



City of Springfield, Ohio  
Community Development Department

**2016 Action Plan**  
For The  
**2015-2019 Consolidated Plan**

Prepared by:  
The Community Development Department  
76 East High Street  
Springfield, Ohio 45502

Prepared for:  
The Department of Housing and Urban Development  
February-March 2016

**City of Springfield  
2015-2019 Consolidated Plan  
2016 Action Plan**

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CITY OF SPRINGFIELD  
2016 ACTION PLAN

PUBLIC MEETING

THURSDAY, FEBRUARY 25, 2016 AT 5:30 p.m.  
CITY HALL FORUM

**AGENDA**

1. Overview of Proposed 2016 Action Plan Projects and Activities

Community Development Block Grant Program  
HOME Program  
Emergency Solutions Grant Program

2. Submission Timeframe and Comment Period

3. Questions and Comments

**Estimated FY 2016 CDBG Budget**

	2015 Budget	2016 Estimated	Projected Percent of Available 2016 Funding
Entitlement Funding	\$1,609,667	\$1,609,667	
Program Income			
Reimbursements from other programs	\$90,000	\$90,000	
RLF Reimbursements	\$375,000	\$375,000	
Total Administrative Planning Funds	\$2,074,667	\$2,074,667	
Administrative Allowance	\$414,933	\$414,933	
<b>Total Available Program Funding</b>	<b>\$1,659,734</b>	<b>\$1,659,734</b>	
General Program Administration	\$338,241	\$349,596	17%
Neighborhood Enhancement (P.S.)	\$316,434	\$260,849	13%
Code Enforcement	\$645,728	\$582,354	28%
Rehabilitation (includes RLF)	\$469,219	\$603,971	29%
Economic Development - SBDC/Minority Business (includes RLF)	\$557,689	\$480,970	23%
Total Revenue	\$2,074,667	\$2,074,667	100%
Total Expenditures	\$2,327,311	\$2,277,741	110%
Expenditures/Revenue	(\$252,644)	(\$203,074)	-10%

**Estimated FY 2016 Emergency Solutions Grant Budget**

	2015 Budget	2016 Estimated Budget	Projected Percent of Available 2016 Funding
Entitlement Funding	\$142,271	\$142,271	
Shelter Operations			
Project Woman - operations and maintenance	\$26,200	\$26,200	18%
IHN- operations for Norm's Place and Hartley House	\$41,732	\$41,732	29%
<b>Total</b>	<b>\$67,932</b>	<b>\$67,932</b>	<b>48%</b>
Street Outreach - IHN	\$6,479	\$6,479	5%
Homeless Prevention	\$0	\$0	0%
Rapid Re-Housing	\$48,860	\$48,860	34%
HMIS	\$10,000	\$10,000	7%
Administration	\$9,000	\$9,000	6%
Total Revenue	\$142,271	\$142,271	100%
Total Expenditures	\$142,271	\$142,271	100%
Expenditures/Revenue	\$0	\$0	0%

**Estimated FY 2016 HOME Budget**

	2015 Budget	2016 Estimated Budget	Projected Percent of Available 2016 Funding
Entitlement Funding	\$356,538	\$356,538	
Total Administrative Planning Funds	\$35,653	\$35,653	10%
CHDO Set-Aside	\$53,480	\$53,480	15%
CHDO Operations	\$17,826	\$17,826	5%
Dollars Available for Housing Projects	\$249,579	\$249,579	70%
HOME Loan Program	\$52,279	\$52,279	15%
Tenant Based Rental Assistance	\$45,000	\$50,000	14%
Private/Non-profit Development Assistance	\$100,000	\$100,000	28%
Transitional to Permanent Housing	\$17,800	\$12,800	4%
Rental Incentive Program	\$34,500	\$34,500	10%
<hr/>			
Total Revenue	\$356,538	\$356,538	100%
Total Expenditures	\$356,538	\$356,538	100%
Expenditures/Revenue	\$0	\$0	0%

**2015-2019 CONSOLIDATED PLAN  
2016 ACTION PLAN APPLICATION SCHEDULE**

2/8/2016

Approx. Dates

\*\*\*\*\* 2015 \*\*\*\*\*

**Tue/Wed Nov 17/18**            City Commission Budget Meeting

**Thu Dec 10**                    CGAB Meeting – Budget review (IF Budget Amount is Released)

\*\*\*\*\* 2016 \*\*\*\*\*

**Thurs Feb 11**                CGAB Meeting – Budget review of projected numbers and process discussion

**Monday Feb 16**            *HUD Allocation Announcement*

**Thu Feb 18**                Notice of Public Meeting in News-Sun

**Thu Feb 25**                30 Day Comment Period Ad in News-Sun

**Thu Feb 25**                **Public Meeting** to Review 2016 Action Plan 5:30 - 7:00 pm. in the CH Forum

**Fri Feb 26**                Start of 30-day comment period for Consolidated Plan Action Plan

**Thurs March 11**            CGAB Meeting Action Plan Budget Review with actual numbers

**Monday March 28**        End of 30 Day Comment Period

**Tues March 29**            City Commission Ordinance for application submission

**April 01**                    Start of 2016 Program Year (Public Participation requirement fulfilled in order to incur pre-award costs per **CPD-16-01 Section IV a – Development of Proposed Action Plans and Section V. Pre-Award Costs**)

**60 Days After Allocation Release – April 16 (Section I Revised Submission Dates)**  
*Submit 2016 Annual Action Plan to HUD.*

## Executive Summary

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

#### 1. Introduction

The City of Springfield Community Development Department is the lead agency responsible for preparing the Consolidated Plan and Action Plan. As an Entitlement City, the City of Springfield administers Community Development Block Grant (CDBG) program, HOME Investment Partnership program and the Emergency Solutions Grant (ESG) funding from the US Department of Housing and Urban Development (HUD). The City also administers several HUD grants that are not specifically addressed in this Consolidated Plan, but will be considered a part of the City's overall strategies to address housing and Community Development issues within the City, including three Permanent Supportive Housing grants through the Homeless Assistance Grants process and a Lead Safe Springfield. The City also continues to manage the grant funds and program income remaining from the Neighborhood Stabilization Program 1 and 2 grants.

According to HUD "the Consolidated Plan is designed to help state and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process services as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the four CPD formula block grant programs: the Community Development Block Grant (CDBG), the HOME Investment Partnership (HOME), the Emergency Solutions Grant (ESG) program, and the Housing Opportunities for Persons with AIDS (HOPWA) program." Currently, the City of Springfield only receives and administers CDBG, HOME and ESG funding.

Consistent with HUD's mission, the City works to increase homeownership, support community development and increase access to affordable housing free from discrimination. In undertaking this work, the City will embrace high standards of ethics, management and accountability and will continue to form new partnerships that leverage resources and improve HUD's ability to be effective on the community level. The City strives to continue to create a city of growth and opportunity for all by making Springfield's neighborhoods better places to work, live and play. For information on specific targeted areas please refer to the Strategic Plan section SP10. Section SP25 Priority Needs describes the highest needs of the community as determined by City of Springfield staff, its partners and community stakeholders. For more details on the annual objective and goals, please refer to the Action Plan section AP20 Annual Goals and Objectives.

## 2. Summarize the objectives and outcomes identified in the Plan

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

The City of Springfield's population has continued to decline since 2000. Between 2000 and 2013, the population has declined 9.2%, a decrease of 6,028 residents. Projections show that since 1990, Springfield has experienced roughly a one-quarter decrease in population. This declining trend in population contributes to the continuing rise in vacant housing units. These factors under-gird many of the housing and economic problems the City will face over the next five years.

As an older city, Springfield contains several neighborhoods that face deteriorating infrastructure and facilities, aging housing stock, and economic establishments that may have become obsolete or marginally viable. As the regional economy continues to grow and housing costs continue to rise relative to incomes, a segment of the population faces increasingly challenging issues such as inadequate and unaffordable housing, poverty, deteriorating neighborhood conditions and quality of living, and limited access to services and facilities.

The purpose of the 2015-2019 Consolidated Plan (CP) is to guide specific federal funding decisions over the next five years. The CP is guided by three overarching objectives that are applied according to the community's needs. These HUD objectives and the City's projected outcomes over the 5-year CP years are:

1. To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing. (per year)
  - Assist 5 rental units designated for low to moderate income households through rehabilitation (HOME)
  - Add 1 to 2 homeowner housing units for low to moderate income households (HOME-NHP/Habitat)
  - Comprehensive Rehabilitation of 4 homeowner housing units for low to moderate income households (HOME)
  - Provide Emergency Repairs for 20 low to moderate income households (HOME)
  - Provide direct financial assistance to 1 low-income homebuyer (HOME-NHP)
  - Provide Tenant Based Rental Assistance to 9 low-income households (HOME)

2. To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low and moderate-income residents throughout the city, increased housing opportunities, and reinvestment in deteriorating neighborhoods.

- Provide crime prevention and neighborhood awareness assistance in CDBG target areas
- Assist 300 homeless persons through overnight shelters
- Provide a safer living environment and capacity building for CDBG target areas
- Provide enhanced Code Enforcement activities in the Code Enforcement Target areas.
- Provide opportunities for Neighborhood Clean Up Activities
- Provide coordination and outreach to neighborhood groups located within CDBG target area

3. To expand economic opportunities through an increased number of jobs that pay self-sufficient wages increased homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low and moderate-income persons to achieve self-sufficiency.

- Create and/or retain 4 low to moderate income jobs
- Assist 5 businesses (creation/expansion)

The three primary federal funding resources in the 2015-2019 Consolidated Plan are the following:

- Community Development Block Grant (CDBG)
- HOME Investment Partnership Program (HOME)
- Emergency Shelter Grant (ESG)

### **3. Evaluation of past performance**

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

The 2015-2019 Consolidated Plan will build upon the achievements and knowledge gained in previous years. The City has developed strong programs with CDBG, HOME, and ESG funds over the years and expects to continue the strong performance, while making slight adjustments to increase the efficiency of the programs and better serving the changing needs of the community.

The CDBG program will continue to offer projects similar to those offered in previous years. Housing Rehabilitation and Code Enforcement activities remain strong and effective projects in addressing community need. These and other projects will positively influence the Priority Needs identified within the 2015-2019 Consolidated Plan: 1.) Preservation of Existing Homes, 2.) Quality Affordable Housing Units, 3.) Fair Housing and Program Administration, 4.) Removal of Slum and Blight, 5.) Economic Development and Job Creation, 6.) Homeless Services, and 7.) Public Services.

The HOME program will continue projects to develop and expand decent affordable housing for all citizens. The City is working to refine its HOME programs. The changes made to the program improve and streamline this grant program.

The Springfield/Clark County Housing Collaborative, (the local Continuum of Care) continues to be a source of guidance on homeless program development. The HC provides guidance on grant funds distribution, activity selection, and performance measures. Although the City continues to work towards developing and expanding affordable housing, preventing and ending homelessness, and promoting neighborhood revitalization, there is still much work left to be done.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Citizen participation plays an integral role throughout the planning and development of the City's Annual Action plan each year. Throughout the planning process the Community Grant Advisory Board, made up of community stakeholders and other private citizens are updated and involved in this process. Additionally, Public meetings are held to gather input on the City's strategies for the use of CDBG, HOME and ESG funds.

The City of Springfield is engaged in ongoing efforts to increase coordination amongst the complex network of public, private, and non-profit organizations that deliver housing and social services to the community. As the administrator of Springfield's CDBG, HOME and ESG programs, the Community Development Department acts as a hub for community development in the community. Open lines of communication are maintained between the City and the area's many non-profit and social service agencies. A full listing of agencies and persons involved with this process is listed in the CP.

The Community Grant Advisory Board (CGAB) also played an integral part in the development of this plan and the programs it contains. This Action Plan budget and current projects and activities was presented and approved by CGAB on February 11, 2016. Any substantial changes and additions to the AP will be first brought to the CGAB. The final Action Plan will be forwarded on the City Commission for public comment, consideration and approval before submission.

A formal public meeting to present the Action Plan to the public was advertised in the Springfield News-Sun on February 18, 2016 and the public meeting was held on February 25, 2016. A summary notice of the Action Plan was published in the Springfield New-Sun and the required 30-day comment period started February 26, 2016 and ended March 28, 2016. Copies of the AP were made available for review at the Clark County Public Library, City Hall, SMHA, Jobs and Family Services, and Interfaith Hospitality Network.

Springfield City Commission will be asked to approve the submission of the Action Plan to the U.S. Department of Housing and Urban Development (HUD) prior to submission. In accordance with CDP Notice 16-01, the Citizens Participation will include a listing of all potential projects and a preliminary budget. Because exact funding was not known at the time of public comment, budgets were presented in both real dollar amounts and as percentages of the 2016 Available Funding.

The City of Springfield is an active member in the Springfield Clark County Housing Collaborative (CoC). The Community Development Director has been affirmed the Collaborative Champion, raising the issues of homelessness to a higher and more coordinated level between local agencies. Community Development staff also participates on the HC Advisory Board and several other working committees for the CoC. The CoC work with the City to adopt ESG guidance and policy.

In addition to coordinating with various outside entities, the City also coordinates grant activities between and among several city departments, including: Community Development, Planning and Zoning, Housing Rehab, Lead Safe Springfield, Finance, Code Enforcement, Service, Building Inspections, and Engineering, among others.

