

CANTON, OH

HOME-ARP Allocation Plan

Submitted to HUD as a Substantial Amendment to the
Approved 2021 Annual Action Plan

Consultation

Section 1: Describe the consultation process including methods used and dates of consultation

See Appendix A for all Stakeholder Consultation materials. Stakeholder comments received throughout the various sessions and individual meetings are summarized below and referenced throughout the Needs Assessment & Gaps Analysis.

The City of Canton and Stark County (each of which is receiving a separate HOME-ARP funding allocation) collaborated on the stakeholder consultation process. In most cases, the same stakeholders cover the city and county, most without regard for the jurisdictional boundary that separates the two. Together, the city and county engaged in an extensive stakeholder consultation process over the course of four months beginning in July 2022. The first round of consultations focused on identifying the QPs and their unmet housing and service needs. A brief PowerPoint presentation on the HOME-ARP program was presented followed by questions meant to engage participants in identifying unmet needs among the qualifying populations they served. Details of Round 1 are included in the chart below.

ROUND 1 STAKEHOLDER CONSULTATIONS				
Date	Method	Participants Stakeholders	PJ Staff/ Consultants	Agency/Organization Type <i>(required stakeholders in italics)</i>
July 20, 2022 2:00-3:30 pm	GoToMeeting virtual session	22	11	<i>Homeless service providers, veterans service provider, Domestic violence provider, Public/private organizations addressing the needs of the QPs, Public agencies that address the needs of the QPs, Continuum of Care, Business, Affordable housing provider, Public housing authority, Philanthropic organization, Nonprofit organization</i>
July 21, 2022 9:00-10:30 am	GoToMeeting virtual session	10	9	<i>Continuum of Care, Public housing authority, Homeless services providers, Local government, Affordable housing provider, HMIS</i>
July 21, 2022 2:00-3:30 pm	GoToMeeting virtual session	8	8	<i>Continuum of Care, Homeless service providers, Business, School district</i>

The second round of stakeholder sessions was rescheduled for October 3, 5, and 6. The purpose of this round was to provide a summary of the stakeholder comments collected in July and a summary of the Needs Assessment & Gaps Analysis. Each session began with a detailed PowerPoint presentation summarizing key findings from the stakeholder consultation and the data analysis. Participants were

asked to provide feedback on the summary of stakeholder-identified needs and the needs identified through the data analysis. Details of Round 2 are included in the chart below.

ROUND 2 STAKEHOLDER CONSULTATIONS				
Date	Method	Participants Stakeholders	PJ Staff/ Consultants	Agency/Organization Type <i>(required stakeholders in italics)</i>
October 3, 2022 1:00-2:30 pm	GoToMeeting virtual session	11	8	<i>Public housing authority, Continuum of Care, Homeless service provider, HMIS, Nonprofit organization, Business, School district</i>
October 5, 2022 1:00-2:30 pm	GoToMeeting virtual session	7	4	<i>Domestic violence service provider, Homeless service provider, HMIS, School district</i>
October 6, 2022 10:00-11:30 am	GoToMeeting virtual session	10	2	<i>Homeless service providers, Domestic violence service provider, Continuum of Care, HMIS</i>

Following a review of the participant stakeholders and information collected during the Round 1 and Round 2 sessions, the city and the county identified the need to seek additional participation from civil rights/fair housing/disability rights organizations, veterans organizations, and domestic violence service providers. Details of these sessions are summarized below.

ADDITIONAL CONSULTATIONS		
Date	Method	Agency/Organization Type <i>(required stakeholders in italics)</i>
October 5, 2022 2:00-3:00 pm	GoToMeeting virtual session	<i>Public organizations that address civil rights, fair housing, disability rights (3)</i>
October 6, 2022 1:00-2:00 pm	Teams Meeting virtual session	<i>Domestic violence service provider</i>
October 7, 2022 9:00-10:00 am	Teams Meeting virtual session	<i>Veterans organization</i>

Section 2: List the organizations consulted and summarize feedback received and results of upfront consultation with these entities.

A list of all invited stakeholders is included in Appendix A. Also, included in Appendix A are summaries of the comments received during each stakeholder consultation session along with the participating entities.

All required stakeholder categories were engaged either through group stakeholder sessions, individual interviews, or via e-mail to obtain data.

