effort to cooperate and work together in preparing a unified homeless strategy.

Narrative (optional):

The City will continue its dialogue with local housing and community development agencies and service providers to identify housing and community needs, set priorities, establish goals, and implement programs.

PR-15 Citizen Participation

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

In order to broaden citizen participation, the City of Canton used a multi-prong strategy that included public meetings, stakeholder interviews and an online survey. Attendees at the public meetings and stakeholder interviews were provided with the links to the online survey and urged to participate in the survey and to encourage others to participate as well. A total of 114 people participated in the survey.

In October 2018 a series of interviews were held with housing, community development, human services, government, economic development, and other stakeholders. Fair housing advocates and advocates for special needs populations were also interviewed. A total of 33 stakeholders participated in these interviews.

In October 2018, the City also conducted two public meetings to solicit input on the City's housing and community development needs. A total of 11 people attended these meetings.

In April 2019, the City placed its draft 2019-2023 Consolidated Plan and its 2019 Annual Action Plan on public display for 30 days (from April 30 to May 29), and the City held a public hearing on the proposed Consolidated Plan and Annual Action Plan on May 14, 2019. There were three attendees at the hearing.

Citizen Participation Outreach

Draft

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)
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Draft

1.	Internet Outreach	Non-targeted/broad community Homeless	A community needs survey was available online via SurveyMonkey, and posted on the City of Canton's website. 114 people responded to the survey.	Comments were wide ranging: support for affordable hsg., homeless assistance, neighborhood revitalization (demo of blighted buildings, more code enforcement, & crime & drug reduction), economic dev (job creation/retention, facilitation of business start-ups), public services (services/facilities for elderly & youth, mental health clients, veterans, substance abuse), infrastructure (street improvements et.al).	No comments were not accepted.	cantonohio.gov/development
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2.	Stakeholder Interviews	Housing and Community Development Stakeholders	A total of 33 stakeholders attended the interviews.	Needs cited: 1. More & better affordable housing 2. Safer neighborhood 3. Workforce development; more & better jobs. 4. More funding for public services 5. Infrastructure improvements 6. Residential rehabilitation (inc. rental units) 7. Homeless assistance and services 8. Housing for special needs populations 9. Code enforcement	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 meetings	Non-targeted / broad community	A total of 11 people attended the two public meetings	Needs cited: 1. Homeless assistance 2. Neighborhood revitalization (inc. demolition) 3. Rental rehab 4. Home maintenance classes 5. Human services 6. Code enforcement 7. Jobs & job training 8. Multiple needs in NRSAs	No comments were not accepted.	Cantonohio.gov/development
4.	Newspaper Ad	Non-targeted / broad community	The City published a public notice in the Canton Repository on April 30, 2019 describing the Consolidated Plan and proposed Annual Action Plan and inviting citizen review and comment. Three people attended.	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)
5.	Public Hearing	Non-targeted / broad community	The City of Canton conducted a public hearing on the Consolidated Plan and Annual Action Plan on May 14, 2019. The hearing was held in the offices of the Department of Development, located on the Fifth Floor of City Canton Hall. Three people attended, two staff members and one representative of a partner organization.	No comments were received.	No comments were received.	

Table 4 – Citizen Participation Outreach

The City used the input it received through its citizen participation and consultation process to re-evaluate its 2014-2018 Consolidated Plan goals, identify potential new goals, and establish priorities among proposed goals.

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The City of Canton's need assessment was performed in a variety of ways, including conducting an online survey, undertaking data review and analysis, conducting stakeholder interviews, and by holding community meetings to receive citizen input about housing and community development needs. The City's Community Needs Survey was posted on-line at the City's Development Department website. Citizens and other interested parties completed the survey on-line, and the City tabulated the results, which are incorporated in the text of this section. The City also distributed the survey to local organizations, including non-profit agencies, neighborhood associations, housing developers, and others to solicit information regarding community needs.

Draft

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Based on the data below, the City of Canton faces a number of housing needs:

- 21% of all households (6,210) are extremely low income (<30% area median family income).
- 17% of all households (5,090) are very low income (31-50% area median family income).
- 19% of all households (5,685) are moderate (51-80% area median family income).
- 57% of all households in the City of Canton are low and moderate income (LMI).
- 27% of all LMI households contain at least one person 62 years old or older.
- 23% of all LMI households contain one or more children 6 years old or younger.
- 3,595 LMI renter households and 1,590 LMI homeowners pay half or more of their income for housing costs, for a total of 5,185 LMI households (31%) with severe cost burden.

The development of Canton's new Five Year Consolidated Plan coincides with the completion of the updated Analysis of Impediments to Fair Housing Choice (AI) and coordinates these documents as well as numerous other strategic plans, studies, and reports developed over the years to highlight problems and called attention to the need for:

- Retention of affordable housing stock by increasing the availability of permanent housing in standard condition that is affordable to low-income and moderate income families;
- Increasing the availability of permanent housing in standard condition that is affordable to low-income and moderate income families;
- Assisting homeless persons to obtain appropriate housing;
- Assisting persons at risk of becoming homeless.

All of these longstanding issues and new ones such as the decline of homeownership levels make it challenging to develop strategies that can make a significant difference in addressing the housing needs of thousands of City households over a five year period, especially given the uncertainty over federal funding levels for housing and community development programs.

Demographics	Base Year: 2000	Most Recent Year: 2013	% Change
Population	80,806	73,027	-10%
Households	35,502	29,696	-16%
Median Income	\$28,730.00	\$30,209.00	5%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6,210	5,090	5,685	3,000	9,710
Small Family Households	2,170	1,605	2,205	1,015	4,800
Large Family Households	655	475	510	210	545
Household contains at least one person 62-74 years of age	580	815	1,030	635	1,945
Household contains at least one person age 75 or older	415	880	875	370	740
Households with one or more children 6 years old or younger	1,970	1,050	955	524	795

Table 6 - Total Households Table

Data 2009-2013 CHAS
Source:

Draft

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	210	240	45	15	510	120	15	75	25	235
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	45	0	10	45	100	0	0	0	4	4
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	140	60	50	0	250	35	0	30	0	65
Housing cost burden greater than 50% of income (and none of the above problems)	2,790	770	35	0	3,595	795	545	250	30	1,620

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	450	1,560	810	35	2,855	125	355	880	420	1,780
Zero/negative Income (and none of the above problems)	285	0	0	0	285	115	0	0	0	115

Table 7 – Housing Problems Table

Data 2009-2013 CHAS
Source:

LMI Housing Problems Narrative

Based on analysis of the data in the above tables, the extent of housing problems affecting LMI Canton Households can be summarized below:

- 47% of LMI households with housing problems are very low income (0%-30% AMI).
- 77% of Very Low Income Households with housing problems are renters.
- 69% of LMI households with housing problems are renters.
- 82% of all Very Low Income Households have housing problems.
- 70% of all Low Income Households (31%-50% AMI) have housing problems.
- 38% of all Moderate Income Households (51%-80% AMI) have housing problems.
- 57% of all Moderate income Households with housing problems are home owners.
- 64% of all LMI Households (0%-80% median income) have housing problems.

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	3,185	1,070	140	55	4,450	950	565	360	65	1,940
Having none of four housing problems	1,400	2,475	2,280	885	7,040	270	985	2,905	1,995	6,155
Household has negative income, but none of the other housing problems	285	0	0	0	285	115	0	0	0	115

Table 8 – Housing Problems 2

Data 2009-2013 CHAS
Source:

LMI Housing Problems Narrative

Based on analysis of the data in the above table, the extent of severe housing problems affecting LMI Canton Households can be summarized below:

73% of Very Low Income Households(0%-30% AMI) have severe housing problems.

76% of Very Low Income Households with severe housing problems are renters.

32% of Low Income Households (31%-50% AMI) have severe housing problems.

65% of Low Income Households with severe housing problems are renters.

9% of Moderate Income Households (51%-80%AMI) have severe housing problems.

72% of Moderate Income Households with severe housing problems are home owners.

39% of all LMI Households (0%-80% AMI) have severe housing problems.

70% of all LMI Households with severe housing problems are renters

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,360	865	415	2,640	300	270	385	955
Large Related	555	255	20	830	59	120	165	344
Elderly	295	510	135	940	290	290	320	900
Other	1,325	845	295	2,465	340	240	280	860
Total need by income	3,535	2,475	865	6,875	989	920	1,150	3,059

Table 9 – Cost Burden > 30%

Data 2009-2013 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,170	280	15	1,465	275	185	50	510
Large Related	445	95	0	540	55	80	55	190
Elderly	230	135	10	375	235	105	80	420
Other	1,205	330	15	1,550	285	175	70	530
Total need by income	3,050	840	40	3,930	850	545	255	1,650

Table 10 – Cost Burden > 50%

Data 2009-2013 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	100	25	60	0	185	0	0	30	0	30

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	90	35	0	0	125	35	0	4	4	43
Other, non-family households	0	0	0	45	45	0	0	0	0	0
Total need by income	190	60	60	45	355	35	0	34	4	73

Table 11 – Crowding Information – 1/2

Data 2009-2013 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

There is no data available on the number and type of single person households in the City of Canton who need housing assistance.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The Stark Metropolitan Housing Authority’s waiting list for public housing units in the City of Canton includes 1,903 families with disabilities. The housing authority’s waiting list for Section 8 units are for the entire county, not just the City of Canton. These countywide waiting lists include 1,078 families with disabilities.

There is no data available for the number and types of families in need of housing assistance who are victims of dating violence, sexual assault and stalking.

What are the most common housing problems?

The Housing Needs Summary Table identifies four types of housing problems – lack of complete kitchen facilities or complete plumbing facilities, overcrowding, and cost burden. A total of 10,440 LMI households have at least one of these housing problems. This represents 61% of all LMI households. The most common housing problem affecting LMI households is cost burden. Housing cost burden - needing to pay more than 30% of monthly income for housing - affects 9,365 LMI households, which represents

55% of all LMI households in the City. Of this total, 5,185 households have housing cost burden greater than 50% of monthly income. This represents 31% of LMI households. By contrast, the number of LMI households with at least one of the other identified housing problems is 1,475 or 9% of total LMI households. The above data proves that cost burden is by far the most prevalent housing problem affecting LMI Canton households.

Are any populations/household types more affected than others by these problems?

Households that are cost burdened include 55% of low income (31% - 50% AMI) renters and 65% of moderate income (51% - 80% AMI) owners. Among renters, cost burden affects most Small Related, Large Related and Other very low income (<30% AMI) households and most Elderly low income (31% - 50% AMI) households. Among owners cost burden is most prevalent among moderate income (51% - 80% AMI) Small Related, Large Related and Elderly households, and very low income (<30% AMI) Other households.

Among households with a housing cost burden greater than 50% of income, almost 78% of renters and one half of owners are very low income (<30% AM). Severe cost burden affects 60% to 80% of all very low income renter household types and about 55% of Small Related, Elderly and very low income owners.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

The characteristics of individuals and families at imminent risk of residing in shelters or becoming homeless include, but are not limited to, mental illness, job loss and domestic violence. The needs of these households include job stability, medical assistance, rental and/or security deposit assistance, and short- to medium-term case management.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Not applicable.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

As noted above, many Canton low and moderate income households are cost burdened, making such households vulnerable to possible eviction and homelessness if their income is reduced for any reason.

Discussion

Housing costs burden is a major housing issue for the City. The City needs to continue to address cost burden and other affordable housing issues.

Draft

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60% of all low-income households within a jurisdiction have a housing problem and 70% of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provide information for the City as a whole that can be useful in describing overall need.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,325	1,475	465
White	3,395	880	305
Black / African American	1,500	570	100
Asian	25	0	0
American Indian, Alaska Native	14	0	0
Pacific Islander	0	0	0
Hispanic	100	0	20

Table 13 - Disproportionately Greater Need 0 - 30% AMI

Data 2009-2013 CHAS

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,530	1,850	0
White	2,325	1,205	0
Black / African American	955	500	0
Asian	0	15	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	105	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2009-2013 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,025	4,105	0
White	1,300	2,915	0
Black / African American	645	970	0
Asian	10	10	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	0	65	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2009-2013 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	350	2,650	0
White	260	1,910	0
Black / African American	90	565	0
Asian	0	15	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	0	75	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2009-2013 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Based on analysis of the data in the tables above, the following racial and ethnic households have disproportionately greater need in terms of housing problems:

0% - 30% AMI: Asian, American Indian, Alaskan Native, Hispanic

31% - 50% AMI: Hispanic

51% - 80% AMI: Asian

However, the number of the above types of households is very small, i.e., less than 2.0% of the total number of households in their income categories.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60% of all low-income households within a jurisdiction have a housing problem and 70% of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified.

Severe housing problems include:

- Lacks complete plumbing or kitchen facilities.
- Overcrowded households with more than 1.5 persons per room, not including bathrooms, porches, foyers, halls, or half-rooms.
- Households with cost burdens of more than 50 percent of income

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,445	2,355	465
White	2,880	1,390	305
Black / African American	1,205	865	100
Asian	15	10	0
American Indian, Alaska Native	14	0	0
Pacific Islander	0	0	0
Hispanic	75	14	20

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2009-2013 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,450	3,930	0
White	940	2,585	0
Black / African American	390	1,075	0
Asian	0	15	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	60	40	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2009-2013 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	460	5,670	0
White	315	3,895	0
Black / African American	130	1,480	0
Asian	0	20	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	0	65	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2009-2013 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	45	2,955	0
White	45	2,115	0
Black / African American	0	660	0
Asian	0	15	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	0	75	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2009-2013 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

Based on analysis of the data in the tables above, the following racial and ethnic households have disproportionately greater need in the terms of severe housing problems:

0% - 30% AMI: American Indian, Alaskan Native

31% -50% AMI: Hispanic

However, the number of the above types of households is very small, i.e., less than 2.0% of the total number of households in their income categories.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

A disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60% of all low-income households within a jurisdiction have a housing problem and 70% of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	18,925	5,215	5,605	480
White	14,120	3,400	3,620	315
Black / African American	3,910	1,510	1,545	100
Asian	80	20	15	0
American Indian, Alaska Native	65	0	14	0
Pacific Islander	0	0	0	0
Hispanic	330	90	105	20

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2009-2013 CHAS
Source:

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Cost Burdened Households	Percent Cost Burdened
Jurisdiction as a whole	18,295	5,215	5,605	480	29,745	36.4
White	14,120	3,400	3,620	315	21,140	33.2

Black / African American	3,910	1,510	1,545	100	6,965	43.9
Asian	80	20	15	0	115	30.4
American Indian, Alaska Native	65	0	14	0	79	17.7
Pacific Islander	0	0	0	0	0	0.0
Hispanic	330	90	105	20	525	37.1

Data Source: 2009-2013 CHAS

Discussion:

Per analysis of data in the above table, there are no racial or ethnic group household types in Canton that have a disproportionately greater need than the population as a whole with respect to housing cost burden.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Analysis of 2009 -2013 CHAS data indicates the following disproportionately greater need for racial and ethnic groups in various income categories:

Disproportionately Greater Need: Housing Problems

0% - 30% AMI: Asian, American Indian, Alaskan Native, Hispanic

31% -50% AMI: Hispanic

51% - 80% AMI: Asian

Disproportionately Greater Need: Severe Housing Problems

0% - 30% AMI: American Indian, Alaskan Native

31% -50% AMI: Hispanic

However, the number of the above types of households is very small, less than 2.0% of the total number of households in their income categories.

If they have needs not identified above, what are those needs?

The need for affordable housing and housing rehabilitation for both renters and homeowners are the most prevalent problems affecting low and moderate income households in Canton.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The City of Canton has established a Neighborhood Revitalization (NRSA) Program and has two NRSA areas that consist of the following Census Tracts: 7001, 7015, 7017, 7018, 7021 and 7023. The NRSA areas are areas of high (>34%) racial concentration.

NA-35 Public Housing – 91.205(b)

Introduction

The Stark Metropolitan Housing Authority (SMHA) provides eligible residents of Stark County with quality affordable housing in decent, safe, and nourishing neighborhoods. By working in partnership with the public and private sectors, the SMHA provides families with housing choices and the opportunity to achieve self sufficiency.

There are a total of 1,738 public housing units in the City. All HUD Minimum Housing Quality Standard requirements are adhered to, except where SMHA has adopted a higher standard. SMHA inspects each unit at least once annually to determine if the unit is in decent, safe and sanitary condition. The current waiting list is 9,158 families, with an annual turnover of 439 units.

SMHA also administers the Section 8 Rental Assistance Program, the Housing Choice Voucher Program, the Moderate Rehabilitation Program, and Shelter Plus Care. The SMHA Section 8 Homeownership Program is a HUD certified housing counseling service offering homeownership opportunities to SMHA residents and post purchase counseling to area homeowners. In addition, the SMHA Federal Credit Union provides its residents and employees with sound, affordable financial services and products, including personal financial education programs.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	8	116	2,417	1,433	1	1,272	0	48	90

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	608	4,878	9,605	9,756	0	9,855	0	5,247
Average length of stay	0	3	6	6	0	6	0	0
Average Household size	1	1	2	2	1	2	0	3
# Homeless at admission	0	0	0	1	1	0	0	0
# of Elderly Program Participants (>62)	0	9	448	210	0	193	0	0
# of Disabled Families	2	34	565	490	0	409	0	0
# of Families requesting accessibility features	8	116	2,417	1,433	1	1,272	0	48
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	4	71	1,255	768	1	655	0	30	70
Black/African American	4	44	1,145	658	0	611	0	18	19
Asian	0	0	5	3	0	2	0	0	1
American Indian/Alaska Native	0	1	10	4	0	4	0	0	0
Pacific Islander	0	0	2	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	2	19	7	0	6	0	0	1
Not Hispanic	8	114	2,398	1,426	1	1,266	0	48	89

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Draft

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

SMHA is implementing a 504/ADA Voluntary Compliance Agreement (VCA) to address accessibility and ADA provisions as required by Section 504 of the Rehabilitation Act of 1973.

SMHA's General Counsel is certified through the National Fair Housing Training Academy as a Fair Housing Investigator and serves as the 504 Compliance Coordinator who is responsible for processing all Reasonable Accommodation and Modification requests. The General Counsel also provides quarterly updates to HUD on progress made towards fulfilling the provisions of the VCA.

In addition, pursuant to the VCA, SMHA must demonstrate to HUD's satisfaction the completion of the construction or conversion of 128 Uniform Federal Accessibility Standards (UFAS) Accessible Units for individuals with mobility impairments and 51 UFAS Accessible Units for individuals with hearing or vision impairments. SMHA has completed 53 UFAS units that are vision, hearing and mobility accessible.

By including the vision, hearing and mobility accessible features in any new development projects, SMHA will be in position to achieve the 128 units that are required to be mobility accessible. From assessing SMHA's reasonable accommodation requests, it is more likely that a person in need of vision and/or hearing accessibility will also be in need of mobility accessible features rather than vice versa. Accordingly, rather than only renovate 51 units to be hearing and vision accessible, it is SMHA's goal to renovate and construct units to be vision, hearing and mobility accessible in an effort to satisfy the needs of SMHA residents and/or applicants on the waiting list.

Pursuant to the VCA, SMHA has completed 101 UFAS units that are vision, hearing and mobility accessible. In furtherance of meeting UFAS requirements, including 78 units remaining to be renovated, SMHA contracted services to complete a Project Capital Needs Assessment (PCNA) for all units in its inventory.

Based on information gathered during the processing of Reasonable Accommodation and Modification requests, there is an increased need for physically accessible units. Consequently, SMHA is coordinating the distribution of a Resident Needs Assessment Survey to be completed by current residents. This survey is intended to specifically address those that reside in UFAS accessible homes. Pursuant to the Dwelling Lease, SMHA will begin to move forward with relocating residents without accessibility needs that reside in accessible homes in order to relocate those with accessibility need into accessible homes.

Overall, SMHA is committed to affirmatively furthering fair housing and will continue to dedicate funds, provide services and participate in/develop programs accordingly.

Regarding the Section 504 Needs of families on the SMHA public housing waiting list for the City of Canton, there are 1,903 families with disabilities, which is 21% of the total of 9,158 families on the list.

For SMHA's Section 8 tenant-based assistance, the countywide waiting list includes 260 families with disabilities, which represents 18% of the total of 1,442 families on the waiting list

The 2012-2016 American Community Survey data indicates that 16.4% of Canton residents and 13.3% of Stark County residents have a disability. Thus, persons with disabilities are overrepresented on both the Canton public housing waiting list and the Stark County Section 8 waiting list.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

There are 9,158 families on the SMHA Public Housing waiting list for Canton; with 5,901 (64%) requiring one-bedroom units and 2,462 (27%) requiring two-bedroom units. With SMHA's agency wide annual turnover of just 439 units, families can be on the waiting list for several years. There are 1,442 families on the waiting list for Section 8 tenant-based assistance, with 87% identified as being extremely low income ($\leq 30\%$ AMI). With an agency wide annual turnover of only 101 units, SMHA does not plan to reopen the Section 8 waiting list any time soon.

The need for affordable rental housing is underscored by SMHA's waiting list for Public Housing, and in particular, on the long-closed waiting list for Section 8 tenant based rental assistance. SMHA continues to pursue a number of strategic affordable housing goals, including expanding the supply of assisted housing, improving the quality of assisted housing, increasing assisted housing choices, providing an improved living environment, promoting self-sufficiency and asset development, and ensuring equal opportunity and fair housing.

How do these needs compare to the housing needs of the population at large

The above goals of the SMHA reflect the overall housing goals of the City of Canton with respect to addressing the needs of low and moderate income renters, especially cost burdened. The need for affordable housing is also a major issue for the city's low and moderate income homeowners.

Discussion

Improving job opportunities for both public housing tenants and voucher holders will not only allow families to move up and out of assisted housing, but it will allow SMHA to assist other needy families. In addition, an improved economy will expand the number of working families and thereby widen the mix of incomes in our public housing developments, which enhances community stability and provides role models for area youth.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The Homeless Continuum of Care of Stark County (also referred to as HCCSC or the CoC) was restructured in July 2013 to conform to the HEARTH Act and new HUD regulations. Continuums of Care have been given very specific responsibilities and duties under the HEARTH Act (Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009). The CoC is managed by an independent nonprofit organization known as the Stark Housing Network Inc., which was formed in 2017. The primary charge of Stark County's CoC is to develop supportive housing options and to secure federal, state and local resources and other measures designed to:

- Promote community-wide commitment to employ best practices to end homelessness in Stark County, Ohio;
- Secure funding for efforts by providers and government entities to prevent homelessness and quickly re-house homeless individuals (including unaccompanied youth) and families in Stark County, while minimizing the trauma and dislocation that homelessness causes to individuals, families, and communities;
- Promote access to and effective utilization of mainstream programs by homeless individuals and families; and
- Optimize self-sufficiency among individuals and families that experience homelessness.

The CoC is comprised of representatives from the Cities of Alliance, Canton and Massillon, the Board of Stark County Commissioners, the private sector, foundations, local health care providers, United Way of Greater Stark County, non-profit service and housing providers, law enforcement, and other interested individuals. The CoC is an outgrowth of the Stark County Homeless Services Collaborative, which continues to be an active partner with the CoC in addressing the issues surrounding homelessness. One of the many duties of the CoC is the management of the Homeless Hotline aka the Homeless Navigation, which is a phone line that people call to get access to homeless shelters and programs.

The CoC also conducts an annual point-in-time (PIT) count, under the direct supervision of the Homeless Services Collaborative, of homeless persons in Stark County. The most recent results are from the count which took place on January 28, 2018 as data from the 2019 count had yet to be fully compiled as of this Plan's writing. The recommendations included in this Consolidated Plan will be based upon the data from the 2018 point-in-time count which is county-wide data and not restricted to the Consortium area. Each count focuses on a specific point-in-time and relies heavily on the participation of all homeless service and housing providers. Providers report the number of persons in shelters and on the streets, as well as those in transitional housing and permanent supportive housing. The CoC's Homeless Management Information System (HMIS) staff, who compile all the data received during the PIT count, cross-check information on individuals to ensure an unduplicated count. Studies indicate that over a year's time, the homeless population is ten times a one-day count.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	133	0	548	532	411	217
Persons in Households with Only Children	0	0	4	4	4	18
Persons in Households with Only Adults	105	40	729	420	510	230
Chronically Homeless Individuals	0	3	12	12	9	381
Chronically Homeless Families	0	0	4	4	4	219
Veterans	10	5	67	60	48	125
Unaccompanied Child	0	0	4	4	4	37
Persons with HIV	0	0	1	1	1	37

Table 26 - Homeless Needs Assessment

Data Source Comments: This information is from the 2018 Homeless Point-in-Time Count and HMIS.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Not applicable. Data is provided in the above table.

Draft

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	138	27
Black or African American	81	12
Asian	0	0
American Indian or Alaska Native	3	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	3	0
Not Hispanic	235	40

Data Source

Comments:

This information is the Point-in-Time Sub-populations information.

Addendum to Discussion

The following homeless needs, challenges and obstacles were identified during public consultations and research:

PROGRAMS AND SERVICES

Most shelters are at full capacity and are often dealing with entire families. The CoC has only one men's shelter for the entire county, and when the new facility is built (2019), it will not be able to house any sex offenders. That shelter also regularly runs over capacity. All shelters are currently challenged with re-housing residents due to a shortage of all types of housing. Victims of domestic violence are often in need of transitional housing, but there is only one transitional housing site in Stark County that's targeted towards domestic violence victims. The CoC has prioritized rapid re-housing over transitional housing; however, a domestic violence agency project was included in the fiscal year 2018 CoC Consolidated Application (the project was included on a priority listing submitted to HUD), which if awarded funds, the agency will be able to serve 11 additional households beginning in late 2019.

Applicants need more knowledge of how to access programs after connecting with the Homeless Hotline (aka Homeless Navigation). Additional supportive services would be advantageous for individuals and families that are diverted from the homeless system, and individuals and families that are prioritized for permanent supportive housing. Applicants and participants could benefit from more support services while searching for housing, and after they are housed. Services that are needed include: alcohol/drug treatment and counseling, mental health case management, education services, financial literacy and budget counseling, health & medical services, and childcare services. There is also a need for case management to continue after clients receive housing.

HOUSING ISSUES

There is a need for more affordable housing (housing costs that are less than 30% of average incomes). Also, much of the remaining affordable housing stock does not pass housing quality inspections, and/or is located in unsuitable environments for families with children, or for persons in recovery. This challenge is beyond the scope of the CoC alone and must be addressed with active participation of members of the community, law enforcement and local governments. There is a need for more tenant-based rental assistance which is set aside for the homeless. There are long waiting lists for Section 8 vouchers. Accessing utility assistance such as HEAP (Home Energy Assistance Program) is very difficult for clients (limited application access time and long lines).

ECONOMIC ISSUES

It is difficult to income-qualify for unsubsidized housing when living-wage employment is hard to find or unavailable. Having a centralized hub, such as an EnVision Center, may help better connect clients with economic opportunities and supportive services.

Stark County has mass transit, which has been expanded outside the City of Canton, but it can take a lot of extra time to get to a job on the bus from some areas of the county. Households in Stark County mainly rely on personal vehicles. Lower-income households are having to choose between fixing their homes/paying rent or fixing their vehicles. There are also not enough housing or employment opportunities for felons.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The number of persons in households with children experiencing homelessness on a given night was 133, according to the 2018 PIT Count. The Stark County CoC supports collaboration with entities, particularly education and children's service systems, that are most likely to encounter households with children who are homeless or at risk of homelessness. This collaboration includes educating teachers, homeless liaisons, counselors, and other direct providers in how to recognize indicators of homelessness, how to engage parents, and how to make referrals for assistance to connect families with appropriate services.