#### **5. Summary of public comments**

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

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

#### **7. Summary**

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	SPRINGFIELD	
CDBG Administrator	SPRINGFIELD	Community Development Department
HOPWA Administrator		
HOME Administrator	SPRINGFIELD	Community Development Department
ESG Administrator	SPRINGFIELD	Community Development Department
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Springfield Community Development Department serves as the lead agency for the CDBG, HOME and ESG programs as well as several other HUD grants including Neighborhood Stabilization Program (1 and 2), Continuum of Care Homeless Assistance grants and the Lead Based Paint Hazard Control Grant.

During the preparation of the plan, the City solicited input from other governmental agencies as well as various public and private agencies providing housing, social services and other community development activities within the community.

The City will continue to form new partnerships with non-profit organizations, the private sector and other local resources. Other community agencies partner with the City on programs covered by the CP, including Springfield Metropolitan Housing Authority, Neighborhood Housing Partnership, Interfaith Hospitality Network, Project Woman, McKinley Hall, St. Vincent DePaul Society, Springfield Police Division, Springfield Small Business Development Center, The Fuller Center for Housing (formerly known as Clark County Community Habitat for Humanity) and Springfield Promise Neighborhoods.

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

### **1. Introduction**

As in past years, the City was determined to encourage a high level of agency consultation in an effort to best identify priority needs. This process ensures the participation of nonprofit organizations and private citizens along with public agencies in a collaborative effort. Ongoing budget cuts often make accepting comments to expand programming more difficult because the federal grants can only be stretched so far. Often consultation leads to expectations and requests which far exceed the City's Entitlement funds. The City, in consultation with our local partners, prioritize the community's needs and must weigh the City's ability to make an impact with the funds being requested. Stretching the funds too far can lessen the impact felt in the community and reflected in the overall accomplishments reported.

Still, the City has worked very hard to become a partner in working in the community and not just another source of funds.

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

The City is an active member of the Springfield Clark County Housing Collaborative (CoC), the local entity that brings together homeless housing providers, other agencies such as mental health services, Clark County Combined Health District, and various social service agencies that serve populations at risk of becoming homeless, or who utilize assisted housing also participate in the CoC. The CoC provides guidance and direction for agencies working with homeless client populations, federal regulations surrounding homeless grants, fair housing, and best practices for social service provision. An Advisory Board on which the City's Development Programs Administrator sits leads the local CoC. The Community Development Director also acts as the Collaborative Champion. The Collaborative provides input and guidance for the three Permanent Supportive Housing (Shelter Plus Care) grants the City administers as well as the ESG Entitlement funds. The City works with Interfaith Hospitality Network, Project Woman and McKinley Hall for the allocation of funds for the ESG program. Permanent Supportive Housing collaboration also includes the same three aforementioned entities as well as Development Disabilities and Mental Health Services.

Input and coordination is also sought from the Community Grant Advisory Board (CGAB). This is a City assigned Board that makes recommendation to the City Commission on the issue of Entitlements funds

and Entitlement project selection. CGAB is made up of representatives of the schools systems, realtors, neighborhood associations, local housing providers, social service providers and a representative of the homeless community. In administering the entitlement funds, the City works with a number of different entities. The City partners with Springfield Metropolitan Housing Authority, the Mental Health Recovery Board, Neighborhood Housing Partnership, OIC and Habitat for Humanity on various housing projects. CDBG collaboration is also sought with the City's Police Division, neighborhood associations, Promise Neighborhood Small Business Development Corporation, Wittenberg University and other Community Development Divisions.

**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 efforts of the Springfield Clark County Housing Collaborative (HC-CoC) are not limited to helping homeless individuals and families find adequate affordable housing, but also include outreach aimed at addressing the root causes of homelessness in the community. Working together with housing agencies and social service providers helps the HC attack the problem of homelessness on two fronts.

The City uses federal funding resources to reach as many homeless persons as possible. The City funds community emergency shelters with operational funds to provide temporary shelter for the homeless (DV, Substance Abuse, Family, Men, etc). ESG funds are also dedicated to Rapid Re-Housing activities for families that are homeless. Additionally the City coordinates with area social service providers to support rental assistance for special needs clients (DV, Substance Abuse, Mental Health, Developmental Disabilities) with HOME TBRA and Permanent Supportive Housing Funds. This collaboration allows service providers to work with clients that in stable housing, eliminating the need to secure a decent and affordable living space before other service needs are met. This collaboration allows Springfield to address both housing and social needs of its homeless population. The City gives priority to the chronically homeless population within the three PSH grants.

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

The City works in consultation with the Springfield Clark County Housing Collaborative (HC-CoC) to establish Emergency Solutions Grant funding priorities, performance standards and policies and procedures. The HC is a funded member of the Ohio Balance of State. Policies and Procedures and Performance Measures are often taken directly from the state via COHHIO, which the City then adopts for consistency. City staff sits on the Advisory Board for the local HC and actively participates in the Plan

to End Chronic Homelessness. See the Program Specific Requirements - Emergency Solutions Grant Section of the CP and Annual Action Plan for further details.

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

Table 2 – Agencies, groups, organizations who participated

1	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>NEIGHBORHOOD HOUSING PARTNERSHIP OF GREATER SPRINGFIELD</p> <p>Housing Services-Education</p> <p>Housing Need Assessment</p> <p>NHP is the City's CHDO and the recognized Home Buyer Counseling Agency in the community. NHP and the City have a very long history of working together utilizing HOME, CDBG and NSP funds.</p>
2	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Springfield Metropolitan Housing Authority</p> <p>Housing PHA Services - Housing</p> <p>Housing Need Assessment</p> <p>Public Housing Needs</p> <p>Homeless Needs - Chronically homeless</p> <p>Homeless Needs - Families with children</p> <p>Homelessness Needs - Veterans</p> <p>Homelessness Needs - Unaccompanied youth</p> <p>Homelessness Strategy</p>
3	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>SMHA was consulted as the Public Housing Authority and member of the local Continuum of Care.</p> <p>Clark County Habitat for Humanity</p> <p>Housing</p> <p>Housing Need Assessment</p>

	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Habitat (The Fuller Center) is the leading provider of affordable owner occupied housing within the city and has been an integral partner in the development of housing for the NSP 1 and 2 grants.</p>
4	<p><b>Agency/Group/Organization</b></p>	<p>Clark County</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Housing Other government - County</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Clark County Community Development has available to it the same kinds of federal grants as does the city, only through the State's Small Cities and Counties program. Coordination between city and county in addressing housing, poverty and other community needs is imperative.</p>
5	<p><b>Agency/Group/Organization</b></p>	<p>City of Springfield</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Employment Service-Fair Housing Other government - Local Planning organization Civic Leaders Grantee Department</p>

<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Public Housing Needs  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  Market Analysis  Economic Development  Anti-poverty Strategy  Lead-based Paint Strategy</p>
<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The City is the participating jurisdiction and grantee for the federal funds in this action plan.</p>
<p><b>6 Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p>	<p>United Way</p> <p>Housing  Services-Children  Services-Elderly Persons  Services-Persons with Disabilities  Services-Persons with HIV/AIDS  Services-Victims of Domestic Violence  Services-homeless  Services-Health  Services-Education  Services-Employment  Service-Fair Housing</p>

<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  Anti-poverty Strategy</p>
<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>As the providers of the local 211 system, United Way has up to date information on available community services and the existing need in the community.</p>
<p><b>7 Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p>	<p>Springfield Clark County Housing Collaborative</p> <p>Housing  PHA  Services - Housing  Services-Children  Services-Elderly Persons  Services-Persons with Disabilities  Services-Persons with HIV/AIDS  Services-Victims of Domestic Violence  Services-homeless  Services-Health  Services-Education  Services-Employment  Other government - Local</p>

	<p>What section of the Plan was addressed by Consultation?</p> <p>Housing Need Assessment  Public Housing Needs  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Market Analysis</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Members of the Housing Collaborative (local CoC) come from varied public, private and non-profit agencies surrounding the housing and service provision for homeless clients in Springfield and Clark County.</p>
<p>8 Agency/Group/Organization</p>	<p>Small Business Development Center, Inc.</p>
<p>Agency/Group/Organization Type</p>	<p>Services-Education  Services-Employment</p>
<p>What section of the Plan was addressed by Consultation?</p>	<p>Economic Development</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Local small business development center and partner in CDBG funding with the city.</p>

**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	Interfaith Hospitality Network	The Action Plan goals concerning the homeless and at-risk population and services are developed in conjunction with the local Continuum of Care and the planning process this group undertakes.
SMHA Annual Plan	Springfield Metropolitan Housing Authority	SMHA publishes their Action Plan each year. Activities include actions to be performed by SMHA to increase and improve the quality of affordable public housing in the community.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

The City of Springfield makes every effort to consult with as many concerned agencies and populations as is practical. Ongoing partnerships with many of the service providers and partners makes this goal more achievable.

## **AP-12 Participation – 91.105, 91.200(c)**

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

Citizen participation includes actively encouraging citizens, particularly the low and moderate-income population, to participate in the planning process for the five-year Consolidated Plan, the Annual Action Plan, the submission of Substantial Amendments and the development of the Consolidated Annual Performance Report (CAPER). All notices of public meetings relating to this process are published in the local newspaper at least seven days prior to the public meeting. Notices will also be posted electronically on the City of Springfield website at [www.ci.springfield.oh.us](http://www.ci.springfield.oh.us). Additionally, the City distributes copies of the Action Plan in various locations in the community.

All public meetings are held in locations convenient to residents, particularly those who are potential or actual beneficiaries. Meetings are held at a variety of times to provide maximum flexibility for an array of citizen schedules. Attention is given to ensure meeting times increase the probability of maximum citizen participation.

Citizen participation played a vital role in the needs assessment analysis and construction of the goals and priorities featured in the Consolidated Plan. Springfield has an extensive network of long-established community organizations. Consultation with these organizations was a vital part of the process. The Community Grant Advisory Board (CGAB) was utilized to assist in the development of programs and strategies for the Consolidated Plan/AP. The CGAB membership includes representative persons from minority, disability, and homeless agencies, and representatives from agencies that work with persons who are of very low income. Additionally, the CP and AP can be made available, upon request, in Spanish as the city maintains a Purchase Order with a local translator. All Public Hearings and Comment Periods are advertised in the Springfield News-Sun, the local newspaper of general circulation.

A formal public meeting to present the Action Plan to the public was advertised in the Springfield News-Sun on February 18, 2016 and the public meeting was held February 25, 2016. A summary notice of the Action Plan was published February 25, 2016 in the Springfield News-Sun and the required 30-day public comment period started February 26, 2016 and will end March 28, 2016. Copies of the Action Plan were available for

review at eight locations throughout the City. The locations include the Clark County Public Library (3 locations), Springfield Metropolitan Housing Authority, Jobs and Family Services and Interfaith Hospitality Network.

The Springfield City Commission will be asked to approve the submission of the Action Plan to the US Department of Housing and Urban Development (HUD) prior to submission.

A public comment period is required prior to submitting the five-year Consolidated Plan, Action Plan and CAPER and any substantial change to the Consolidated Plan or Action Plan. The public will have 30 days after publication to provide written comments to the City of Springfield Community Development Department regarding the Annual Action Plan. The publication in the local newspaper will include a brief summary of the contents of the Plans and will include a list of locations where copies of the entire proposed plan may be examined. The City will respond to any written correspondence received.

#### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-targeted/broad community	No one in attendance for the public meeting.	No comments were received.	N/A	
2	Newspaper Ad	Non-targeted/broad community		No comments were received.	N/A	
3	Internet Outreach	Non-targeted/broad community		No comments were received.	N/A	

Table 4 – Citizen Participation Outreach

## **Expected Resources**

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

#### **Introduction**

The Community Development Block Grant and HOME Programs have seen a steady decline in annual funding over the last several years with only slight positive adjustments occurring because of census data and changing demographics. The City is anticipating level CDBG and HOME funding for the upcoming annual plan and has based its planning process on a flat budget. CPD Notice 16-01 instructed entitlement grantees to hold off on submitting Annual Action Plans until actual entitlement amounts are known, the numbers used in the final submitted plan will be real.

02/25/2016 - Grant amounts for Entitlement Cities have not been released by HUD yet. The Public Meeting will be held 02/26/2016 and the Action Plan will go out for public comment the following day. The numbers presented in the Action Plan currently reflect a flat budget and expresses budgetary numbers in terms of both dollar amounts and poroportion of the entire grant for the year. Should the actual amounts differ significantly from the planned numbers, the City will follow its citizen participation process to communicate those changes as necessary.

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In general however, any funding adjustments will result in prorated adjustments to the projected budgets across the board unless otherwise stated in a Substantial Amendment to the Annual Action Plan. Additionally, once allocation amounts are released staff will work to update the budget numbers and will post an updated Action Plan to the City's website.

**Priority Table**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Narrative Description	
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$		Total: \$
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,632,411	375,000	762,439	2,769,850	While the City is carrying over prior year funding in 2014, this surplus amount will drop by about 50% after 2015 and drop dramatically to almost nothing by 2017.
						5,657,000	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	389,640	68,000	956,538	1,414,178	1,140,000	HOME generally carries 2 prior year's funding because of the 2 year commitment and 4/5 year expenditure rule.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	144,902	0	0	144,902	430,000	ESG contracts with sub-recipients run July 1 through June 30 each year. There is no real carry over of funds from one year to the next.

Table 5 - Expected Resources – Priority Table

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

### **matching requirements will be satisfied**

While CDBG Funds do not carry the requirement of specific matching mandates, the City encourages and prioritizes projects that leverage other funding. All internal projects and programs that have CDBG funds also carry some degree of local government general fund and other funds in the budget. Likewise, other agencies and programs funded with CDBG funds include private and other public funds to support the activities funded through the project. Staff makes all reasonable attempts to collect documentation of "other" funding that is leveraged for CDBG Projects.