The general themes and trends that emerged from the stakeholder sessions include the following:

- More affordable and accessible rental housing is needed for households up to 50% AMI through new construction and preservation with smaller developments and scattered sites available as options to expand housing choice

- Many landlords refuse to accept Housing Choice Vouchers given the higher market rents they can charge, and many landlords also refuse to rent to tenants who are homeless or released offenders, or who have a criminal history, evictions on their record, or poor credit
- Better collaboration with landlords is needed to increase the acceptance of HCVs from persons who are homeless or have criminal histories.
- The current level of HCV is inadequate to serve families in need of subsidized rental housing
- Subsidized housing has long waiting lists with little turnover among PSH and affordable rental units
- The level of supportive services available for those who are homeless is insufficient, contributing to the potential for returning to homelessness. These services include legal, financial counseling, case management, employment training, and more.
- There is a need for affordable housing that is accessible for persons with disabilities and accessible to transportation, amenities, good schools, etc.
- Increasing rental costs are impacting nearly all household groups, placing more households at risk for homelessness
- Lower income households who cannot afford rising rental rates are moving out of their units to avoid having an eviction action on their record. This is placing a strain on agencies who then must find them housing, front rent and utility deposits, etc.
- Gentrification is causing displacement in some city neighborhoods but there are no affordable units for these households
- Persons with limited English proficiency cannot find resources to help them understand and navigate the system. They do not understand the eviction process, they do not know about Legal Aid or how to use the homeless hotline.
- There are subsidies and services available for homeless veterans but finding rental units is very difficult.
- The number of adults and children who received emergency shelter from DVPI surged 73% in the first six months of 2022.
- Victims of domestic violence need TBRA so they don't have to wait on the SMHA HCV waiting list, even it was open. Otherwise, they risk having to return to their abuser.

Public Participation

[To be completed following the 15-day public comment period and public hearing.]

See Appendix B for evidence of Public Participation conducted for the plan.

Section 1: Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan.

- ***Date(s) of public notice:*** Click or tap to enter a date.
- ***Public comment period: start date*** - Click or tap to enter a date. ***end date*** - Click or tap to enter a date.
- ***Date(s) of public hearing:*** Click or tap to enter a date.

Describe the public participation process:

Enter narrative response here.

Section 2: Describe efforts to broaden public participation.

Enter narrative response here.

Section 3: Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing.

Enter narrative response here.

Section 4: Summarize any comments or recommendations not accepted and state the reasons why.

Enter narrative response here.

Needs Assessment and Gaps Analysis

This section presents the results of the homeless needs and gaps analysis, drawing on CoC HMIS data, Point-In-Time (PIT) count information, and public federal data sources. Where appropriate, this information is contextualized with feedback from community stakeholders. Although the city and county collaborated on stakeholder consultations, the needs assessment and gap analysis is specific to the City of Canton. Unless otherwise stated, Stark County data includes the City of Canton where jurisdictional data cannot be separated. Where data is available for Canton exclusively, it is provided.

Like many communities, Canton has an insufficient inventory of affordable housing for most income tiers up to 80% AMI. This shortage is impacting the Qualifying Populations in several ways:

- There is a lack of available and affordable units for persons exiting the homeless system. This, in turn, has caused lengthened stays in emergency shelter beds and transitional housing beds to just under six months.
- The tight rental market overall has caused rents to surge as landlords and property managers increase rents due to demand exceeding supply. As a result, landlords are less interested in accepting tenants with rental vouchers because they can achieve higher rents than the HUD fair market rents.
- With increasing mortgage interest rates, renters who were hoping to become homebuyers are remaining renters since they've been priced out of the sales market. This means less turnover in the rental market.
- Households with incomes above 80% of AMI have more options in the rental market. If they are unable to rent within their income tier (e.g., an 80-100% AMI household finding a unit that is affordable to an 80-100% AMI household), then they tend to rent down-market. In other words, they will rent units that are affordable to households in lower-income tiers. This squeezes out the lower-income households from renting within their own income tier, causing cost burden for many who then rent up-market.
- The resulting shortage of units both affordable and available for renter households at or below 30% AMI increases housing insecurity on extremely low-income households, making them at risk of becoming homeless

Table 1 includes the current inventory of resources available within Stark County. Using the 2022 Point in Time count of persons and families who were homeless on the night of January 23, there are no gaps in the homeless inventory. However, the PIT count is a count on a single night and doesn't capture the full profile of homeless persons and families who depend on the Canton/Stark County CoC throughout the year. These trends are discussed in subsequent sections of the plan.

Table 1. Homeless Needs Inventory and Gap Analysis

Canton, OH													
	Current Inventory					Homeless Population (January 23, 2022 PIT Count)				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# Beds	# Units	# Beds	# Units	# Beds					# Beds	# Units	# Beds	# Units
Emergency Shelter (non-DV)	172				8								
Emergency Shelter (DV)	49												
Safe Haven			8										
Transitional Housing (non-DV)													
Transitional Housing (DV)	26												
Rapid Re-Housing (all persons)	29		131										
Rapid Re-Housing (families)	29												
Permanent Supportive Housing	156		412										
Other Permanent Housing	3												
Sheltered Homeless						33	89	7	163				
Unsheltered Homeless							5	2					
Current Gap										0	0	0	0