The number of veterans experiencing homelessness on a given night was 10, as identified during the 2018 PIT Count. This is up from 8 in the 2013 PIT count. There are service groups available locally to assist veterans, including the Veterans Administration and the Veterans Services Commission. A variety of service programs are also available via city and county government, and local housing providers.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The Stark County 2018 Point in Time Count reported a total of 278 homeless, including 238 sheltered and 40 unsheltered, which is down substantially from the 2013 Count of 524 homeless. The 2018 racial breakdown of the 278 reported homeless is the following: White - 165 (59%), Black/African American - 93 (33%), all other races - 20 (7%). White and Black homeless decreased slightly from the 2013 Count. Hispanics comprise only 1% of the total, a very minimal increase from 2013. The percentage of

homelessness among Black/African Americans is high when compared to the percentage of the total population in the community; Black/African Americans make up 7.3% of the population in Stark County, yet they make up 33% of reported homeless.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Stark County's most recent Point-In-Time Count took place in January 2018. Since Stark County's last Consolidated Plan in 2013, the number of those living on the street has decreased over 47%. This decrease corresponds to an increase in housing units, particularly permanent supportive housing, and related programs that serve the homeless population. For 2018, there were 238 homeless counted in shelters as compared to 468 in 2013. Unsheltered homeless accounted for 40 persons in 2018, a decrease from 2013's count of 56.

As the data indicates, the primary sub populations that make up the homeless population appear to be persons dealing with severe mental illness, chronic substance abuse, veterans, and families with children that cannot find affordable housing, ex-offenders, and victims of domestic violence.

Discussion:

The Homeless Continuum of Care of Stark County (CoC) was created in 2013 to "plan, implement, evaluate and continuously improve the system of homelessness services in Stark County." Of their many responsibilities is the operation of a centralized intake and assessment system (the Homeless Hotline and the Homeless Management Information System, or HMIS), which ensures that all requests for homeless services are registered, evaluated and prioritized consistently.

As the national dialogue moved from one of "managing" homelessness to truly ending it, homeless council priorities have changed over the years, adding in the components of rapid re-housing, permanent supportive housing and prevention.

The Stark County Homeless Services Collaborative (HSC) is a group of local agencies that work collaboratively to end homelessness in our community. The HSC consists of approximately 50 agencies that provide direct service to homeless clients. The HSC and its Planning Committee is the established network of front line homeless service providers. The HSC's focus is on ending homelessness and assisting those who are homeless by creating an environment meant to do so, identifying gaps in the homeless system, problem solving to eliminate those gaps and proposing solutions to make the system better. The HSC assists with identifying the full spectrum of needs of homeless families and individuals. The HSC provides input into the drafting of local priorities for the CoC which are then reviewed, modified and adopted by the Stark Housing Network, the formal, collaborative applicant of the CoC. Member agencies implement the components (prevention, shelter, transitional housing, and services) of the CoC system for all homeless subpopulations. In addition, the HSC conducts the annual Point in Time Count under the guidance of the CoC.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

This section of the plan includes an assessment of the housing needs of persons who are not homeless but require supportive housing, including but not limited to:

- the elderly (defined as 62 and older);
- the frail elderly (defined as an elderly person elderly person who requires assistance with three or more activities of daily living, such as bathing, walking, and performing light housework);
- persons with mental, physical, and/or developmental disabilities;
- persons with alcohol or other drug addiction;
- persons with HIV/AIDS and their families;
- and victims of domestic violence, dating violence, sexual assault, and stalking.

Describe the characteristics of special needs populations in your community:

Elderly and Frail Elderly

Elderly Households, age 62 and above, comprise 28% of all households in the City of Canton, and 27% of all low and moderate income households. Frail elderly households (i.e., households containing at least one person age 75 or older), comprise 7% of all households in Canton, and 13% of all LMI households. 1,840 elderly households have housing cost burdens >30%, including 940 renter and 900 owner elderly households. 795 elderly households have housing cost burdens >50%, including 375 renter and 420 owners. The total number of elderly households with an identified housing cost burden is 2,635, including 1,315 renters and 1,320 owners. The total number of cost burdened elderly households represents 57% of all LMI elderly households and 32% of all elderly households.

48% of all elderly households between the ages of 62 and 74 are low and moderate income. 66% of all "frail" elderly households, ages 75 and above, are low and moderate income. Low income elderly and frail elderly households are often unable to maintain existing homes or to afford rent. In addition, the numbers of elderly requiring medical and other services to remain in homes rather than in medical facilities continues to increase. The Areawide Agency on Aging assists with several programs to prevent the institutionalization of seniors. These include visiting nurses, the home delivery of meals, and emergency response programs.

Persons with Physical Disability

Census data previously provided by HUD indicate that there are 15,269 disabled persons in the City of Canton, representing 19% of the City's total population. Of this total, 4,672 are elderly disabled, and 2,925 are frail elderly disabled. Females comprise 66% of all elderly disabled persons, and 70% of all frail disabled elderly. The majority of disabled persons are adults 21-64 years in age. Finding housing that is both affordable and accessible is a basic challenge for persons with physical disabilities.

Persons with Developmental Disabilities

Persons with developmental disabilities are individuals with mental or physical disabilities or a combination of mental and physical conditions resulting in significant impairments to daily functioning, including mental retardation, autism, traumatic brain injury, fetal neurological disorders, epilepsy and cerebral palsy. The disability's origin is in the brain and is usually established early in life and the disability must be expected to last indefinitely. There is clearly a need for more services to help developmentally disabled persons stay with their families as well as additional housing and residential facilities. Other needed services include vocational services, social & community involvement, and transportation.

Persons with Mental Disabilities

It is estimated that mental disorders affect one-quarter of all Americans. By this count more than 2 million of Ohio's 11 Million citizens experience some form of mental disorder including 200,000 children. Psychiatric problems affect people of all ages, all income groups, all ethnic groups, all religious groups, urban and rural, male and female.

Persons with Substance Abuse Issues

Substance abuse is a pattern of drug use/drinking that result in harm to one's health, interpersonal relationships or ability to work. It is estimated that over 1.1 million or one in 10 Ohioans are addicted to alcohol and/or other drugs.

Domestic Violence

Domestic violence and emotional abuse are behaviors used by one person in a relationship to control the other, including physical, sexual, emotional, psychological, or financial abuse. Victims of domestic violence need emergency shelter, counseling and other supportive services.

What are the housing and supportive service needs of these populations and how are these needs determined?

Elderly and Frail Elderly

Low income elderly and frail elderly households are often unable to maintain existing homes or to afford rent. In addition, the numbers of elderly requiring medical and other services to remain in homes rather than in medical facilities continues to increase. These elderly, especially the frail elderly, will need long-term services and support, and they will be challenged affording such care and assistance.

There is a need for more affordable senior housing and housing for frail elderly. Housing types include independent living that is accessible, independent living with in-home care, assisted living facilities, and nursing facilities. Many seniors are also below the poverty level, adding more challenges to finding affordable care and housing. Needed services include healthcare and medication management, meals and nutritional counseling, caregiver support, abuse prevention and advocacy, money management, personal services, housekeeping and homemaker assistance, and transportation.

Persons with Physical Disabilities

There is a continuing need for housing that is livable, affordable and accessible for persons with physical disabilities. Supportive service needs include transportation, and public facilities and infrastructure that provide for mobility and accessibility. Also important are housing programs that provide home modification and other repairs to enable seniors and persons with physical disabilities to continue to live independently.

Persons with Developmental Disabilities

The Stark County Board of Developmental Disabilities provides service from infancy onward to nearly 3,000 area residents with mild, moderate, severe, or profound developmental disabilities. Services include school programs beginning with early intervention and preschool, and continuing throughout the school-age years. For adults, the agency provides workshops and supported employment in the community. Senior citizens also benefit from specially designed programs.

Stark DD also provides residential care in the community with appropriate supports based on individual needs. The agency also provides transportation through the County to more than 500 families, traveling more than one million miles annually.

Persons with Mental Disabilities

Persons with several and persistent mental illness need services such as early intervention, recovery, illness management, and self-sufficiency. These services are often correlated with substance abuse treatment, family psycho-treatment education, supportive employment, medication management training, and outreach programs. As facilities for the mentally ill are decentralized and an increasing number of developmentally disabled persons become semi-independent, the need for residential facilities with supervision has increased. Support for these populations is provided in various group homes. While some opportunities for appropriate, assisted housing exist, additional units are needed to provide supportive housing for people with a mental illness transitioning from homelessness, and for people in need of higher levels of care and support.

Domestic Violence

In the greater Canton area, the Domestic Violence Project Inc. (DVPI) a private non-profit organization, is committed to providing a strong comprehensive safety net for area families. The agency's comprehensive programming serves to address many client needs including: a hotline, emergency shelters in Canton and Massillon, prevention & education, support & legal advocacy, renew counseling & recovery center, and on-going support.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the Ohio Department of Health, there were 32 new diagnoses of HIV infection identified in Stark County in 2016; this number has more than doubled since 2012. From 2012-2016, an additional 105

cases were identified. As of 2016, the largest percentage of persons newly diagnosed with HIV were white males (59%), and persons between the ages of 20-34 constituted 66% of those newly diagnosed. There are currently 450 persons living with an HIV diagnoses in Stark County (as of 2016). No other data was available.

Discussion:

There are a number of agencies in the Canton area that provide services to the City's special needs populations. These include the following agencies: The Stark County Board of Development Disabilities, the AAA on Aging, the Mental Health and Recovery Services of Stark County, Catholic Charities of Stark County, Community Services of Stark County, the J.R. Coleman Center, the Domestic Violence Project, Child & Adolescent Behavioral Health, Crisis Intervention & Recovery Center, among others.

There is demand for more special needs housing and assistance to help these populations. Many of these residents are in poverty or low-income; some are homeless. Often they can have more than one special need such as being elderly and having mental health issues. Coordination among service providers needs to remain strong. More services and funding are needed to continue to assist Canton's special needs population.

Draft

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

There is continuing need within the City of Canton for public facilities to serve the needs of low income neighborhoods as well as to rehabilitate existing aging facilities. Many low- and moderate-income areas (LMA) in the City are within older neighborhoods that either do not have proper facilities or whose existing facilities suffer from heavy use and deferred maintenance leading to disrepair. Many of these areas are located within the City's two Neighborhood Revitalization Strategy Area (NRSA) areas where CDBG infrastructure and capital improvement funding will be concentrated for maximum leveraging opportunities to provide the greatest impact to residents with the greatest needs.

How were these needs determined?

In 2012, Canton prepared a Neighborhood Revitalization Strategy Area (NRSA) Plan that was designed to focus the City's housing and community development efforts within designated low income neighborhoods, providing a framework for a comprehensive approach to revitalization of targeted neighborhoods. (See the City's NRSA Plan for a more detailed description of Canton's public facility needs.) In November 2018, HUD approved the recertification of these two NRSA areas.

Public facilities needs were also identified via the City's Consolidated Plan public participation process, i.e., stakeholder interviews, public meetings and an online survey.

Describe the jurisdiction's need for Public Improvements:

Well maintained streets, curbs, sidewalks, and street lighting are important to overall community health, safety and livability. Many of the city's streets, curbs, sidewalks, and street lights are in disrepair. The City is continuing its systematic, city-wide program to install curb cuts and ramps at all intersections to improve pedestrian mobility and accessibility throughout the community, including the NRSA areas.

How were these needs determined?

Canton's Neighborhood Revitalization Strategy Area (NRSA) Plan contains a detailed description of Canton's infrastructure needs. Also, information on the City's public improvements needs was gathered from the City's Streets Department and via the stakeholder interviews and online survey conducted as part of the City's Consolidated Plan public participation process.

Describe the jurisdiction's need for Public Services:

The public service needs of low and moderate income households (including those at or below poverty levels, at risk of homelessness, unemployed or underemployed, physically challenged, aging, lacking access to health care, or lacking education or literacy skills) have always been, and continue to be, a priority concern for the City. Public service activities such as elderly services, healthcare, legal services, substance abuse treatment and violence prevention remain high priorities for the City.

Stimulating the economy is vital to the stabilization of the City. Economic development activities and programs such as workforce development, adult literacy, job creation/retention, job readiness, and small business assistance are essential needs.

How were these needs determined?

Demographic statistics (e.g., public service needs of the homeless population identified in the point-in-time count), information provided by human services and social service agencies interviewed as part of the Consolidated Plan process, and the results of the City's online survey document the public service needs among low and moderate income households. The City's Neighborhood Revitalization Strategy Area plan also stresses public service programs as a high priority need for Canton residents. Public forums, neighborhood meetings, and citizen input meetings also indicate the continuing needs for public services.

Draft

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Housing Market Analysis provides data and narrative information regarding the local housing market, including:

- significant characteristics of the jurisdiction's housing market in general, including the supply, demand, and condition and cost of housing
- housing stock available to serve persons with disabilities and other special needs
- condition and needs of public and assisted housing
- brief inventory of facilities, housing, and services that meet the needs of homeless persons
- regulatory barriers to affordable housing
- significant characteristics of the City's economy.

Housing Supply Summary

As shown in the 2009-2013 American Community Survey data, the City of Canton has a total of 35,895 housing units – 14,810 (41%) are owner-occupied, 15,410 (43%) are renter-occupied, and 5,675 (16%) are vacant.

The 2000 Census indicated that the total number of housing units in the City of Canton was 35,502, the number of occupied housing units was 32,489 (92%) and the number of vacant housing units was 3,013 (8%). The total number of owner-occupied housing units was 19,394 (54% of the total number of units) while the total number of renter-occupied was 13,095 (37% of the total number of units).

Thus, since 2000:

- the total number of housing units increased 1%
- the number of occupied units decreased 7%
- the number of vacant units increased 88%, from 3,013 to 5,675
- the percentage of owner-occupied housing units decreased from 54% of the total units to 41%
- the percentage of tenant-occupied housing units increased from 37% of the total units to 43%
- in terms of occupied units, the percentage of owner-occupied units decreased from 60% to 49%, with a corresponding 11% increase in the percentage of tenant occupied units

The impact of economic decline, the 2008-2009 mortgage foreclosure crisis and population loss has resulted in many vacant housing units in the City's low – moderate income neighborhoods. Much of the housing stock in these neighborhoods, both owner-occupied and rental properties, suffers from disinvestment and lack of maintenance, thereby underscoring the need for rehabilitation assistance.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

According to American Survey Data for the period 2009-2013 as shown below, the City of Canton has a total of 35,895 housing units. Of this total, 30,220 (84%) are occupied and 5,675 (16%) are vacant. Of the occupied units, 14,810 (49%) are owner-occupied and 15,410 (51%) are renter-occupied.

Single unit, detached dwellings (23,425) comprise two thirds of the City's total housing inventory, while structures containing five or more dwelling units make up just 10% of the City's housing stock.

Per ACS data in the table below, 77% of owner-occupied dwelling units in Canton are 3-bedroom or larger. However, just 37% of renter-housing is 3-bedroom units.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	23,425	65%
1-unit, attached structure	1,140	3%
2-4 units	5,125	14%
5-19 units	3,695	10%
20 or more units	2,480	7%
Mobile Home, boat, RV, van, etc	30	0%
Total	35,895	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2009-2013 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	15	0%	855	6%
1 bedroom	210	1%	3,640	24%
2 bedrooms	3,250	22%	5,150	33%
3 or more bedrooms	11,335	77%	5,765	37%
Total	14,810	100%	15,410	100%

Table 28 – Unit Size by Tenure

Data Source: 2009-2013 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Within the City of Canton, there are numerous long-term affordable housing developments that have been constructed/renovated with Federal and/or State funding. Descriptions of the most common assisted housing programs are listed below:

HOME Investment Partnerships Program (HOME) – Provides federal HUD funding for the development of affordable housing for very-low, low-, and moderate-income owner and renter households.

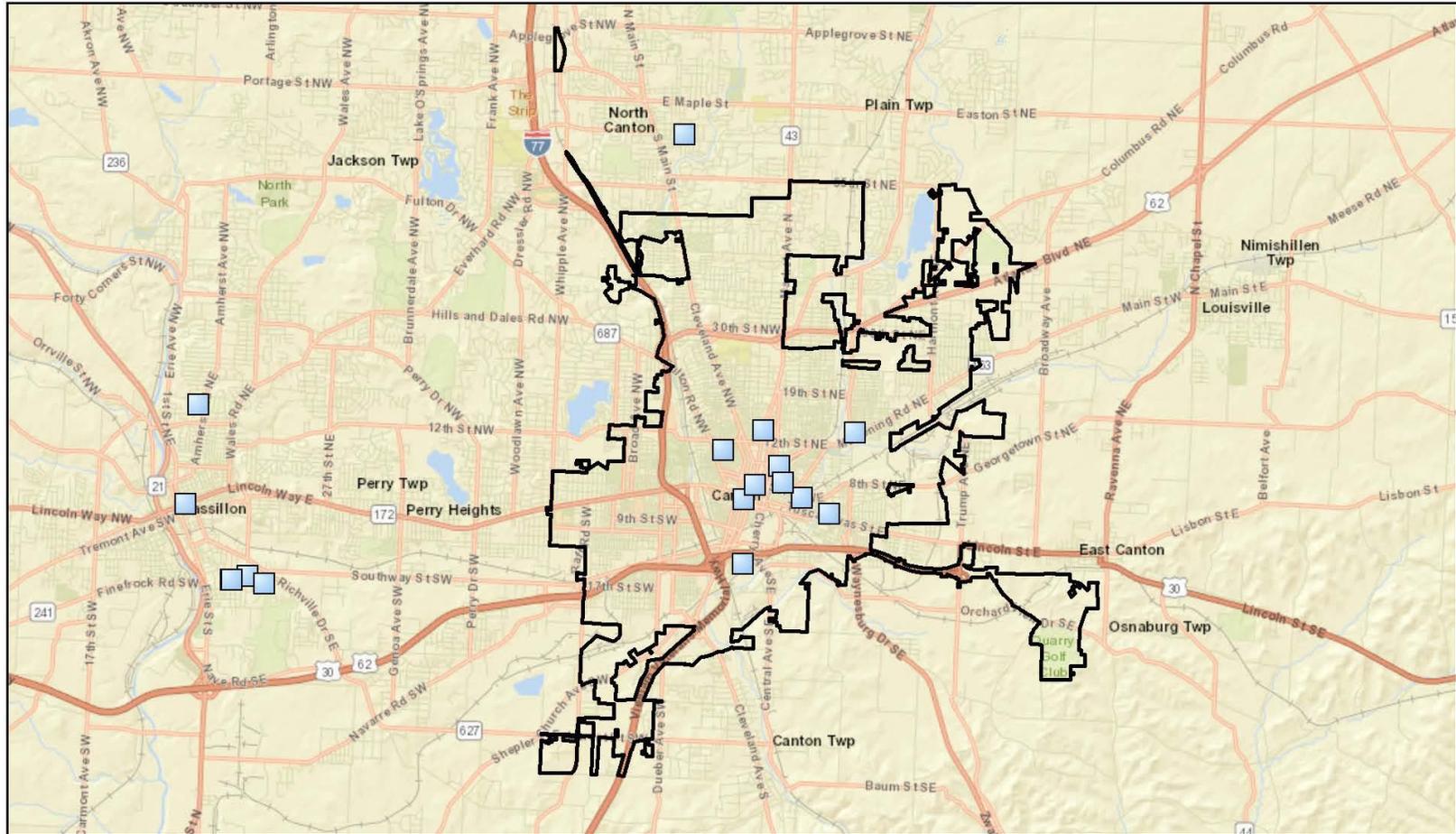
Community Development Block Grant Program (CDBG) – Provides federal HUD funding for the repair and rehabilitation of affordable housing for very-low, low-, and moderate-income owner households.

Neighborhood Stabilization Program (NSP) – Provides federal HUD funding for the rehab and development of affordable housing for very-low, low-, moderate-, and middle-income owner and renter households within neighborhoods that have been impacted by vacant, abandoned, and foreclosed housing.

Low Income Housing Tax Credit (LIHTC) – Provides federal income tax credits to developers who construct, rehabilitate, or acquire and rehabilitate qualified low-income rental housing. These developments can encompass both multi-family and single-family rental housing for families or senior citizens. Eligible applicants include for-profit and non-profit sponsors.

The following maps provide graphic representations of the number, types, and location of assisted housing in Canton.

City of Canton CDBG Housing Activities - Consolidated Plan and Continuum of Care Planning Tool



January 23, 2019

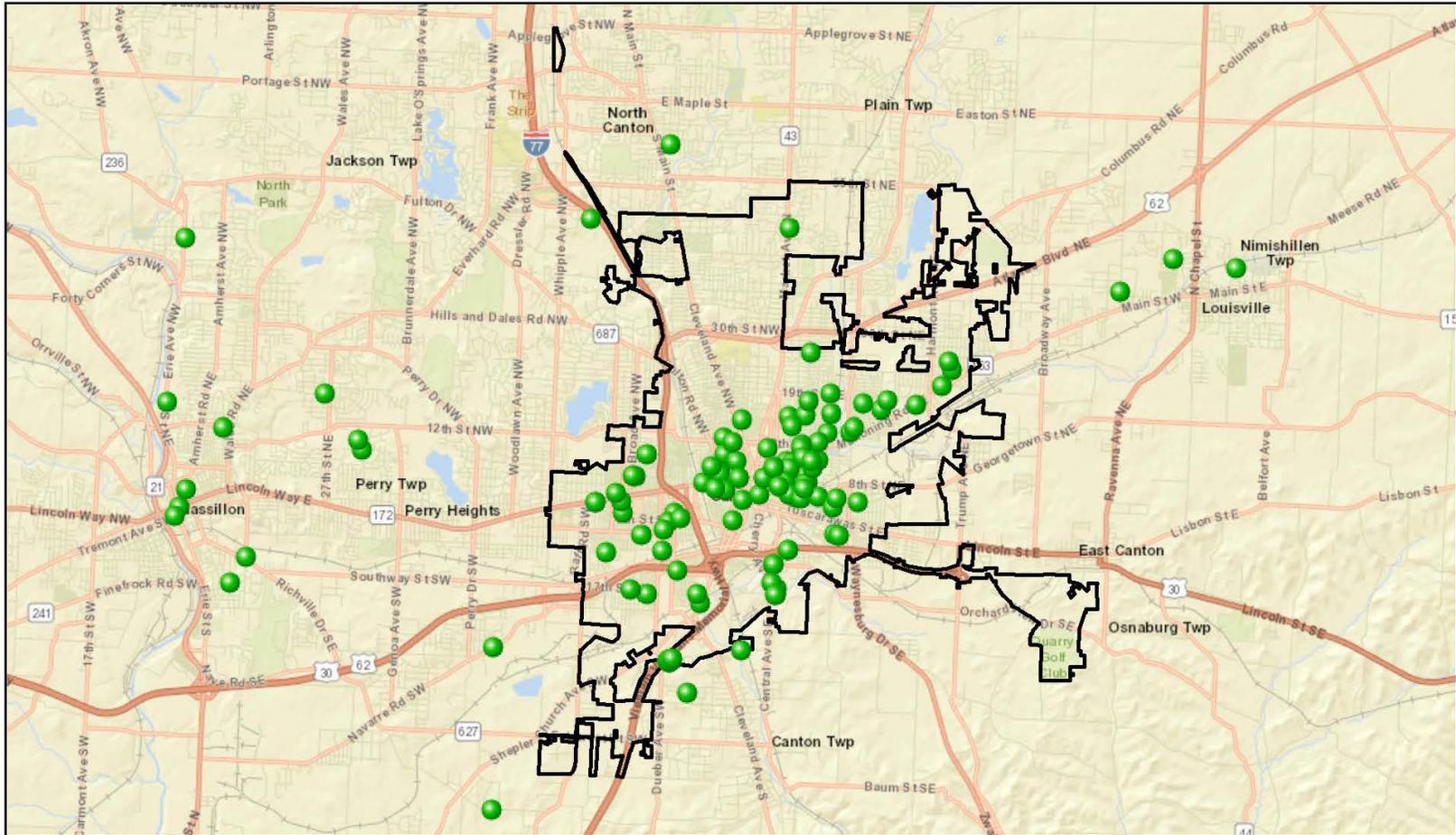
■ CDBG Activity (Housing)

Override 1



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

City of Canton HOME Multifamily Activities - Consolidated Plan and Continuum of Care Planning Tool



January 23, 2019

● HOME Multifamily Rental Activity

Override 1



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Over the next five years, the Stark Metropolitan Housing Authority anticipates losing a total of 109 public housing units – 28 units at Jackson-Sherrick through disposition and 81 units at McKinley Park Apartments via disposition or demolition.

Housing units that receive tax credits or other forms of assistance can be at risk of being converted to market rate housing upon maturity of the tax credits or the affordability period, typically 15, 20, or 30 years. However, the City expects that no regulated affordable housing units that have received financial assistance are expected to be lost from the inventory of affordable housing in the near future. In particular, in regards to affordable housing projects that are owned by non-profit agencies whose missions are either to provide low-income housing and/or serve the elderly or disabled population, it is anticipated that such housing will remain affordable regardless of the situation.

Does the availability of housing units meet the needs of the population?

The Needs Assessment section of this Consolidated Plan clearly indicates the need for more affordable housing to meet the needs of Canton’s very-low, low- and moderate-income households. The analysis of housing affordability found in MA-15 of this market analysis supports these same conclusions.

Describe the need for specific types of housing:

Low income homeowners with high housing cost burdens need housing rehabilitation programs to bring their dwellings up to code standards, make them energy efficient and help them reduce their cost burdens. Low income renters with housing problems, including severe housing cost burdens, need access to quality affordable rental housing. While Section 8 vouchers may provide some financial relief to very-low income renter households, the waiting lists for such assistance are very long.

Low-income elderly households are also burdened with high housing costs, and need housing rehabilitation programs to assist owner-occupants and need affordable senior housing to assist elderly renter households.

Discussion

The narratives in this section continue to emphasize the point that Canton needs quality, affordable housing for low and moderate households. The next section of the Consolidated Plan will discuss housing costs in detail.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The data in the tables below indicates that, within the City of Canton, there is a diverse mix of housing in different price ranges for owner-occupied and rental dwelling units. However conclusions about the availability of affordable housing for low and moderate income households need to take into account additional factors such as the age and condition of this housing and the neighborhoods in which such housing is located. Housing needs to be both affordable and good quality and located within safe, stable residential neighborhoods.

The City of Canton was hard hit by recent economic downturns, resulting in major neighborhood impacts from increasing numbers of vacant, abandoned, and foreclosed housing. These negative impacts have resulted in lower housing values in the City.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2013	% Change
Median Home Value	82,100	71,100	(13%)
Median Contract Rent	417	473	13%

Table 29 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2009-2013 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	8,790	57.0%
\$500-999	6,440	41.8%
\$1,000-1,499	80	0.5%
\$1,500-1,999	85	0.6%
\$2,000 or more	8	0.1%
Total	15,403	100.0%

Table 30 - Rent Paid

Data Source: 2009-2013 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,555	No Data
50% HAMFI	7,315	2,875
80% HAMFI	12,580	6,135
100% HAMFI	No Data	8,099
Total	22,450	17,109

Table 31 – Housing Affordability

Data Source: 2009-2013 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	473	539	717	916	977
High HOME Rent	473	539	717	916	977
Low HOME Rent	473	539	717	843	941

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Canton Household Incomes Chart

Household Income in the Past 12 Months	Percent	30% of Gross Monthly Income
Less than \$14,999	24.5%	\$375 or less
\$15,000 to \$24,999	17.1%	\$376 to \$625
\$25,000 to \$34,999	14.3%	\$626 to \$875
\$35,000 to \$49,999	14.3%	\$876 to \$1,250
\$50,000 to \$74,999	16.4%	\$1,251 to \$1,875
\$75,000 to \$99,999	6.8%	\$1,876 to \$2,500
\$100,000 to \$149,999	5.0%	\$2,501 to \$3,750
\$150,000 or more	1.7%	\$3,751 or more
TOTAL	100%	

Median Household Income: \$ 30,837.00

Data Source: 2017 ACS

Is there sufficient housing for households at all income levels?