HOME Participating Jurisdictions are required to leverage permanent contributions for affordable housing under the HOME program, also known as HOME Match. During a fiscal year the HOME Match must equal at least 25% of the HOME funds drawn for the same fiscal year for project costs unless the City has received a reduction in the match requirement. The City has received a 100% reduction in its Match liability in 2002, 2012, 2013, 2014, and 2015, and has received a 50% reduction from 2003-2011. The City reports Match in the submission of the yearly CAPER. Even in years with a 100% reduction in Match the City requires match of its HOME partners, collects Match documentation, tracks the amounts and reports any eligible Match in the CAPER to be "banked" for future use if necessary. The City is well ahead of the 25% required Match. HOME Match is derived from eligible activities funded by the HOME program, primarily from rental development projects and/or homeownership developments completed by the Fuller Center (formerly Habitat for Humanity). Staff suggests a 1 to 1 non-Federal Match and proposals are evaluated based upon Match proposed.

A 1 to 1 Match is required of all ESG funds received. Each year the City collects Match contribution amounts and documentation from ESG sub-recipients as a part of the ESG application and evaluation process.

### **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 currently owns a limited number of vacant properties within the city. On occasion, this vacant land is identified by a housing partner as needed to fulfill a proposed project. Consideration is usually given to the partnering agency when the project includes the development of decent, affordable housing. The City has begun the implementation of a Mow to Own program, wherein property owners with vacant city

owned land adjacent to their own property can apply to maintain the city property for a specified amount of time and the City will transfer ownership to them. These lots are residential and not of any real value to the city, but could become a real asset for the property owner. While this use is not specifically addressed in this plan, the City does look to cost cutting measures wherever it can.

**Discussion**

Annual Action Plan is based on actual allocation amount released for 2016 on February 16, 2016.

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Owner Occupied Housing Rehabilitation	2015	2019	Affordable Housing	City-wide	Preservation of Existing Homes Quality Affordable Housing Units	CDBG: \$660,448 HOME: \$101,243	Homeowner Housing Rehabilitated: 25 Household Housing Unit
2	Housing for Special Needs	2015	2019	Affordable Housing Non-Homeless Special Needs	City-wide	Preservation of Existing Homes Quality Affordable Housing Units Homeless Services	HOME: \$12,800 ESG: \$96,043	Rental units constructed: 1 Household Housing Unit Homeless Person Overnight Shelter: 300 Persons Assisted
3	Code Enforcement	2015	2019	Affordable Housing	Code Enforcement Target Area	Preservation of Existing Homes Removal of Slum and Blight	CDBG: \$549,109	Housing Code Enforcement/Foreclosed Property Care: 3000 Household Housing Unit
4	New Housing Construction	2015	2019	Affordable Housing	City-wide	Quality Affordable Housing Units	HOME: \$226,517	Rental units constructed: 5 Household Housing Unit Direct Financial Assistance to Homebuyers: 1 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Removal of Slum and Blight	2015	2019	Non-Housing Community Development	CDBG Eligible Area	Removal of Slum and Blight	CDBG: \$25,000	Buildings Demolished: 5 Buildings
6	Public Services	2015	2019	Non-Housing Community Development	CDBG Eligible Area	Public Services	CDBG: \$290,125	Public service activities other than Low/Moderate Income Housing Benefit: 7000 Persons Assisted
7	Promotion of Fair Housing and Program Admin	2015	2019	Affordable Housing Public Housing Homeless	City-wide	Fair Housing and Program Administration	CDBG: \$363,441	Other: 111 Other
8	Economic Development and Job Creation	2015	2019	Non-Housing Community Development	City-wide CDBG Eligible Area	Economic Development and Job Creation	CDBG: \$488,726	Jobs created/retained: 2 Jobs Businesses assisted: 10 Businesses Assisted
9	Tenant Based Rental Assistance/Rapid Re-Housing	2015	2019	Homeless	City-wide	Quality Affordable Housing Units Homeless Services	HOME: \$50,000 ESG: \$48,860	Tenant-based rental assistance / Rapid Rehousing: 15 Households Assisted

Table 6 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Owner Occupied Housing Rehabilitation
	<b>Goal Description</b>	The City is committed to the revitalization of the community that occurs when the City assists in the rehabilitation of owner occupied housing. Owner Occupied housing rehab promotes the availability of decent, affordable housing and keeps homeowners in stable housing and assists in the sustainability of the entire neighborhood; a high priority for the City of Springfield. This goal will utilize both HOME and CDBG funds and includes both activity (rehab) costs as well as direct project costs for the personnel costs associated with delivering the activities.
2	<b>Goal Name</b>	Housing for Special Needs
	<b>Goal Description</b>	The City supports the development of affordable housing units for special needs populations including the homeless population. This goal supports the use of ESG funds for shelter expenses and operational costs. HOME funds can also be used to address the special needs including decent affordable rental housing for populations with mental health disabilities.
3	<b>Goal Name</b>	Code Enforcement
	<b>Goal Description</b>	The City supports the efforts of the Code Enforcement Division in conducting targeted inspections of housing in the Code Enforcement Target Area. The CE Target Area is determined to be deteriorated or deteriorating based on census data relative to housing indicators, including percentage of vacant housing, percentage of housing units valued under \$99,000 and \$50,000 and the number of structures being utilized as rentals. Additionally, the area must be primarily residential and at least 51% LMI. Last, code enforcement together with public improvements, rehabilitation, and services to be provided, must be expected to arrest the decline of the area.
4	<b>Goal Name</b>	New Housing Construction
	<b>Goal Description</b>	Construction of new affordable housing for low-income households that will remain permanently affordable for the community is a priority for the City. Funds are provided to private and non-profit entities and the City's CHDOs to carry out and accomplish this goal.
5	<b>Goal Name</b>	Removal of Slum and Blight
	<b>Goal Description</b>	The City of Springfield has an abundance of vacant and blighted housing structures that are having a negative influence on the housing market and the surrounding neighborhoods. Removing blighted structures from within the city limits is a high priority for the City.

6	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Public service activities provide the best opportunity for the City to respond to the specific needs identified within the community. For this reason, maximum resource allocation is planned in the following areas that have been identified on focus group sessions: public safety and crime prevention, downtown revitalization support, neighborhood support, and neighborhood enhancement activities such as mowing and the removal of junk and trash.
7	<b>Goal Name</b>	Promotion of Fair Housing and Program Admin
	<b>Goal Description</b>	Promoting fair housing practices, including the completion of the Analysis of Impediments to Fair Housing and undertaking activities to inform citizens of their fair housing rights and promoting fair housing awareness to housing providers and practitioners is not only a HUD requirement, but it is also a priority for the Community Development Department. Additionally, professionally administered programs with standard performance measures and the ability to complete programs that are not only compliant with HUD regulations, but also make difference in the community is a high priority.
8	<b>Goal Name</b>	Economic Development and Job Creation
	<b>Goal Description</b>	The City of Springfield has experienced limited income increases in the past 5 years. Economic Development is one tool for the community to provide assistance to those that are experiencing poverty conditions. The ED program provides loans and technical assistance to small businesses and micro-enterprise entities in order to create jobs. Additionally, the Minority Business program assists community members that are interested in starting small or micro-enterprise businesses.
9	<b>Goal Name</b>	Tenant Based Rental Assistance/Rapid Re-Housing
	<b>Goal Description</b>	Decent, affordable housing is a high priority for the City. The TBRA/RR programs provide rental assistance for homeless, special needs clients undertaking a self-sufficiency plan or accepting case management with a social service provider.

Table 7 – Goal Descriptions

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

Approximately 40 non-homeless and/or special needs LMI families will be provided affordable housing during this Action Plan year with federal funds. Federal funds will also be used to assist 350 homeless families in the Springfield community.

## AP-35 Projects – 91.220(d)

### Introduction

The Community Development Department is recommending the CDBG, HOME and ESG funding amounts for FY2016 projects. Recommendations for projects and activities are based upon survey data, draft action plan goals, individual project ratings and available funding. Recommendations have been vetted through the public participation process, including a public meeting, public comment period and approval by the City Commission.

The 2016 Action Plan is based upon the actual 2016 Allocation budget announced February 16, 2016. Based on compliance with CPD-16-01 Section III a. the City is submitting this budget in compliance with the Public Participation requirements to incur pre-award costs beginning April 1, 2016. Since actual allocations are not known as of 02/26/2016, project budgets are communicated with both the actual dollar amount planned and the proportion of the total budget that project represents. Below, the budgets for each project not only include an actual dollar amount, but also contains a percentage of 2016 available dollars. The percentage of funds spent on each project should remain in proportion to the allocation amount unless specifically called out in a Substantial Amendment to the 2016 Action Plan. Additionally, once allocation amounts are known for 2016, staff will work to replace planned budget numbers with the actual amounts based on the actual allocation.

#	Project Name
1	2016 Neighborhood Enhancement Public Services
2	2016 Fair Housing and Program Administration
3	2016 Code Enforcement Initiative
4	2016 Economic Development Initiatives
5	2016 Housing Rehabilitation Administration
6	ESG16 Springfield
7	Housing Revolving Loan Fund
8	HOME - Loan Program
9	HOME - Tenant Based Rental Assistance
10	HOME - Administration and Planning Costs
11	HOME - CHDO Set-Aside and Administration
12	HOME - Transitional to Permanent Housing
13	HOME - Non-Profit Development Assistance
14	HOME - Rental Incentive Program

Table 8 – Project Information

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

## needs

The Federal CDBG, HOME and ESG funds are intended to provide low- and moderate-income households with viable communities, which include decent housing, a suitable living environment, and extended economic opportunities. Eligible activities include, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning and administration. The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG, HOME and ESG programs
- Meeting the needs of low and moderate income residents
- Focusing on low and moderate income areas of neighborhoods
- Coordination and leveraging of resources
- Response to expressed community needs
- Sustainability and/or long-term impact, and
- The ability to demonstrate measurable progress and success.

Consequently, much of the City's funds are invested in the identified low and moderate-income census tract areas within Springfield.

The primary obstacles to meeting underserved needs are the limited resources available to address identified priorities. The City of Springfield will partner with other public agencies and nonprofit organizations, when feasible, to leverage resources and maximize outcomes in housing and community development. In the end, however, the need far exceeds the funding available from all sources combined.

## Projects

### AP-38 Projects Summary Project Summary Information

Table 9 – Project Summary

<b>1</b>	<b>Project Name</b>	2016 Neighborhood Enhancement Public Services
	<b>Target Area</b>	CDBG Eligible Area
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$290,125
	<b>Description</b>	The Neighborhood Enhancement Public Service Project is a comprehensive approach to improving Low-Mod areas of Springfield. 2016 Project combines several public service activities under one comprehensive umbrella project. 2016 Neighborhood Enhancement Public Services will make up between 12% of the 2016 funds available, which includes program income.
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Public Service activities meet the Area Benefit National Objective and work in these activities will be done in Low-Mod census tracts. Public Service activities reach the greatest number of citizens. It is estimated that 7,000 households per year will directly gain benefit from Public Service activities. It can be said that Public Service activities also benefit the entire census tract in which the activity is performed. Staff will balance the Public Service and Admin caps carefully and allocate funds so as not to outspend the appropriate caps.
	<b>Location Description</b>	All activities will be conducted within Low-Mod Census Tracts in the City of Springfield.

<b>Planned Activities</b>	<p>Public service activities provide the best opportunity for the City respond to specific needs identified within the community. For this reason, maximum resource allocation is planned in the following areas that have been identified in focus groups sessions: public safety and crime prevention, downtown revitalization support, neighborhood support, and neighborhood enhancement activities (mowing and junk/trash).</p> <p>2016 Fair Housing and Program Administration</p> <p>City-wide</p> <p>Promotion of Fair Housing and Program Admin</p> <p>Fair Housing and Program Administration</p> <p>CDBG: \$363,441</p> <p>Promoting fair housing practices, including completing the Analysis of Impediments to Fair Housing and undertaking activities to inform citizens of their fair housing rights and promoting fair housing awareness to housing providers and practitioners is not only a HUD requirements, it is also a priority for the Community Development Department. Additionally, professionally administered programs with standard performance measures and the ability to complete programs that are not only compliant with HUD regulations, but also make a difference in the community is a high priority. Oversight, management, monitoring and coordination of the federal CD funded programs is accomplished through the City Departments of Community Development and Finance. 2016 Fair Housing and Program Administration will make up between 15% of the 2016 funds available, which includes program income. Implementing Agencies: Community Development Department and Finance Administration. National Objective Code: NA</p>
<b>Target Date</b>	3/31/2017
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This is an Administrative Activity. On one hand, there are no beneficiaries because it is admin. On the other, each activity that is conducted through the CD department is touched by this administrative activity. Additionally, the Fair Housing activities reach a great number of people within the City.