Data Sources: 1. 2022 Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultations; 4. Alliance Area Domestic Violence; 5. Domestic Violence Project, Inc.; 6. 2022 HDX Report from Stark County CoC

Within the city's rental housing inventory, there is a housing gap for households at 0-30% and 31-50% AMI (see Table 2). Analyzing the household occupancy of rental units by income tier provides additional information. According to CHAS data, there are 5,400 renter households in Canton at 0-30% AMI. However, there are only 4,940 rental units affordable to this group of households. Further exacerbating the situation is that only 2,585 of these 4,940 affordable units are occupied by 0-30% AMI households. The remaining 2,355 units are occupied by households with incomes above 30% AMI. ***This results in a housing gap of 2,815 rental units affordable to 0-30% AMI renter households.***

Moving up the income spectrum, there are 3,485 renter households at 31-50% AMI. For this income group, there is an over-supply of 6,155 units affordable to them. However, only 1,515 of the 6,155 units are occupied by 31-50% AMI households. The remaining supply of 4,640 units are occupied by households of other income tiers, likely including some of the 0-30% AMI households who are living in units outside of their income tier that would cause them to be cost burdened. ***This results in a housing gap of 1,970 rental units affordable to 31-50% AMI renter households.***

The CHAS data used to complete this analysis is from 2014-2018 and was the current data set at the time this analysis was conducted. It does not reflect current housing market conditions that have resulted from the COVID-19 pandemic, including recent rent surges. However, it is still valuable in analyzing the degree to which households above 30% AMI and above 50% AMI are renting down-market due to a lack of housing inventory for higher-income households.

Table 2. Housing Gap Analysis

Renter Households	0-30% AMI	31-50% AMI
Total Households	5,400	3,485
Affordable Housing Units	4,940	6,155
Units Occupied by Appropriate Income Tier ¹	2,585	1,515
Units Occupied by Other Income Households ²	2,355	4,640
Gap ³	2,815	1,970

¹ Number of housing units occupied by a household of the same income tier (i.e., a 0-30% AMI household occupies a unit that is affordable to a 0-30% AMI household)

² Number of housing units occupied by a household that is not of the same income tier (i.e., a 0-30% AMI unit is occupied by a household above 30% AMI)

³ Total Number of Households minus Units Occupied by Appropriate Income Tier equals the number of units needed to house the balance of the households within that income tier that are occupying units affordable to households above their income tier (i.e., the housing gap).

Data Source: 2014-2018 Comprehensive Housing Affordability Strategy (CHAS)

Section 1: The size and demographic composition of Qualifying Populations

1. Homeless as defined in 24 CFR 91.5

The number of Stark County residents that meet the definition of homeless under 24 CFR 91.5 was derived from the 2022 PIT Count, conducted by the Canton, Massillon, Alliance/Stark County Continuum of Care (CoC) on January 23, 2022. The PIT Count identified a total of 247 persons experiencing homelessness in 2022. Of the counted homeless individuals, 219 (88.7%) were sheltered and 28 (11.3%) were unsheltered. In terms of racial and ethnic demographics, 97 (39.3%) of homeless individuals were Black/African American, 102 (41.3%) were White, 42 (17%) were multiple races, and 33 (13.7%) were Hispanic.

Between January 2021 and July 2022, a total of 4,257 homeless persons were served by the Stark County Continuum of Care.

Table 3. Persons Served by Stark County CoC, January 2021-July 2022

Program	Persons Served
Emergency Shelter	1,620
Permanent Supportive Housing and Supportive Housing	1,471
Rapid Re-Housing	1,000
Street Outreach	166
Total	4,257

According to the FY2021 Performance Measurement Module, 1,108 individuals experienced homelessness for the first time during the period October 1, 2020-September 30, 2021. This is a 6.2% decrease from 2020 when 1,181 persons experienced homelessness for the first time. These numbers account for persons entering emergency shelter, transitional housing, safe haven, and permanent housing programs.

2. At Risk of Homelessness as defined in 24 CFR 91.5

According to 2014-2018 CHAS data, in Canton there is a housing gap of 2,815 rental units affordable to 0-30% AMI households. The 2,815 households represented by this unit gap are living in units that are affordable to higher-income households, meaning they are all cost-burdened and paying more than 30% of their monthly income on housing costs. In addition, there is a housing gap of 1,970 rental units for 31-50% AMI households. Many of the 1,970 households represented by this unit gap are living in units that are affordable to higher-income households although some are likely occupying units affordable to 0-30% AMI. The housing gap for both of these income groups represents renter households who are living in units where they are cost-burdened, putting them at risk for homelessness.

Based on HMIS data from January 1, 2021-June 30, 2022, 38% of leaver households exited to temporary destinations. Exiting to a temporary destination may indicate a greater risk of returning to homelessness.