No. The tables above show that there is insufficient affordable housing for Canton's low and moderate income households. Of the City's 15,410 rental units, only 2,555 (17%) are affordable to renter households with incomes that are 30% or less of median family income. Just 7,315 rental units (47%) are affordable to renters with incomes that are between 31% and 50% of median family income. A total of 12,580 rental units (82%) are affordable to renters with incomes between 51% - 80% median family income.

Of the City's 14,810 owner occupied units, 2,875 (19%) are affordable to owner households with incomes between 31% - 50% of median family income, and 6,135 (41%) are affordable to owner

households with incomes between 51% - 80% of median family income. (NOTE: There is no data available for owner households with incomes that are 30% or less of median family incomes.)

How is affordability of housing likely to change considering changes to home values and/or rents?

As the data in *Table 29* indicates, Canton's median home value has decreased 13%, but median rent has increased 13%. Thus, owner units have become more affordable and renter units have become less affordable. However, many "affordable" housing units in the City of Canton are in substandard condition and need rehabilitation. Also, as noted in the Needs Assessment Section of this Consolidated Plan, many low and moderate income households in Canton are housing cost burdened.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The Canton area median rent is \$473. The Fair Market Rent (FMR) ranges from \$473 for an Efficiency to \$977 for a four bedroom unit. High HOME rents are the same as FMR, and low HOME rents are the same as the FMR for Efficiencies, one bedroom and two bedroom units, but 8% less for three bedroom units and 4% less for four bedroom units. Compared to FMR rents and HOME rents, Canton's actual rents are "affordable". However, many existing "affordable" units are in substandard condition.

The City needs to encourage the rehabilitation and preservation of existing rental housing to ensure that affordable units are in good condition. New construction of affordable rental housing may only be successful to the extent that the production of such units can be subsidized to enable them to remain affordable and to the extent that existing rental housing is seen as substandard and undesirable.

Discussion

Housing cost burden is a major housing issue for a large number of Canton's low and moderate income households. The table titled "Canton Housing Incomes Chart" shows household incomes for Canton as reported in the 2017 American Community Survey. The table also calculates 30% of the gross incomes to give an indication of the affordable limit of housing related expenses for households at various income levels. This table shows that 25% of the households in the City of Canton had an annual income of less than \$15,000. Comparing fair market rents data with the large number of Canton households earning less than \$15,000 further demonstrates the cost burdens and affordability gaps facing these households who need quality, affordable housing.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The City of Canton has an old housing stock. According to 2012 -2016 ACS Data, 53% of the City's total housing stock (19,039 units) was constructed prior to 1950 and 15% (5,519 units) was vacant. Using this data to compare conditions in the City's LMI neighborhoods, i.e., Neighborhood Revitalization Strategy Areas (NRSA), indicates that within the City's NRSA's, 58% of the housing units were constructed before 1950 and 23% (2,027 units) was vacant. This data indicates that Canton's low income neighborhoods are affected to a greater degree by the problems caused by older and vacant housing. Due to the age of the housing stock in Canton, many older housing units are more likely to need rehabilitation to remain in standard condition and are likely to contain lead paint.

Definitions

Standard Condition - A unit of housing is considered to be in standard condition if it is generally in good repair, with no substandard habitability elements (i.e., lacking complete plumbing or kitchen facilities) or exterior elements. Such units may be eligible for housing rehabilitation funding if interior conditions are such that the HUD Section 8 Housing Quality Standards are not met, or a threat to the integrity or livability of the unit exists and should be addressed. Examples of ways in which the interiors of such homes might be rehabilitated include the replacement of heating systems, electrical system repairs or upgrades, plumbing system repairs or upgrades, energy efficiency improvements, and accessibility improvements.

Substandard Condition but Suitable for Rehabilitation - This category describes dwelling units that do not meet one or more of the HUD Section 8 quality standard conditions likely due to deferred maintenance or work without permits, but that are both financially and structurally feasible for rehabilitation. Such units may be lacking complete plumbing or kitchen facilities and/or may have exterior elements in need of repair (e.g., a roof in need of replacement, siding in need of repair or replacement, or a missing or failing foundation). In order to be suitable for rehabilitation the unit value generally exceeds the cost of the repairs or upgrades that would be required in order to bring it to standard condition. This category of properties does not include units that require the correction of minor livability problems, or maintenance work.

Substandard Condition and Not Suitable for Rehabilitation - This category describes dwelling units that are in such poor condition as to be neither structurally nor financially feasible for rehabilitation. Such units will typically have an improvement value that is less than the cost of addressing the habitability and exterior elements that cause its classification as "substandard," or will be considered to be unfit to occupy for reasons of safety by the City's Building Official.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,555	24%	7,480	49%
With two selected Conditions	60	0%	500	3%
With three selected Conditions	0	0%	20	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	11,195	76%	7,415	48%
Total	14,810	100%	15,415	100%

Table 33 - Condition of Units

Data Source: 2009-2013 ACS

Housing Condition

Table 33 displays the number of housing units by tenure based on the number of housing conditions per unit. Selected conditions are the same housing problems identified in the Needs Assessment section of this Consolidated Plan and include: (1) lacks complete plumbing facilities, (2) lacks complete kitchen facilities, (3) has more than one person per room, and (4) cost burden greater than 30%. Housing cost burden has been identified as the City of Canton's biggest housing problem, accounting for most of the units listed in this table as having just one selected condition.

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	665	4%	645	4%
1980-1999	520	4%	1,680	11%
1950-1979	4,640	31%	6,630	43%
Before 1950	8,990	61%	6,455	42%
Total	14,815	100%	15,410	100%

Table 34 – Year Unit Built

Data Source: 2009-2013 CHAS

As previously noted, 53% of Canton's housing stock (19,039 units) was built before 1950. Older housing units are more likely to need rehabilitation to remain in standard condition.

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	13,630	92%	13,085	85%
Housing Units build before 1980 with children present	724	5%	234	2%

Table 35 – Risk of Lead-Based Paint

Data Source: 2009-2013 ACS (Total Units) 2009-2013 CHAS (Units with Children present)

Lead-based paint was banned from residential uses in 1978. All houses constructed before 1978 are considered at risk for containing lead-based paint.

Considering the age of housing stock in Canton, there is a substantial risk for lead-based paint hazards. As indicated in Table 35, 92% of owner-occupied units and 85% of renter-occupied units were constructed before 1980, indicating a high risk for the presence of lead-based paint in these housing units. Families in owner-occupied homes are more likely to have children present in homes with risk to lead exposure (5% compared to 2% in renter-occupied homes).

Canton’s homeowner rehabilitation programs help address lead-based paint issues in homes via mandatory lead-based paint risk assessments and the use of lead-based paint certified contractors.

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	Data not available	Data not available	5,519
Abandoned Vacant Units	Data not available	Data not available	Data not available
REO Properties	Data not available	Data not available	Data not available
Abandoned REO Properties	Data not available	Data not available	Data not available

Table 36 - Vacant Units

Data Source: 2012-2016 ACS data: Number of vacant units. There is no accurate data available for the number of abandoned vacant units, REO properties, abandoned REO properties and whether vacant and REO properties are suitable for rehabilitation.

According to the 2012-2016 American Community Survey data, there were 5,519 vacant housing units in Canton. Of these vacancies, 3,195 (58%) were vacant for reasons other than being for sale or for rent, sold or rented but not occupied, for migrant workers, or for seasonal use. No ACS or other data is available on Real Estate Owned (REO) properties, the condition of vacancies, whether they are abandoned and whether they might be suitable for rehabilitation.

The HUD generated table contains no data.

Need for Owner and Rental Rehabilitation

Data in the tables in this section of the Plan indicates that, 3,555 owner-occupied housing units and 7,480 renter-occupied units have one or more selected housing problems. These numbers represent 24% of all owner-occupied housing and 49% of all rental housing. In addition, 8,990 owner-occupied housing units and 6,455 renter occupied units were constructed prior to 1950. These numbers represent 61% of all owner occupied units and 42% of all renter occupied units.

Based on the number of households with documented housing problems and the age of Canton’s housing stock, there is a demonstrable need for both owner and rental rehabilitation programs to preserve, maintain and expand the City’s affordable housing stock.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Because lead-based paint was banned from residential use in the U.S. in 1978, housing units built before 1980 are more likely to contain lead hazards. Data in Table 35 indicate that 724 homeowner households with children present and 234 renter households with children present occupy housing units that were constructed prior to 1980. These units represent 5% of homeowner units and 2% of renter units – significant reductions from the corresponding percentages in the City’s 2014 -2018 Consolidated Plan which were 27% and 15% respectively.

The data in section NA-10 of this Consolidated Plan show that 57% of Canton households are low-moderate income. By applying that percentage to the above data, it is assumed that 413 LMI owner households and 133 LMI renter households occupy housing units that could contain lead-based hazards. The corresponding estimates in Canton’s 2014-2018 Consolidated Plan were 3,010 and 1,302 respectively.

Discussion

The City of Canton has many housing units that need substantial repairs and improvements in order to keep them livable and affordable. There continues to be a real need for the City of Canton to provide housing rehabilitation, repair and maintenance programs to address the problems of substandard housing occupied by the City’s low and moderate income residents.

In addition, the City has a large number of vacant and abandoned housing units that are in substandard or dilapidated condition.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Stark Metropolitan Housing Authority (SMHA) provides eligible residents of Stark County with quality affordable housing in decent, safe, and nourishing neighborhoods. By working in partnership with the public and private sectors, the SMHA provides families with housing choice and the opportunity to achieve self-sufficiency. All HUD minimum Housing Quality Standard requirements are adhered to, except where SMHA has adopted a higher standard. SMHA inspects each unit at least once annually to determine if the unit is in a decent, safe, and sanitary condition. SMHA also administers the Section 8 Rental assistance Program, the Housing Choice Voucher Program, the Moderate Rehabilitation Program, and Shelter Plus Care.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units or vouchers in use	0	86	2,437	1,395	93	1,302	44	45	76
# of accessible units			101						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: Stark Metropolitan Housing Authority. NOTE: Data in table may be for SMHA’s entire jurisdiction, i.e., not specific to the City of Canton.

Describe the supply of public housing developments:

SMHA owns and manages a total of 1391 public housing units within the City of Canton. Of this total, 1391 are family units, and 0 are elderly. These housing units are part of 10 separate Asset Management Projects (AMP) that include both project and scattered site locations. The following table lists public housing developments in Canton.

DEV#	DEVELOPMENT NAME	UNITS	YEAR	TYPE	CITY

18-1	Sherrick Ct.	96	1963	Family	Canton
18-2	Sherrick Ct.	100	1965	Family	Canton
18-3	McKinley Park	81	1969	Family	Canton
18-4	Jackson Park	130	1969	Family	Canton
18-6	Girard Gardens	100	1970	Family	Canton
18-7A	Kimberle Gardens	31	1971	Family	Canton
18-7B	Roselane Gardens	19	1971	Family	Canton
18-8L	Linwood Acres	112	1971	Family	Canton
18-8M	Mahoning Manor	82	1972	Family	Canton
18-9	Metropolitan Arms	134	1972	Family	Canton
18-10E	Ellisdale Homes	141	1972	Family	Canton
18-10G	Gage Gardens	54	1971	Family	Canton
18-12	Plaza Terrace	100	1974	Family	Canton
18-13	Neal Ct., Sct.	19	1974	Family	Canton
18-19	Scattered Sites	106	1974	Family	Canton
18-25	Scattered Sites	22	1982	Family	Canton
18-26	Sunset Homes	14	1959	Family	Canton
18-36	Scattered Sites	50	1992	Family	Canton

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Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

HUD's Real Estate Assessment Center (REAC) conducts physical property inspections of properties that are owned, insured or subsidized by HUD, including public housing and multifamily assisted housing. The following chart provides the inspection scores for SMHA public housing units. A passing REAC score is 60 and above.

Public Housing Condition

AMP	Properties included in AMP	Score	Last Inspection Date / Release Date
210	Mahoning Manor, Gage Gardens, Scattered Sites on NE side of Canton	87c	2/25/2016
220	Ellisdale Homes	68c	3/30/2017
310	Scattered Sites throughout all of the County	40c	12/6/2017
510	Linwood Acres, Scattered Sites on SW side of Canton	44c	12/8/2017
520	Girard Gardens, Washington Rehab Scattered Sites	55c	1/25/2017
610	Jackson Sherrick, Sunset Homes	74c	1/18/2017
710	McKinley Park, McKinley Townhomes (scattered sites), Turner Towers	81c	3/23/2017
720	Roselane Gardens plus sites in Waynesburg & Louisville	64c	12/22/2017
810	Plaza Terrace, Kimberle Gardens and Neal Court Scattered Sites	85c	3/15/2016

820	Shortridge Villa plus sites in Massillon	99c	2/9/2016
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Table 38 - Public Housing Condition

Draft

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The Stark Metropolitan Housing Authority Five-Year Capital Fund Plan lists extensive interior and exterior improvements, replacements, and upgrades to public housing units in Canton including the following elements: balconies, porches, railings, bathrooms, HVAC, walks, driveways, parking lots, landscaping, kitchens, security systems, flooring, kitchen and bathroom cabinets and fixtures, foundations, fire escapes and alarms, fencing, asphalt paving, decks, patios, doors, roofs, windows, siding, plumbing, signage, carports, curbs, sidewalks, electrical systems and components, stairs, steps, ADA accessibility, garages, building slabs, waterproofing, painting, gutters, downspouts, hot water tanks, dumpsters and enclosures, exterior pavilion, catch basins, trim, intercoms, et. al.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

SMHA's strategy to improve the living environment of public housing residents includes the following:

1. Facilitate programs for all seniors and residents with disabilities that enhance their ability to live independently.
2. Take action to reduce crime and other unlawful activities by conducting routine safety talks, increasing communication between police and residents, enforcing lease violations, encouraging residents to report criminal and/or suspicious activity, and implementing a monitoring system for vehicles parked on SMHA property.
3. Increase resident knowledge of resources available to meet their social and economic needs.
4. Maintain and improve the overall appearance of SMHA sites through removing graffiti, enforcing housekeeping standards, reducing trash and litter, and improving the appearance of common areas.
5. Improve employee performance, productivity and customer service to better serve residents.
6. Fully utilize SMHA community spaces to better serve residents.

Discussion:

The City of Canton and the Stark Metropolitan Housing Authority have a good working relationship and have a history of cooperating on projects and developments. During the 2019-2023 Consolidated Plan period, they will continue to collaborate on efforts to meet the affordable housing needs of the City's low and moderate income citizens.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The Consolidated Plan must include a brief inventory of facilities, housing, and services that meet the needs of homeless persons within the jurisdiction, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. The inventory of services must include both services targeted to homeless persons and mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

Emergency Shelter: According to the Stark County January 2018 Point in Time Count, there are currently a total of 246 year-round emergency shelter beds available in the County, compared to 254 beds available in 2013. Of these 246 emergency shelter beds, 44 are targeted towards individual males and 202 are designated for families with children and single females.

Transitional Housing: One area provider offers a total of 2 individual beds and 12 family beds for transitional housing, a significant decrease from the 50 individual beds and 144 family beds available in 2013. The decrease is partially due to federal and state housing funders focusing on Rapid Rehousing and Permanent Supportive Housing. Select county housing providers transitioned to a Permanent Supportive Housing and Rapid Rehousing model.

Permanent Supportive Housing: is currently being offered by five providers. The current inventory of permanent supportive housing consists of 425 individual beds, 165 family beds, for a total of 590 beds. This is up substantially from the 441 beds that were in the inventory in 2013. The increase is due to completion of projects and receipt of vouchers that have been developed since 2013, and the reclassification of certain types of assistance. Of these 590 currently available beds, 252 are targeted towards chronically homeless individuals. There are currently three permanent supportive housing projects under development; one for families, one for transitional-age youth, and one for individuals.

While not part of the Consortium, the City of Canton received an Emergency Solutions Grant (ESG) in 2019, the objective of which is to "increase the quality of emergency shelters and transitional housing facilities for homeless individuals and families, to operate these facilities, provide essential social services, and to be used for operations, maintenance costs, supportive services, and staff costs". The 2018 funding level was \$213,000 and it is anticipated that the 2019 level will be the same (was not announced yet as of the writing of this plan). The 2018 ESG was utilized to fund homelessness prevention services and program support, and based on Canton's FY'18 Annual Action Plan, it is anticipated that the focus of the 2019 ESG grant will continue to fund similar programs and services to help reduce homelessness locally.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	162	16	12	165	30
Households with Only Adults	84	19	2	425	24
Chronically Homeless Households	0	0	0	252	0
Veterans	0	0	0	81	0
Unaccompanied Youth	0	0	0	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Addendum 1 for Shelters

Stark's emergency shelters include four sub-populations: single men, single women, families, and persons fleeing domestic violence. All shelters are currently challenged with moving residents out to other housing due to a shortage of all types of housing. All shelters are located in one of Stark County's three major cities.

Domestic Violence Shelters:

- Alliance Domestic Violence Shelter (Alliance) – 15 beds
- Domestic Violence Project (Canton) - 32 beds
- Domestic Violence Project (Massillon) - 19 beds

Motel Beds:

Very few organizations offer motel vouchers which provide temporary housing when shelters are full. There are no services directly linked to these vouchers but the agencies providing the vouchers do offer housing case management, food assistance and linkages to mainstream services.

- Faith Community - 10 beds

Dedicated Men's Shelter:

- Refuge of Hope - 44 beds

The CoC has only one men's shelter for the entire county, and this shelter houses the chronically homeless. Refuge of Hope will not be able to house any sex offenders in their new facility (slated for opening in 2019). Refuge of Hope regularly runs over capacity as local need far exceeds capacity.

Dedicated Women and Family Shelters:

There are two shelters for families with children and single females in the City of Canton, and one in Massillon. There is also a child care facility on site for the Canton facilities.

- YWCA (Canton) - 51 beds single women, single parent female headed households with children
- YWCA (Canton) - 22 family beds (large families with children, single parent male-headed households, intact couples with or without children). The shelter also has the ability to house a disabled person with a service animal.
- Family Living Center (Massillon) - 33 single and/or family beds (single females, households with children including female or male-headed households, or couples with children. The shelter does not house single males).

Fully Inclusive Shelter:

Alliance for Children & Families (Alliance) - 30 beds (single males, single females, families with children, excludes sex offenders due to the mix of genders and presence of children). Alliance for Children & Families also offers six overflow beds for when shelter capacity is exceeded.

TRANSITIONAL HOUSING:

The only transitional housing available in Stark County is targeted towards domestic violence victims. As noted previously, the decrease in transitional housing providers is largely due to the transition to other types of housing, such as permanent supportive housing and rapid rehousing.

Domestic Violence Victims:

- Domestic Violence of Canton - 14 beds

Addendum 2 for Shelters

RAPID RE-HOUSING:

Stark County's "Rapid Re-Housing" program targets families and individuals who are in a crisis state of homelessness and who will be able to sustain themselves after a minimal amount of assistance. Rental assistance is provided for typically one month, as well as security deposits and housing inspections. Case management is typically provided for 3 months with linkages to other mainstream services.

- YWCA - 77 beds
- ICAN Housing - 32 beds

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

There are a number of services available locally that complement services targeted to homeless persons. Some of the more mainstream services include the following:

Stark Mental Health & Addiction Recovery (StarkMHAR) serves as a coordinating & funding body for programs serving persons with mental health or addiction issues.

United Way of Greater Stark County targets over \$5-million dollars annually to the following program areas: Education; Financial Stability; and Health. Also, UWGSC has supporting programs targeted to homeless or those at risk of becoming homeless. Programs include emergency financial assistance, intervention and support services for at-risk youth, legal documentation services for acceptance into emergency shelters or treatment facilities, financial stability including financial literacy & employment programs, auto repair services, housing & services, and access to basic health care including mental & physical care.

Stark County Jobs and Family Services (SCJFS) partners with customers, community and other service providers to protect children and vulnerable adults, stabilize and strengthen families and encourage self-sufficiency and personal responsibility. SCJFS provides cash, food, medical & transportation assistance, childcare, child protection, child support case management, & employment services.

All major hospitals in the County provide assistance to homeless & low-income clients through medical debt forgiveness/cost write-down based on income & household size. Local community clinics also serve homeless clients free of charge. Multiple homeless service and housing providers offer case management to all clients, including referrals to health care professionals.

Besides StarkMHAR, Stark County's Board of Development Disabilities (SCDD) targets persons with developmental issues. There is also a strong partnership between several of Stark County's housing providers offering permanent supportive housing and agencies providing mental health and case management services for those most in need of services. CommQuest Services and Coleman Professional Services also provide drug and alcohol addiction and mental health assistance. Coleman also offers housing and employment assistance.

Employment assistance is provided through several agencies: SCJFS operates a Work Experience Program providing employment services to recipients of Ohio Works First (OWF) via cash and/or food assistance. They also have an employer subsidy program when SCJFS clients are hired. OhioMeansJobs is a local workforce development/training center connecting job seekers with employers by providing many resources in one location. The Stark County Community Action Agency (SCCAA) operates a workforce training center. Goodwill Industries offers job readiness assessment & training. Most CoC-funded programs offer referrals and some provide transportation assistance to employment/training opportunities and job fairs. Other housing providers offer similar assistance through case workers.

Welcome Home is a newer program offered by The Stock Pile, a local nonprofit building material reuse store. Welcome Home provides furniture and home essentials at no cost to applicants transitioning out

of homeless situations, aging out of foster care, or are domestic violence victims. Other agencies also offer similar programs on a smaller scale.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Stark's CoC provides the full continuum of housing and services from emergency assistance to transitional and permanent housing. All CoC facilities provide housing/shelter with wrap-around services such as case management and linkage with other services including counseling, budgeting assistance, education, life skills training, meals, mainstream services through SCJFS, mental health case management, and drug/alcohol abuse treatment. Homeless participants enter this housing with the understanding that they will engage in services appropriate to their individual needs through a service plan which is part of the programs contract and which is created by the provider and the participant working together. Service plans are modified as needed to adjust for a person's improvement (decreasing the level of services) or relapse/return to problem behavior (increasing the level of services). The success of the various programs is measured by a low turnover rate and by number of clients successfully exiting to permanent housing. Included in the accompanying list of services and facilities are programs specifically targeted to the needs of chronically homeless individuals and families, families with children, veterans and transitional age youth.

EMERGENCY SHELTER:

Stark's emergency shelters include four sub-populations: single men, single women, families, and persons fleeing domestic violence. All shelters are currently challenged with moving residents out to other housing due to a shortage of all types of housing. All shelters are located in one of Stark County's three major cities.

Dedicated Men's Shelters:

- Refuge of Hope - 44 beds

The CoC has only one men's shelter for the entire county, and this shelter houses the chronically homeless. Refuge of Hope was the only shelter that would take sex offenders; however, they will not be able to house any in their new facility (slated for opening in 2019). Refuge of Hope regularly runs over capacity as local need far exceeds capacity.

Dedicated Women and Family Shelters:

The following three shelters are for women and children. Two are located in the City of Canton and one in Massillon. There is a child care facility on site for the Canton facilities.

- YWCA (Canton) - 51 beds (single women, single parent female headed households with children)
- YWCA (Canton) - 22 family beds (large families with children, single parent male headed households, intact couples with or without children). The shelter also has the ability to house a disabled person with a service animal
- Family Living Center (Massillon) - 33 single and/or family beds (single females, households with children including female or male headed households, or couples with children. The shelter does not house single males.)

Fully Inclusive Shelter:

- Alliance for Children & Families (Alliance) - 30 beds (single males, single females, families with children, excludes sex offenders due to the mix of genders and presence of children)

Draft

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

There are many agencies in the Canton/Stark County area that offer a comprehensive set of services to meet the needs of special needs populations. In addition to the homeless services described in the previous section of this Plan, a network of providers also deliver housing and supportive services to elderly people, people with mental, physical and/or developmental disabilities, people with substance abuse addictions, individuals and their families living with HIV/AIDS, and youth aging out of foster care.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, describe their supportive housing needs

Elderly and frail elderly are served by the Area Agency on Aging (AAA) with programs to help them remain in their homes instead of being placed in nursing homes. The AAA distributes federal, state and local funds to service providers. Numerous non-profit and for-profit providers of these in-home services are working in the community to assist this population. The AAA provides assessments, case management, information and referral to service agencies, and assists consumers of long-term care services with choices and concerns. The service providers assist with ongoing needs such as home maintenance, and in-home medical and non-medical assistance, including bathing, dressing, food preparation and housecleaning. There are multiple housing complexes in the area that serve seniors and people with disabilities, including public housing, tax credit developed housing, and other federally sponsored housing through private housing providers. These programs include on-site senior services and activities as well as case management where appropriate.

The community system for persons with developmental disabilities falls under the auspices of the Stark County Board of Developmental Disabilities (Stark DD). Individuals with developmental disabilities rely on SCDD to provide assistance, life-long learning and activities that add to the quality of life. Services include early intervention with children and educational services through school-age years. Adult services include workshops, supported employment, and job training programs. Stark DD also provides residential care in the community with appropriate supports based on individual needs. Individual supports include adult day services (employment, life skills, motor skill development, respite), transportation, home modification, meal and nutrition, and assistive equipment. Nearly 3,700 persons were served by Stark DD in 2018.

Persons with mental health issues, and persons with alcohol or other drug addictions fall under the aegis of the Stark Mental Health & Addiction Recovery (StarkMHAR). StarkMHAR provides support for mental health and substance abuse prevention, intervention, and treatment in the community. The Board also promotes behavioral health through community education and awareness activities designed to increase public understanding about behavioral health issues and decrease the stigma that surrounds it.

The MHR SB Provider Network includes Canton Community KidSummit Against Drugs, Child & Adolescent Behavioral Health, Coleman Professional Services, CommQuest Services, Foundations, A Place for

Education and Recovery, Make-A-Way, Ohio Guidestone, Pathway Caring for Children, Stark County, TASC, ICAN Housing Solutions, NAMI (National Alliance on Mental Illness) Stark County, Stark County Social Workers Network, Summit Psychological Associates, Children's Network of Stark County, and Stark County Family Council.

Persons with HIV/AIDS are served by the AIDS Resource Center Ohio, which provides housing services.

For children aging out of foster care, and young adults, there is an active collaboration between Stark County Department of Jobs and Family Services (SCDJF), Pathways Caring for Children (the largest foster care program), MHR SB, Community Services, and housing providers. Case managers work with housing and service providers to place these young adults into the most appropriate housing available. MHR SB has a grant to assist young adults with significant mental health and/or behavioral issues to obtain housing with intensive support services. The YWCA TH program works directly with SCDJFS for placement of young adults who have lost custody (or are at risk of losing custody) of their children. Through the housing placement and support services, appropriate interventions assist the parent and break the intergenerational cycle of poor parenting and life skills. Community Services hosts The Shelter Program that provides housing support and services to young adults (ages 18-25) that are homeless or are in danger of becoming homeless and have mental health or mental health & substance abuse concerns.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

MHR SB has a specific protocol for persons returning from a mental health or substance recovery program. This protocol includes discharge planning, case manager assistance locating appropriate housing and advocacy for acceptance, and support services after housing placement. For persons with the most severe mental health issues, the protocol complies with state requirements for discharge planning for persons leaving institutions of care. Following the protocol that the MHR SB started several years ago in the Stark County Jail system, MHR SB created a system to track individuals with a mental health diagnosis while institutionalized.

An ongoing partnership exists between housing providers and mental health providers who offer case management under the auspices of the MHR SB for those with mental illness. MHR SB has an intense service program that includes visits to residents five days a week to ensure that the resident is taking required medication, paying rent, and that basic needs are being met.