<b>Location Description</b>	This activity will be undertaken at City Hall and at numerous places in the community when staff meet with the public in the regular conduct of Fair Housing and administration of programs.
<b>Planned Activities</b>	Activities for Fair Housing include outreach, education and counseling provided to renters, home-owners, lenders, social service agencies and other entities providing housing services within the community. Administration activities include the application, monitoring and reporting on federal fund usage. Additionally, staff also work to provide technical assistance to the public and other agencies within the community.
<b>3</b>	<b>2016 Code Enforcement Initiative</b>
<b>Project Name</b>	2016 Code Enforcement Initiative
<b>Target Area</b>	Code Enforcement Target Area
<b>Goals Supported</b>	Code Enforcement Removal of Slum and Blight
<b>Needs Addressed</b>	Preservation of Existing Homes Removal of Slum and Blight
<b>Funding</b>	CDBG: \$549,109
<b>Description</b>	The Code Enforcement Initiative Project is a comprehensive approach to improving Low-Mod and Slum-Blight properties located in Springfield OH. Code Enforcement activities will only take place in locally defined target areas based on LMI Census Tract location, number of Code Enforcement complaints, housing value, vacancies, percentage of renters in the area and the existence of other programs in the area that can be expected to arrest the decline of the area. The target area aligns funds for ED, housing, and community development in the locally define Code Enforcement Target Area (CETA). The local CETA is determined on an annual basis. 2016 Code Enforcement Initiative will make up 23% of the 2016 funds available, which include program income.
<b>Target Date</b>	3/31/2017

	<p>It is estimated that 3000 Code Enforcement inspections will be performed in the CETA. While the structures that are improved because of these inspections benefit, so do the families that live in and around those structures. Additionally, the neighborhood also benefits from having decent housing as a choice in their neighborhood.</p>
<b>Location Description</b>	All activities will be conducted in the CETA.
<b>Planned Activities</b>	Code Enforcement inspections.
<b>Project Name</b>	2016 Economic Development Initiatives
<b>Target Area</b>	City-wide CDBG Eligible Area
<b>Goals Supported</b>	Economic Development and Job Creation
<b>Needs Addressed</b>	Economic Development and Job Creation
<b>Funding</b>	CDBG: \$181,726
<b>Description</b>	<p>The Economic Development Initiative Project is a comprehensive approach to improving the economic development climate in the Low-Mod areas and creating jobs specifically for Low-Mod persons in the community. Activities for 2016 will remain essentially the same. Activities for 2016 will include: 1) Springfield Technology Center - Located in LMI CT 12 BG 4, Springfield Technology Center receives funds for technical assistance and overhead costs for operation of the Springfield Technology Center which serves as a business incubator to provide support for business start-up/expansion in the community and job opportunities to LMI persons in the city. 2) Springfield Financial Center - providing technical assistance for various loan programs providing loans to new/expanding firms to create and retain for LMI populations. 3) Targeted Investment Loan - funded with PI, this revolving loan funds for-profit entities of commercial/industrial acquisition/rehab of real and personal property. 4) Minority Business Development - activities providing technical assistance to community members looking to start micro-enterprise and small businesses, especially minority owned. Technical assistance to include information and referral, training and business plan development and counseling. 2016 Economic Development Initiatives will make up between 21% of the 2016 funds available, which includes program income.</p>

<p><b>Target Date</b></p>	<p>3/31/2017</p>
<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>The Economic Development Initiative Project is a comprehensive approach to improving economic development climate in the low-mod areas and creating jobs specifically for Low-Mod persons in the community. Activities for 2015 will remain essentially the same. Activities will include: 1) Springfield Technology Center - located in LMI CT 12 BG 4. Springfield Technology Center receives funds for technical assistance and overhead costs for operation of the Springfield Technology Center that serves as a business incubator to provide support for business start-up/expansion in the community and job opportunities to LMI persons in the city. 2) Springfield Financial Center - providing technical assistance for various loan programs providing loans to new/expanding firms to create and retain jobs for LMI populations. 3) Targeted Investment Loan - run with PI, this revolving loan funds for-profit entities of commercial/industrial acquisition/rehab of real and personal property. 4) Minority Business Development - activities providing technical assistance to community members looking to start micro-enterprise and small businesses, especially minority owner. Technical assistance to include information and referral, training and business plan development and counseling.</p>
<p><b>Location Description</b></p>	<p>Activities for 2016 will include: Springfield Technology Center located in LMI CT 12 4, and other locations within the community and at City Hall.</p>
<p><b>Planned Activities</b></p>	<p>The Economic Development Initiative Project is a comprehensive approach to improving economic development climate in the low-mod areas and creating jobs specifically for Low-Mod persons in the community. The City of Springfield has experienced limited income increases over the past 5 years. Economic Development is one tool for the community to provide assistance to those that are experiencing poverty conditions. The ED program provides loans and technical assistance to small businesses and micro-enterprises in order to create jobs. Additionally, the minority Business program assists community members that are interested in starting a micro-enterprise business. While in this Action Plan year 4 jobs will be created and 5 businesses will be assisted, the entire community benefits.</p>
<p><b>5 Project Name</b></p>	<p>2016 Housing Rehabilitation Administration</p>
<p><b>Target Area</b></p>	<p>City-wide</p>

	<p><b>Goals Supported</b></p> <p>Owner Occupied Housing Rehabilitation Housing for Special Needs New Housing Construction Tenant Based Rental Assistance/Rapid Re-Housing</p>	
	<p><b>Needs Addressed</b></p> <p>Preservation of Existing Homes Quality Affordable Housing Units Fair Housing and Program Administration</p>	
	<p><b>Funding</b></p> <p>CDBG: \$592,448</p>	
	<p><b>Description</b></p> <p>Funding to provide staff salaries and office expenses for the implementation of housing rehabilitation activities through the HOME and CDBG programs. Funding also provides for monitoring of all housing programs in the City. Implementing Agency: Community Development Department. National Objective Code: LMH. 2016 Housing Rehab Admin will make up about 28% of the 2016 funds available, which includes program income.</p>	
	<p><b>Target Date</b></p> <p>3/31/2017</p>	
	<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p> <p>This activity is a direct project costs to housing activities. All activities performed will record beneficiaries that are Low-Mod Income under another activity. Additionally, most of the activities are also provided for a targeted audience: elderly, special needs - developmentally disabled, mental health, etc.</p>	
	<p><b>Location Description</b></p>	
	<p><b>Planned Activities</b></p> <p>Housing Services are provided on a city-wide basis.</p>	
6	<p><b>Project Name</b></p> <p>ESG16 Springfield</p>	
	<p><b>Target Area</b></p> <p>City-wide</p>	
	<p><b>Goals Supported</b></p> <p>Housing for Special Needs</p>	
	<p><b>Needs Addressed</b></p> <p>Quality Affordable Housing Units Homeless Services</p>	
	<p><b>Funding</b></p> <p>ESG: \$144,902</p>	

	<p><b>Description</b></p> <p>Funds for operating costs of local homeless shelters providing a clean, safe shelter for homeless individuals/families. Administration costs for the ESG, HMIS activities and the provision of rapid rehousing services. Implementing Agencies: City Community Development Department, Interfaith Hospitality Network, Project Woman. National Objective Code: LMH</p>
	<p><b>Target Date</b></p> <p>3/31/2017</p>
	<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p> <p>All beneficiaries will be homeless. This includes individuals and families and special needs clients. Shelter Operations will serve 300 per year and Rapid Re-Housing will serve 8 families.</p>
	<p><b>Location Description</b></p> <p>This project will undertake activities city-wide.</p>
	<p><b>Planned Activities</b></p> <p>Funds for operating costs of local homeless shelters providing a clean, safe shelter for homeless individuals/families. Administration costs for the ESG program, HMIS activities and the provision of rapid rehousing.</p>
7	<p><b>Project Name</b></p> <p>Housing Revolving Loan Fund</p>
	<p><b>Target Area</b></p> <p>City-wide</p>
	<p><b>Goals Supported</b></p> <p>Owner Occupied Housing Rehabilitation Housing for Special Needs New Housing Construction</p>
	<p><b>Needs Addressed</b></p> <p>Preservation of Existing Homes Quality Affordable Housing Units</p>
	<p><b>Funding</b></p> <p>:</p>
	<p><b>Description</b></p> <p>Revolving Loan Fund (RLF) for City Housing Rehab Projects that utilize program income as a funding source. Monies are recaptured from previously funded loans through loan payments and pay-offs and "re-loaned" to eligible homeowners through various rehab programs. Implementing Agency: Community Development Department. National Objective Code: LMH</p>
	<p><b>Target Date</b></p> <p>3/31/2017</p>

<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>Program Income from housing activities will be used to fund 2016 housing rehab activities. The city expects to rehab about 20 homes using the Emergency Repair Program, including roofs, furnaces, plumbing, electric and other one-item emergency repair requests. At least half of the program participants will be elderly.</p>
<p><b>Location Description</b></p>	<p>Activities will be undertaken on a city-wide basis.</p>
<p><b>Planned Activities</b></p>	<p>The city expects to serve about 20 homes using the Emergency Repair Program, including roofs, furnaces, plumbing, electric and other one-item emergency repair requests.</p>
<p><b>Project Name</b></p>	<p>HOME - Loan Program</p>
<p><b>Target Area</b></p>	<p>City-wide</p>
<p><b>Goals Supported</b></p>	<p>Owner Occupied Housing Rehabilitation</p>
<p><b>Needs Addressed</b></p>	<p>Preservation of Existing Homes</p>
<p><b>Funding</b></p>	<p>HOME: \$62,279</p>
<p><b>Description</b></p>	<p>This program is the city's comprehensive housing rehab program for homeowners. The program will include homeowners at or below 80% AMI. The program will provide loans for contracted comprehensive rehab services for targeted population with a sliding scale repayment terms that is based on income, age, disability and/or military status. The 2016 budget represents about 16% of the total 2016 grant amount. Implementing Agency: Community Development Department. National Objective Code: LMH</p>
<p><b>Target Date</b></p>	<p>3/31/2017</p>
<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>The City expects to undertake activities for comprehensive rehabilitation for at least 4 low-income households. Approximately half of the beneficiaries will be elderly and/or disabled.</p>
<p><b>Location Description</b></p>	<p>Activities will be undertaken on a city-wide basis.</p>
<p><b>Planned Activities</b></p>	<p>Funds will be allocated for the comprehensive rehabilitation of low-mod owner-occupied housing. Funds must be used to address all code violations.</p>

9	<b>Project Name</b>	HOME - Tenant Based Rental Assistance
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Housing for Special Needs Tenant Based Rental Assistance/Rapid Re-Housing
	<b>Needs Addressed</b>	Quality Affordable Housing Units Homeless Services
	<b>Funding</b>	HOME: \$50,000
	<b>Description</b>	Program will provide tenant based rental assistance to homeless families participating in the Project Woman self-sufficiency program. SMHA will screen candidates and will be reimbursed for staff project costs and rental assistance provided. Funds budgeted for this activity represent 13% of the total HOME budget. Implementing Agency: Community Development Department. National Objective Code: LMH
	<b>Target Date</b>	3/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The TBRA project anticipates assisting 9 homeless, special needs households with rental assistance. Project Woman will provide case management.
	<b>Location Description</b>	Qualified tenants of the Chrysalis House will be offered TBRA assistance.
	<b>Planned Activities</b>	Rental assistance will be provided to 9 households. Clients will enroll in a case management based self-sufficiency plan with Project Woman. Once rental assistance is secured, the tenant may move from the Chrysalis House and keep the rental assistance if they are still engaged in the self-sufficiency plan.
10	<b>Project Name</b>	HOME - Administration and Planning Costs
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Owner Occupied Housing Rehabilitation Housing for Special Needs New Housing Construction Tenant Based Rental Assistance/Rapid Re-Housing

	<p>Preservation of Existing Homes Quality Affordable Housing Units</p>	<p>HOME: \$38,964</p>
<b>Funding</b>		
<b>Description</b>	<p>Administrative costs to provide for overall program management, coordination, monitoring and evaluation of HOME Program activities. Consulting for special programs such as lead grants, continuum of care and specialized technical services such as project management, marketing, housing counseling, planning, grant writing and grant implementation. Funding amount is approximately 10 of the total HOME budget for 2016. Implementing Agency: Community Development Department.</p>	
<b>Target Date</b>	<p>3/31/2017</p>	
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<p>This activity is a direct project cost related to housing activities. All activities performed will record beneficiaries that are low-mod income under another activity. Additionally, most of the activities are also provided for a targeted audience: elderly, special needs, etc.</p>	
<b>Location Description</b>	<p>Activities will be undertaken on a city-wide basis.</p>	
<b>Planned Activities</b>	<p>Activities that will be undertaken in this project include: working with program beneficiaries to qualify their income eligibility, accept application, write rehab specs, make inspections, work with the contractor to communicate beneficiary needs, invoice payment and ocumentation.</p>	
<b>11 Project Name</b>	<p>HOME - CHDO Set-Aside and Administration</p>	
<b>Target Area</b>	<p>City-wide</p>	
<b>Goals Supported</b>	<p>Owner Occupied Housing Rehabilitation Housing for Special Needs New Housing Construction</p>	
<b>Needs Addressed</b>	<p>Preservation of Existing Homes Quality Affordable Housing Units</p>	
<b>Funding</b>	<p>HOME: \$77,948</p>	