Stark County assisted 1,445 (67% of applicants) households through the Emergency Rental Assistance Program within the last 24 months through July 13, 2022. Of these households, the average income was approximately \$12,853.21, equivalent to the federal poverty level for a 1-person household or 21% of AMI. Households requiring emergency rental assistance may be at greater risk of experiencing homelessness if they cannot sustain ongoing rent and utility payments. The majority of these households were assisted due to one-time Covid-related funding that ended in June 2022. Currently, the CoC's Coordinated Entry can only refer households to one program that offers rental assistance: the City of Canton's ESG program that provides about \$72,800 annually.

Stark Metro Housing Authority's Housing Choice Voucher waiting list includes 1,793 applicants. Of these, 85% are extremely low-income households at 0-30% AMI. With only 75 vouchers in the program, waiting list households will wait years to receive a voucher. These 1,793 households are at risk for homelessness.

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

Stark County sheltered 59 adults and 44 children who were escaping domestic violence from January through December 2021. There were 52 adult females and 6 adult males. Children aged 12 and younger

numbered 38. The majority were White (61 individuals/59%) followed by 26 (25%) who were Black/African American and 5 (4.9%) Hispanic individuals. There were 34 disabled individuals.

From January through June of 2022, 34 adults and 26 children were sheltered. There were 41 adult females and 19 adult males. Of the children, 25 were 12 years of age or younger. A total of 25 of the individuals were disabled. There were 35 (58%) White individuals and 21 (35%) were Black/African American with one Hispanic (1.7%).

The Domestic Violence Project, Inc. (DVPI) provided emergency shelter to 75 adults and 31 children during calendar year 2021. Fifty percent were White, 44% were Black/African American, and the race/ethnicity of 15 individuals was unknown. During the first six months of 2022, the number of adults and children who received emergency shelter from DVPI surged. A total of 127 adults and 56 children were assisted, equivalent to an overall increase of 73% in only six months. Of these, 49% were White and 38% were Black/African American. Furthermore, DVPI tracked 588 persons fleeing domestic violence from January-June 2022 whose shelter needs could not be met, an unduplicated number. These persons and families would be at risk for homelessness.

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

Those at greatest risk of housing instability include 2,730 renter households at 0-30% AMI and the 735 renters at 31-50% AMI who are severely cost-burdened (i.e., paying more than 50% of their income on housing costs). This represents 22% of all renter households in Canton.

According to HMIS data, 973 people were assisted by an emergency shelter during the period January 1, 2021 through December 31, 2021; of these 313 or 32.2% were Black/African American. During the same period, 557 people were receiving rapid rehousing assistance; of these, 36.6% were Black/African American, highlighting that this segment of the population is disproportionately represented among people experiencing homelessness. Three percent were Hispanic. Of households that exited Rapid Rehousing programs, 35.7% of adult leavers had no cash income, putting these households at greater risk of returning to homelessness if unable to support ongoing rent payments.

From January 1, 2021 through June 30, 2022, 879 households exited to temporary destinations and 99 households exited to unknown destinations. Households receiving temporary assistance and those exiting to temporary destinations are more likely to return to homelessness or face a greater risk of housing instability than those exiting to permanent destinations.

Section 2: Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

Stark Metropolitan Housing Authority (SMHA) owns and manages 1,720 public housing units throughout the county. Of those, 1,106 units are in the greater Canton area. SMHA also administers 75 Housing Choice Vouchers. The Authority received an additional 61 Emergency Housing Vouchers during Covid, all of which have been issued.

In Table 1, the Stark County CoC housing inventory includes 244 emergency shelter beds (100% occupancy rate), including 23 motel beds for overflow. There are 8 Safe Haven beds (100% occupancy), 568 Permanent Supportive Housing beds (90.32%), 160 Rapid Rehousing beds (100%), and 3 Other Permanent Housing beds (100%). There are 75 beds for survivors of domestic violence. DV transitional housing provides 26 of those beds and is the only provider of transitional housing in the county.

Section 3: Describe the unmet housing and service needs of qualifying populations:

1. Homeless as defined in 24 CFR 91.5

HMIS indicated 2,315 individuals were served by the homeless system during the period from January 1, 2021-June 30, 2022. According to the 2022 HIC, Stark County has 568 Permanent Supportive Housing beds, 244 emergency shelter beds, 26 Transitional Housing beds and 8 Safe Haven beds. This includes 253 year-round beds and 23 overflow beds (consisting of hotel rooms covered by an outside agency, such as Child and Protective Services). With a length of stay (in emergency shelters and transitional housing beds, primarily) averaging several months, the available inventory is insufficient to meet the needs of the population experiencing homelessness.