Using the CoC tier assessment process, appropriate housing programs are identified and application is made for housing. Housers include YWCA, Stark Metropolitan Housing Authority (SMHA), ICAN, and private landlords. Housing options include; Permanent Supportive Housing, Transitional Housing, and Rapid Rehousing based on need and level of severity of mental health and health issues.

All of these programs include support services and case management (appropriate to need level). Case management agencies include Phoenix Rising, Coleman Professional Services, and Community Services. Case management supportive services are detailed in individual service plans and cover a range of

activities such as counseling, crisis intervention, advocacy, follow-up continued treatment, assistance with carrying out activities of daily living (ADLs), assistance in developing support systems, education, vocational training, and identification of obstacles barriers and new challenges to maintaining housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

For 2019, the City of Canton has proposed to allocate a portion of its HOME funding to the Y.W.C.A. for Tenant-Based Rental Assistance (TBRA) serving special needs populations and enabling such persons to secure affordable permanent housing and helping them achieve self-sufficiency. The City of Canton will also utilize CDBG funding to provide housing rehabilitation, repair and maintenance programs to lower income households, including senior citizen homeowners. By providing needed repairs and upgrading, this housing assistance enables low income seniors to maintain and remain in their homes, preserving their independence. In addition, the City of Canton operates a summer food voucher program, serving elderly persons, providing additional resources to support good nutrition and a healthier life style. The City of Canton will also continue its city-wide program of installing ADA curb ramps at various intersections to improve pedestrian mobility and accessibility.

Additionally, the City will continue working with the CoC in analyzing and addressing ongoing needs in the community.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

As described above, the specific activities that the City of Canton plans to undertake in 2019 to address the housing and supportive services needs with respect to persons who are not homeless but have other special needs include: Housing Rehabilitation and Repair/Maintenance Programs (HOME and CDBG), Tenant-Based Rental Assistance (HOME), and ADA Curb Ramps (CDBG).

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Canton's land development policies are expressed in its comprehensive plan and zoning ordinance and map. The City's comprehensive plan calls for reforming planning policies and zoning regulations that are barriers to the creation of affordable housing, but does not identify specific actions or measures of such reform.

Land Development Policies

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

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

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

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

Public Policies Regarding Investment of Federal Housing and Community Development Funds

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) funds to carry out projects designed to address priority needs such as decent affordable housing, safe neighborhoods, and access to needed services.

In addition, Canton has developed an Affirmative Marketing Policy. Under this policy, the City has obligations which include community outreach and education, while also requiring developers to advertise availability of HUD-assisted units with local minority 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.

Site selection for HOME-assisted construction of new rental units should promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high concentration of LMI households. The City identifies its southern two-thirds in the Consolidated Plan as an area of investment of entitlement funds by virtue of predominantly low- and moderate-income households and minority concentration. The City should expand housing choice by creating new housing opportunities in non-concentrated areas.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In regards to zoning issues, the City Planning Department is responsible for subdivision review and approval as well as zoning recommendations. Consideration of any changes to zoning must bear in mind the consequences such changes may have on affordable housing. In addition, as described in the preceding section, allowing alternative residential development design can provide opportunities to expand the supply of affordable housing by reducing the cost of infrastructure. Alternative design models can be used to produce and preserve affordable housing options for working and lower income households.

Stark County recently prepared an Analysis of Impediments to Fair Housing Choice (AI). Although this AI has not yet been adopted, one of its recommended action steps for Canton is amending the City's zoning ordinance to allow a greater variety of residential construction, including multifamily units, which are an important affordable housing option for 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 way 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 and policy makers about the City's affordable housing needs.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

In determining priorities for the allocation of federal funds, the City of Canton recognizes the need to foster a competitive local economy that expands economic opportunities for present and future residents. The City will do so by investing CDBG funds in economic development efforts – business retention, creation and expansion, workforce training and development, job creation, etc.

Economic Development Market Analysis

Economic indicators suggest that the City is underperforming compared to the county, state, and nation. The unemployment rate in Canton in October 2018 was 5.6%, which is much higher than the unemployment rates for Stark County (4.6%), Ohio (4.3%) and the United States (3.5%). Also, according to 2012-2016 ACS data, Canton’s median income (\$30,444) is 37% less than Stark County’s median income (\$48,714).

The top business sector City residents are employed in is Education and Health Care Services. Almost one-quarter of City residents hold jobs in this sector. Many of these jobs require college degrees, and 20% of City workers hold at least a Bachelor’s degree. However the City also has a fairly large number of working age residents who have only marginal employment skills. Almost 7,000 working age residents did not finish high school and do not have a high school diploma or GED. They will be left behind in the region’s increasingly advanced and competitive job market.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	163	84	1	0	0
Arts, Entertainment, Accommodations	3,243	2,724	13	7	-5
Construction	961	2,003	4	5	2
Education and Health Care Services	5,601	11,685	22	31	9
Finance, Insurance, and Real Estate	1,308	1,952	5	5	0
Information	386	487	1	1	0
Manufacturing	4,150	9,716	16	26	10
Other Services	934	1,106	4	3	-1
Professional, Scientific, Management Services	1,646	1,685	6	4	-2

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Public Administration	0	0	0	0	0
Retail Trade	3,189	2,752	12	7	-5
Transportation and Warehousing	763	645	3	2	-1
Wholesale Trade	1,159	1,586	4	4	0
Total	23,503	36,425	--	--	--

Table 40 - Business Activity

Data Source: 2009-2013 ACS (Workers), 2013 Longitudinal Employer-Household Dynamics (Jobs)

Draft

Labor Force

Total Population in the Civilian Labor Force	34,297
Civilian Employed Population 16 years and over	28,951
Unemployment Rate	15.59
Unemployment Rate for Ages 16-24	41.06
Unemployment Rate for Ages 25-65	10.13

Table 41 - Labor Force

Data Source: 2009-2013 ACS

Occupations by Sector	Number of People
Management, business and financial	4,040
Farming, fisheries and forestry occupations	1,330
Service	5,822
Sales and office	6,596
Construction, extraction, maintenance and repair	1,762
Production, transportation and material moving	2,400

Table 42 – Occupations by Sector

Data Source: 2009-2013 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	22,480	81%
30-59 Minutes	3,929	14%
60 or More Minutes	1,304	5%
Total	27,713	100%

Table 43 - Travel Time

Data Source: 2009-2013 ACS

Travel time to work is not an issue for Canton residents, almost 80% of whom travel less than 30 minutes to work each day. This means that most City residents do not have to travel far to find acceptable employment. However, stakeholders interviewed cited transportation for low-income residents who do not have cars as being a major obstacle for them to obtain and keep jobs.

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,908	774	2,710
High school graduate (includes equivalency)	8,400	1,640	3,846
Some college or Associate's degree	8,450	1,184	2,724
Bachelor's degree or higher	4,805	182	650

Table 44 - Educational Attainment by Employment Status

Data Source: 2009-2013 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	110	234	192	688	1,024
9th to 12th grade, no diploma	1,212	1,524	644	2,110	1,731
High school graduate, GED, or alternative	2,048	2,963	3,220	7,720	4,598
Some college, no degree	3,364	3,271	2,213	3,575	1,258
Associate's degree	109	931	912	1,468	281
Bachelor's degree	193	1,197	724	2,043	599
Graduate or professional degree	0	446	329	898	262

Table 45 - Educational Attainment by Age

Data Source: 2009-2013 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	13,035
High school graduate (includes equivalency)	20,367
Some college or Associate's degree	23,515
Bachelor's degree	38,167
Graduate or professional degree	52,167

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2009-2013 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

In the City of Canton, the major employment sectors are education and health care services, manufacturing, arts, entertainment, and accommodations, and retail trades.

Describe the workforce and infrastructure needs of the business community:

Workforce Development

In the Business Activity table, the “Jobs Less Workers” column indicates commuting. A negative number suggests that residents leave the City for their jobs, while a positive number indicates that workers in the City reside outside of its boundaries. The largest shares of residents leave the City for jobs in Arts, Entertainment and Accommodations and Retail Trade sectors, which are often low paying jobs. Large suburban commuter populations working in Education and Health Care Services and Manufacturing, travel to jobs in these high-paying sectors in the City. Therefore, the City’s many workforce development needs include those to address the need for education and training for high paying job sectors.

Infrastructure Needs

Many older Canton neighborhoods and its commercial / industrial corridors have aging infrastructure that needs improvement and upgrades. Well maintained sidewalks are important to overall health, safety and livability of residential neighborhoods. Sidewalks line almost all of the City’s streets on both sides. However, many of the city’s sidewalks are in disrepair, and the City needs to undertake sidewalk replacement /reconstruction in many areas.

Adequate streets and street lighting add to the safety and security of neighborhoods, and the improvement of streets and lighting is needed within the City. The City is considering a program to install more energy efficient LED-type lighting throughout the City. Also, the City has an ongoing street repaving / reconstruction program.

The City’s infrastructure needs also includes the replacement / reconstruction of aging water and sewer lines.

Downtown Development

Downtown development projects that could have a major impact on the City include:

- Revitalization of the former Hercules Engine Co. site - A private developer has completed an initial phase of the Hercules redevelopment project, and environmental remediation that will facilitate future development has been done. Long-term plans for the 26-acre site include retail shops, a boutique hotel and a convention center.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect

job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Oil and Gas Industry – Shale Development

Development of Marcellus Shale and Utica Shale deposits continue to have an impact on the Canton area economy. However, a combination of mild weather and the low cost of petroleum continues to affect the oil and gas industry, and the anticipated ripple effects of Shale development have not fully materialized in the region. Leaders continue to debate the economic and environmental impacts of shale development.

The \$500 million development of the Pro Football Hall of Fame Village in the City of Canton continues to hold the promise of the next major economic development driver for the region. Announced in 2015, plans include the construction of hotels, a conference center, a sports entertainment complex, an assisted living facility, a youth sports facility, a center for excellence, NFL-themed rides / virtual experience, and a Main Street with restaurant / retail establishments (Pro Football Hall of Fame website). The project will attract multiple businesses and significant levels of private investment in the local and regional economies. To supplement this project, Canton has begun infrastructure projects designed to benefit the region while jumpstarting local investment interest.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Education and job training are key components in workforce development. ACS data in the “Educational Attainment by Employment Status” indicates that unemployment is much higher among those persons with less education, especially for those lacking a high school diploma (whose unemployment rate of 24% is more than four times the City’s unemployment rate). Conversely the “Educational Attainment – Median Earnings in the Past 12 Months “ table shows that median income rises with higher levels of educational attainment. However only 18% of City residents have a college degree, and almost half (43%) have not exceeded high school educational attainment. These factors demonstrate the need for additional education and workforce training (and re-training) for Canton residents to prepare them for the jobs of today and tomorrow.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

There are a variety of workforce training initiatives and opportunities available in the Canton area, including the following:

Stark State College provides numerous associate degrees, certificates and professional development opportunities for high school graduates. Its offerings include courses and training to address demands in various fields including the oil and gas industry, commercial driver’s licenses, computers, geographic information systems, and welding.

The Employment Source – Ohio Means Jobs and Stark and Tuscarawas Counties are northeastern Ohio’s premier workforce development and training centers that connects job seekers with employers by providing numerous resources in a single location. It is a free service made possible through funds provided by the U.S. Department of Labor and operated locally by the Workforce Investment Board, the Stark and Tuscarawas County Commissioners and the Mayor of the City of Canton. Services for job seekers include on-line job openings linked with the State database, job search workshops, career research library, and use of research equipment for preparation of resumes, accessing employer information, and scheduling job interviews.

The Stark County Community Action Agency promotes economic self-sufficiency among low income residents. Its Center for Education and Employment Opportunities (CEEEO) offers education, skills training, and employment assistance to help program participants become better-prepared for a job search. Obtaining secure, gainful employment that provides economic self-sufficiency is challenging, especially given frequent barriers such as unstable work histories, lack of marketable skills, or criminal backgrounds.

Goodwill Industries provides a comprehensive set of services designed to improve employment skills and to find and maintain a job. Its services include vocational evaluation, career counseling, work-related skills training and jobs seeking assistance.

The Stark Education Partnership engages and collaborates with education, business, community and civic leaders to create and respond to opportunities that provide all students (preschool through college) with education and career success. Its current initiatives include continued support for programs that help high school students earn college credits and the creation of a new network of action to increase the number of county residents with college degrees.

All of the above mentioned efforts will help achieve Canton’s Strategic Plan goal to expand opportunities for City residents via education, employment training and job creation.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

In 1978, NEFCO (Northeast Ohio Four County Regional Planning and Development Organization) was designated as an Economic Development District by the U.S. Department of Commerce, Economic Development Administration (EDA) for the counties of Portage, Stark, Summit, and Wayne. This designation gives member communities ongoing eligibility for economic assistance programs through EDA. NEFCO maintains this eligibility by updating the Comprehensive Economic Development Strategy

(CEDS) every year and by preparing a revised CEDS every five years. The CEDS is a document that contains the region's goals and objectives and the economic development priorities of NEFCO members.

Canton is a participating member in NEFCO and, as such, participates in the development of the CEDS. The CEDS 2017 Priority Project List included the Mahoning Road Corridor – one of Canton's major economic development corridors.

The \$500 million development of the Pro Football Hall of Fame Village in the City of Canton continues to hold the promise of the next major economic development driver for the region. Announced in 2015, plans include the construction of hotels, a conference center, a sports entertainment complex, an assisted living facility, a youth sports facility, a center for excellence, NFL-themed rides / virtual experience, and a Main Street with restaurant / retail establishments (Pro Football Hall of Fame website). The project will attract multiple businesses and significant levels of private investment in the local and regional economies. To supplement this project, Canton has begun infrastructure projects designed to benefit the region while jumpstarting local investment interest.

Discussion

The City of Canton has a large array of assets and incentives to offer businesses and companies who are looking to expand their operations locally or build new operations in the city. These assets and incentives include:

Limitless Water Supply

For companies that need large amounts of fresh water for processing or manufacturing, the City of Canton owns and operates one of the largest underground freshwater aquifers in the state.

Site-Ready Facilities

The City of Canton has a wide variety of out-of-the-box facilities and build-ready sites to offer to companies that need large amounts of space for research, offices, or manufacturing.

Global Access

The City can help companies compete in the global economy by partnering with state trade offices in more than a dozen countries, giving local businesses access to markets, suppliers, and customers outside of the United States. Also, with a Foreign Trade Zone (see www.neotec.org for more information) located only minutes from downtown, products can be shipped or received worldwide.

Public/Private Partnerships

Local businesses benefit from a number of grants, tax incentives, and low-interest loans from city, county, state, federal, and private/non-profit sources. Companies also have access to a wide variety of services offered by the Canton Regional Chamber of Commerce.

Workforce

By working closely with its local partners in secondary and higher education, the City tries to ensure that local companies possess a workforce of skilled and highly-trained employees to operate their businesses.

Transportation

The Akron-Canton Regional Airport (CAK) gives local companies convenient air access to national and international markets.

Canton's location at the intersection of two major highway systems - I-77 and US-30 - connects local businesses to more than 50% of the nation's population in less than a day's travel.

The Wheeling & Lake Erie Railway Co. serves Canton, Toledo, Cleveland, Pittsburgh and Akron markets. The Norfolk Southern Corporation provides freight service to Cleveland, Toledo, and Norfolk, VA.

Business Incentive Programs

In addition to these assets, the City of Canton offers several programs that provide incentives to companies looking to locate or expand:

- Income Tax Incentive programs, such as the Job Creation Incentive Program and the Net Profit Tax Incentive.
- Property Tax Incentives, such as the Enterprise Zone Program, Tax Increment Financing, and Community Reinvestment Areas.
- Economic development financial assistance.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Multiple housing problems consist of more than one of the following: lacking complete plumbing facilities, lacking complete kitchen facilities, housing costs greater than 30% of income, and having more than one person per room.

The City of Canton has analyzed 2013-2017 American Community Survey (ACS) data to identify areas of the City with concentrations of households with multiple housing problems. A concentration of households with multiple housing problems occurs when the percentage of such households in a census tract is 10 or more percentage points greater than the percentage for the City as a whole.

According to the ACS 2013-2017 data, only one census tract in the City has a concentration of households (as defined above) with multiple housing problems---CT 7001. CT 7001 is the heart of Canton's downtown and is part of the City's Central NRSA. In this census tract, 20% of the occupied units lack complete kitchen facilities compared to just 2.1% of occupied units for the City as a whole.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Areas of Concentration – Low Income Households

The City considers a census tract to have a high concentration of low income persons if the tract has a low income rate that exceeds the overall City rate (35.4%) by 10 percentage points or more.

According to 2013-2017 American Community Survey (ACS) data, the following census tracts have a high concentration of low income persons; i.e. a low income population of 45.5% or more:

7001 (63.9%), 7003 (50.5%), 7005 (50.6%), 7013 (48.6%), 7015 (50.6%), 7018 (52.8%), 7021 (49.7%), and 7023 (70.0%).

Census Tracts 7001 and 7015 are two of the three census tracts that compose the City's Central Neighborhood Revitalization Strategy Areas (NRSA), while Census Tracts 7018, 7021, and 7023 compose the City's Central NRSA.

Areas of Concentration – Minority Households

The City of Canton has reviewed 2013-2017 ACS Data to determine if there are areas of the City with a concentration of minority households. The City considers a census tract to have a high concentration of minority households if the percentage of Black/African Americans in the tract is more than 10 percentage points greater than the percentage of Black/African Americans in the City as a whole. In Canton, 23.2% of the population is Black/African American.

The following census tracts have a high concentration of minority population, i.e., a Black/African American population of 33.2% or more: 7018 (49.5%), 7021 (63.8%), and 7023 (53.9%). These three census tracts compose the City's Eastside Neighborhood Revitalization Strategy Area (NRSA).

Please refer to the maps at the end of this section for further information regarding these and other factors presented in this section.

Neighborhood Revitalization Strategy Area

In 2013, the City of Canton designated two areas of the City as Neighborhood Revitalization Strategy Areas (NRSA). An NRSA, per HUD guidelines, is an area where at least 70% of the residents are LMI persons, and where the local government proposes a multi-year comprehensive approach to revitalization efforts. The City's Neighborhood Revitalization Strategy Area Program was created as an amendment to the FY 2013 Annual Action Plan and it is being carried forward into the new 5-Year Consolidated Plan for 2019-2023. The two areas that have been designated are known as the Eastside NRSA and the Central NRSA.

The Eastside NRSA includes the neighborhoods around East Tuscarawas Street, Sherrick Road, and Mahoning Road and includes the following Census Tracts – 7018, 7021, and 7023. The Central NRSA includes the downtown area and the surrounding neighborhoods to the west from Navarre Road to 12th Street NW and includes the following Census Tracts – 7001, 7015, 7017. As was detailed in the prior section, the City's NRSA areas represent neighborhoods with high concentrations of low income households, minority households, and households with housing problems.

What are the characteristics of the market in these areas/neighborhoods?

As noted in the NRSA Plan and other sections of this Consolidated Plan, the Eastside and Central NRSA are two areas faced with many social and economic challenges. They have high concentrations of low income residents and minority populations. The characteristics of the NRSA include older and deteriorating housing stock, blighting influences (e.g., vacant dilapidated buildings and deteriorated infrastructure), and both residential and commercial disinvestment. Housing is more likely to be in multi-family and tenant-occupied units. Other problems include crime, high unemployment and low educational attainment levels.

Are there any community assets in these areas/neighborhoods?

The City's NRSA areas do have a number of community assets, including the following:

Neighborhood Associations - The City of Canton has encouraged the establishment of neighborhood associations to empower citizens to become involved with and actively work toward improving their neighborhoods. Within the City's two NRSA areas, there are a number of existing neighborhood associations. The City will continue to work closely with these groups to help identify and resolve problems that continue to impact the quality of life in these neighborhoods.

Southeast Community Center - Built in 1985 with a \$2.2 million Community Development grant and United Way funds, the Edward L. Coleman Southeast Community Center, located at 1400 Sherrick Road SE, has been a neighborhood hub for over 25 years. The multipurpose center features a full-sized gymnasium, weight room, game room, community room, indoor and outdoor basketball courts, playground, tennis courts and Crenshaw Park.

J.R. Coleman Center - Founded in 1974 as an outreach ministry of St. Paul's Catholic Church, J.R. Coleman Center comprises several 501(c)(3) private not for profit organizations that share a common mission to assist families and individuals in achieving and maintaining independence, security and personal well-being.

Nimisilla Park - Once home to the Stark County Fairgrounds, the Canton Garden Center, and a fondly remembered zoo, the area now known as Nimisilla Park, located at the corner of 12th Street and Maple Avenue NE, has addressed the recreation and entertainment needs of thousands of families for more than a century on the northeast side of Canton.

Are there other strategic opportunities in any of these areas?

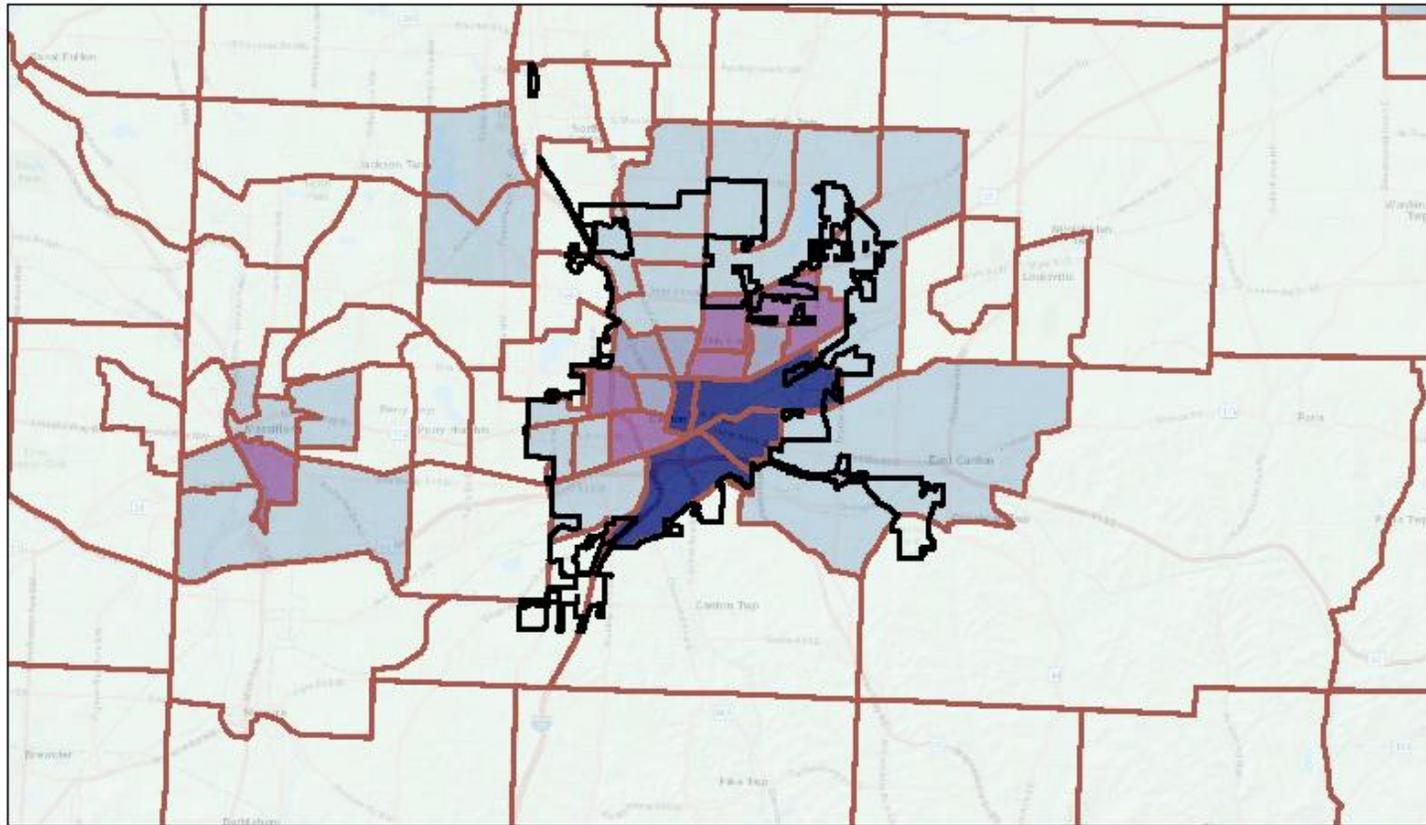
The Eastside NRSA includes a number of neighborhood commercial corridors: Mahoning Road, 12th Street, East Tuscarawas Street, and portions of Cherry Street. Some of these are more vibrant and active than others, but most support a variety of retail and service activities. The primary commercial corridors in the Central NRSA include Market Avenue, Cleveland Avenue, West Tuscarawas Street, and McKinley Avenue.

Neighborhood commercial corridors, as well as the City's Central Business District, struggled in the economic climate of the 1970's and 1980's, which favored strip mall development and big box stores with acres of automobile parking. As urban cities seek to revitalize themselves in the 21st century, a resurgence of public appreciation for walkable, urban neighborhoods can help encourage the type of neighborhood improvements envisioned by the NRSA Program. A program to revitalize the City's commercial corridors will, by necessity, include funding for activities such as façade rehabilitation/restoration and streetscape improvements to make these areas attractive for investment.

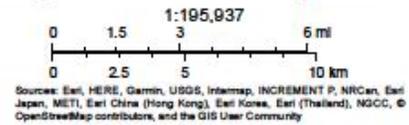
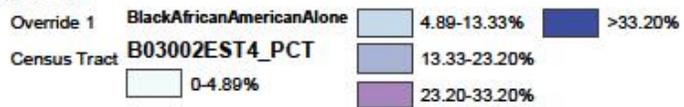
Revitalization of the City's Central Business District has been underway for several years. Older office buildings have been refurbished and restored, attracting new workers downtown. Trendy restaurants and artist galleries have opened. And there is an organized series of events like First Friday, and music concerts, that serve to attract the general public to sample what downtown has to offer.

To carry this approach into the surrounding NRSA areas, the City recognizes that its investment in housing and neighborhood revitalization must include incentives to rehabilitate and reoccupy vacant, underused, and abandoned commercial buildings.