	<p>Funds for eligible CHDO activities to include project specific technical assistance and site control loans, project specific funds for acquisitions, rehabilitation, new construction and related staff costs for administering the home ownership, lease purchase and rental units developed with CHDO funds. Funds for this project will be 20% of the projected 2016 HOME budget. Implementing Agency: Neighborhood Housing Partnership of Greater Springfield, Inc.</p>
<p><b>Target Date</b></p>	<p>3/31/2017</p>
<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>CHDO activities will be undertaken for families that are low-mod income. Given the limited amount of funding, CHDO set-Aside funds are usually combined over several years and with other types of funding. A current projection for CHDO Set-Aside activities indicated a project for new affordable rental housing for LMI elderly.</p>
<p><b>Location Description</b></p>	<p>Activities are undertaken on a city-wide basis.</p>
<p><b>Planned Activities</b></p>	<p>Eligible owner, sponsor, developer activities can be undertaken with CHDO Set-Aside funds. CHDO Admin funds are used for administrative costs that are associated with a CHDO development.</p>
<p><b>12 Project Name</b></p>	<p>HOME - Transitional to Permanent Housing</p>
<p><b>Target Area</b></p>	<p>City-wide</p>
<p><b>Goals Supported</b></p>	<p>Housing for Special Needs New Housing Construction</p>
<p><b>Needs Addressed</b></p>	<p>Preservation of Existing Homes Quality Affordable Housing Units Homeless Services</p>
<p><b>Funding</b></p>	<p>HOME: \$12,800</p>

	<p>Permanent housing projects for individuals and families while supportive services are obtained in order to make a successful transition into permanent housing. Non-profit agencies providing the transitions to permanent housing are encouraged to submit proposals for the development or rehab costs of a project. The City's Transitional to Permanent Housing program will target homeless and/or special needs clients. Funding for this project represents 3% of the total HOME budget.</p>	<p>3/31/2017</p>
<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>The city allocated a small amount of fund each year for this activity, but the execution of the activities are dependant upon proposals for projects being submitted to the city. The city is supportive of the development of decent, affordable housing for homeless and special needs populations. Often, several year's funding will be combined.</p>	<p>3/31/2017</p>
<p><b>Location Description</b></p>	<p>Activities are undertaken on a city-wide basis.</p>	
<p><b>Planned Activities</b></p>	<p>Activities can include new construction or rehab of existing properties for use by homeless and/or special needs households that are ready to transition to permanent housing with supportive services.</p>	
<p><b>Project Name</b></p>	<p>HOME - Non-Profit Development Assistance</p>	
<p><b>Target Area</b></p>	<p>City-wide</p>	
<p><b>Goals Supported</b></p>	<p>Housing for Special Needs New Housing Construction</p>	
<p><b>Needs Addressed</b></p>	<p>Preservation of Existing Homes Quality Affordable Housing Units</p>	
<p><b>Funding</b></p>	<p>HOME: \$100,000</p>	
<p><b>Description</b></p>	<p>Projects will evaluate proposals submitted by non-profit housing providers, either rental or new affordable housing opportunities on a case-by-case basis. Assistance will vary dependent upon the needs of the project and people served. Funding will represent 26% of the total HOME budget. Implementing Agency: Community Development Department</p>	<p>3/31/2017</p>
<p><b>Target Date</b></p>		<p>3/31/2017</p>

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<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>Project will evaluate proposals submitted by non-profit housing providers, for either rental or new affordable housing opportunities on a case-by-case basis. Assistance will vary dependant upon the needs of the project and people served.</p>
<p><b>Location Description</b></p>	<p>Activities will be undertaken on a city-wide basis.</p>
<p><b>Planned Activities</b></p>	<p>Rehab or new construction of decent, affordable housing for low and very-low income renter or homeowners.</p>
<p><b>Project Name</b></p>	<p>HOME - Rental Incentive Program</p>
<p><b>Target Area</b></p>	<p>City-wide</p>
<p><b>Goals Supported</b></p>	<p>Housing for Special Needs New Housing Construction</p>
<p><b>Needs Addressed</b></p>	<p>Quality Affordable Housing Units</p>
<p><b>Funding</b></p>	<p>HOME: \$47,669</p>
<p><b>Description</b></p>	<p>The city will assist for-profit and non-profit developers with the rehabilitation or new construction of rental units for low-income families (i.e. LIHTC). Projects are subject to design review to meet standards of affordable housing development and will be consistent with the City's Con Plan. Funding for this project is 12% of the overall HOME budget. Implementing Agency: Community Development Department. National Objective Code: LMH</p>
<p><b>Target Date</b></p>	<p>3/31/2017</p>
<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>The City will assist non-profit and for profit developers with the rehabilitation or new construction of rental units for low-income (i.e. LIHTC). The project developers determine beneficiaries at the time of application.</p>
<p><b>Location Description</b></p>	<p>Activities will be undertaken on a city-wide basis.</p>
<p><b>Planned Activities</b></p>	<p>New construction of rehab of existing units for decent, affordable housing for low-income renters.</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**

The City will make all housing programs and housing development projects eligible citywide in order to ensure the City is not concentrating low income or minority populations through affordable housing projects. Public service activities will be targeted to the CDBG eligible area, consisting of census blocks with 51% or more of the population at 80% or below AMI, in order to ensure the achievement of a CDBG national objective. Code Enforcement activities will be targeted to the CETA with greater concentrations of poverty and property maintenance violations, vacant housing percentage, property value and rental population.

Priority CDBG funding includes areas where there is a majority of low and moderate-income persons (LMI). According to population data in this plan the 2010 census showed the population of Springfield falling to 60,608 down over 10,000 from 1990. The only exception to this declining population trend has been the increase in Hispanic residents. From 2000 to 2010 census the Hispanic population jumped from 770 residents to 1,824 residents. Hispanic residents make up 3% of the total population. The minority population grew as a proportion of the general population moving from 22% of the population to 25.7%. Between the 2000-2010 the white population shrunk from 51,007 residents to 45,607, a decrease of almost 6,000. Despite the decline white residents still make up 74.3% of the population. Therefore, there were no dramatic shifts in proportions.

Concentrations of Minority and Hispanic Persons: HUD defines areas of racial concentration overall. In Springfield, minority persons comprised 25.7 % of the population. Therefore an area of racial concentration includes an area where the percentage of minority residents is 35.7% or higher. There were six census tracts that met the criteria for areas of racial concentration. Census Tract CT2 - 75.3%, CT9.02 - 70.7%, CT11.01 - 77.8%, CT11.02 - 71.4% and CT12 - 53.1%. In addition persons of Hispanic origin represent 3% of the population of Springfield. Therefore, an area of ethnic concentration included the census tracts where the percentage of Hispanic residents is 13% or higher. No census tract met these criteria.

Low-Moderate Income Area- LMI persons as determined by HUD, have incomes at or below 80% of the Median Family Income (MFI). HUD defines an LMI census tract in which 51% or more of the population have incomes of 80% of MFI. According to census data 13 whole census tracts are qualified as LMI and 5 census tracts have one or more block groups that qualify as LMI. Three census tracts in the city did not qualify.

## Geographic Distribution

Target Area	Percentage of Funds
City-wide	20
CDBG Eligible Area	40
Code Enforcement Target Area	40

**Table 10 - Geographic Distribution**

### Rationale for the priorities for allocating investments geographically

All housing related activities are allocated as a city-wide investment. Beneficiaries of housing activities are LMI and can choose/have chosen to live throughout the entire city. The City supports the idea of spreading housing options throughout the city so as not to concentrate low-income populations into certain census tracts or neighborhoods. In reality, most of the housing rehab activity does occur within the CDBG Eligible Area. Economic Development activities can also be citywide if it qualifies for a Low-Mod Jobs or Businesses Benefit designation. Activities conducted on LMA (CDBG Eligible) basis include all public services activities including weed cutting, junk and trash and board and secure. Approximately 85% of the city's Census Tracts qualify as low-mod income areas. Activities that specify LMA as a national objective therefore cover most of the city. Code Enforcement activities are directed to the narrowed Code Enforcement Target Area which is based not only upon the CT being low-mod, but also the number of code enforcement complaints, vacant homes, depressed housing values, a high percentage of renter occupied housing and the availability of other resources that will assist in the redevelopment of the area. Economic Development activities can qualify either the beneficiary as LMI or the area as LMA. ESG program activities are considered City Wide.

### Discussion

As a part of the 2015-2019 Consolidated Plan effort, the City identified several target areas throughout the city. Each area has a specified set of activities that can be conducted in that area based on compliance with HUD regulations for the CDBG program. Both HOME and ESG activities are carried out citywide.

# Affordable Housing

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

### Introduction

The City utilizes a combination of strategies and funding sources to address the affordable housing need in the community. As in the past, the City will continue to spend a large portion of its CDBG funds on housing activities and the provision of decent, affordable housing. Likewise, the HOME funds that the City receives are also targeted for affordable housing. CDBG funds from prior years (PI) will be used to fund an Emergency Repair program for homeowners at or below 80% AMI. CDBG PI will also be used by the City's CHDO to promote ownership and rehab through the home purchase and rehab incentive (HPRI) program. The City will utilize HOME funds to impact both owner occupied and rental housing in the city with comprehensive rehab programs for homeowners and development and rehab programs for the addition of decent affordable rental units in the city. HOME will also fund a small TBRA program that is connected to a self-sufficiency program with a local domestic violence program. Finally, ESG will be used to rapidly re-house homeless clients into decent affordable rental units and for shelter operations.

One Year Goals for the Number of Households to be Supported	
Homeless	300
Non-Homeless	40
Special-Needs	5
Total	345

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	30
The Production of New Units	2
Rehab of Existing Units	30
Acquisition of Existing Units	0
Total	62

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

### Discussion

Affordable housing goals for 2016 remain consistent with prior years goals. Staff had been able to utilize programs to maximize the affordable housing benefit by partnering with local non-profit groups and/or tax credit developers. In 2016 one local project applied for tax credits. This project, if funded, will

construct an affordable elderly rental development. The project applied for tax credits in 2015, but was not funded for the 2015 Tax Credit Program.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

SMHA strives to maintain high quality management and operations of its housing programs and units. SMHA uses various HUD devised manuals in implementing its management and maintenance policies including Admissions and Continued Occupancy Handbook, PH Maintenance Plan Document, FSS Action Plan, Public Housing Assessment System Manual, Section 8 Administrative Plan, Housing Inspection Manual, Section 8 and Voucher Program Master Book, and HUD Handbook 7420.7.

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

City staff coordinates with SMHA on a regular basis. Both agencies are active participants in the Continuum of Care process and both coordinate together on the administration of three Continuum of Care Grants. The City's Fair Housing coordinator also coordinates with SMHA staff on Fair Housing and mediation issues. Additionally, SMHA holds a designated seat on the Community Grant Advisory Board and helps to guide the use of CDBG, HOME and ESG funds in the city. The City Commission appoints two members of the SMHA Board.

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

To better serve the needs of its residents, SMHA offers training and educational services to staff that communicate with residents on a daily basis. SMHA also offers new and continuing educational programs to residents at the Community Center to enhance the living environment of public housing residents. SMHA's overall objectives are to expand home ownership among low-income households, to improve existing housing stock among low-income renter households, and to provide adequate and efficient services to existing public housing residents. To accomplish this, SMHA has established resident councils at three of the public housing communities. Resident councils are involved with management operations, modernization needs, the family self-sufficiency program, and the homeownership program.

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

Springfield Metropolitan Housing Authority reports that the HUD Public Housing Assessment System (PHAS) Score Report for Interim Rule as of January 6, 2016 for fiscal year ending 9/30/2015 is designated

as a Standard agency. SMHA for the past few years was designated as a Substandard Financial agency and the Executive Director reported that the agency is stronger financially and the PHAS score reflects this status.

### **Discussion**

The City partners with the local PHA on several projects. SMHA is a valuable member of the local Continuum of Care group and assists with the operation of three Shelter + Care grants and the HOME TBRA program. The working relationship with the local PHA is good.

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

### **Introduction**

The Springfield/Clark County Housing Collaborative (HC) recently undertook a strategic planning process to update their plan to end homelessness. Looking at what homelessness looks like in Springfield and Clark County, the HC found that those experiencing homelessness in our community are almost as likely to be families with children as they are single adults. The current state of homelessness in Clark County (2015 PIT):

- 171 people were identified as "sheltered" homeless based on the 2015 PIT (191 in 2014)
- 6 people were identified as "unsheltered" homeless (13 in 2014); living on the streets, in cars, or other places not meant for human habitation. (Ohio BOS average was 17% unsheltered).

Based on current analysis of goals and program expectations, the local CoC established the following goals to reduce all homelessness in Springfield/Clark County by 40% in 10 years and by 80% in 20 years.

1. Prevent Homelessness Whenever Possible
2. When Homelessness Does Occur, End it Quickly
3. Homeless Programs Operate Effectively and Efficiently
4. Homeless Systems (Planning Region 15) Operate Effectively and Efficiently

Springfield/Clark County Housing Collaborative and local Continuum of Care Operates Effectively and Efficiently

### **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 City participates in the Springfield/Clark County Housing Collaborative (HC), the local CoC. This HC has adopted a Strategic Plan to End Homelessness. Outreach and assessment of homeless persons is a part of that strategic plan. Goal 1 is Prevent Homelessness Whenever Possible. One of the strategies to address this goal is to "increase the use of a broad based approach to outreach to include service providers and organizations in the Housing Collaborative." Additionally, Goal 4, Homeless Systems Operate Effectively and Efficiently lists "develop, implement and monitor coordinated intake and assessment processes within Region 15 (Springfield/Clark County and Greene County) as a strategy to address this goal. The intake and assessment process plays an integral role in identifying those

individuals that are homeless and making sure their needs are addressed by the proper agency.