The resounding comment heard from stakeholders was the same overwhelming need: affordable rental housing. Subsidized units fill quickly and experience very little turnover with long waiting lists for affordable housing and permanent supportive housing. Many permanent supportive housing providers rely on scattered site privately owned units, and many tenants are refused by landlords who are no longer willing to accept rental assistance or have tenant selection policies that act as barriers for special needs populations.

According to stakeholders, more case management and wrap-around supportive services are needed to assist in stabilizing tenants and decreasing individuals' chances of returning to homelessness. Stakeholders indicated that people who are single, have a disability, and are Black/African American are disproportionately represented in the homelessness system.

2. At Risk of Homelessness as defined in 24 CFR 91.5

According to 2014-2018 CHAS data, there is a gap of 4,785 rental units affordable to 0-30% AMI households and a gap of 1,970 units affordable to 31-50% AMI households in Canton. This indicates that the supply of affordable housing is insufficient for households earning 0-30% AMI and those earning 30-50% AMI.

Looking more closely at cost-burdened households reveals specific trends about the QP households at greatest risk for homelessness.

In Canton there are 5,400 renter households at 0-30% AMI. Of these, two-thirds (66.8%) are cost burdened and pay more than 30% of their income on housing costs. More notably, 2,730 of the 5,400 households are severely cost-burdened and pay more than 50%. Among the 3,485 households at 31-50% AMI, the rate of cost burden is higher still at 68%. Typically, rates of cost burden decline as income rises; however, this is not the case in Canton. By comparison, the rate of severe cost burden does decline for 31-50% AMI households. All these cost-burdened households are at risk of homelessness but the risk is much higher among the severely cost-burdened.

Table 4. Cost Burden Among Lower Income Renters

	Total		Cost burdened		Severely Cost burdened	
	#	%	#	%	#	%
Total Renters	15,905	100.0%	7,100	44.6%	3,525	22.2%
Very Low-Income Renters (0-50% AMI)	8,885	55.9%	5,975	67.2%	3,465	39.0%
30-50% AMI	3,485	21.9%	2,370	68.0%	735	21.1%
0-30% AMI	5,400	34.0%	3,605	66.8%	2,730	50.6%

Data source: 2014-2018 CHAS data

Stakeholders reported that TBRA is useful with landlords working through the YWCA of Canton when a community health worker is assigned to provide social service needs to tenants. Otherwise, more available and affordable housing units are needed to take full advantage of existing rental assistance programs.

According to the SMHA reports for northeast, northwest, southeast, and southwest Canton, there were 16,424 households on the public housing waitlist as of May 25, 2022. Of those households, 14,038 (85.5%) were extremely low-income. There were 3,355 (20%) disabled, 310 (1.9%) veterans, and 732 (4.5%) victims of domestic violence identified. Most households, 11,653 or 71%, were headed by females. The households were split mostly between White (7,748 or 47%) and Black/African American (6,901 or 42%) with 726 (4.4%) Hispanic households.

SMHA maintains four separate waiting lists for the four quadrants of the city, and there are most likely many duplicate applicants on each list. (SMHA's system does not allow it to provide an unduplicated number.) However, considering the extremely high number of applicants, there is a high probability that households waiting for public housing may be doubled-up in units occupied by other households. ACS data for 2020 provides the number of housing units that are overcrowded (more than 1.00 person per room) and severely overcrowded (more than 1.50 persons per room). In Canton, 2% of all occupied rental units were overcrowded (323 units) and 0.2% were severely overcrowded (31 units). Among 0-50% AMI households, CHAS identified 160 units households as living in overcrowded conditions. For Stark County as a whole, 0.3% of all renter households (133) were overcrowded and 0.8% (397) were severely overcrowded.

Poor credit history and a criminal record in the past 10 years have been identified as barriers for households accessing affordable households. Rental assistance and legal services for eviction prevention were identified as needed services to retain tenancies and prevent poor rental history from becoming a barrier for future tenancies.

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

According to the APR from January 1, 2021 to June 30, 2022, 1,092 households had a history of domestic violence. Of those, 243 were actively fleeing domestic violence. According to the 2022 HIC, only 49 shelter beds were dedicated for survivors of domestic violence. Transitional housing has been identified

as a successful model for individuals fleeing domestic violence and human trafficking, particularly when finding permanent affordable housing is difficult.

The Domestic Violence Project, Inc. (DVPI) tracked 588 persons (unduplicated) fleeing domestic violence from January-June 2022 whose shelter needs could not be met.

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

According to HMIS, during the period January 1, 2021-June 30, 2022, 2,315 households exited the homeless system. Of these, 978 (42%) exited to temporary living situations, including transitional housing and temporarily staying with friends or family, or unknown destinations. Households without permanent housing may be more likely to experience returns to homelessness. Even among households exiting to permanent destinations, 25.6% exited to rentals without ongoing subsidy. Together, these suggest a need for both affordable housing units, as well as tenant-based rental assistance to support extremely low, and low-income households.