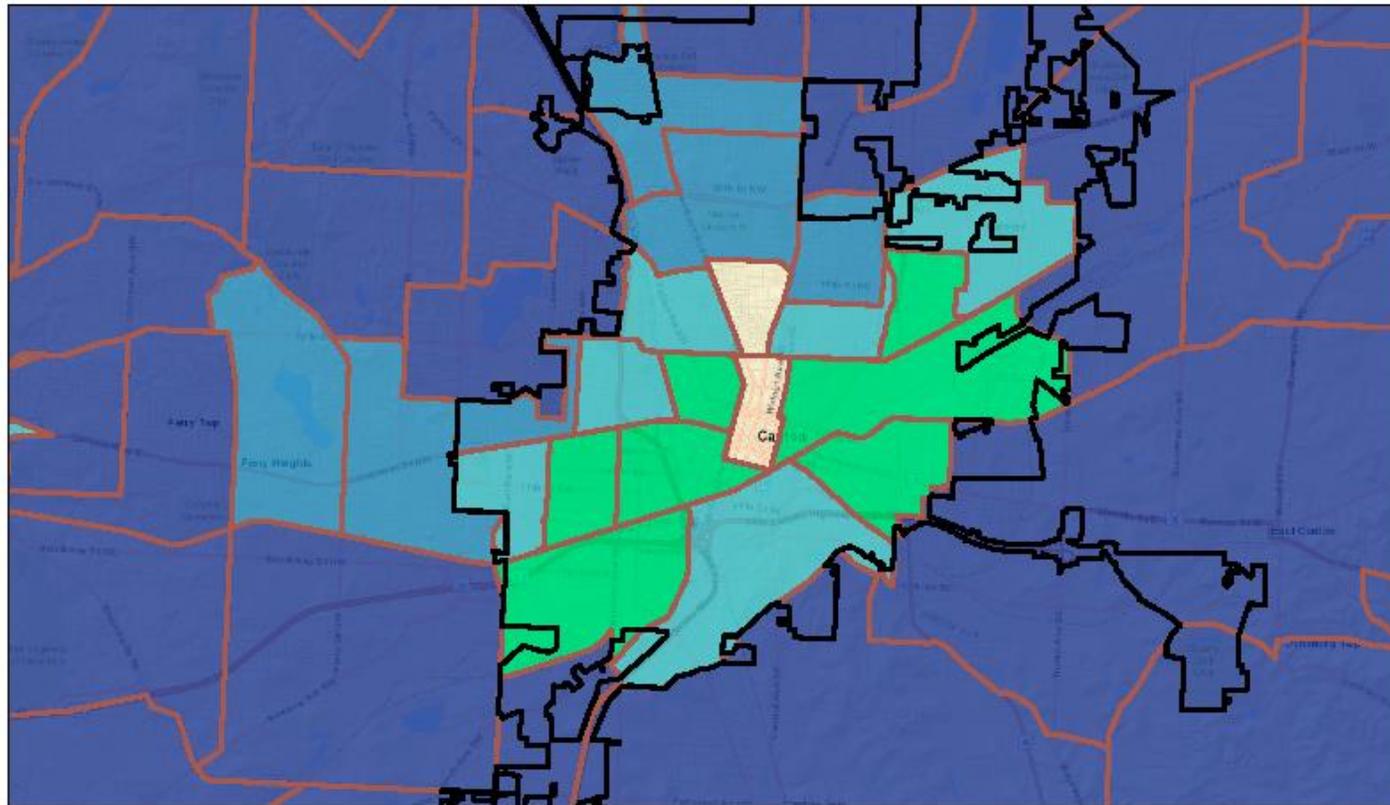
CPD Maps - Canton OH - Percent - Black or African American Population



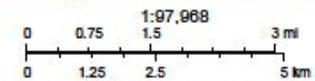
February 8, 2019



CPD Maps - Canton OH - Median Home Value

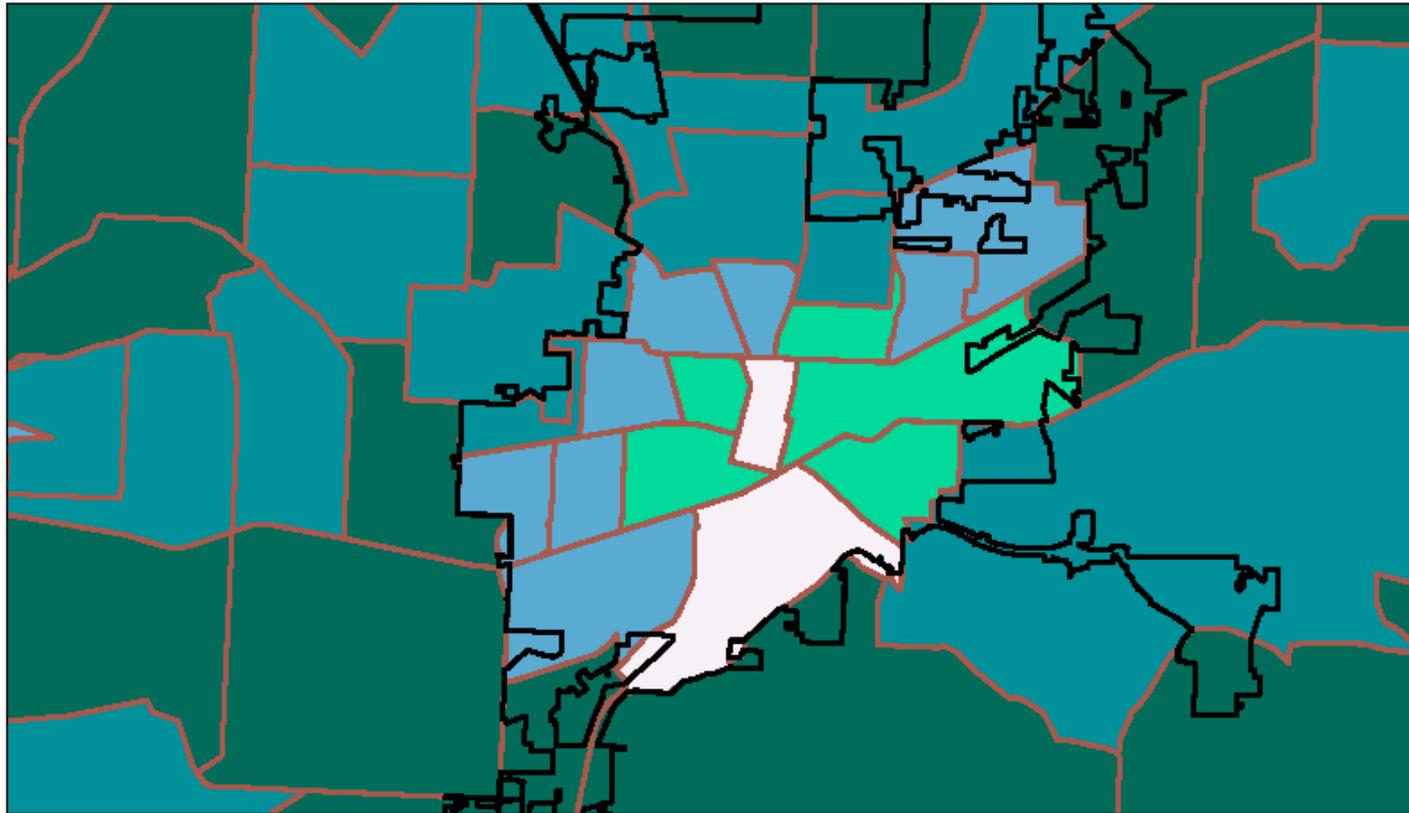


February 8, 2019

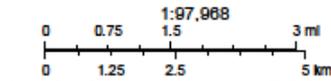


Sources: Esri, HERE, Garmin, UGG, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Canton OH - Median Household Income

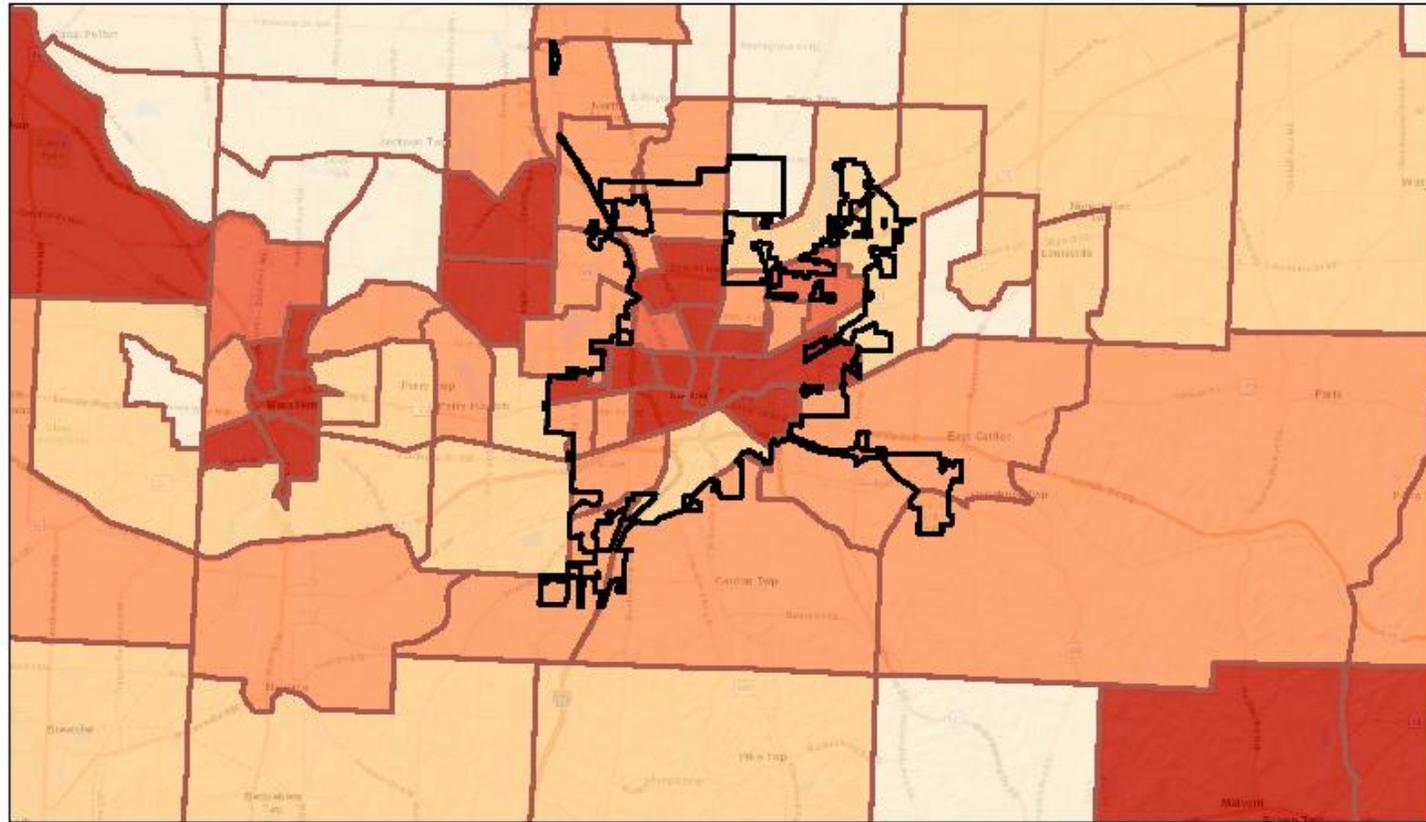


February 8, 2019

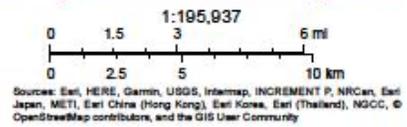
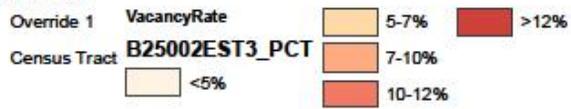


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

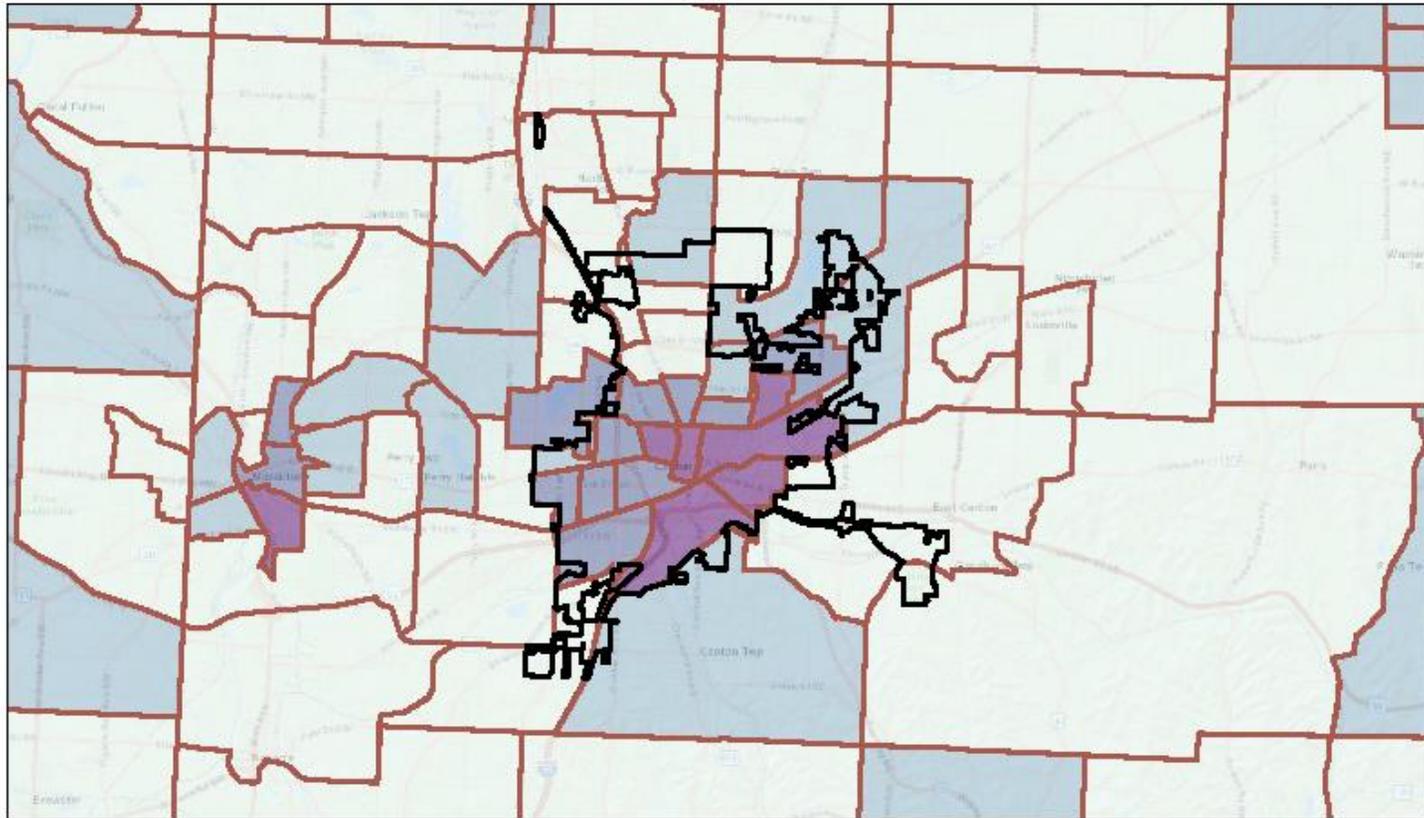
CPD Maps - Canton OH - Percent - Vacancy Rate



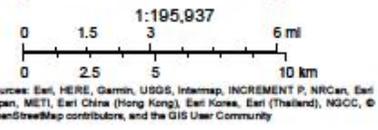
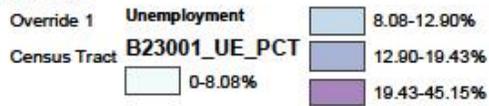
February 8, 2019



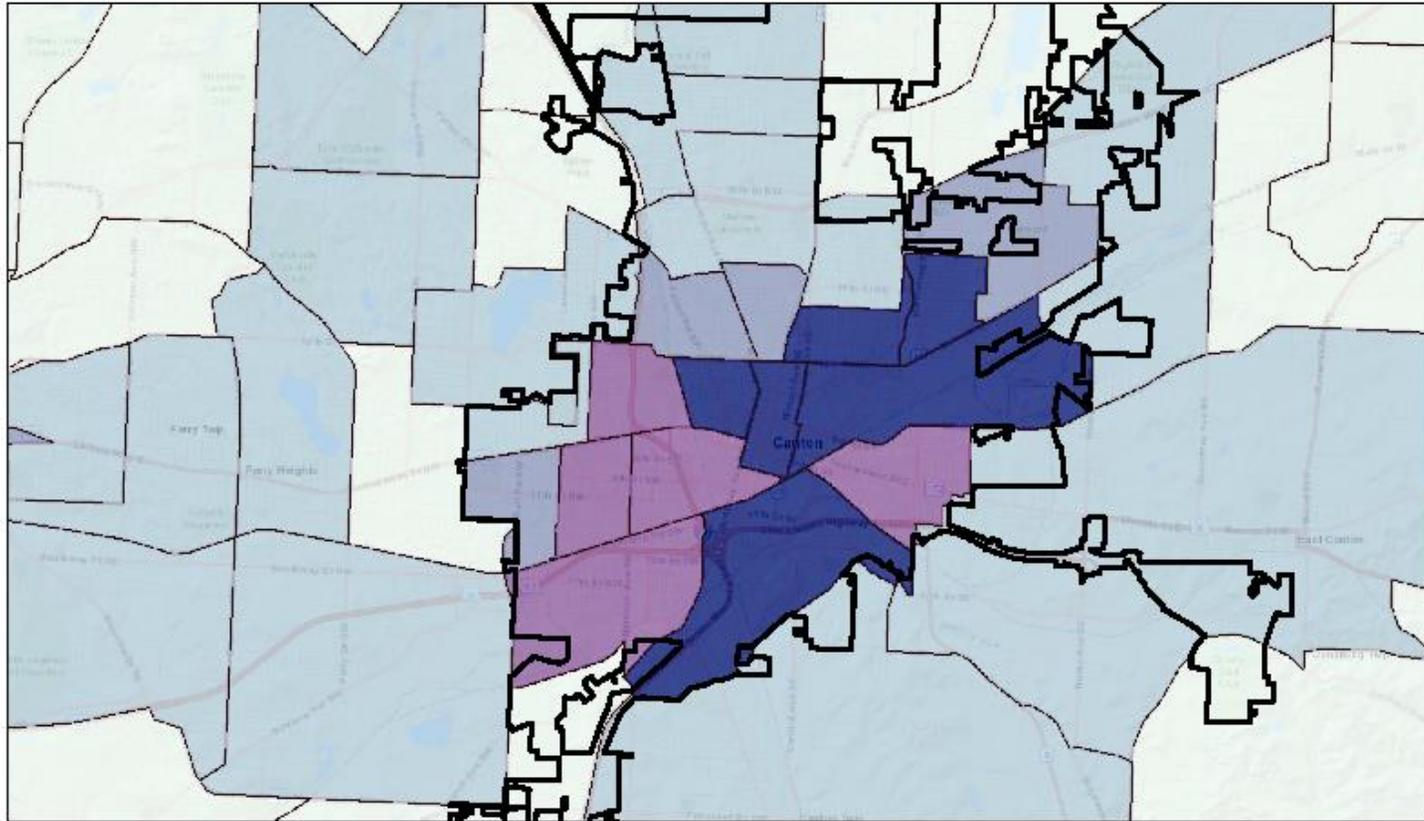
CPD Maps - Canton OH - Percentage of Unemployment



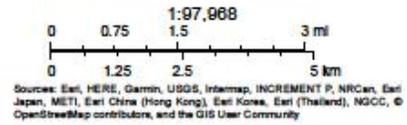
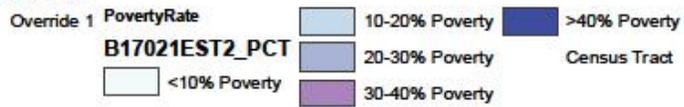
February 8, 2019



CPD Maps - Canton OH - Poverty Rate



February 8, 2019



Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan summarizes the City of Canton's community development, housing and economic development priorities, goals and strategies for program years 2019 through 2023 that will be pursued through the use of Community Development Block Grant (CDBG) Program funds, HOME Investment Partnerships Program (HOME) Funds, and Emergency Solutions Grant (ESG) funds.

Geographic Priorities

In 2013, the City of Canton established two Neighborhood Revitalization Strategy Areas (NRSAs): the Eastside NRSA, which incorporates portions of the northeast and southeast sides of the City, and the Central NRSA, which includes the downtown and adjacent neighborhoods to the southwest and west. In November 2018, HUD approved the renewal of these NRSA areas for another five years.

The U.S. Department of Housing and Urban Development (HUD) encourages the establishment of a 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. Comprehensive community revitalization strategies seek to create partnerships among federal and local governments, the private sector, community organizations and neighborhood residents. The City plans to target investment of CDBG funds within these two NRSA areas during the 2019-2023 Consolidated Plan period.

Priority Needs

This Consolidated Plan has identified the following priority needs that provide the programming focus over the next five years:

1. Maintain and improve the quality of existing affordable housing;
2. Expand affordable housing opportunities;
3. Reduce housing cost burden;
4. Address homelessness issues;
5. Improve public facilities serving low and moderate income (LMI) neighborhoods;
6. Improve streets and sidewalks in LMI areas;
7. Remove barriers to accessibility;

8. Expand economic opportunities;
9. Provide Canton's special needs and low-income residents with services to improve their self-sufficiency; and
10. Remove blight and blighting influences in residential neighborhoods.

Influence of Market Conditions

Decent and Affordable Housing. There is need for housing rehabilitation of Canton's many housing units built before 1980. Housing affordability and housing cost burden are also major issues for the City's extremely low and low-income households. Many LMI households in the City of Canton have moderate to severe housing problems, including 10,440, LMI households that have one of four identified housing problems (lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, cost burden greater than 30%). This represents almost 61% of all LMI households. The most common housing problem affecting LMI households is cost burden. Housing cost burden - needing to pay more than 30% of monthly income for housing - affects 9,365 households, which represents 89.7% of all LMI households with a housing problem.

Community Development and Blighting Influences. The population losses that Canton has sustained since the 1950s have resulted in a high rate of vacant buildings. Much of the housing stock in the City, especially within the NRSA areas, both owner occupied and rental properties, suffers from disinvestment and lack of maintenance. The foreclosure crisis and economic recession exacerbated the problem of blighted neighborhoods. Vacant, abandoned, and dilapidated structures and properties are blighting influences that can destabilize neighborhoods, destroy property values, and become a breeding ground for criminal activities such as drug trafficking, vandalism, prostitution, and arson. Due to reduced government revenues for public improvements and infrastructure, many sidewalks in the City do not have curb ramps or the ramps are unsafe, and the sidewalks are chipped, cracked, and/or broken due to age of the concrete and/or tree root intrusion, posing public safety hazards. Some areas do not have sidewalks.

Economic Opportunities. According to the 2012-2016 American Community Survey (ACS), the household median income for Canton is \$30,444, while the median household income for Stark County is \$48,714 – 60% higher than the City's income. In October 2018, the City of Canton unemployment rate was 5.6%, compared with 4.6% for Stark County, 4.3% for Ohio, and 3.5% for the United States. There is a need for economic development in the City of Canton that will create more jobs and more higher-paying jobs for area residents, in particular for LMI households.

Public Services. Within the Canton area, public services are typically provided by non-profit organizations assisted by foundations and public sector funding. Local fundraising for needed public services is challenging, especially when government funding fluctuates. However, demand for public services and assistance continues to grow. There is a continuing need for public services for the LMI population including, but not necessarily limited to, activities serving youth, the elderly, homeless and

special needs populations, healthcare, literacy, crime awareness and prevention, housing and landlord-tenant counseling, substance abuse, mental health, and homebuyer down payment assistance.

Anticipated Resources

The City of Canton anticipates that it will receive average annual HUD funding of approximately \$2,600,000 in CDBG funding, \$650,000 in HOME funding and \$210,000 in ESG funding during the 2019-2023 Consolidated Plan period.

Institutional Delivery Structure

The City of Canton will work with various City departments, Stark County and regional and local agencies to implement the programs and projects that will address the goals and priorities identified in this Consolidated Plan. Resources will be invested to address housing cost burden and homelessness, remove blighting influences in neighborhoods, and support programs and services that help Canton's low-income and special needs populations.

Funding for housing rehabilitation and neighborhood improvements will be concentrated in the City's two established Neighborhood Revitalization Strategy Areas.

Goals

This Strategic Plan has identified the following Consolidated Plan goals to be addressed during the 2019-2023 Consolidated Plan Period.

Goal 1: Expand, Maintain and Improve Canton's Affordable Housing Opportunities

Goal 2: Reduce the Number of Residents Experiencing Homelessness

Goal 3: Improve the Safety and Livability of Low and Moderate Income Neighborhoods

Goal 4: Expand Economic Opportunities for Low and Moderate Income Persons

Goal 5: Support Canton's Low Income and Special Needs Residents through Public Services

Barriers to Affordable Housing

Barriers to affordable housing in Canton will be reviewed and addressed over the plan period through the efforts of the City's Community Development Department, local officials and the public.

Homelessness Strategy

The City of Canton is an ESG grantee and provides funding for homeless facilities and assistance through a Request for Proposals (RFP) Process. In addition, the City is an active participant in the Stark County Continuum of Care (CoC). The CoC's primary charge is to develop supportive housing options and to secure federal, state and local resources and other measures designed to:

- Promote community-wide commitment to employ best practices to end homelessness in Stark County, Ohio;
- Secure funding for efforts by providers and government entities to prevent homelessness and quickly re-house homeless individuals (including unaccompanied youth) and families in Stark County, while minimizing the trauma and dislocation that homelessness causes to individuals, families, and communities;
- Promote access to and effective utilization of mainstream programs by homeless individuals and families; and
- Optimize self-sufficiency among individuals and families that experience homelessness.

Lead-Based Paint Hazards

The City of Canton has established guidelines for dealing with lead-based paint hazards in homes being rehabilitated under its HUD-funded programs. A Lead Risk Assessment is undertaken early in the process, after rehab specifications have been drafted by City inspectors. All rehab contractors must be certified as Lead Safe Renovators in order to participate in the City's housing rehabilitation and repair/maintenance programs.

In addition, the Canton City Health Department offers testing to City homeowners for lead based paint and lead based paint hazards through its Lead Poisoning Prevention Program. The health department 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.

Anti-Poverty Strategy

Three key elements of the City's anti-poverty strategy during the Consolidated Plan period will include using local and federal resources to support the efforts of social service agencies that serve low income and special needs residents; retaining and increasing affordable housing opportunities for low income families; and carrying out economic development initiatives to strengthen and expand family-wage employment opportunities.