There are many social service agencies in the city that provide benefits to low-income individuals and families in order to prevent homelessness or serve those who are homeless. By linking clients with the proper services a homeless episode may be avoided or shortened or an unsheltered clients may accept housing with the right offer for services. For this next Action Plan year the City will continue to work to support of the Continuum of Care agencies that provide direct services to the sheltered and unsheltered homeless.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Goal 2 of the Strategic Plan to End Homelessness includes the strategies that the Housing Collaborative has adopted for the coming years. This Goal speaks to the emergency and transitional shelter needs of the homeless in Springfield and include; 1). "Improve the percentage of clients in temporary and transitional housing that are being exited to permanent solutions, 2). Shorten the length of time persons remain homeless in transitional housing programs (the goal is for the average length of stay to be under 240 days), and 3). Increase access to and receipt of mainstream resources and cash and non-cash benefits for those experiencing homelessness."

These goals should assure at least 50% of all emergency shelter clients receive mainstream benefits and 70% of all rapid re-housing, temporary housing and traditional housing clients maintain or increase income during their program stay. The plan calls for the use of quarterly performance reports and regular monitoring of programs for measuring performance.

The City works with the Continuum of Care to distribute the Emergency Solutions Grant to local emergency and transitional housing providers. This grant provides much needed operational funds to local agencies as well as funds for rapid re-housing and case management. The local continuum has worked over the last several years to develop a coordinated system for intakes and referrals. Beginning with HPRP program and continuing into the re-organization of the Homeless Grants and ESG, the local Continuum has adapted and updated policies and procedure to comply with changing regulation. The changes have produced a more responsive and efficient system of serving at risk and homeless populations. The City has moved forward with changes in the Homeless Programs, the City and the Continuum of Care has continued holding rapid re-housing and shorter stays in homeless shelters as a priority. All grant programs throughout the continuum have the goal of exiting clients into permanent housing and the permanent housing programs have the goal of keeping clients housed at least six 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**

The Housing Collaborative Plan to End Homelessness addresses the needs of chronically homeless in making the transition to permanent housing and includes the goal of shortening the length of time that households experience homelessness, utilizing a rapid re-housing approach. The goals of this plan are to:

- Prevent Homelessness Whenever Possible
- When Homelessness Does Occur, End it Quickly
- Homeless Programs Operate Effectively and Efficiently
- Homeless Systems (Planning Region 15) Operate Effectively and Efficiently
- Springfield/Clark County Housing Collaborative and local Continuum of Care Operates Effectively and Efficiently.

Each of these goals have strategies listed that will assist in meeting the individual goal and the plan to End Homelessness in 20 years. Specifically, the HC looks to the listed strategy "Increase targeting of Permanent Supportive Housing (PSH) resources to those experiencing homelessness with the greatest barriers and longest terms of homelessness" to have the most effect on the chronically homeless, veterans and unaccompanied youth in obtaining permanent housing.

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

The Plan to End Homelessness addresses prevention and discharge planning as strategies in the first two goals (1. Prevent Homelessness Whenever Possible and 2. When Homelessness Does Occur, End it Quickly). These goals list increasing the use of quality diversion strategies and measuring the impact and effectiveness of their use. The HC seeks to increase the use of broad based approaches to outreach to include service providers and organizations in the HC and educating members on the benefits of a broad based approach and the potential impact of ending homelessness in 20 years. Along with prevention strategies, the HC also identifies increasing access to and receipt of mainstream resources and cash and non-cash benefits for those experiencing homelessness.

Continuum of Care members routinely works with at-risk populations that maybe discharged into

homelessness. It is the goal of the CoC to prevent discharge into homelessness and to be able to permanently house these clients as quickly as possible. While CDBG funds have been used to support this goal, the local agencies have been able to receive other funds to assist in this goal.

**Discussion**

The Springfield/Clark County Housing Collaborative Strategic Plan to End Homelessness sets a path to ending homelessness in the Springfield/Clark County region by 2035. The goals and strategies identified in that plan are summarized here in the Consolidated Plan will guide the CoC's work progressing towards the ultimate goal of ending homelessness. This is not meant to say that no one will ever have a housing crisis or need to spend a night in an emergency shelter. Ending homelessness means that when it does occur, homelessness is rare, short-term, and does not recur. Progress on this plan will be gauged by the use of data collected through the annual Point in Time (PIT) Count. PIT Counts are one-day, unduplicated counts of sheltered (in emergency shelters and transitional housing programs) and unsheltered homeless persons. This data is the best indication of how well the plan is working in preventing, reducing, and ultimately ending homelessness for our community members. In particular, the unsheltered counts should provide a picture of those persons who are absolutely in need of homeless program beds/units but who have been unable to access those resources. As their numbers decrease, this should serve as an indication that those in need of homeless services are being served by appropriate programs and that those who can be served by other systems/providers have been appropriately connected and referred away from the homeless system.

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

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

### **Introduction**

There are a number of State and local regulations designed to promote the orderly development and maintenance of safe, decent and sanitary housing in the community. Sometimes these regulations can act as barriers to affordable housing. That does not appear to be the case in Springfield. The Community Development Department, including planning and zoning and building regulations divisions, work hard to ensure a barrier-free environment not only for affordable housing, but for all new developments. The current public policies relating to housing and in particular, affordable housing, do not appear to be excessive, exclusionary, or discriminatory nor do they duplicate any other policies.

Each year the Fair Housing Coordinator analyzes this process and determines the barriers to affordable housing and impediments to fair housing. The Fair Housing program staff is dedicated to pursuing housing equality within Springfield. Staff works with both landlords and renters to ensure that federal fair housing practices are being followed within Springfield.

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

The City will continue its proactive position in regard to affordable housing by continuing to provide both financial and technical assistance to affordable housing activities and projects. The City is committed to the principle that all individuals should have available to them an equal opportunity for housing choices regardless of their race, color, religion, familial status, sex, national origin or handicap. The City also operates a fair housing program and has staff dedicated to pursuing housing equality within Springfield. Staff works with both landlords and renters to ensure that federal fair housing practices are being followed with in Springfield.

The City also fosters and maintains its affordable housing stock through the code enforcement program, an exterior inspection program targeted toward CE Target Areas; the housing rehabilitation programs that provide low-income homeowners assistance in addressing housing deficiencies, and participation in new homeowner and rental housing developments projects.

The City will continue to monitor relevant public policies to ensure they do not change in such a manner as to constitute a barrier to affordable housing. The Zoning Codes used by the City do not restrict the development of special needs or other housing targeted towards making housing more accessible.

## **Discussion**

The City of Springfield works very hard to create an environment friendly for affordable housing projects. The land use controls, tax policies, zoning codes, building codes and other policies do not restrict affordable housing projects. The City works closely with nonprofit and for profit agencies working to meet affordable housing needs of the residents. Recent projects have included senior affordable housing projects through HOME and NSP dollars, as well as a new tax credit senior project, and permanent supportive housing for homeless people. The City also helped Habitat for Humanity (The Fuller Center) acquire land and build 16 new affordable houses to sell to the very low-income population. The City will continue to strive to limit the effects of public policy on the development of affordable housing.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

CITY OF SPRINGFIELD MINORITY BUSINESS OUTREACH The City continues to be committed to Minority Business Development, through Chapter 153 of its Codified Ordinances. This Chapter identifies the following objectives, 1.) To ensure that disadvantaged and minority business enterprises have maximum opportunity to participate in all City contracts; 2.) To encourage all City contractors to make conscientious efforts, consistent with sound procurement practices and applicable law, to afford disadvantaged and minority/female business enterprises a fair opportunity in their subcontracting or supplying process; and 3.) To prohibit City contractors from discriminating against potential subcontractors and potential suppliers because such potential subcontractor or potential supplier is a minority/female or a disadvantaged business. (Ord. 94-106. Passed 4-5-94.) The City of Springfield's Minority Business participation goal for HUD funded projects is at 22% of the applicable contract amount. Staff in the Community Development Department and the Division of Purchasing within the Purchasing Department work together to ensure Minority, Female and Disadvantaged Business Enterprises has the maximum opportunity to participate in all City contracts regardless of funding source. The Minority Business Office provides the following services business start-up assistance information on procurement policies and opportunities; each bid package with a value of more than \$10,000 must include the Minority Business Requirement Package training and technical assistance seminars networking opportunities prime and subcontracting opportunities; local, State and Federal Certification assistance; special outreach to re-entering citizens; Historically Disadvantaged Directory on the City's website.

### **Actions planned to address obstacles to meeting underserved needs**

The City of Springfield continues to partner with area agencies that work specifically with at-risk and underserved populations in allocating the Emergency Solutions Grant and Shelter + Care Grant funds. ESG Funds are targeted towards shelter operations as much as possible to allow for the ongoing operation for these facilities. Additionally, ESG will also assist with the coordination of an overflow shelter and hotel voucher program that will be able to house those unsheltered homeless in the community that seek shelter when the temperatures fall below the range when it is safe to live outdoors. Services and shelter is offered to these individuals on a longer-term basis as well. The Shelter + Care grants address the hard to house homeless populations that include disability and addiction clients. These clients are provided both housing and case management to assist them in remaining

housed.

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

The City of Springfield continues to support local groups, such as Habitat for Humanity (Fuller Center), Interfaith Hospitality Network, Developmental Disabilities of Clark County, the local Mental Health and Recovery Board and Neighborhood Housing Partnership, who work to provide decent affordable housing and seek viable financing options for such housing programs.

The City also continues to operate the CDBG Emergency Repair Program, the HOME Investment Partnership programs and the Lead Safe Springfield Program. These programs provide eligible homeowners (and landlords in the Lead Program) with affordable loan products to stabilize homes, repair emergency system failures and other code concerns. The programs enhance the livability of homes and provide owners with affordable methods to make necessary repairs. This action not only assists in stabilizing a homeowner, it also helps to stabilize a neighborhood.

Code Enforcement also works to foster affordable housing. By maintaining a minimum set of standards that is expected of all structures in the city, residential and commercial, owner occupied or rental, all structures benefit. Code Enforcement officers not only work to enforce the City's Property Maintenance Codes, but refer eligible property owners to CDBG and HOME programs that might assist in the maintenance of distressed property. Addressing the minimum standards required by code allows a neighborhood to maintain a standard quality of housing so that all area homes and residents benefit.

### **Actions planned to reduce lead-based paint hazards**

The Lead Safe Springfield Program utilizes a Housing and Urban Development (HUD) Lead Based Paint Hazard Control Grant (Grant) to assist private property owners to make lead safe housing for children under the age of 6 years by providing funding to perform lead hazard control activities on deteriorated lead painted surfaces in pre-1978 construction properties. Work includes replacing lead painted windows with vinyl replacement windows, installing vinyl siding to cover lead painted exterior wood lap siding, and exterior paint stabilization. In 2012 the City of Springfield received a 3-year \$2,480,000 grant to make 160 homes lead-safe between June 15, 2012 and June 14, 2015. **The program was granted a one-year extension, allowing the program to continue through June 14, 2016.** This grant covers the City of Springfield and Clark County, Ohio. To date the City has received 6 consecutive grants totaling over \$17,500,000. When finished with the 2012 grant, the program will have assisted in making over 1,300 residential units lead-safe. Applications to the program are screened to ensure the applicant and the property meet program participation guidelines. To participate in the program the property must be pre-1978 construction, structurally sound, habitable, free of property maintenance code violations, have

a good roof and must be in decent, safe and sanitary condition. Owner-occupied units must have a child under the age of 6 years in residence, have custody of a child under the age of 6-years, be a licensed foster home, or a pregnant woman in residence, and the home must be the primary residence of the family. Rental units no longer have to have children under the age of six living in the home, but landlords must agree to make rental units available to families with children under the age of six and must provide the program with the tenants' income for a period of three years following the completion of the project. Priority ranking for applications is based on the following: Priority 1 - Renter/owner occupied with an Elevated Blood Lead Level (EBLL) child greater than or equal to 10 micrograms/deciliter under the age of 6 years; Priority 2 - Renter/owner occupied with a child under the age of 6 years; Priority 3 - Renter/owner occupied with a pregnant female in residence; In-home Type-B day-care centers with children under the age of 6 years in attendance, maximum of 6 children; Priority 4 – Vacant unit. Vacant units and a limited number of Type B day care operations can be accepted. Once occupant and property eligibility are verified and lead based paint hazards are found, the program also has a limited number of Healthy Homes funds available to address safety and health issues in those qualifying properties.

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

Reducing the number of persons in poverty remains one of the foremost aims of public policy within the Community Development Department. According to the 2009-2013 American Community Survey 5-year estimates, 23.7% of all families had incomes that were below the poverty level in Clark County. 44.2% of households with a female head of household were below the poverty level and 57% of female head of households with children under 5 years were below the poverty level. The goal of the City is to provide opportunities for these residents to help themselves out of this condition. The City funds Economic Development activities in order to increase the available jobs for these households. Additionally, the City's Minority Business Development Coordinator works directly with individuals, often-female heads of households, in starting a micro-enterprise business.

The City also offers programs that can assist those living at the poverty level, including affordable housing options, economic opportunities, and more efficient social service delivery systems. While these activities may not increase a household's income, the underlying issues creating the existence of poverty can be better addressed. The existence of poverty is often the result of a combination of factors. According to the feedback received during stakeholder workshops, the major issues to be addressed in the community are: transportation services, housing rehabilitation, targeted neighborhood revitalization, affordable rental housing, tenant based rental assistance, and housing and economic

opportunities. Each of these needs is recognized in the Consolidated Plan. The resources currently available to address this problem include CDBG, HOME, ESG funds, Lead Safe funds, and NSP funds.