Stakeholders identified criminal background checks as a barrier to rental housing. Many landlords who were previously only going back 3-5 years on criminal background checks are now going back 5-10 years due to the fear of nonpayment after the Covid-19 eviction moratoria. Additionally, poor or no credit scores and rental histories are barriers. Stakeholders indicated 1,157 unique households were housed in a shelter since Covid-19 began. Many households were housed more than once bringing the total households served to 5,383. There is also a need to have landlord education and training programs to keep them informed of program guidelines and help them feel comfortable renting to disadvantaged households.

Stakeholders reported that Rapid Rehousing households without ongoing supportive services and employment are more likely to return to homelessness. Services such as case management, financial literacy, budgeting, basic life skills, workforce development and training, childcare and transportation, when provided beyond the time limitations of housing and/or rental assistance, are needed to promote stability and prevent returns to homelessness.

Veterans: There are a total of 71 beds available for veterans according to the 2022 HIC. During the period from January 1, 2021 to June 30, 2022, 31 chronically homeless veterans and 120 non-chronically homeless veterans were housed through the CoC. Of the 151 veterans, only 31.8% exited to a positive destination while 22.5% exited to temporary housing. Veterans often face additional, compounding barriers that may include mental health and/or substance abuse disorders, lack of income or rental history, or criminal history.

Persons with Disabilities: From January 1, 2021 to June 30, 2022, there were 3,601 instances of a mental health disorder or developmental or physical disability were reported among persons assisted. While many individuals experience more than one condition concurrently, it is evident people with disabilities are a significant portion of those experiencing homelessness. Furthermore, for people with disabilities, accessible housing is a continuing and critical need, ranging from individuals in wheelchairs to medical beds and in-home healthcare services in order to maintain housing stability. Overall, there is a need for permanent housing that can accommodate persons with disabilities. This typically includes a bathroom equipped with grab bars, installation of handrails, walk-in showers and tubs, along with accessible doors

and cabinets. Medical respite care was identified as a need for individuals discharged from hospital settings. Other needs of this population to maintain housing stability are the same as everyone else: access to employment and accessible public transportation.

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

According to OH 2-1-1 Counts, 11,200 requests were made for housing and shelter assistance between January 2021 and June 2022 in Stark County. This was the top request at 30.1%. Over 57.2% of these requests were made for rental assistance. While most requests were adequately met, 10% of rental assistance requests could not be met. Rates for unmet requests were high for those seeking temporary housing solutions through shelter (7%) and home repair or maintenance needs for low-income homeowners (20%). Home repair/ maintenance includes adaptations for safety and disability access, general upkeep, and weatherization. This indicates an unmet need for supportive services and reinforces stakeholder comments indicating a lack of affordable and accessible housing options.

The Stark County Annual Performance Reports (APR) from January 1, 2021 to June 30, 2022, reported a total of 2,315 households staying at least one night in emergency shelter, permanent supportive housing, permanent housing, rapid re-housing, or on the street.

Table 5. Exits from the Homeless Service System

	% Positive Destinations	# Positive Destinations	Total Households Exited
<i>By Household type</i>			
Adult-only Households	48.4%	620	1,281
Households with Children	62.4%	643	1,031
Child-only Households	100%	3	3
<i>By Pathway</i>			
ES	54.1%	726	1,343
PSH + PH	43.5%	148	340
RRH	56.7%	304	536
Street Outreach	91.7%	88	96
All Households	54.7%	1,266	2,315

Nearly 55% of households exiting the homeless system exited to positive housing destinations. This suggests that there is an overall lack of permanent housing resources for all household types that entered the homeless system, especially for those who were able to access only emergency shelter or rapid re-housing resources.

Stakeholders indicated the need for more affordable one- to three-bedroom units. There is also a need to build housing distributed throughout Stark County rather than a large multi-family building in Canton. There is a great need for affordable housing in Canton, but stakeholders discussed how multi-family living in the city is not for everyone and there is a need throughout the rest of Stark County. Stakeholders also indicated the need for more employment, case management, and counseling.

The 2014-2018 CHAS Data identified 3,710 renter households in Canton with income below 30% AMI who are at risk of homelessness. There are 2,450 renter households between 31-50% AMI, thus there is a total 4,785 unit-gap in housing in units both affordable and available. This suggests that households are experiencing cost burden and severe cost burden by occupying units that are not affordable to them, putting them at greater risk of housing stability and homelessness.