Monitoring

The City of Canton Development Department will monitor all HUD-funded activities, including those of subrecipients. Prior to awarding funding, the City will also carefully screen proposed subrecipients to ensure subrecipient agencies have the experience and capacity to meet applicable HUD regulations. This monitoring is intended to ensure that the intended community benefits of the City's investments are being achieved, and that the federal regulations that apply to those investments are being followed. As needed, the City will provide technical assistance and training to make sure recipient agencies have the capacity and understanding needed to achieve compliance.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

1	Area Name:	Central Neighborhood
	Area Type:	Strategy area
	Other Target Area Description:	
	HUD Approval Date:	4/1/2013; renewed: 11/27/2018
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The Central strategy area covers the downtown and surrounding neighborhoods to the west, and is generally bounded by 12th Street on the north, Cherry Street on the East, Navarre Road on the south, and Harrison Avenue and Monument Road on the west. The area coincides with the following U.S. Census tracts: 7001, 7015, and 7017.
	Include specific housing and commercial characteristics of this target area.	<p>According to 2012-2016 ACS data, the Central NRSA has 3,923 housing units, 43.6% of which are 1-unit, detached structures. The owner occupancy rate is 25.8%. The housing vacancy rate is 27.1%, and 63.1% of housing units were constructed in 1939 or earlier.</p> <p>For the City as a whole, the corresponding percentages are 66.5%, 49.2%, 15.3% and 40.9%. Thus, housing units in the Central NRSA are more likely to be multi-family, tenant occupied, vacant and older compared to units in the City.</p> <p>Commercial areas within the Central NRSA include the City's Central Business District as well as the commercial corridors of 12th Street and West Tuscarawas Street.</p> <p>While Canton's downtown continues to benefit from revitalization efforts, other Central NRSA commercial areas need to address the rehabilitation of deteriorated storefronts and the removal or restoration of vacant, abandoned and underutilized commercial properties.</p>

<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>The boundaries of the Central NRSA area were established by the City of Canton as part of a comprehensive reorganization of its housing and community development program. The Neighborhood Revitalization Strategy Area Program enables the City to focus its efforts and concentrate its funding on those neighborhoods that are most in need of assistance. The NRSA program provides the framework in which the City can undertake a comprehensive approach to neighborhood improvement and revitalization, while also providing the needed flexibility to offer innovative solutions to complex problems.</p> <p>The Central NRSA was established as part of Canton’s FY 2013 Action Plan. The 2019 Annual Action Plan represents the first year of the City’s new FY 2019 - FY 2023 Consolidated Plan. As the City of Canton implements its NRSA strategies, it will continue to consult with community groups, housing agencies, and other relevant stakeholders.</p>
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Draft

<p>Identify the needs in this target area.</p>	<p>Combining such factors as the low incomes among residents, the high number of rental properties and the large number of vacant/abandoned units results in severe housing issues for this part of the City. The housing problems identified in the two NRSA areas can be linked to additional problems, such as increased crime, neighborhood tensions, and lack of business investment.</p> <p>The needs for this target area mirror the needs for the City as a whole and include:</p> <ul style="list-style-type: none"> • 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; • Remove blight and blighting influences within residential neighborhoods.
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	<p>What are the opportunities for improvement in this target area?</p>	<p>The City has been somewhat successful in initiating some housing programs in the downtown, promoting the area to artists and young professionals. However, more needs to be done to improve existing housing conditions for the current residents (homeowners and renters), the majority of whom are low income, with limited resources and options. The Central NRSA area needs to be revitalized to attract private housing investment, to rehabilitate existing structures and to construct new market rate developments to improve the economic diversity within this neighborhood. More low income family housing is not the answer for this neighborhood. Rather the solution will involve the demolition and removal of vacant/dilapidated structures, the rehabilitation of existing housing already occupied by low and moderate income families, and the rehab/restoration of existing housing and the development of new housing for middle and higher income families. These goals are interconnected and will not be accomplished easily or quickly. They require a long term, comprehensive and cooperative approach by the City, housing providers, neighborhood organizations, and private developers, to achieve the desired result - suitable, livable, sustainable neighborhoods.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>The main barrier to improvement and revitalization of the Central NRSA is changing the image of this area from one of blight and deterioration to one of positive tangible improvement. Revitalization of this area will not occur overnight and will require a continued commitment from the City, neighborhood organizations and agencies that serve the area. Stable and ongoing funding from Federal and State agencies will be needed in order to continue the progress being made and to enable planning for future projects and improvements.</p>
<p>2</p>	<p>Area Name:</p>	<p>Eastside Neighborhood</p>
	<p>Area Type:</p>	<p>Strategy area</p>
	<p>Other Target Area Description:</p>	
	<p>HUD Approval Date:</p>	<p>4/1/2013; renewed 11/27/2018</p>

% of Low/ Mod:	
Revital Type:	
Other Revital Description:	
Identify the neighborhood boundaries for this target area.	<p>The Eastside strategy area covers much of the northeast and southeast sections of the city, including neighborhoods east of Cherry Street, and south of 12th and Mahoning Road on the northeast section, and the neighborhoods along East Tuscarawas Street and along Sherrick road in the southeast side. The area coincides with the following U.S. Census tracts: 7018, 7021, and 7023.</p>
Include specific housing and commercial characteristics of this target area.	<p>According to 2012-2016 ACS data, the Eastside NRSA has 4,717 housing units, 61.8% of which are one-unit, detached structures. The owner occupancy rate is 34.4%. The housing vacancy rate is 20.4%, and 39% of housing units were constructed in 1939 or earlier.</p> <p>For the City as a whole, the corresponding percentages are 66.5%, 49.2%, 15.3% and 40.9%. Thus, housing inputs in the Eastside NRSA are more likely to be multi-family, tenant-occupied, vacant and slightly younger than units in the City.</p> <p>Commercial areas within the Eastside NRSA include the commercial corridors of 12th Street/Mahoning Road NE and East Tuscarawas Street.</p> <p>These areas require rehabilitation and reinvestment to address their deteriorated buildings and physical environments.</p>

<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>The boundaries of the Eastside NRSA area were established by the City of Canton as part of a comprehensive reorganization of its housing and community development program. The Neighborhood Revitalization Strategy Area Program enables the City to focus its efforts and concentrate its funding on those neighborhoods that are most in need of assistance. The NRSA program provides the framework in which the City can undertake a comprehensive approach to neighborhood improvement and revitalization, while also providing the needed flexibility to offer innovative solutions to complex problems.</p> <p>The Eastside NRSA was established as part of Canton’s FY 2013 Action Plan. The 2019 Annual Action Plan represents the first year of the City’s new FY 2019 - FY 2023 Consolidated Plan.</p> <p>As the City of Canton implements its NRSA strategies, it will continue to consult with community groups, housing agencies, and other relevant stakeholders.</p>
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Draft

<p>Identify the needs in this target area.</p>	<p>Combining such factors as the low incomes among residents, the high number of rental properties and the large number of vacant/abandoned units results in severe housing issues for this part of the City. The housing problems identified in the two NRSA areas can be linked to additional problems, such as increased crime, neighborhood tensions, and lack of business investment.</p> <p>The needs for this target area mirror the needs for the City as a whole and include:</p> <ul style="list-style-type: none"> • 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; • Remove blight and blighting influences within residential neighborhoods.
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	<p>What are the opportunities for improvement in this target area?</p>	<p>While the City has been somewhat successful in initiating some housing programs in the downtown, more needs to be done to improve existing housing conditions for homeowners and renters in the adjacent northeast and southeast neighborhoods, the majority of whom are low income, with limited resources and options. The Eastside NRSA area needs to be revitalized to attract private housing investment, to rehabilitate existing structures and to construct new market rate developments to improve the economic diversity within this neighborhood. More low income family housing is not the answer for these neighborhoods. Rather the solution will involve the demolition and removal of vacant/dilapidated structures, the rehabilitation of existing housing already occupied by low and moderate income families, and the rehab/restoration of existing housing and the development of new housing for middle and higher income families. These goals are interconnected and will not be accomplished easily or quickly. They will require a long term, comprehensive and cooperative approach by the City, housing providers, neighborhood organizations, and private developers, to achieve the desired result - suitable, livable, sustainable neighborhoods.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>The main barrier to improvement and revitalization of the Eastside NRSA is changing the image of this area from one of blight and deterioration to one of positive tangible improvement. Revitalization of this area will not occur overnight and will require a continued commitment from the City, neighborhood organizations and agencies that serve the area. Stable and ongoing funding from Federal and State agencies will be needed in order to continue the progress being made and to enable planning for future projects and improvements.</p>
<p>3</p>	<p>Area Name:</p>	<p>City-Wide</p>
	<p>Area Type:</p>	<p>Local Target area</p>
	<p>Other Target Area Description:</p>	
	<p>HUD Approval Date:</p>	
	<p>% of Low/ Mod:</p>	

Revital Type:	Comprehensive
Other Revital Description:	
Identify the neighborhood boundaries for this target area.	This target area includes the entire of City of Canton.
Include specific housing and commercial characteristics of this target area.	<p>According to 2012-2016 ACS data, 36,061 housing units, 66.5% of which are 1-unit, detached structures. The owner occupancy rate is 49.2%. The housing vacancy rate is 15.3%, and 40.9% of housing units were constructed in 1939 or earlier.</p> <p>Commercial areas within Canton include the Central Business District as well as the commercial corridors of 12th Street/Mahoning Road and Tuscarawas Streets East and West. While the City's downtown continues to benefit from revitalization efforts, its other commercial areas are hampered by physical deterioration of buildings and public improvements and disinvestment.</p>
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Because a majority of Canton residents are considered by HUD to be low/moderate income, the City for years has operated its HUD-funded programs on a City-wide basis. This is true for housing rehabilitation and new construction programs, as well as public service activities. Many of the Canton's programs have been undertaken to benefit the entire City.

<p>Identify the needs in this target area.</p>	<p>Combining such factors as the low incomes among residents, the high number of rental properties and the large number of vacant/abandoned units results in severe housing issues for the City. These housing problems can be linked to additional problems, such as increased crime, neighborhood tensions, and lack of business investment.</p> <p>The identified housing and community developments needs for the City include:</p> <ul style="list-style-type: none"> • 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. • Remove of blight and blighting influences in residential neighborhoods.
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	<p>What are the opportunities for improvement in this target area?</p>	<p>The City has been somewhat successful in initiating some housing programs in the downtown, promoting the area to artists and young professionals. However, more needs to be done to improve existing housing conditions for the current residents of surrounding neighborhoods, both homeowners and renters, the majority of whom are low income, with limited resources and options. Canton neighborhoods need to be revitalized to attract private housing investment, to rehabilitate existing structures and to construct new market rate developments to improve the economic diversity within the City. More low income family housing is not always the answer for these neighborhoods. Rather the solution will involve the demolition and removal of vacant/dilapidated structures, the rehabilitation of existing housing already occupied by low and moderate income families, and the rehab/restoration of existing housing and the development of new housing for middle and higher income families. These goals are interconnected and will not be accomplished easily or quickly. They will require a long term, comprehensive and cooperative approach by the City, housing providers, neighborhood organizations, and private developers, to achieve the desired result - suitable, livable, sustainable neighborhoods.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>The main barrier to improvement and revitalization of Canton is changing the image of the City from one of blight and deterioration to one of positive tangible improvement. Revitalization will not occur overnight and will require a continued commitment from the City, neighborhood organizations and agencies that serve area residents. Stable and ongoing funding from Federal and State agencies will be needed in order to continue the progress being made and to enable planning for future projects and improvements</p>
<p>4</p>	<p>Area Name:</p>	<p>Target Area Census Tracts</p>
	<p>Area Type:</p>	<p>Local Target area</p>
	<p>Other Target Area Description:</p>	

HUD Approval Date:	
% of Low/ Mod:	
Revital Type:	Comprehensive
Other Revital Description:	
Identify the neighborhood boundaries for this target area.	The Target Area Census Tracts include all or portions of the following Census Tracts: 7001, 7002, 7003, 7004, 7005, 7006, 7008, 7010, 7011, 7012, 7013, 7015, 7017, 7018, 7021, 7023, 7025, 7116, 7117, 7124, and 7131. This area includes the southern two-thirds of the City.
Include specific housing and commercial characteristics of this target area.	<p>These targeted census tracts include the low/moderate income neighborhoods of Canton. HUD data indicates that 65.6% of the residents within this area are low/moderate income. These are the neighborhoods most impacted by older, deteriorating housing, vacant and abandoned units, high crime, and older infrastructure.</p> <p>The area includes the downtown and the major commercial corridors of Canton, including 12th Street/Mahoning Road NE and Tuscarawas Street. While the City's downtown has benefited from revitalization efforts, its other commercial areas have been hampered by physical deterioration of buildings and public improvements and disinvestment.</p>
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The City of Canton has designated these areas as target areas in previous Consolidated Plans. The City continues to concentrate HUD-funding allocations to programs and services designed to assist the low income residents of these neighborhoods and to improve and revitalize these areas.

<p>Identify the needs in this target area.</p>	<p>Combining such factors as the low incomes among residents, the high number of rental properties and the large number of vacant/abandoned units results in severe housing issues for these parts of the City. The housing problems identified in these targeted census tracts can be linked to additional problems, such as increased crime, neighborhood tensions, and lack of business investment.</p> <p>The needs for these target areas mirror the needs for the City as a whole and include:</p> <ul style="list-style-type: none"> • 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. • Remove blight and blighting influences within residential neighborhoods.
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<p>What are the opportunities for improvement in this target area?</p>	<p>The City has been somewhat successful in initiating some housing programs in the downtown, promoting the area to artists and young professionals. However, more needs to be done to improve existing housing conditions for the current residents of targeted census tracts, homeowners and renters, the majority of whom are low income, with limited resources and options. These target census tract areas need to be revitalized to attract private housing investment, to rehabilitate existing structures and to construct new market rate developments to improve the economic diversity within these neighborhoods. More low income family housing is not the answer for these neighborhoods. Rather the solution will involve the demolition and removal of vacant/dilapidated structures, the rehabilitation of existing housing already occupied by low and moderate income families, and the rehab/restoration of existing housing and the development of new housing for middle and higher income families. These goals are interconnected and will not be accomplished easily or quickly. They will require a long term, comprehensive and cooperative approach by the City, housing providers, neighborhood organizations, and private developers, to achieve the desired result - suitable, livable, sustainable neighborhoods.</p>
<p>Are there barriers to improvement in this target area?</p>	<p>The main barrier to improvement and revitalization of these targeted census tracts is changing the image of these areas from one of blight and deterioration to one of positive tangible improvement. Revitalization of these areas will not occur overnight and will require a continued commitment from the City, neighborhood organizations and agencies that serve the areas. Stable and ongoing funding from Federal and State agencies will be needed in order to continue the progress being made and to enable planning for future projects and improvements.</p>

Table 47 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

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 investments includes 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, and a minority population concentration. These targeted census tracts and block groups all exceed the 51% threshold 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

In addition, during the FY 2013 Program Year, 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 the NRSA 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. As part of the 5-Year Strategic Plan for 2019 - 2023, the City will continue to concentrate HUD funding for a comprehensive revitalization program of projects and activities within each NRSA.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

1	Priority Need Name	Maintain Affordable Housing Supply
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly
	Geographic Areas Affected	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide
	Associated Goals	Expand, Maintain & Improve Affordable Housing Planning and Program Administration
	Description	Maintain and improve the quality of affordable housing supply, especially those housing units occupied by low and moderate income households.
	Basis for Relative Priority	The Consolidated Plan Needs Assessment and Market Analysis document the need to maintain and improve the quality of affordable housing for Canton LMI households.
	2	Priority Need Name
Priority Level		High
Population		Extremely Low Low Moderate Large Families Families with Children Elderly
Geographic Areas Affected		Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide

	Associated Goals	Expand, Maintain & Improve Affordable Housing Provide Needed Public Services Planning and Program Administration
	Description	Increase the supply of affordable housing for LMI households in Canton. Increase opportunities for LMI homeowners to secure affordable housing in the City.
	Basis for Relative Priority	The Consolidated Plan Needs Assessment and Housing Market Analysis document that housing cost burden is a major problem affecting LMI households in Canton. The age of housing stock, the number of vacant and abandoned units, and economic downturns all impact LMI households and LMI neighborhoods. The need to expand affordable housing opportunities results from this analysis of housing needs and conditions.
3	Priority Need Name	Address Homelessness Issues
	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	City-Wide
	Associated Goals	Reduce Homelessness Planning and Program Administration
	Description	The need to address homelessness includes assistance to homeless persons to obtain affordable housing and the skills to help them gain independence and self-sufficiency, as well as the provision of emergency, transitional, and permanent supportive housing and associated case management services.
	Basis for Relative Priority	As described in the homeless needs assessment sections of the Consolidated Plan, the City of Canton participates in the Homeless Continuum of Care of Stark County (HCCSC). The HCCSC is implementing a 10-Year Plan to address homeless needs and end homelessness in Stark County, including the City of Canton.
4	Priority Need Name	Public Facilities and Improvements

	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	Target Area Census Tracts Eastside Neighborhood Central Neighborhood
	Associated Goals	Improve the Safety & Livability of Neighborhoods Expand Economic Opportunities Planning and Program Administration
	Description	Public Facilities includes those community and neighborhood facilities that provide programs and services for residents of the City, including community centers, social service centers, parks and recreational facilities. Public improvements includes infrastructure such as streets, sidewalks, water and sewer, and the removal of barriers to accessibility, i.e., curb ramps.
	Basis for Relative Priority	Improvements to public facilities and infrastructure, especially in low/moderate income areas, including the City's two Neighborhood Revitalization Strategy Areas, is a need that has been well documented in the Consolidated Plan Needs Assessment and Housing Market Analysis.
5	Priority Need Name	Expand Economic Opportunities
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide
	Associated Goals	Improve the Safety & Livability of Neighborhoods Expand Economic Opportunities Provide Needed Public Services Planning and Program Administration

	Description	The expansion of economic opportunities includes support and assistance to projects and activities designed to create and retain jobs within the City of Canton. This need can include activities such infrastructure improvements needed to promote economic development, renovation of commercial/industrial facilities, job training, as well as direct assistance to companies seeking to establish or expand operations in the City.
	Basis for Relative Priority	The Needs Assessment and Housing Market Analysis sections of the Consolidated Plan have analyzed the economic challenges facing the City of Canton. The recent economic downturn has resulted in prolonged high unemployment, changing market conditions and a depressed housing market. The need to expand economic opportunities in the City, especially for low/moderate income persons, has been well documented.
6	Priority Need Name	Public Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence

	Geographic Areas Affected	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide
	Associated Goals	Improve the Safety & Livability of Neighborhoods Expand Economic Opportunities Provide Needed Public Services Planning and Program Administration
	Description	Public service needs include, but are not limited to: child care, health care, job training, recreation programs, education programs, crime prevention, housing counseling, elderly services, homeless assistance, drug abuse counseling and treatment, and homebuyer downpayment assistance.
	Basis for Relative Priority	The Needs Assessment and Housing Market Analysis sections of the Consolidated Plan describe the needs of low and moderate income residents. The need for services to improve the social, health, safety and economic well-being of Canton residents, especially for low/moderate income persons and within low/moderate income neighborhoods has been well documented.
7	Priority Need Name	Removal of Blight and Blighting Influences
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	Target Area Census Tracts Eastside Neighborhood Central Neighborhood
	Associated Goals	Improve the Safety & Livability of Neighborhoods Expand Economic Opportunities Planning and Program Administration
	Description	The need to remove blight and blighting influences within Canton neighborhoods includes the need to deal with such problems as vacant and abandoned housing, vacant and abandoned lots, deteriorated and poorly maintained structures, incompatible land uses, overcrowded conditions, crumbling infrastructure, and other physical problems impacting neighborhoods.

Basis for Relative Priority	<p>The Needs Assessment and Housing Market Analysis sections of the City's Consolidated Plan, as well as the City's Neighborhood Revitalization Strategy Area Plan, have described the issues affecting Canton's neighborhoods. The City's long-term population decline as well as the recent economic downturn has resulted in a surplus of vacant, abandoned, deteriorating and poorly maintained housing. This housing acts as a blight on Canton neighborhoods, particularly in low/moderate income neighborhoods, including the City's Neighborhood Revitalization Strategy Areas. The need to remove blight and blighting influences within Canton neighborhoods has been well documented.</p>
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Table 48 – Priority Needs Summary

Narrative (Optional)

The priority goals and strategies identified in the City’s 2019-2023 Strategic Plan are based on the needs identified in the Needs Assessment and Housing Market Analysis sections of the Consolidated Plan. Those sections include analysis of Census data that was refined with local statistics and community input through agency consultations and citizen participation.

The strategies are intended to address the needs of the community by supporting efforts to create and retain affordable housing opportunities, remove blight within low income neighborhoods, address the needs of homeless residents, provide needed services and assistance to low income persons and expand economic opportunities. The City intends to target CDBG funding to activities that will address these priority needs and that will primarily benefit those with the lowest incomes or the lowest income neighborhoods, including the City's two Neighborhood Revitalization Strategy Areas.

Many program activities identified in the five-year Consolidated Plan period will address more than one of these needs.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Housing is the single largest budgetary expense for most households. Section NA-10 Housing Needs Assessment of this Consolidated Plan analyzed the housing needs of Canton residents, including low/moderate income households. The most common housing problem affecting LMI households is cost burden. Severe housing cost burden - needing to pay more than 50% of monthly income for housing - affects 3,050 very low income renter households, (at or below 30% area median income). Of these very low income renter households, 1,170 are small-families, 445 are large-families, 230 are elderly, and 1,205 are other households.
TBRA for Non-Homeless Special Needs	Similar forces, variables and market characteristics that influence the use of TBRA are applicable to the use of TBRA to serve persons with special needs who are not homeless. Arguably, their need is greater than the general low income population that is eligible for TBRA. However, an added market characteristic that may influence the use of TBRA for non-homeless special needs tenants is the proximity and willingness of service providers to assist the TBRA clients to remain stable in their housing.
New Unit Production	The ACS data provided in the Needs Assessment section of this Consolidated Plan shows that Canton has almost 10,000 renter and owner low/moderate income households that are housing cost burdened. These statistics demonstrate the need for more affordable housing for low/moderate income households.
Rehabilitation	According to 2009-2013 ACS data, 88% of all occupied housing units in Canton were built prior to 1980. Since this housing is more than 35 years old, it is highly likely that many of these units need repair or rehabilitation to maintain their livability. Major operating systems (plumbing, electrical, heating, etc.) may need to be replaced. For low income homeowners, financing significant and comprehensive housing rehabilitation is often not feasible. The same analysis can apply to providers of renter housing units who are committed to providing affordable housing, but are operating with minimal reserves to carry out repairs or cover costs of debt financing for rehabilitation.
Acquisition, including preservation	Many housing units in the City of Canton are vacant and/or abandoned. 2012-2016 ACS data indicates that 15.3% of housing units in the City are vacant. Habitat for Humanity has been acquiring and rehabbing homes in targeted areas where they are building. Houses that are too dilapidated to rehab are demolished and the land is then used for new construction or pocket parks.

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The 2019-2023 Consolidated Plan must identify 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: Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, and Emergency Solutions Grant (ESG) Program. Canton receives an annual allocation of federal funding from HUD for each of these programs. Below is a breakdown of anticipated funding resources.

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Anticipated Resources

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,586,977	150,000	200,000	2,936,977	11,747,908	CDBG Funds will leverage private funding, as well as other public funding from local, state, federal funding sources.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	588,572	0	0	588,572	2,354,288	HOME Funds will leverage private funding, as well as other public funding from local, state, federal funding sources.

ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	219,197	0	0	219,197	876,788	ESG Funds will leverage private funding, as well as other public funding from local, state, federal funding sources.
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Table 50 - Anticipated Resources

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 may leverage additional private, local, state, or federal funding for housing and community development activities. CDBG funding allocated for economic development may leverage private investment.

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

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

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

The City of Canton owns and operates the Edward “Peel” Coleman Southeast Community Center located at 1400 Sherrick Avenue SE. This center houses recreation and public services facilities and provides a meeting place for area residents. This facility is located within the boundaries of the City’s Eastside Neighborhood Revitalization Strategy Area.

The Canton Community Improvement Corporation (CCIC) owns the former Ford Motor plant, which is being marketed for economic development.

Discussion

As described above, the City of Canton will utilize a portion of its HUD-funded funding to partner with subrecipients for housing and community development projects and activities. These activities can result in the leveraging of additional private, local, state, or federal funding sources. This leveraging can increase the impact these activities will have on the community, enabling more persons to be served in addition to furthering community and neighborhood revitalization.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

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Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Stark County Community Action Agency	CBDO	Economic Development neighborhood improvements public services	Stark County
HAMMER AND NAILS, INC.	Non-profit organizations	Ownership	
Habitat for Humanity of Greater Stark and Carroll Counties	Community/Faith-based organization	Ownership neighborhood improvements	
YMCA	Non-profit organizations	public facilities public services	
Stark Co. Mental Health Services & Addiction Recovery Services Board of Canton	Non-profit organizations	Homelessness	
CommQuest	Non-profit organizations	Homelessness	Stark County
Domestic Violence Project	Non-profit organizations	Homelessness	
Stark County Network	Continuum of Care	Homelessness	CoC Jurisdiction
Stark Metropolitan Housing Authority	PHA	Public Housing	Stark County
Stark County Regional Planning Commission	Government agency	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Facilities Public services	Stark County
ICAN	CHDO	Homelessness (Mental Health)	
Economic and Community Development Institute	Non-profit organization	Economic Development	
Workforce Initiative Association	Non-profit organization	Economic Development	

Canton City Public Health	Government agency	Public Services	
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Table 51 - Institutional Delivery Structure

Assess Strengths and Gaps in the Institutional Delivery System

The City of Canton has a long history of administering CDBG, HOME and ESG programs. To implement these programs, the City works with a variety of housing providers, social service organizations, neighborhoods groups, homeless assistance providers, and economic development organizations. The City consults with local organizations and citizens in the development of its consolidated plan and annual action plan and involves community organizations in the direct implementation of program activities through its Request for Proposals (RFP) process. The development of the Neighborhood Revitalization Strategy Area Plan provided additional opportunities for Canton to work with community area agencies. Effective communication and regular consultation among the local government, public institutions, and area community agencies is a key to identifying and overcoming any real or perceived gaps in the institutional delivery system.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X		X
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X

Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X		X
Employment and Employment Training	X		X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other			

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Housing providers have an array of housing types---from shelters to permanent supportive housing (PSH)--- that specifically serve homeless persons, including chronically homeless, families with children, persons fleeing domestic violence and veterans. Those who are literally homeless, at imminent risk of homelessness and/or victims fleeing domestic violence situations are served by shelters, rapid re-housing and transitional housing programs. People who are literally homeless and those fleeing domestic violence are also served by PSH programs. All of these categories include persons from the sub-populations mentioned above. Wrap around services address specific issues for the same homeless sub-populations, with services targeted to both issues identified as contributing to homelessness and to enabling skill development and education in order to improve self-sufficiency. For example, the mental health providers offer counseling, group work, and crisis intervention. The education system provides services to school age children and to adults working toward skill development and employability. Childcare providers enable parents to work and/or go to school. SARTA provides bus and door-to-door service for people with physical disabilities. The wrap around model with individualized service plans targets specific needs and issues on a person by person basis.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Stark County has many strengths in its service delivery system. Stark County 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 hotline maintains a current listing of available shelter beds. The Hotline was recently expanded to include an assessment tool in which special service needs are identified and more appropriate referrals are given.

United Way's 2-1-1, SCJFS, and StarkMHAR refer all homeless, or at risk of homeless persons to the Homeless Hotline for an initial assessment of needs. All CoC and ESG funded programs offer assistance with, or direct linkage to, other agencies that offer support services such as rental, utility and legal assistance as well as to counseling, mental health and drug/alcohol abuse case management, life skills, financial management and employment training.

Representatives from most of the services listed in the table are part of the CoC, and many participate in the HSC. Through the meetings of both groups, providers and stakeholders raise common concerns, consider how to assist each other with their clients' needs, and brainstorm possible solutions. The HSC provides ongoing training through guest speakers from mainstream and non-homeless specific services which are of benefit to homeless persons.

Identified gaps include the need for more affordable rental housing, more subsidized housing, more special needs housing, more homeless-related housing (to help reduce the different waiting lists), and mental health services for persons who are not at the more severe levels of dysfunction or who have stabilized and then are graduated out of case management thereby becoming vulnerable to relapse. The CoC is working on a closer relationship with law enforcement, education and employment/employment training programs in order to target services specifically towards homeless persons. While there are limited services in the following areas, services need to be increased for: healthcare including non-traditional delivery sites, child care that is not restricted to TANF regulations, and greater county-wide transportation. These issues will be raised at the CoC meetings to heighten awareness and to foster collaboration.

The CoC has determined that there is a need for stronger collaboration with all agencies providing homeless prevention services and their funders. Early identification of root causes of homelessness will help connect clients to all necessary resources and decrease the occurrences of repeat calls for prevention or homeless services assistance shortly after receiving emergency assistance through the Emergency Assistance Collaborative. There is also an identified need to more quickly transition people from PSH to affordable housing as part of a carefully coordinated move-on program.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Institutional Structure of Service and Housing Delivery System. The Stark Housing Network (SHNI) is the collaborative applicant for the Continuum of Care (CoC), and provides staffing, guidance and leadership for the CoC. The CoC serves as the entity that promotes community-wide commitment to employ best practices to end homelessness in Stark County. The SHNI assists in securing funding to prevent homelessness, and to rapidly re-house homeless. The SHNI attends meetings of the various committees of the CoC; serves as the primary liaison among providers, CoC members, and mainstream providers; facilitates communications; and disseminates information to CoC committees, the CoC Executive Board, and to service providers.

The CoC has various committees and sub-committees that assume responsibilities for the various tasks assigned under the HEARTH Act. For example: the System Performance and Planning Committee oversee an annual gaps analysis; the Coordinated Entry Committee works on expanding our coordinated entry system for the county; the Youth and Veterans Sub-Committees are focused on raising awareness and increasing availability of housing options for veterans and youth.