Springfield has an active group of community-based organizations that provide housing and community development services. The City will continue to work closely with and cooperate with these organizations so as many qualified households as possible benefit from available resources. The City, in collaboration with the Continuum of Care, will continue to address activities which will allow persons to remain in their housing; keep it decent, safe and sanitary; provide affordable housing opportunities for the low and moderate income persons; and work to increase economic opportunities to the low income individuals in the community. Low interest loans for rehabilitation will permit low and moderate-income persons to be better able to use limited resources for other necessary items (i.e. clothing, food, transportation costs, etc.). The principal goal of this coordinated strategy is to assist low- and moderate-income renters and owners, the homeless, female headed households with children, low-income elderly, persons with AIDS, public and assisted housing residents, persons with mental and physical disabilities, and other special needs populations.

### **Actions planned to develop institutional structure**

The City of Springfield's Community Development Department is the lead agency responsible for the development of the Consolidated Plan and Action Plan. The Development Program Division's responsibility includes oversight and administration of all CDBG, ESG and Continuum of Care Homeless Program grant programs funded by HUD. The Housing Division administers a variety of housing programs funded by CDBG, HOME, Lead Safe Springfield programs. Responsibility for the NSP1 and 2 programs is shared between the two divisions. Both City divisions in turn work closely with local human service and housing providers and local institutions in order to most effectively meet the needs within the community with limited federal, city, non-profit, and for-profit resources. The Community Development Department administers the City's code enforcement activities, which is the largest CDBG expenditure. The same department is administratively responsible for program formulation, regulatory compliance, budgeting and subrecipient monitoring and reporting responsibilities to the Department of Housing and Urban Development (HUD). The Community Development Department implements the City's housing rehabilitation, homeownership and homeless services programs, which address the issue of affordable and decent housing in different ways. This department also administers the City's Fair Housing Policy, Minority Business Development, Neighborhood Enhancement and lead abatement program called "Lead Safe Springfield". The City utilizes two boards to help prioritize CDBG, HOME, ESG, and other federal, state and local grant related projects, budgets, and expenditures. The Community Grant Advisory Board (CGAB) assists with all federal grant programming. The Springfield Clark County Housing Collaborative assists with the ESG and CoC program funding. The Boards will continue to serve

in an advisory role to the City Commission, recommending programming and participation proposals. Through the Continuum of Care process, the Springfield Clark County Housing Collaborative was identified as the group to review Emergency Solutions Grant applications and CoC programming and make recommendations to the City Commission for funding.

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

Public and private housing services and social services most obviously intersect within the Homeless Program planning within the community. The Springfield/Clark County Housing Collaborative manages the Continuum of Care concept in the community. Public and private housing providers as well as social service agencies address client needs. Clients are followed from the streets to permanent housing. This is achieved by fostering interagency cooperation, avoiding duplication of services, providing efficient service delivery, and more collaborative efforts. Clients can use Continuum of Care services in one or all of the following ways: (1) Emergency shelters, (2) Referral to an appropriate service provider, (3) Transitional and permanent housing assistance, (4) Rapid Re-Housing, (5) Homelessness Prevention, and/or (6) Follow-up housing services after placement is made. The Continuum of Care carries out its homelessness strategy via a combination of public and private sector organizations. Public sector organizations include state and local government agencies, public housing authorities, schools, and law enforcement entities. Organizations from the private sector include nonprofit organizations, faith-based organizations, advocacy groups, businesses, the medical community, and homeless persons.

### **Discussion**

As a result of the development of the 2015-2019 Consolidated Plan and the elements of the Needs Assessment and Market Analysis, there have been some revelations regarding the conditions and cost of housing in the community that has lead staff to accept the fact that during the last decade, while the Community Development Department has worked very hard on continuing the CDBG and HOME programs that are thought to be of service to the most needy in our community, and even rolled out new programs offered through the HPRP and NSP1 and NSP2 programs, the housing condition and cost of housing has slipped. Despite a fairly aggressive demolition program, far too many vacant and blighted structures still remain in our community and the number grows continually. Despite having a over-saturated housing market, the cost to rent an apartment takes up more that 50% of many household's income. Despite the over-saturation, it is difficult for a low-income household to find decent and safe living accommodations.

Spirited discussions have been held within the focus group process that guided this Plan. Staff would be remiss to fail to mention that this issue was by far the biggest discussion point. Focus groups debated the need for not only a vacant structure registry process, but also advocated for a routine inspection process to be conducted on all rental properties. Those properties that receive any kind of federal rental assistance already undergo an inspection process. What this means is that those units that do not pass this inspection are left for those individuals and households that are not lucky enough to be able to access this rental assistance. This is the majority of all low-income households, by far. In the coming Consolidated Plan timeframe, staff will be taking a look at this problem to discuss possible strategies for addressing this issue.

## Program Specific Requirements

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

#### Introduction

Projects planned with CDBG and HOME funds for FY2016 are identified in the Projects Table located earlier in the Annual Action Plan Process. The following identifies program income available to utilize in planned projects. The City of Springfield expends program income before HUD entitlement funds on each draw request.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

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

#### HOME Investment Partnership Program (HOME)

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

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

The City utilizes a variety of federal, state and local resources to expand affordable housing opportunities in Springfield. These resources include:

Community Development Block Grant funds - A portion of the annual CDBG funds will be allocated for housing-related activities, primarily focusing on preservation and rehabilitation of housing and code enforcement.

HOME Investment Partnership funds - HOME funds will be allocated for increasing the supply of affordable rental housing through substantial rehabilitation and new construction, and for providing homeowner assistance.

Emergency Solutions Grant funds - The City of Springfield coordinates an application to process for ESG funds with local agencies that provide services to the homeless and at risk populations.

Shelter + Care funds - The City receives three Shelter + Care grant from HUD. One grant is for a sponsor-based project partnering with St. Vincent DePaul. The other two S+C grant offer tenant based rental assistance. The grants provide rent subsidy for at least 25 units populated by homeless and disabled households. Renewals are sought each year.

Neighborhood Stabilization Program (NSP) funds - The City received grants for both NSP1 and NSP2 (\$2.27M and \$6,101,315) to deliver a Purchase-Rehab-Resale program, a Demolition program, a New Construction of Affordable Housing Program for households at or below 50% of AMI, and a Rental program to develop affordable rental units for households at or below 50% AMI. The City will be expending the remaining program funds and closing out both NSP grants within this Consolidated Plan time frame. Program Income will continue to accrue and will be allocated and expended according to regulation.

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

The City of Springfield will be using the recapture provision to address affordability requirements of the program. All eligible participants will be provided HOME down payment assistance towards the agreed purchase price of all developed properties. Applicants will have household incomes at 80% of the area median or below and will reside in the property as their principal residence during the loan

term. The applicable affordability period will be based upon the total amount of HOME funds provided to the qualified applicant, based upon the schedule listed in 92.254(a)(4). Funds will be secured by a mortgage, until the participant obligation has been satisfied. Funds provided for down payment assistance will be in the form of a deferred loan, which may be partially forgiven or totally forgiven over the applicable period and will typically require a non-federal match. Should the applicant not satisfy the terms of the loan agreement and/or if there should be an outstanding balance of the loan, and a voluntary or involuntary sale occur, then the City will accept payment of the balance owed under the deferred payment schedule, as payment in full. If the sale does not yield sufficient funds to pay for the total outstanding balance, then the City will accept net proceeds from the sale as full payment. "Net proceeds" is determined by sales price minus superior loan payments and any other loan costs. In either situation, the HOME program will recapture all available funds before any payments are made to the homeowner. If there should be a situation where another eligible homebuyer were interested in purchasing an existing HOME assisted unit, the City would consider an assumption of the original homebuyers loan, provided the they meet established program guidelines.

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:

The City of Springfield will monitor all assisted families throughout the applicable affordability period / loan term, either by on-site property inspections and other acceptable methods. The City will utilize recapture provisions when providing direct homebuyer assistance to participants using the HOME program. The affordability periods will be based upon 92.254(a)(4) or longer based upon program design. Typically, written correspondence is provided to the assisted family, reflecting their compliance with the terms and conditions of the loan agreement and also reflects any adjustments of their deferred loan. All assisted properties are funded utilizing loan agreements, which outlines the terms and conditions of the HOME assistance being provided and are secured by a promissory note and a recorded mortgage. Recorded mortgages further assists the City to be informed of potential property transfers or pending legal actions against property owners during compliance/monitoring periods.

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:

Not Applicable.

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

1. Include written standards for providing ESG assistance (may include as attachment)

Both Homelessness Prevention and Rapid Re-Housing Activities are ESG eligible activities. The City's focus with ESG funds is Rapid Re-Housing since HC agencies receive Homelessness Prevention funds from the State of Ohio's ESG program. While the priority is Rapid Re-Housing, both are outlined in the written standards. Funds will be distributed in the City by the use of the common needs and barrier assessment tool. Individuals will be referred to IHN from United Way Information and Referral 211 services and other non-front door service agencies. Households eligible to receive assistance will complete a needs and barrier assessment to determine financial and supportive services need. The level of need and barriers to success are assessed and scored based on levels 1 thru 5, with 1 being in crisis and 5 being empowered.

The HC assists clients who are at risk of becoming homeless and are at or below 30% of AMI with Homelessness Prevention. To qualify for "at risk of homelessness" status, the individual(s) or family must meet two threshold criteria as follows: The household has income below 30% of AMI for the geographic area, and the household has insufficient resources or support networks immediately available to attain housing stability and has documentation such as an eviction notice. Providers will target homeless prevention funds to assist those that are presently in housing or at imminent risk of becoming homeless. This service will provide clients a resource to prevent them from housing loss, becoming evicted, and moving into emergency shelter.

Clients are eligible to receive short or medium term assistance based on their assessment and matrix score. Clients may receive short-term prevention financial assistance in the following categories and thresholds for up to three months of assistance. Clients may receive up to \$1600 for rental assistance. Clients may receive up to a \$550 security deposit. Clients may receive up to \$175

in utility assistance. Clients that score short term can be reassessed after the completion of the 3-month period if their situation has changed to meet the medium term scoring criteria. The same amount of assistance is eligible under medium term assistance. However, clients are eligible to receive the assistance up to 6 months if determined to be medium term

The HC provides Re-Housing financial assistance, housing relocation and stabilization services for literally homeless individuals and families. These services are provided to clients staying in emergency shelters within the region. The services assist clients with financial assistance for security deposits, utility deposits, utility payments, rental arrears, and case management services. Re-housing services will target clients who are living in emergency shelter, and would benefit from utility assistance, security deposit, and/or rental assistance. Clients are eligible to receive up to \$1600 in rental assistance. Clients are eligible to receive up to \$500 in security deposit assistance. Clients are eligible to receive up to \$750 dollars in utility payment assistance and up to \$175 in utility deposit assistance. The goal of this program is to help reduce the length of clients stay in emergency shelters.

Clients will receive case management assistance with the financial assistance. Performance measures are agreed upon between the case manager and client for accessing housing, and developing a plan to assist them in sustaining permanent housing. Client's plans may include job training, furthering education, access to life skills classes and budgeting. Clients' performance will be tracked through Homeless Management Information System (HMIS) and monitoring. The case managers meet with the clients monthly, or more often if desired. Case Managers will build relationships with landlords across the region to help support participation and program compliance.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Intake System for Housing Collaborative utilizes a coordinated "no wrong door" approach whereby, any front door agency in Clark County will complete intake paperwork for those who are homeless or at risk of becoming homeless. The intake forms include a Common Screening Tool and a Common Assessment Tool. The agency who interviews the individual or family will determine a proper referral, if needed, based on information revealed by the assessment tool. Determination of which agency is most suited to work with the client is based on information contained in the Inventory of Community Resources.

Those who fall into the category of “at risk of homelessness” or who are “homeless” and whose income falls below 30% AMI will be referred to Interfaith Hospitality Network of Springfield for assessment for participation in the Housing Prevention Program or Rapid Re-housing program.

A. Common Screening Tool - The common screening tool should be used to determine the client’s appropriateness for admission along with their eligibility for admission. This screening tool will also allow service providers to review information in which it was given and to decide which client has precedence. Front door agencies should utilize this screening tool to determine if the client is eligible for their program and what other resources they should be referred to as well. Back door agencies should also use this screening tool to determine what referrals need to be made so that the client is adequately served. All agencies must use this form to gather necessary information to effectively assist clients in their area of need. It is of great importance that all agencies complete this form in its entirety. .

B. Common Assessment Tool - The purpose of the Common Assessment Tool is to gather and verify information about the person and his/her housing and service needs and program eligibility and priority. The goals of the Tool are to:

- improve accessibility to prevention and rapid re-housing assistance and services;
- better coordinate emergency shelter referral and placement; and/or
- enhance system capacity to intervene timely and effectively in housing and personal crises.

In support of a “no wrong door” services strategy, clients may call or go to any one of the “front-door” participating prevention and homeless programs at different geographic locations. Intake workers at each location will use standardized intake, assessment, tools and referral procedures. It ensures that clients will not have to undergo repeated or inconsistent intake processes at multiple locations as they move between different services. The Tool reduces the burden placed on homeless individuals and families to have to personally identify which agencies offer appropriate services; instead, the Tool will help guide them to the most appropriate service based on their current housing situation.

The Common Assessment Tool is broken into sections, acknowledging that the level and mix of information needed will vary depending upon the program/service selected for the client. The Common Assessment Tool not only gathers client information, but it also helps to determine client eligibility within the programs throughout the Housing Collaborative. The Tool is broken into sections so that some may not be needed based on the service required for the client. The Tool should present the overall picture of a client’s/household’s needs. Additionally, the Tool also serves as a means of collecting data in the Housing Collaborative region to offer a picture about what service gaps may exist in the region and providing supporting data for evidencing any such gaps.