6. Identify priority needs for qualifying populations:

Based on stakeholder consultations and data analysis, the following priority needs among Qualifying Populations emerged from the planning process:

- Rental housing that is affordable and accessible to individuals and households at 0-30% AMI
- An adequate inventory of deeply subsidized housing for Qualifying Populations. Very low rental vacancy rates and escalating rents make it difficult for them to find units they can afford and remain stably housed.
- Emergency shelter beds and transitional housing for the rising numbers of persons experiencing or fleeing from domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Increased investment in supportive services to assist the QPs

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

In addition to feedback from stakeholders, the following data sources were consulted to determine the needs and system gaps for HOME-ARP qualifying populations:

- American Community Survey (ACS), 2016-2020
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018
- Canton, Massillon, Alliance/Stark County CoC 2022 Point-In-Time Count
- Canton, Massillon, Alliance/Stark County CoC 2022 Housing Inventory County (HIC)
- Canton, Massillon, Alliance/Stark County CoC 2022 HDX Competition Report
- Stark County Coordinated Entry System (CES)
- Stark County CoC Annual Performance Reports (APR)
- 2021 System Performance Measures
- United Way of Greater Stark County's 2-1-1 Counts
- Alliance Area Domestic Violence data for January 2021-June 2022
- Stark Metro Housing Authority
- Domestic Violence Project, Inc.

HOME-ARP Activities

Section 1: Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Canton will issue a Request for Proposals (RFP) from developers, service providers, and/or subrecipient organizations to develop new rental housing units. The RFP will, at a minimum, specify eligible applicants, eligible activities, minimum and maximum funding amounts, application thresholds, and underwriting criteria, and will provide instructions on how to submit an application for funding. The RFP will include bonus points for proposed projects that will leverage other resources, such as project-based rental assistance, and other state and federal funding.

Applications may be evaluated according to criteria such as organizational or developer experience, capacity, demonstrated effective grant management experience, services offered, housing need, project readiness, and leveraged resources, among other factors. The RFP process will be finalized once HUD approves the city's Allocation Plan.

2. Describe whether the PJ will administer eligible activities directly:

Canton will not directly administer HOME-ARP activities beyond program administration and planning.

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

No HOME-ARP administrative funds have been provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

Table 6. Use of HOME-ARP Funding

Table 6	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 309,846		
Acquisition and Development of Non-Congregate Shelters			
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$1,754,327		
Non-Profit Operating	\$ 64,336	2.5 %	5%
Non-Profit Capacity Building	\$ 64,336	2.5%	5%
Administration and Planning	\$ 380,623	14.79 %	15%
Total HOME ARP Allocation	\$ 2,573,468		

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

The HOME-ARP budget was driven by the following priority needs identified as a result of stakeholder consultation and data analysis:

- Rental housing that is affordable and accessible to individuals and households at 0-30% AMI
- An adequate inventory of deeply subsidized housing for Qualifying Populations. Very low rental vacancy rates and escalating rents make it difficult for them to find units they can afford and remain stably housed.
- Emergency shelter beds and transitional housing for the rising numbers of persons experiencing or fleeing from domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Increased investment in supportive services to assist the QPs

Three of the four priority needs indicate strong demand for more affordable rental units. And because the Stark County CoC includes all Qualifying Populations, then all QPs will have access to the HOME-ARP-funded units. Canton will allocate 68% of its HOME-ARP grant to the development of affordable rental housing and 12% to supportive services. The city will make available up to 2.5% of its HOME-ARP budget to the capacity building needs and another 2.5% to the operating expenses of nonprofit organizations that are awarded HOME-ARP funds for other eligible HOME-ARP activities. The remaining 14.79% of the grant will be allocated to program administration.

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

The priority needs in Canton were selected based on the following data and stakeholder comments:

- Rental housing that is affordable and accessible to individuals and households at 0-30% AMI
 - Subsidized units fill quickly and experience very little turnover with long waiting lists for affordable housing and permanent supportive housing. Many permanent supportive housing providers rely on scattered site privately owned units, and many tenants are refused by landlords who are no longer willing to accept rental assistance or have tenant selection policies that act as barriers for special needs populations.
- An adequate inventory of deeply subsidized housing for Qualifying Populations. Very low rental vacancy rates and escalating rents make it difficult for them to find units they can afford and remain stably housed.
 - In Canton, 51% of the 5,400 renter households at 0-30% AMI are severely cost-burdened and pay more than 50% of their income on housing. Among the 3,485 households at 31-50% AMI, 68% are severely cost-burdened
 - More than 85% of the 16,424 households on the waitlist for public housing are 0-30% AMI households. (This list may include duplicates based on the regional waitlists maintained by SMHA.)
- Emergency shelter beds and transitional housing for the rising numbers of persons experiencing or fleeing from domestic violence, dating violence, sexual assault, stalking, or human trafficking
 - According to the APR from January 1, 2021 to June 30, 2022, there were 243 persons actively fleeing domestic violence. According to the 2022 HIC, only 49 shelter beds were dedicated for survivors of domestic violence.
- Increased investment in supportive services to assist the QPs

- Across all Qualifying Populations, stakeholders emphasized the need for supportive services to assist in keeping the Qualifying Populations stably housed.