Strategy for Overcoming Gaps: The System Performance Committee has developed sub-committees of providers and others to target specific gaps such as increasing employment and youth homelessness. The work of the sub-committees provides valuable insight on needs and challenges faced by providers.

SCRPC and the CoC work proactively to identify new sources of funding to expand services and/or to address a specific gap, and collaborate on securing identified funds. The CoC offers support to agencies that are either expanding their services or successfully partnering with other agencies to include the types of services identified above through their programs through support letters and higher scoring on the CoC priority listing.

SP-45 Goals Summary – 91.215(a)(4)

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	2019	2023	Affordable Housing	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities	CDBG: \$6,476,120 HOME: \$2,641,430	Rental units constructed: 8 Household Housing Unit Rental units rehabilitated: 13 Household Housing Unit Homeowner Housing Added: 30 Household Housing Unit Homeowner Housing Rehabilitated: 600 Household Housing Unit Direct Financial Assistance to Homebuyers: 50 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 25 Households Assisted

2	Improve the Safety & Livability of Neighborhoods	2019	2023	Affordable Housing Non-Housing Community Development	Target Area Census Tracts Eastside Neighborhood Central Neighborhood	Public Facilities and Improvements Removal of Blight and Blighting Influences	CDBG: \$1,413,790	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 30,000 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted Buildings Demolished: 50 Buildings
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Reduce Homelessness	2019	2023	Homeless Non-Homeless Special Needs	City-Wide	Address Homelessness Issues	ESG: \$1,126,845	Homeless Person Overnight Shelter: 1,300 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 66 Beds Homelessness Prevention: 1000 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Expand Economic Opportunities	2019	2023	Non-Housing Community Development	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide	Expand Economic Opportunities	CDBG: \$375,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Facade treatment/business building rehabilitation: 0 Business Jobs created/retained: 0 Jobs Businesses assisted: 20 Businesses Assisted
5	Provide Needed Public Services	2019	2023	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide	Public Services	CDBG: \$3,533,000	Public service activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Planning and Program Administration	2019	2023	Planning, Administration, Fair Housing	City-Wide	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Address Homelessness Issues Public Facilities and Improvements Expand Economic Opportunities Public Services Removal of Blight and Blighting Influences	CDBG: \$2,886,975 HOME: \$294,285	Other: 5 Other

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Expand, Maintain & Improve Affordable Housing
	Goal Description	Canton's goal for affordable housing includes retaining, preserving & improving the affordable housing stock for the City's low/moderate income population and increasing the availability of affordable permanent housing in standard condition to low and moderate income households in all areas of the community.
2	Goal Name	Improve the Safety & Livability of Neighborhoods
	Goal Description	Canton's goal for improving the safety and livability of its neighborhoods, includes neighborhood revitalization strategy area programs, the elimination of blighting influences and deteriorated property and facilities, improvements to public facilities and infrastructure, increasing access and improving accessibility to public facilities and services, and restoring and preserving properties of special historic, architectural or aesthetic value.
3	Goal Name	Reduce Homelessness
	Goal Description	The City of Canton's goals for reducing homelessness include assistance to persons and households at risk of becoming homeless, assistance to homeless persons and households with emergency shelter needs, and assistance, including supportive services, to homeless persons and households to help them transition from homelessness to self sufficiency. The City of Canton will utilize ESG funding and work with the Stark CoC on Continuum of Care funding to address homeless needs.

4	Goal Name	Expand Economic Opportunities
	Goal Description	The City of Canton's goal of expanding opportunities includes job creation and retention activities; the establishment, stabilization and expansion of businesses, including small businesses; the provision of public services concerned with employment; public infrastructure improvements needed to assist economic development; assistance to for-profit commercial and industrial companies for rehabilitation and new construction activities designed to create/retain jobs, elimination of substandard building conditions, preservation of historic properties; and downtown improvement/revitalization projects and activities.
5	Goal Name	Provide Needed Public Services
	Goal Description	The City of Canton's goal for public services is to assist the City's low/moderate income and non-homeless special needs populations with public services, including programs serving youth, the elderly, child care, health care, education and recreation programs, fair housing and housing counseling, public safety and crime prevention, drug abuse treatment and counseling, job training, and homebuyer down payment assistance
6	Goal Name	Planning and Program Administration
	Goal Description	The City of Canton will undertake general planning and overall management of HUD-funded activities to be undertaken during the 5 Year Comprehensive Plan Period, including affirmatively furthering fair housing in the community.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City of Canton estimates that, during the 5-Year Consolidated Plan Period (2019 – 2023), the City's programs and activities will provide affordable housing to approximately 370 extremely low-income, 275 low-income, and 60 moderate-income families.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

As noted in Section NA-35, the Stark Metropolitan Housing Authority (SHMA) is implementing a 504 ADA Voluntary Compliance Agreement (VCA) to address accessibility and ADA provisions. Pursuant to the VCA, SMHA must complete the construction or conversion of 128 Uniform Federal Accessibility Standards (UFAS) Accessible Units for individuals with mobility impairments and 51 UFAS Accessible Units for individuals with hearing or vision impairments. In an effort to best satisfy the needs of SMHA residents and / or applicants on the waiting list, it is SMHA's goal to renovate and construct units to be vision, hearing and mobility accessible. To date, SMHA has completed 101 UFAS units that are vision, hearing and mobility accessible, leaving 78 UFAS units remaining to be constructed or renovated.

Activities to Increase Resident Involvements

SMHA undertakes a variety of initiatives to increase resident involvement, including a comprehensive, updated website that provides information on all facets of the housing authority operations, policies and procedures. SMHA has established a Residents Association that represents all Stark County Residents living in the SMHA Developments. Monthly meetings are held the third Tuesday of each month (except July and August). SMHA provides transportation to Resident Association meetings. SMHA also publishes a resident newsletter highly upcoming events, programs, services, and announcements.

The SMHA Community Services Department coordinates programs, activities, and services offered to SMHA residents, including:

- 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.
- Programs for Children- A variety of programs and services are made available to residents at various SMHA sites that include but are not limited to: after school tutoring, health, safety, gang prevention programs, nature projects, etc.
- Summer Lunch- Children ages 5-18 are invited to eat lunch at various SMHA sites throughout the summer months.

By working in partnership with the public and private sectors, SMHA provides many services for senior residents, including

- Flu Immunization- Influenza vaccines are made available to qualifying residents of SMHA at little or no cost, as set by the area health departments.
- Senior Council- Senior Council is a forum that is used for SMHA staff and Senior Resident Officers to meet monthly and exchange information.

- Meals on Wheels- At several locations, you can purchase a hot, nutritious meal provided by the Meals on Wheels foundation for a small donation.

SMHA's other partnerships and collaborations include the following:

- A partnership with the YMCA to help residents access programs and services including group exercise classes, health and wellness programs, and healthy lifestyle choices opportunities.
- In collaboration with the Early Childhood Resources Center, Incept, and Stark County Jobs and Family Services, SMHA has opened two family learning stations that offer a dramatic play area, an art station, and a quiet reading area.

The Security Division of SMHA has established a Resident Safety and Security Initiative to create a greater partnership and communication with residents, security, law enforcement and management in the prevention of drug and criminal activity in SMHA housing. As part of the initiative a 24/7 recorded information hot line was installed to allow residents to report confidentially any drug or criminal activity on SMHA property, as well as other lease violations that may be detrimental to other residents.

SMHA has also provided a client suggestion box in the central office main lobby.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not Applicable

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Land Development Policies

The City of Canton's land development policies are expressed in its Comprehensive Plan, Zoning Ordinance, and Land Use Map. The City's Comprehensive Plan recommends reform to the City's planning policies and zoning regulations that are barriers to the creation of affordable housing, but does not identify specific actions or measures of such reform.

The City of Canton has a wide variety of residential zoning districts. Five R-1 districts (R-1, R-1a, R-1b, R-1c, & R-1d) are single family zones at various densities. The R-2 allows Two-Family Dwellings and R-1 uses. The R-3 and R-4 districts permit Multi-Family dwellings and R-2 and R-1 uses. Single-Family dwellings are permitted in the Municipal Agriculture District (MA) and some Business Districts. Multi Family Dwellings are permitted in all Business Districts.

Though a majority of residential space in the City is designated within one of the R-1 zones, the City of Canton does not believe this limits developable land available for the construction of multifamily housing. The City of Canton Planning Department recognizes multi-family housing represents an important affordable housing option for lower-income households and that a lack of affordable housing may impede housing choice for LMI households. It is this recognition that further promotes a wide variety of residential development in the City of Canton, with varying styles, densities, and types.

While the Canton City Planning Department is in the early stages of a comprehensive amendment to the Land Use Map, the idea of providing areas suitable for affordable housing through zoning is one of the topics in the forefront of the planning process. The planners recognize the problems that can be created with poor planning for this very thing in mind. They realize sprawling car-based suburbs far from the work center can prove problematic for LMI households, and have every intention of retaining multi-family options close to the amenities they absolutely need.

Excessively large lot sizes may deter development of affordable housing. In Canton, however, the minimum lot size in R-1 districts ranges from 6,000 square feet per family to 43,560 square feet per family. The City of Canton Land Use Map illustrates that many smaller-minimum areas exist throughout Canton. 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. It should be further noted, larger lots and less density in any district is monumentally helpful in providing an appropriate amount of properties for the population present in the City. This "right-sizing" of the City has already shown dividends in helping to eliminate the slum and blight vacant, abandoned, smaller properties lend to.

The City of Canton also believes allowing alternative designs could provide 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

diverse styles of residential types. Alternative design developments can produce and preserve affordable housing options for working and lower income households. Canton's Planned Unit Development (PUD) provisions encourage a variety of single and multi-family dwelling types.

Public Policies Regarding Investment of Federal Housing and Community Development Funds

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

In addition, Canton has an Affirmative Marketing Policy. Under this policy, the City has obligations that include community outreach and education, while also requiring developers to advertise availability of HUD-assisted units with local minority 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.

Site selection for HOME-assisted construction of new rental units can promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high concentration of LMI households. In the Consolidated Plan the City identifies its southern two-thirds as an area of investment of federal entitlement funds due to predominantly low and moderate income households and minority concentrations. The City can expand housing choice by creating new housing opportunities in non-concentrated areas.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In regards to zoning issues, the City Planning Department is responsible for subdivision review and approval as well as zoning recommendations. Consideration of any changes to zoning must bear in mind the consequences such changes may have on affordable housing. In addition, as described in the preceding section, allowing alternative residential development design can provide opportunities to expand the supply of affordable housing by reducing the cost of infrastructure. Alternative design models can be used to produce and preserve affordable housing options for working and lower income households.

Stark County recently prepared an Analysis of Impediments to Fair Housing Choice (AI). Although this AI has not yet been adopted, one of its recommended action steps for Canton is amending the City's zoning ordinance to allow a greater variety of residential construction, including multifamily units, which are an important affordable housing option for 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 way 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 and policy makers about the City's affordable housing needs.

Draft

SP-60 Homelessness Strategy – 91.215(d)

The City of Canton is a member of the Stark County Continuum of Care. The responses to the questions in this section are based on the CoC's jurisdiction, not just the City of Canton.

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

The Homeless Hotline, aka Homeless Navigation, is a coordinated entry system for referral and/or placement with homeless housing and service providers in the county. The Continuum of Care (CoC) also has a Coordinated Entry Committee that guides policy direction and decision-making and has refined the coordinated entry system. The initial assessment is conducted via the Hotline phone intake, which connects qualified callers to the appropriate homeless provider agency(s). This includes all eligible participants seeking shelter and/or housing, with the end goal of identifying callers who could be best served through diversion, and the most appropriate referrals for those who cannot. The CoC oversees the Homeless Management Information System (HMIS), the database used to capture the data of individuals and families that access the homeless system, to help ensure more coordinated assessment, entry, and tracking. After assessment, the CoC provider community assists participants with completing applications to the most appropriate housing programs. The CoC providers continue to work on building strong relationships with local landlords in order to locate appropriate and affordable housing for participants.

Current CoC homeless programs include seven shelters in Stark County, one transitional housing facility, several permanent supportive housing (PSH) units and programs, homeless prevention services and two rapid re-housing programs operated by two different agencies. Case workers at each facility provide further assessment of needs and link participants to services including: health, mental health, substance treatment, education, and employment. In addition to homeless outreach and assessment through dedicated homeless programs, outreach is also done through local community health workers, local healthcare facilities, mental health providers, substance recovery programs, law enforcement, public schools (homeless liaison), United Way's 211 help line, and the faith-based community. Persons who are identified by case managers as needing in-depth mental health, medical, or substance abuse assessment are referred to the appropriate program.

Addressing the emergency and transitional housing needs of homeless persons

During the assessment phase of the Homeless Hotline call, a participant's need for emergency shelter and/or housing is determined. The role of the Homeless Hotline has been expanded to add diversion services and to improve assistance with referrals to homeless prevention services, shelter diversion, placement into emergency shelters, rapid re-housing, and permanent supportive housing. The diversion strategy includes training of Hotline staff to better identify persons with a higher likelihood of returning to permanent housing with some short term assistance, and to identify those who would be best served through diversion services such as mediation, short-term financial assistance, or legal assistance. A

second component of this diversion strategy is for local housing providers to establish strong relationships with landlords in each of the main cities within the county (Alliance, Canton, Massillon) to place those participants who are suitable for private market housing.

All eligible persons who do not qualify for diversion, homeless prevention or rapid re-housing will be referred to shelters (or are given motel vouchers when shelters are full) to address their emergency need of having a safe place to stay. An in-depth participant assessment will examine the factors that led to homelessness and determine if the participant is suitable for rapid re-housing or permanent supportive housing. Shelters now provide case management with individualized plans detailing how a participant's causes for becoming homeless are addressed, and the steps that will be taken to exit the participant into permanent housing. As the number of homeless persons continues to rise, the CoC is challenged by a shortage of emergency shelter beds. In addition, due to a lack of subsidized and affordable housing units, many homeless remain in shelters (particularly the men's shelter) beyond 90 days, adding to the need for additional shelter beds.

Transitional housing is best suited to those in transitional life stages such as transition-age youth, families with young children, persons fleeing domestic violence, ex-offenders, the undereducated, and those lacking certain skills. However, as HUD has moved away from funding new transitional housing programs, the CoC has pursued and is currently operating additional rapid re-housing programs that could also serve persons typically assisted through transitional housing, with the potential to achieve self-sufficiency in open market housing within 12 months. Rapid re-housing typically targets families and individuals who are in a crisis state of homelessness and who should be able to sustain themselves after a minimal amount of assistance. Rental assistance is typically provided for one month, along with security deposits and housing inspections. Case management is generally provided for 3 months, with linkages to other mainstream services.

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.

Improving the initial intake assessment process is key to reducing the time in which persons and families experience homelessness. Because the CoC assessment process has become more sophisticated and the housing placement process has improved, homelessness should decrease even among more challenging sub-populations.

Fast housing placement for the most vulnerable is another key component in shortening the period of homelessness. As noted previously, the rapid re-housing program provides a fast transition for individuals and families directly into housing. Rapid re-housing targets those who have already been evicted, who are living in shelter or who are literally homeless. Rapid Re-Housing also targets

participants who have some form of income and who need minimal assistance and case management, typically up to 3 months. The CoC recognizes that the fast transition will be dependent on the needs of the participant (e.g. time for obtaining education and/or job training), as well as availability of affordable housing and employment opportunities that provide enough income to enable the participant to pay rent.

While the CoC has expanded the rapid re-housing program, one challenge with expanding rapid re-housing and serving participants with more barriers to employment and self-sufficiency is identifying landlords who are willing to rent to participants who may need up to 24 months to gain financial independence, and who are willing to rent their units at affordable rates to households who will be required to exit the program when they reach 30% AMI. Because Stark County does not have a large stock of safe, decent sanitary units that are affordable, the CoC will continue attempting to build partnerships with landlords and developers to address this issue.

Participants who have severe and possibly life-long barriers to attaining self-sufficiency are referred to PSH. A long term goal of the CoC is to ensure that there are a sufficient number of PSH units to immediately refer and place persons into a unit as needed to make the transition to permanent housing and independent living more rapid, thus shortening the period of time that they experience homelessness.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

While the Ohio Development Services Agency (ODSA) Homeless Crisis Response Program (HCRP) focuses on funding rapid re-housing, funding for homeless prevention in Stark County comes from private foundations, the United Way, and the Emergency Solutions Grant (ESG) Program. The CoC is in a collaboration with these entities. Both rapid re-housing and homeless prevention programs are in key positions to identify individuals and families who are “at-risk” of becoming homeless. The ESG jurisdiction (City of Canton) and homeless prevention provider agencies target participants who are at risk of homelessness and who are only in a temporary crisis. These homeless prevention programs serve persons who are behind in rent and/or utilities, but who, with limited assistance (1 -2 months), will be able to sustain themselves. This prevention strategy focuses on those facing evictions as well as those who are at risk of homelessness, such as those being discharged from publicly funded institutions, but who are still in a position to maintain themselves in housing with minimal assistance. If program applicants have already been evicted and are living with friends or family they will be encouraged to participate in diversion services and if their loss of housing is imminent (within 14 days) they will be referred to rapid re-housing.

One strategy under discussion is to look at the feasibility of screening United Way and Emergency Assistance callers with a process similar to those calling the Hotline to identify high-risk callers and start an intervention/diversion process before the caller becomes homeless, similar to the ESG program. This would give the CoC better insight into risk factors for homelessness in Stark County, and develop programs geared at providing timely intervention and prevention services. Over the long-term this should reduce homelessness and reduce recidivism, provided that the primary cause is not external and beyond the control of the CoC (e.g., economic downturn, loss of jobs, insufficient number of affordable housing units).

The Stark County protocol for homeless prevention includes collaboration with the CoC, housing providers, homeless services providers and institutions discharging participants. Stark County Jobs and Family Services (SCJFS) begins transition planning/programming for all youth in foster care at age 16. It employs two independent living specialists who work with each youth and his/her case worker to develop a written plan tailored to the individual's needs and goals and to link the youth to programs that will enable him/her to achieve those goals, including classes offered by SCJFS to build independent living skills. Updated every 90 days, plans include strategies for securing housing upon emancipation. SCJFS supports youth in achieving their goals as best it can by (1) helping them identify available housing and secure Family Unification Program vouchers for use in the REACH and HOPE programs, which also receive support from the mental health board and (2) by providing financial help for security deposits, rent, utilities, furnishings and even groceries for variable periods of time (up to age 21) after emancipation.

Continuation - Homeless Narrative

Stark County's local hospitals employ social workers who work with patients on discharge planning, making sure that they have a place to go upon discharge and that they are connected to services they will need in the community to complete their rehabilitation/recuperation or manage their chronic health problems. Unfortunately, patients who are homeless when they arrive at a local hospital have limited options when they are discharged. Many do end up in shelters or receive vouchers to stay in motels for a time while the CoC identifies long-term housing options for them. This is a problem that the CoC has yet to address, but case managers from area local hospitals have agreed to collaborate during the coming year in an effort to define the scope of the problem and identify solutions.

The Stark Mental Health & Addiction Recovery agency (StarkMHAR) funds a hospital/community liaison who meets daily with treatment teams at Heartland Behavioral Health Care Hospital, the local state provider of inpatient care for acutely mentally ill adults, to discuss admissions of Stark County residents and plans for their discharge. The liaison facilitates a weekly meeting with other local providers to brainstorm community-based solutions for current patients and coordinate care/discharge planning. As appropriate, adult care facilities, safe havens, and PSH are used to house discharged patients. Project REACH and SHELTER (TBRA projects funded by StarkMHAR) serve some clients, but there is a shortage of housing vouchers needed for immediate transition into housing. As a result, many

clients must spend some time in a shelter or a motel upon discharge.

Draft

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City of Canton has established guidelines for dealing with lead-based paint hazards in homes being rehabilitated under its HUD-funded programs. Rehab specifications are drafted by City inspectors and Lead Hazards are assumed. All rehab contractors must be certified as Lead Safe Renovators in order to participate in the City's housing rehabilitation and repair/maintenance programs. A Lead Clearance is required when a painted surface is disturbed and/or replacement of windows and doors.

In addition, the Canton City Health Department offers testing to City homeowners for lead based paint and lead based paint hazards through its Lead Poisoning Prevention Program. 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 of Canton plans to apply for the Lead Hazard Control and Healthy Homes Grant to address health and safety hazards and target lead hazard control efforts in housing units where children less than six years of age are at risk of lead poisoning. Under this program a Lead Paint Inspection and Risk Assessment would be required for each property being rehabilitated, a City inspector certified as a Lead Abatement Contractor would determine the work to be performed and a Lead Clearance would be required.

How are the actions listed above related to the extent of lead poisoning and hazards?

Among children under six years of age, lead poisoning is the number one environmental health risk. Lead poisoning can affect all body systems and cause damage which can last a lifetime. Lead can interfere with a child's brain development, which can cause learning problems, behavior problems, and delayed development that can result in children not reaching their potential. In short, lead poisoning can rob a child of a better life.

The Centers for Disease Control and Prevention (CDC) has lowered the threshold amount of lead that can cause harm in children ages one year to six years old to 5 ug/dL (micrograms lead per deciliter of whole blood). The Ohio Department of Health's most current (2017) data on blood lead levels testing on Canton children less than 72 months of age identified 54 children with confirmed blood lead levels greater than or equal to 5 ug/dL and another 70 children with unconfirmed blood lead levels greater than 5 ug/dL.

Canton has an aging housing stock with many older units in substandard condition. Given the likelihood of some substandard housing being occupied by low-income households with children, Canton residents are well served by the City's policies and programs regarding lead hazard reduction via HUD-funded residential rehabilitation and the health department's lead poisoning prevention efforts.

How are the actions listed above integrated into housing policies and procedures?

In 2011, Canton City Council approved an ordinance that required all home improvement contractors conducting renovations in pre-1978 housing to be certified with accredited training and to follow work practice requirements of the Lead-Based Paint Poisoning Prevention Regulations (40 CFR 745, Subpart E-Residential Property Renovations). Each contractor performing work on Department of Development projects is screened to ensure compliance. The Department of Development also facilitates training seminars to assist contractors to become Lead Safe Renovators. The Department will only work with contractors who have the State required certification for Lead Safe Renovation.

Draft

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City of Canton has developed anti-poverty goals, strategies, and programs to help reduce the number of families and individuals living in poverty. Per 2012-2016 American Community Survey data, Canton had an individual poverty rate of 35.8%, and a family poverty rate of 27%. The poverty rate for families who rent is 48.4%, compared to 9.6% for owner-occupant families.

Canton's Black/African American population has a much higher incidence of poverty (43.1%) than the City's White population (25.4%), and for persons of Hispanic or Latino origin (28.9%). Educational attainment is also a factor in poverty rates – 38.1% of persons without a high school degree or equivalent were in poverty, while only 7.4% of those with a bachelor's degree or higher were in poverty.

The City of Canton's anti-poverty goals include:

- Reducing the number of Canton residents living in poverty over the Consolidated Plan period
- Ensuring all residents, including those in poverty, have a safe place to live, access to job training and life skills, adequate food and clothing, parenting skills and support, and educational opportunities to improve their livelihood and sustainability.

The following objectives and strategies have been developed to reduce poverty and improve the self-sufficiency of Canton's lowest income residents.

Expand Economic Opportunities for Canton's Low Income Persons

The availability of living wage jobs is a large factor in reducing the poverty level. Canton's unemployment rate in October 2018 was 5.6% and is substantially higher than the corresponding unemployment rate for Stark County (4.6%), the State of Ohio (4.3%), and the United States (3.5%). The following strategies will help to expand economic opportunities and reduce poverty in the community.

1. Support Job Creation. The City will work with area businesses and economic development agencies to develop or expand programs that create jobs, to offer microenterprise assistance, and to provide business assistance or training.

2. Support workforce development. Education, job skills development and training are important to getting a living wage job. There is a need to train workers for jobs in growing or emerging industries and to support activities that improve or provide access to economic opportunities for extremely low- and very low-income residents.

3. Provide Services that Support Self-Sufficiency. Individuals and households in poverty struggle to provide basic needs such as a safe home, heat, food, transportation, health care, and education.

Accordingly, the City will:

- a) Work with area service providers to identify gaps in services and to coordinate programming to leverage existing funding and resources within the community.

- b) Support programs that help persons improve self-sufficiency by providing access to education, employment, health care, food, and financial stability.
- c) Support programs that address risk factors for homelessness such as alcohol and drug addiction.

4. Expand and Improve Canton's Affordable Housing Supply and Improve Living Conditions. Persons below the poverty level may live in substandard housing, unsafe housing, or energy inefficient housing. The following strategies will be employed:

- a) Support housing rehabilitation and weatherization programs that reduce monthly housing costs and improve housing conditions.
- b) Support programs that prevent foreclosure.
- c) Help Low-Income residents become homeowners.

How are the Jurisdiction's poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City of Canton's poverty goals and programs are incorporated into the following Consolidated Plan strategies summarized below.

Expand, Maintain and Improve Existing Affordable Housing Supply. The Strategic Plan and Action Plan propose to allocate funding for housing rehabilitation, repair/maintenance, and weatherization programs assisting low/moderate income households. These housing programs will enable low income families to remain in their homes, and keep their homes decent, safe and sanitary, while also allowing them to use their limited resources for other necessary items (i.e. clothing, food, etc.). The City will also support creating affordable housing units through new development or acquisition and rehabilitation, thereby providing additional affordable housing opportunities for low- and moderate-income families.

Reduce Homelessness. ESG funding will be provided to agencies that provide housing, shelter, and supportive services to assist the homeless and those households at risk of becoming homeless to help them achieve self-sufficiency.

Expand Economic Opportunities for Low and Moderate Income Persons. The Strategic Plan and Annual Action Plan propose funding for economic development programs and activities designed to help existing and new businesses create jobs for low or moderate income persons, to help businesses in low or moderate-income areas with building improvements or public improvements, to provide job training opportunities, and to support small business development.

Public Services. The City's Strategic Plan and Annual Action Plan propose funding for public services that directly assist low/moderate income persons, such as youth and elderly services, child care, education and training, health care, fair housing and other housing counseling programs.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

As a HUD designated Entitlement Community & HOME Participating Jurisdiction, the City of Canton is responsible for managing the day-to-day operations of its CDBG, ESG & HOME Programs and ensuring that all funds are used in keeping with program requirements. Regulations require that the performance of each participant receiving HUD funds must be reviewed at least annually to ensure compliance with applicable program requirements, ensure production and accountability, evaluate organizational and project performance, as well as project viability (financial health, management capacity, etc.) The City of Canton DOD will use its Standard Operating Procedures (SOP), rehab policies, and requests for proposals (RFP) to achieve its production and service goals. While this will include managing in-house programs, some programs and services may be contracted out to sub-grantees. Funds will be allocated to eligible projects based on funding availability. Monitoring for housing may include HOME, CDBG and NSP projects. To assist in the successful management of the City's HUD programs, the Department of Development (DOD) has adopted a monitoring plan and the following procedures.

PROGRAM MONITORING

The City monitors housing rehabilitation, new construction activity and all other community development activity carried out by Community Housing Development Organizations (CHDO) and sub-grantees on an annual monitoring schedule created to ensure strict compliance with applicable HUD laws, regulations and program guidelines. Once or twice a year, the Department of Development reviews applications for specific projects through an RFP process, reviewing all applications against the needs identified in the Consolidated Plan. This application review includes reviewing project feasibility, providing technical assistance, and monitoring the progress of projects under construction on an on-going basis.

Property inspections are built into the City's service delivery system and are conducted in accordance with the City's SOP for Inspectors. Properties are closely monitored from the time that funds are committed to the completion of construction or rehabilitation in subsequent years. Annually, the City conducts regular on-going site visits and program and tenant file monitoring of units funded through the HOME Program, CDBG, NSP and other federally funded programs to ensure compliance with program goals and federal regulations. Non housing projects are closely monitored from the time that funds are committed to the completion of the projects. Annually, the City conducts regular on-going site visits and program file monitoring to ensure compliance with program goals and federal regulations.