HOME-ARP Production Housing Goals

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

Canton proposes to develop 6-7 affordable rental units at a per-unit development cost of \$225,000.

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

Canton estimates the development of 6-7 affordable rental housing units for Qualifying Populations to address the priority needs as outlined in the plan. The city will work with developers and local non-profit entities to acquire, rehabilitate and/or construct new affordable rental units. The city may work with Stark Metro Housing Authority to secure project-based vouchers in addition to potentially utilizing HOME TBRA to ensure units are financially sustainable throughout the minimum compliance period.

Preferences

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

Canton will provide access to all Qualifying Populations and will prioritize homeless individuals and families.

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

The preference method will follow the Homeless Continuum of Care of Stark County's (HCCSC or CoC) guidelines adopted by the governing board. This will include adjustments needed to the definitions of the Qualified Populations outlined for the HOME-ARP funding. Preferences will be followed once eligibility is determined. Eligibility is determined using the Full-Service Prioritization and Decision Assistance Tool and using HUD's definitions of homelessness. The preference guidelines are included below.

Households Prioritized for Permanent Supportive Housing

1. Chronically Homeless Individuals and Families with the Longest History of Homelessness and with Severe Service Needs
2. Homeless Individuals and Families with a Disability and with Long Periods of Episodic Homelessness and Severe Service Needs
3. Homeless individuals or heads of household (in the case of families), as defined in 24 CFR 578.3, who are eligible for CoC Program-funded PSH and who have severe service needs. In the case of individuals or heads of households with equally severe service needs, those with the longest cumulative length of documented homelessness during the last three years will receive priority.
4. Homeless individuals and heads of households (in the case of families) who are:
 - a. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project, where, before residing in the transitional housing, they had lived in a place not meant for human habitation, in an emergency shelter, or in a safe have; or
 - b. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project if they were fleeing or attempting to flee domestic violence before residing in the transitional housing even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven before entering the transitional housing.

Households Eligible for Rapid Rehousing

1. Households with minor children will be prioritized before households without minor children
2. Among both households with minor children and other households, chronically homeless individuals and families will be prioritized for RRH before those who are not chronically homeless.
3. Among both the chronically homeless and those who are not chronically homeless, households with higher SPDAT scores will be prioritized for RRH before those with lower scores
4. Among households with equal SPDAT scores, households with veterans will be prioritized for RRH before households without veterans

Households Prioritized for Housing Help Supports

1. Households who are literally homeless whose assessment indicates a lower-level need of need than rapid rehousing assistance

Households Prioritized for other Homelessness Assistance including Homelessness Prevention

1. Prioritization of Head of Households who are eligible for Projects for Assistance in Transition from Homelessness (PATH) will be prioritized for services before households that and not eligible for PATH
2. Households with at least one minor child or, a woman who is pregnant with the head of household under the age of 24 will be prioritized before households that do not have minor children with a head of household under the age of 24
3. All others

Referral Methods

1. Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJs may use multiple referral methods in their HOME-ARP program.

(Optional):

Direct referral procedures are led by the CoC's Coordinated Entry System (CES) staff during weekly "By Names" prioritization list meetings which all providers are expected to attend. At these meetings, an inventory of vacancies will be reported by each housing provider and direct referrals will be provided by CES staff as the group reviews the prioritization list of persons eligible for a housing referral. CES staff verify that actions taken in between the weekly meetings by housing providers adhere to the Coordinated Entry policies and procedures. Case conferencing will also be conducted for any households facing significant barriers to being housed. Anyone being placed into a referred unit must be verified and approved at the By-Names list meeting or, if an eligible household is being entered into a project between meeting dates, via CES directly.

Households being referred for housing will have the opportunity to express their preference to be housed in one or more areas of Stark County. In offering people housing, the CES staff and participating housing projects will honor expressed preferences to the best of their ability. However, people will be classified as "inactive" and removed from the prioritization list in the event they have refused two project placements.

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

All populations will be covered by the CoC's coordinated entry system process as outlined above.

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

The only referral method for a HOME-ARP project or activity will be the CoC's coordinated entry system.

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

The only referral method for a project or activity will be the CoC's coordinated entry system.

Limitations in a HOME-ARP Rental Housing or NCS Project

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

Canton will not include any limitations for eligibility for its HOME-ARP activity.

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

Not applicable.

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

Not applicable.

Appendix A: Stakeholder Consultation Materials

Appendix B: Public Participation Materials

[to be inserted upon completion of 15-day public comment period and public hearing]