ADDITIONAL MONITORING REQUIREMENTS FOR ESG

Monitoring occurs when monthly bills are submitted. Invoices are checked to ensure that spending is only occurring on eligible activities and, importantly, that funding limits on essential services, operation

costs, homeless prevention activities, and administrative costs are all in compliance with HUD mandated rules. A representative of the DOD attends Homeless Collaborative meetings, to participate, provide input and receive information regarding homelessness. At these meetings, monthly reports of the Homeless Collaborative, which is made up of the various agencies providing services to the homeless, are received, reviewed and discussed.

OUTREACH TO MINORITY AND WOMEN-OWNED BUSINESSES

Canton's Minority and Women-Owned Business Enterprise Program provides purchasing opportunities to certified Minority and Women-Owned businesses. The City of Canton offers certification for MBE/WBE's that are geographically located or wish to do business within the borders of the City of Canton.

Draft

Expected Resources

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

Introduction

This section of the 2019 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: Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, and 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

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,586,977	150,000	200,000	2,936,977	11,747,908	CDBG funds will leverage private funding, as well as other public funding from local, state and federal funding sources.
HOME	Public-federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	588,572	0	0	588,572	2,354,288	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 Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	219,197	0	6,172	225,369	876,788	ESG funds will leverage private funding, as well as other public funding from local, state and federal funding sources.
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Table 54 - 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.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

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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	2019	2023	Affordable Housing	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities	CDBG: \$1,295,224 HOME: \$528,286	Rental units constructed: 0 Household Housing Unit Rental units rehabilitated: 13 Household Housing Unit Homeowner Housing Added: 5 Household Housing Unit Homeowner Housing Rehabilitated: 165 Household Housing Unit Direct Financial Assistance to Homebuyers: 10 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 5 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Improve the Safety & Livability of Neighborhoods	2019	2023	Affordable Housing Non-Housing Community Development	Eastside Neighborhood City-Wide	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Public Facilities and Improvements Expand Economic Opportunities Public Services Removal of Blight and Blighting Influences	CDBG: \$282,758	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,000 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted
3	Reduce Homelessness	2019	2023	Homeless Non-Homeless Special Needs	City-Wide	Address Homelessness Issues	ESG: \$225,369	Homelessness Prevention: 375 Persons Assisted
4	Provide Needed Public Services	2019	2023	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	Target Area Census Tracts Eastside Neighborhood Central Neighborhood City-Wide	Public Services	CDBG: \$706,600	Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Planning and Program Administration	2019	2023	Planning, Administration, Fair Housing	City-Wide	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Address Homelessness Issues Public Facilities and Improvements Expand Economic Opportunities Public Services Removal of Blight and Blighting Influences	CDBG: \$577,695 HOME: \$58,857 ESG: \$0	Other: 1 Other
6	Expand Economic Opportunities	2019	2023	Non-Housing Community Development	City-Wide	Expand Economic Opportunities	CDBG: \$75,000	Businesses assisted: 10 Businesses Assisted

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Expand, Maintain & Improve Affordable Housing
	Goal Description	The City of Canton will utilize CDBG and HOME funds to carry out activities designed to expand, maintain, and improve affordable housing. The City will undertake these housing activities, utilizing programs carried out by the Department of Development. In addition, the City will provide funding to subrecipient organizations for affordable housing activities.
2	Goal Name	Improve the Safety & Livability of Neighborhoods
	Goal Description	The City of Canton will utilize CDBG funding to carry out activities designed to improve the safety and livability of neighborhoods. Activities will be concentrated within the City's Neighborhood Revitalization Strategy Areas and Target Area Neighborhoods.
3	Goal Name	Reduce Homelessness
	Goal Description	The City of Canton will provide ESG funding to various local organizations to carry out activities designed to reduce homelessness in the community. These ESG-funded projects will help to complement the Continuum of Care activities being funded through the Homeless Continuum of Care of Stark County.
4	Goal Name	Provide Needed Public Services
	Goal Description	The City of Canton will provide CDBG funding to various local non-profit organizations to provide needed public services in the community. Public services include programs for youth, elderly assistance, nutrition, job training and neighborhood safety.
5	Goal Name	Planning and Program Administration
	Goal Description	The City of Canton will utilize CDBG and HOME funds for the planning and overall management of its Annual Action Plan, including activities to affirmatively further fair housing.
6	Goal Name	Expand Economic Opportunities
	Goal Description	The City of Canton's goal of expanding opportunities includes job creation and retention activities; the provision of public services concerned with employment; public infrastructure improvements needed to assist economic development.

Projects

AP-35 Projects – 91.220(d)

Introduction

This section lists and describes the projects that the City of Canton will carry out during FY 2019. These projects reflect a thorough process that determined Canton's priority needs to be addressed during the first year of the 2019-2023 Five-Year Strategic Plan. The City of Canton will utilize CDBG, HOME, and ESG funding to undertake the following FY 2019 projects:

Projects

#	Project Name
1	CDBG Rehabilitation – Single Family Residential
2	CDBG Rehabilitation Administration
3	Public Facilities and Improvements
4	Public Service Activities
5	Clearance and Demolition
6	Eastside Neighborhood Revitalization Strategy Area
7	Central Neighborhood Revitalization Strategy Area
8	Economic Development
9	Fair Housing Management
10	Planning
11	CDBG General Management
12	HOME General Management
13	HOME Homebuyer New Construction
14	HOME Rental Rehab
15	Tenant Based Rental Assistance
16	HOME Down Payment Assistance
17	ESG 19 Canton

Table 56 – Project Information

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

The City of Canton continually strives to improve its implementation of housing and community development activities, particularly to more effectively address underserved needs in the community. To address this issue, the City undertakes a two-step approach: 1) the City continually evaluates 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 Plan Funds will be expended within the target areas, however some programs will operate 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 Proposals (RFP) process. Limited direct allocations are also made with these funds.

RFP's are mailed 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.

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AP-38 Project Summary
Project Summary Information

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1	Project Name	CDBG Rehabilitation - Single Family Residential
	Target Area	City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Removal of Blight and Blighting Influences
	Funding	CDBG: \$1,000,000
	Description	The City of Cantons Homeownership Rehab Programs are designed to assist low to moderate income homeowners correct housing conditions, which if neglected, would adversely affect the health, safety and welfare of the homeowner. Work may include roof, furnace, electric, plumbing, flooring, code sewage backup, water line breaks, hot water heaters, and code violations such as siding, windows, steps and other qualifying repairs.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	165 low to moderate income families
	Location Description	
	Planned Activities	The following activities are planned to be carried out as part of this project: <u>City of Canton In-house CDBG Homeowner Rehab Programs: \$750,000</u> , assisting LMI homeowners with rehab assistance to correct housing conditions, which if neglected, will adversely affect the health, safety, and welfare of the homeowner. 160 LMI housing units to be rehabbed. <u>Habitat for Humanity Preservation Program: \$250,000</u> , preservation/rehab of existing homes to be sold to low/mod households as part of a neighborhood revitalization effort. Part of the project is located in the Eastside NRSA. 5 LMI housing units to be rehabbed.
2	Project Name	CDBG Rehabilitation Administration
	Target Area	City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing

	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Removal of Blight and Blighting Influences
	Funding	CDBG: \$295,224
	Description	The City of Canton will allocate CDBG funding for staff and subrecipient costs directly involved in carrying out the City's housing rehabilitation programs.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The activities to be undertaken as part of this Project include the following: \$245,224.00 - providing CDBG funding the City's Development Department staff directly involved in the delivery of housing rehabilitation program services. \$50,000.00 - providing CDBG funding for other direct program delivery costs associated with the City's housing rehabilitation program.
3	Project Name	Public Facilities and Improvements
	Target Area	City-Wide
	Goals Supported	Improve the Safety & Livability of Neighborhoods
	Needs Addressed	Public Facilities and Improvements
	Funding	CDBG: \$207,758
	Description	CDBG funds will be used for improvements to public facilities.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	3,000 low/moderate income persons
	Location Description	

	Planned Activities	<p><u>Child and Adolescent Behavioral Health</u>: \$70,000, Renovations to the Shipley Center gymnasium. The agency specializes in the emotional and behavioral needs of children, adolescents, young adults, and their families.</p> <p><u>JRC</u>: \$12,758, Purchase kitchen equipment for the Learning Center.</p> <p><u>Domestic Violence Project</u>: \$25,000, Assist with the replacement of the HVAC system for a center that houses victims and provides support services.</p> <p><u>Canton City School District</u>: \$100,000, Assist with the installation of a baseball field. CDBG funds will provide a match to other funds.</p>
4	Project Name	Public Service Activities
	Target Area	City-Wide
	Goals Supported	Provide Needed Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$324,000
	Description	The City of Canton will provide CDBG funding to local non-profit organizations for needed public services assisting low and moderate income persons and households.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	2,000 low/moderate persons assisted
	Location Description	

	Planned Activities	<p>The activities to be undertaken as part of this Project include the following:</p> <p><u>Beacon Charitable Pharmacy</u>: \$40,000, Prescription assistance for uninsured/underinsured persons.</p> <p><u>Canton Ex-Newsboys Association</u>: \$40,000, providing clothing assistance for school aged youth in partnership with JC Penney.</p> <p><u>Stark Mental Health & Addiction Recovery</u>: \$50,000, Assist with wages for a homeless hotline and centralized intake and assessment program.</p> <p><u>Tiqvah Hands of Hope</u>: \$30,000, Afterschool program for troubled youth.</p> <p><u>ICAN Housing</u>: \$64,000, Wages and expenses for staff to assist persons who are new to the Rapid Re-housing Program work toward self-sufficiency.</p> <p><u>The Stock Pile</u>, \$15,000, Wages and lease assistance for an agency that provides reusable building materials at low cost.</p> <p><u>The First Tee of Canton</u>: \$15,000, Provides equipment and wages for a program offering golf instruction and enrichment services for youth. Teaches core values and healthy habits to youth enrolled in the program.</p> <p><u>Coleman Professional</u>: \$5,000, Mediation and conflict resolution services.</p> <p><u>ABCD Transportation Services</u>, \$10,000, Transportation for low/mod income people to medical and other appointments at no cost.</p> <p><u>Fair Housing</u>: \$55,000, providing fair housing public services to tenants with Fair Housing issues.</p>
5	Project Name	Clearance and Demolition
	Target Area	
	Goals Supported	Improve the Safety & Livability of Neighborhoods
	Needs Addressed	Removal of Blight and Blighting Influences
	Funding	CDBG: \$75,000
	Description	Removal of Blight and Blighting Influences
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	6,000 low/moderate persons assisted; 10 structures demolished.
	Location Description	
	Planned Activities	<p>The activities to be undertaken as part of this Project include the following:</p> <p>Demolitions: \$60,000</p> <p>Demolition Salaries: \$15,000</p>

6	Project Name	Eastside Neighborhood Revitalization Strategy Area
	Target Area	Eastside Neighborhood
	Goals Supported	Improve the Safety & Livability of Neighborhoods
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Public Facilities and Improvements Expand Economic Opportunities Public Services Removal of Blight and Blighting Influences
	Funding	CDBG: \$210,000
	Description	CDBG funding for project activities to be carried out in the City's Eastside Neighborhood Revitalization Strategy Area (NRSA). The City prepared a detailed comprehensive plan for the revitalization of these two designated areas in Canton and is carrying out a wide ranging list of projects and activities designed to achieve the goals set forth in the NRSA Plan.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	1,200 low/moderate persons assisted.
	Location Description	Eastside Neighborhood
	Planned Activities	The activities to be undertaken as part of this Project include the following: <u>Southeast Community Center</u> : \$210,000, Building improvements to a neighborhood facility in an area that has a very high concentration of minority and low income persons. There are plans to add a dental facility to the center and add other services needed in the neighborhood.
7	Project Name	Central Neighborhood Revitalization Strategy Area
	Target Area	Central Neighborhood
	Goals Supported	Improve the Safety & Livability of Neighborhoods

	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Public Facilities and Improvements Expand Economic Opportunities Public Services Removal of Blight and Blighting Influences
	Funding	CDBG: \$172,600
	Description	CDBG funding for project activities to be carried out in the City's Central Neighborhood Revitalization Strategy Area (NRSA).
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	250 low/moderate persons assisted.
	Location Description	Central Neighborhood
	Planned Activities	<u>Christ the Servant Parish</u> : \$28,000, Afterschool enrichment program for youth ages 5 to 16. <u>Girl's Think Tank</u> : \$33,600, Leadership development and conflict resolution skills training for girls ages 15-18. <u>Stepping Off to College</u> : \$56,000, Program to foster financial literacy of youth ages 17-19 to be prepared to enter college. Provides participants with a laptop and printer, as well as a business casual outfit. <u>En-Rich-Ment</u> : \$55,000, Provide free music lessons, education, training, art, dance, choir and drumline to underserved urban youth ages 5 – 18 through summer and year-round programs.
8	Project Name	Economic Development
	Target Area	City-Wide
	Goals Supported	Expand Economic Development Opportunities
	Needs Addressed	Expand Economic Opportunities
	Funding	CDBG: \$75,000
	Description	Assistance to programs that work toward increasing and retaining jobs in the City of Canton.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	10 small businesses
	Location Description	
	Planned Activities	<p>Assistance to programs that work toward increasing and retaining jobs in the City of Canton.</p> <p>The following activities are proposed to be undertaken as part of this Project:</p> <p><u>Economic and Community Development Institute (ECDI)</u>: \$50,000, Provides technical assistance, micro-lending.</p> <p><u>ABCD Project Manager</u>: \$25,000, Project will provide assistance and mentoring to African American businesses.</p>
9	Project Name	Fair Housing
	Target Area	City-Wide
	Goals Supported	Planning and Program Administration
	Needs Addressed	<p>Maintain Affordable Housing Supply</p> <p>Expand Affordable Housing Opportunities</p> <p>Address Homelessness Issues</p> <p>Public Facilities and Improvements</p> <p>Expand Economic Opportunities</p> <p>Public Services</p> <p>Removal of Blight and Blighting Influences</p>
	Funding	CDBG: \$50,000
	Description	Administrative activities carried out by the City's Fair Housing Office.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	20 families assisted
	Location Description	
	Planned Activities	Advertising, travel and training expenses for the Fair Housing Office.
	Project Name	Planning

10	Target Area	City-Wide
	Goals Supported	Planning and Program Administration
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Address Homelessness Issues Public Facilities and Improvements Expand Economic Opportunities Public Services Removal of Blight and Blighting Influences
	Funding	CDBG: \$35,000
	Description	Planning activities related to HUD programs.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Salaries for Department of Development Planning staff.
	11	Project Name
Target Area		City-Wide
Goals Supported		Planning and Program Administration
Needs Addressed		Maintain Affordable Housing Supply Expand Affordable Housing Opportunities Address Homelessness Issues Public Facilities and Improvements Expand Economic Opportunities Public Services Removal of Blight and Blighting Influences
Funding		CDBG: \$492,395
Description		CDBG funds are being allocated to pay for Canton Department of Development expenses associated with planning and administration of the City's CDBG Program.
Target Date		

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	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.
12	Project Name	HOME General Management
	Target Area	City-Wide
	Goals Supported	Planning and Program Administration
	Needs Addressed	Maintain Affordable Housing Supply Expand Affordable Housing Opportunities
	Funding	HOME: \$58,857
	Description	HOME funds for Canton Department of Development expenses associated with planning and administration of the City's HOME Program.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	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.
13	Project Name	HOME Homebuyer
	Target Area	City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	HOME: \$250,000

	Description	HOME funds allocated by the City of Canton to local housing developers, either for-profit companies or non-profit agencies, to assist in the construction of new affordable homeowner housing for low and moderate households.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	5 low/moderate families
	Location Description	
	Planned Activities	The activities to be undertaken as part of this Project include the following: <u>Habitat for Humanity</u> : \$250,000, to be used for the construction of 5 (five) new homes.
14	Project Name	HOME Rental Rehab
	Target Area	City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	HOME: \$188,286
	Description	Acquisition and rehab of properties for rent to low/mod households
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	13 low/moderate income families
	Location Description	
	Planned Activities	The activities to be undertaken as part of this Project include the following: <u>ICAN Housing/CHDO</u> : \$88,286, Rehabilitation of 3 (three) rental units. <u>Stark Metropolitan Housing Authority</u> : \$100,000, Acquisition and rehab of rental units.

15	Project Name	Tenant Based Rental Assistance
	Target Area	City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing
	Needs Addressed	Maintain Affordable Housing Supply
	Funding	HOME: \$30,000
	Description	Rental assistance program
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	5 low/ moderate families
	Location Description	
	Planned Activities	YWCA: \$30,000, Assistance for households in permanent supportive housing.
16	Project Name	HOME Down Payment Assistance
	Target Area	City-Wide
	Goals Supported	Expand, Maintain & Improve Affordable Housing
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	HOME: \$60,000
	Description	Assistance to homebuyers
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	10 low/moderate income families
	Location Description	
	Planned Activities	<u>Community Building Partnership</u> : \$60,000, Counseling and down payment assistance for low/mod households.
17	Project Name	ESG 19 Canton
	Target Area	City-Wide
	Goals Supported	Reduce Homelessness

Needs Addressed	Address Homelessness Issues
Funding	ESG: \$225,369
Description	The City of Canton will allocate ESG funding to local non-profit agencies to carry out homeless assistance/prevention activities, including homeless prevention, shelter operations, essential services, and HMIS.
Target Date	
Estimate the number and type of families that will benefit from the proposed activities	375 low-moderate families
Location Description	
Planned Activities	<p>The activities to be undertaken as part of this Project include the following:</p> <p><u>CommQuest Services</u>: \$90,000, providing rent and utility assistance for qualified residents to prevent homelessness.</p> <p><u>Domestic Violence Project, Inc.</u>: \$72,629, Providing emergency housing to victims of domestic violence.</p> <p><u>Refuge of Hope</u>: \$25,000, Providing emergency housing for homeless men.</p> <p><u>Stark Mental Health & Addiction Recovery</u>: \$ 21,300, providing homeless management information system services to support central intake and assessment activities.</p> <p><u>ESG General Management</u>: \$16,440., 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.</p>

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 Annual 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 2019-2023, the City will allocate concentrated HUD-funding for a comprehensive revitalization program of projects and activities within each NRSA.

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

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

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

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

Geographic Distribution

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

Table 57 - 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.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Canton's FY 2019 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	69
Non-Homeless	183
Special-Needs	0
Total	252

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	69
The Production of New Units	5
Rehab of Existing Units	168
Acquisition of Existing Units	10
Total	252

Table 59 - 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, the Stark Metropolitan Housing Authority (SHMA) is implementing a 504 ADA Voluntary Compliance Agreement (VCA) to address accessibility and ADA provisions. Pursuant to the VCA, SMHA must complete the construction or conversion of 128 Uniform Federal Accessibility Standards (UFAS) Accessible Units for individuals with mobility impairments and 51 UFAS Accessible Units for individuals with hearing or vision impairments. In an effort to best satisfy the needs of SMHA residents and / or applicants on the waiting list, it is SMHA's goal to renovate and construct units to be vision, hearing and mobility accessible. To date, SMHA has completed 101 UFAS units that are vision, hearing and mobility accessible, leaving 78 UFAS units remaining to be constructed or renovated.

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 \$219,197 in ESG funding for 2019.

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 ICAN Inc. 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

While the Ohio Development Services Agency (ODSA) Homeless Crisis Response Program (HCRP) focuses on funding rapid re-housing, funding for homeless prevention in Stark County comes from private foundations, the United Way, and the Emergency Solutions Grant (ESG) Program. The CoC is in a collaboration with these entities. Both rapid re-housing and homeless prevention programs are in key positions to identify individuals and families who are “at-risk” of becoming homeless. The ESG jurisdiction (City of Canton) and homeless prevention provider agencies target participants who are at risk of homelessness and who are only in a temporary crisis. These homeless prevention programs serve persons who are behind in rent and/or utilities, but who, with limited assistance (1 -2 months), will be able to sustain themselves. This prevention strategy focuses on those facing evictions as well as those who are at risk of homelessness, such as those being discharged from publicly funded institutions, but who are still in a position to maintain themselves in housing with minimal assistance. If program applicants have already been evicted and are living with friends or family they will be encouraged to participate in diversion services and if their loss of housing is imminent (within 14 days) they will be referred to rapid re-housing.

One strategy under discussion is to look at the feasibility of screening United Way and Emergency Assistance callers with a process similar to those calling the Hotline to identify high-risk callers and start an intervention/diversion process before the caller becomes homeless, similar to the ESG program. This would give the CoC better insight into risk factors for homelessness in Stark County, and develop programs geared at providing timely intervention and prevention services. Over the long-term this should reduce homelessness and reduce recidivism, provided that the primary cause is not external and beyond the control of the CoC (e.g., economic downturn, loss of jobs, insufficient number of affordable housing units).

The Stark County protocol for homeless prevention includes collaboration with the CoC, housing providers, homeless services providers and institutions discharging participants. Stark County Jobs and Family Services (SCJFS) begins transition planning/programming for all youth in foster care at age 16. It employs two independent living specialists who work with each youth and his/her case worker to develop a written plan tailored to the individual’s needs and goals and to link the youth to programs

that will enable him/her to achieve those goals, including classes offered by SCJFS to build independent living skills. Updated every 90 days, plans include strategies for securing housing upon emancipation. SCJFS supports youth in achieving their goals as best it can by (1) helping them identify available housing and secure Family Unification Program vouchers for use in the REACH and HOPE programs, which also receive support from the mental health board and (2) by providing financial help for security deposits, rent, utilities, furnishings and even groceries for variable periods of time (up to age 21) after emancipation.

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's land development policies are expressed in its Comprehensive Plan, Zoning Ordinance, and Land Use Map. The City's Comprehensive Plan recommends reform to the City's planning policies and zoning regulations that are barriers to the creation of affordable housing, but does not identify specific actions or measures of such reform.

The City of Canton has a wide variety of residential zoning districts. Five R-1 districts (R-1, R-1a, R-1b, R-1c, & R-1d) are single family zones at various densities. The R-2 allows Two-Family Dwellings and R-1 uses. The R-3 and R-4 districts permit Multi-Family dwellings and R-2 and R-1 uses. Single-Family dwellings are permitted in the Municipal Agriculture District (MA) and some Business Districts. Multi Family Dwellings are permitted in all Business Districts.

Though a majority of residential space in the City is designated within one of the R-1 zones, the City of Canton does not believe this limits developable land available for the construction of multifamily housing. The City of Canton Planning Department recognizes multi-family housing represents an important affordable housing option for lower-income households and that a lack of affordable housing may impede housing choice for LMI households. It is this recognition that further promotes a wide variety of residential development in the City of Canton, with varying styles, densities, and types.

While the Canton City Planning Department is in the early stages of a comprehensive amendment to the Land Use Map, the idea of providing areas suitable for affordable housing through zoning is one of the topics in the forefront of the planning process. The planners recognize the problems that can be created with poor planning for this very thing in mind. They realize sprawling car-based suburbs far from the work center can prove problematic for LMI households, and have every intention of retaining multi-family options close to the amenities they absolutely need.

Excessively large lot sizes may deter development of affordable housing. In Canton, however, the minimum lot size in R-1 districts ranges from 6,000 square feet per family to 43,560 square feet per family. The City of Canton Land Use Map illustrates that many smaller-minimum areas exist throughout Canton. 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. It should be further noted, larger lots and less density in any district is monumentally helpful in providing an appropriate amount of properties for the population present in the City. This "right-sizing" of the City has already shown dividends in helping to eliminate the slum and blight vacant, abandoned, smaller properties lend to.

The City of Canton also believes allowing alternative designs could provide 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 diverse styles of residential types. Alternative design developments can produce and preserve

affordable housing options for working and lower income households. Canton's Planned Unit Development (PUD) provisions encourage a variety of single and multi-family dwelling types.

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

In addition, Canton has an Affirmative Marketing Policy. Under this policy, the City has obligations that include community outreach and education, while also requiring developers to advertise availability of HUD-assisted units with local minority 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.

Site selection for HOME-assisted construction of new rental units can promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high concentration of LMI households. In the Consolidated Plan the City identifies its southern two-thirds as an area of investment of federal entitlement funds due to predominantly low and moderate income households and minority concentrations. The City can expand housing choice by creating new housing opportunities in non-concentrated areas.

Discussion:

In regards to zoning issues, the City Planning Department is responsible for subdivision review and approval as well as zoning recommendations. Consideration of any changes to zoning must bear in mind the consequences such changes may have on affordable housing. In addition, as described in the preceding section, allowing alternative residential development design can provide opportunities to expand the supply of affordable housing by reducing the cost of infrastructure. Alternative design models can be used to produce and preserve affordable housing options for working and lower income households.

Stark County recently prepared an Analysis of Impediments to Fair Housing Choice (AI). Although this AI has not yet been adopted, one of its recommended action steps for Canton is amending the City's zoning ordinance to allow a greater variety of residential construction, including multifamily units, which are an important affordable housing option for 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 way 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 and policy makers about the City's affordable housing needs.

Draft

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 Partnerships (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 2018 allocations, the City has budgeted more than \$2 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, Rodriguez Association, Stark County Community Action Agency and ICAN Housing.

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 under its HUD funded programs.

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.

Minor Home Repair Program - A scope of work is written by City inspectors addressing one minor home repair such as electrical, plumbing, heating or energy conservation upgrade. If any of these repairs require disturbing a painted surface, the contractor is to assume it contains lead and a lead clearance will be required.

Roof Repair Program – This program provides roof replacement as well as gutter and fascia replacement. If any of these repairs require disturbing a painted surface, the contractor is to assume it contains lead and a lead clearance will be required.

Emergency Repair Program – This program assists with specific home repairs to eliminate conditions immediately detrimental to the health and safety of human life. These repairs usually do not disturb painted surfaces but if they do the contractor is to assume it contains lead and a lead clearance will be

required.

While a home is undergoing rehabilitation through a City of Canton HUD funded program, the assigned Construction Coordinator 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 a licensed through the EPA as Lead Safe Renovators to participate in the City's Housing Rehabilitation Programs.

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

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

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

In an effort to maximize the number of children under the age of six years protected from lead poisoning and the number of housing units where lead hazards are controlled, the City of Canton plans to apply for the Lead-Based Paint Hazard Reduction Grant. Upon award, housing rehabilitation with this funding will require a Lead Paint Test and Lead Hazard Risk Assessment. The Specification of Work will be written by City Inspectors Certified as Lead Abatement Contractors. Only Lead Abatement Contractors licensed through the Ohio Department of Health will perform the work; Lead Clearance will be required.

An occupant protection plan will be established for each project. If necessary, the occupants will be relocated to a "Safe House" while rehabilitation is taking place to comply with HUD 24 CFR Part 35.1345. During the rehabilitation, the assigned Construction Coordinator will verify proper containment and lead safe work practices. When the project has been completed and a Lead Clearance is achieved the occupants will be permitted to move back into their home.

The City Inspector will include a job spec line item for internal and contractor cost estimating to cover Worksite Preparation and Occupant Protection. This informs the contractor that this element of work is not only required, but represents costs that can be recouped. The City Inspector will also add 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 Housing Program Manager reviews the Risk Assessment for quality and completeness. The Construction Coordinator ascertains that all Lead Hazards have been addressed with the (L*) designation added to the specification of work. The Housing Program Manager reviews the Lead

Clearance report for quality and completeness utilizing ODH forms 7730 & 7731, as well as HUD form 15.2 Field Sampling Form.

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

Actions planned to reduce the number of poverty-level families

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 2019, 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 Homeless Prevention Rapid-Rehousing 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 CHDO 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.

Draft

Program Specific Requirements

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

Introduction:

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

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

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