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).

**Process for Making Sub-Award** - Each year the City accepts applications for funding from area homeless services providers. ESG grants are awarded by the Community Development Department to local Continuum of Care agencies whose purpose it is to shelter, serve, and re-house the homeless. The city uses an Application/RFP process inviting local CoC agencies with the ability to carry out ESG activities to apply for funds. Applications for ESG funding will be evaluated by the Community Development Department in conjunction with a panel of CoC agencies not requesting ESG funds. Recommendations for funding will be related to the Community Grant Advisory Board and is subject to City Commission approval.

Selection of applicants for funding will be made based on the following:

- Meeting of criteria as outlined in the Policies and Procedures and detailed in the Request for Proposal (RFP)
  - The applicant's history of providing effective shelter or prevention services to the homeless, and of successfully operating performance-based grant-funded programs.
  - The applicant's effective coordination with organizations in the local CoC to address identified gaps in services for the homeless and improves outcomes for participants.
  - If the applicant is requesting ESG Operations funding assurances that funds will preserve or support existing shelter bed capacity.
  - If applicant is requesting ESG social services, rapid re-housing, or prevention funding: The applicant's ability to transition homeless participants or shelter residents to permanent housing, and/or prevent homelessness for families and individuals who are at risk.
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.

Homeless Participation Requirement. The City reserves a seat on the Community Grant Advisory Board for a homeless or formerly homeless person. Admittedly, filling this position continually proves to be a challenge for staff. For this reason, staff recommends that ESG agencies involve this

population in its decision-making boards as well. Often the agencies have an easier time of securing board members because of the relationship that forms between the agency and an individual served.

5. Describe performance standards for evaluating ESG.

Performance Standards - The City looks to more than the traditional output measures – number of persons in emergency shelter, number of bed-nights provided, or number of households receiving services – adopting the following outcome measures, indicators and targets, consistent with the goal of ending homelessness. Not all ESG sub-recipients will report on all measures. Outcome performance measures are tailored to the category of ESG activity for which funding is awarded, as outlined below:

A. Emergency Shelter Operations

- Exits to permanent housing - Goal 30%
- Earned income at exit - Goal 15%
- Non-cash benefits at exit - Goal 50%
- Average length of stay - Goal 40 days

B. Transitional Housing

- Exits to permanent housing - Goal 80%
- Earned income at exit - Goal 40%
- Maintain or increase income - Goal 70%
- Non-cash benefits at exit - Goal 85%
- Average length of stay - Goal 240 days

C. Rapid Re-Housing

- Earned income at exit - Goal 50%
- Maintain or increase income - Goal 70%
- Non-cash benefits at exit - Goal 85%
- Average length of stay - Goal 150 days

**Discussion**

For additional information please see the ESG Policies and Procedures listed in the Appendix.



# Appendix I

# Affirmative Marketing Policy

## **City of Springfield Affirmative Marketing Policy General**

The City of Springfield will maintain an affirmative marketing plan for its housing programs.

The City of Springfield will continue to work on overcoming any impediments to fair housing, through the HUD required process of Analyzing Impediments to fair housing, and planning to overcome these impediments.

The City of Springfield will continue to provide fair housing education in the community through the use of printed materials, media, community meetings and special events.

The City of Springfield will continue to provide a means for fair housing complaints, for anyone who believes they have suffered housing discrimination.

The City of Springfield will inform the public, owners, and potential tenants about Federal fair housing laws and the participating jurisdiction's affirmative marketing policy (e.g., the use of the Equal Housing Opportunity logotype or slogan in press releases and solicitations for owners, and written communication to fair housing and other groups).

### **City of Springfield Affirmative Marketing Plan**

The City of Springfield seeks to affirmatively market their housing programs by advertising them to all segments of the community and offers them to all persons without discrimination based on protected classes of race, color, familial status, handicap status, religion, sex, national origin, military status or ancestry.

Outreach material includes printed material, information on the City website, and brochures and newsletters distributed to the community. The HUD Equal Housing Opportunity logo is included on all advertising documents.

The City of Springfield will provide outreach at community events with information about their housing programs.

The City of Springfield will also provide information and outreach through churches, agencies for persons with disabilities, barbershops and beauty shops and other community locations seeking to reach all sectors of the community in both traditional and nontraditional means. The City of Springfield will also market their programs through the local media.

The City of Springfield will display the H.U.D. Fair Housing Poster in their office.

## **City of Springfield Affirmative Marketing Policy for Partners**

**All housing contractors providing subsidized housing in the City of Springfield are required to prepare an Affirmative Marketing Plan and have it approved by the City of Springfield Fair Housing Coordinator. They should also give a report quarterly during the first year of operation and an annual report thereafter of actual steps they are taking to assure affirmative marketing practice.**

**The Affirmative Marketing Plan should include the following elements:**

- (a) Plans to advertise available housing through local media**
- (b) Plans to advertise available housing through community contacts**
- (c) Use of the Equal Housing Opportunity logotype or slogan in all advertising**
- (d) Display of the HUD approved or other equivalent Fair Housing Poster in all rental offices**
- (e) Steps to assure all staff are educated and follow the letter and spirit of the Fair Housing Law as they transact business**
- (f) Steps to assure that they will inform and solicit applications from persons in the housing market area who are not likely to apply for the housing without special outreach. This should include, but is not limited to conducting outreach through: community organizations, places of worship, employment centers, fair housing groups, and housing counseling agencies**
- (g) Provide consumers with a contact number to make fair housing inquiries and complaints. City of Springfield Fair Housing Coordinator, (937) 324-7696. Ohio Civil Rights Commission (888) 278-7101.**

**The Affirmative Marketing Plan can be reported on HUD Form 935-2.**

# Appendix II

# Fair Housing Action Plan

## **FAIR HOUSING ACTION PLAN 2016-2017**

During the 2016-2017 project year the City will be addressing the impediments to fair housing as outlined in the 2013 Analysis of Impediments to Fair Housing to the community, covering the time period of 2008-2012. Impediments being addressed include: racial segregation; housing discrimination against Latinos, persons with disabilities, African-Americans, LGBT housing consumers, families with children; housing loan discrimination; foreclosures; racial steering; lead-based paint and access to decent, safe and sanitary housing; retaliation; discrimination based on military status and affordable housing for persons of the protected classes (homebuyers and renters).

The City will continue to work with the Springfield/Clark County Fair Housing Advocates to address concerns. This group will work to provide outreach to promote homeownership and good housing loan decisions for minorities and low income persons, work with the Board of Realtors to sponsor fair housing education, and provide fair housing information at community events.

The Fair Housing office will continue to offer landlord-tenant information and referrals in person and on the phone, as well as outreach to tenants through various forms of communication.

The City will continue its contract with Miami Valley Fair Housing to conduct random and case specific fair housing tests, as well as to provide consultation services as needed.

The City will continue with its fair housing information and referral, education and complaint intake during the project year. The City will continue to provide fair housing education to housing providers. Landlords are required by City ordinance to give each tenant a Landlord-Tenant brochure with fair housing information.

The Fair Housing Action Plan addresses the impediments to fair housing, with special attention to protected classes identified as concerns in the analysis

### **Impediments to Fair Housing: Action Plan for 2016-2017**

#### **Impediment/Concern #1: Racial Segregation/Racial Steering**

**There are reports that real estate agents are not always suggesting houses in all areas of Springfield to prospective homebuyers (Racial Steering).**

**Action #1 to be taken: Educational outreach to real estate community on fair housing law.**

Action Time Frame: The City will offer at least one real estate education class on fair housing law during the 2016-2017 project year. The City will provide Constant Contact emails to the real estate community.<sup>1</sup> The City will also prepare two newsletters with fair housing law information to the real estate community.

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<sup>1</sup>Attachment A. Constant Contact Contract

Resources: The City uses Community Development Block Grant (CDBG) resources and partners with the Springfield/Clark County Fair Housing Advocates.

Documentation: Minutes of the Springfield/Clark County Fair Housing Advocates, Fair Housing Outreach binder with documentation of actions taken.

**Action #2: The city will continue the contractual relationship with Miami Valley Fair Housing for enforcement services. The agency will conduct random tests during the project year.**

Action Time Frame: The City will continue a contract with Miami Valley Fair Housing to conduct fair housing random tests during 2016.

Resources: The City uses Community Development Block Grant (CDBG) resources for these contractual purposes.

Documentation: A copy of the contract for 2015-2016 with Miami Valley Fair Housing.

**Action #3: The city will conduct fair housing educational outreach to the community on fair housing on a regular basis through community fairs, media, printed materials, internet and speaking engagements**

Action Time Frame: The educational outreach will span the 2016-2017 CDBG year.

Resources: The City uses Community Development Block Grant (CDBG) resources for these events and also partners with the Springfield/Clark County Fair Housing Advocates to host educational booths, and media outreach in Real Estate Plus.

Documentation: Springfield/Clark County Fair Housing Advocates minutes with plans for 2016.<sup>2</sup> Copies of outreach seminar lists of persons who attended, sign in sheets are maintained.

**Action #4: The city's 2016-2017 Action Plan sets goals to eliminate blight in neighborhoods by providing housing rehabilitation programs and code enforcement. Housing rehabilitation is done through a home-deferred loan program for older owner-occupants and persons with disabilities, and low interest loans for other low income residents. Grants are also available to veterans to off-set loan amounts. In addition, Code Enforcement demolishes blighted properties, cuts weeds on abandoned properties and enforces the property maintenance code on houses and rental properties throughout the community.**

Action Time frame: 2016-2017 project year

Resources: City CDBG funds, HOME funds, City general fund, and Moving Ohio Forward Funds.

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<sup>2</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals

Documentation: City of Springfield Consolidated Plan – City Action Plan 2016 program year.<sup>3</sup>

**Action #5: The City will educate about and build understanding among the many cultures of local residents through the Global Education Calendar and monthly speaker series. The City will also coordinate efforts to develop a new series and publish a full color calendar to advertise the series. Ads in the calendar will include promoting fair housing with the City and Springfield/Clark County Fair Housing Advocates. The City fair housing office will promote events through press releases, emails and posters in the community, including fair housing newsletters to housing consumers and providers, maintaining records of outreach.**

Action Time Frame: During the project year the City will continue to coordinate a group to provide a monthly speaker series on “Global EarthCare” in local and global ethnic cultures. Programs planned include: April 5, 2016, A Muslim Perspective on Climate Change, May 3, Community Efforts to Cultivate the Earth in South Springfield. The City will also coordinate efforts to develop a new series and publish a full color calendar to advertise the series beginning in September, 2016, with 4000 copies printed.

Resources: CDBG, Lead-Safe Springfield and other community calendar sponsors.

Documentation: 2015-2016<sup>4</sup> calendar. The donor list for 2015-2016.<sup>5</sup> Copies of press releases and newspaper articles are maintained. Binders are maintained with copies of checks from donors.

**Action #6: The City will maintain information and referral for fair housing and landlord-tenant concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

Documentation: The city maintains files on all calls, and provides a summary for annual performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2016-2017.<sup>6</sup>

**Impediment/Concern #2: Discrimination with the Latino Population.**

**Action #1: Educational outreach to real estate community on fair housing law and working with Latino populations by conducting a fair housing seminar for housing providers**

Action Time Frame: The City will offer at least one real estate education class on fair housing law during the 2016-2017 project year. The City will provide Constant Contact emails to the

<sup>3</sup> Attachment D. City of Springfield 2016-2017 Action Plan.

<sup>4</sup> Attachment E. Global Education Calendar 2015-2016

<sup>5</sup> Attachment F. Global Education Calendar sponsor list 2015-2016

<sup>6</sup> Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.

real estate community.<sup>7</sup> The City will also prepare two newsletters with fair housing law information to the real estate community.

Resources: The City uses Community Development Block Grant (CDBG) resources and partners with the Springfield/Clark County Fair Housing Advocates.

Documentation: Minutes of the Springfield/Clark County Fair Housing Advocates, Fair Housing Outreach binder with documentation of actions taken.

**Action #2: Educational outreach to Latino housing consumers. The City will maintain Spanish language fair housing and landlord-tenant information and distribute brochures in the community. Provide Spanish language fair housing information at health fairs, the Clark County Fair and other community events and maintain an open purchase order for interpretation and translations services.**

Action time frame: 2016-2017 CDBG year. Community events including the Clark County Fair (July, 2016) and CultureFest (September 25, 2016). Other activities are ongoing.

Resources: The City will utilize CDBG resources to maintain Spanish language brochures in stock and distribute in the community at events and coordinate City fair housing efforts, including leadership of the Springfield/Clark County Fair Housing Advocates .

Documentation: Copies of Landlord Tenant brochure and City Fair Housing brochure in Spanish.<sup>8</sup> Purchase order for language translation/interpretation.<sup>9</sup> Will document outreach events in Fair Housing Outreach Binder.

**Action #3: The city will continue the contractual relationship with Miami Valley Fair Housing for enforcement services. The agency will conduct random tests during the project year.**

Action Time Frame: The City will continue a contract with Miami Valley Fair Housing to conduct fair housing random tests during 2016.

Resources: The City uses Community Development Block Grant (CDBG) resources for these contractual purposes.

Documentation: A copy of the contract for 2016-2017 with Miami Valley Fair Housing.

**Action #4: The City will maintain information and referral for fair housing and landlord-tenant concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

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<sup>7</sup> Attachment A. Constant Contact Email Contract

<sup>8</sup> Attachment G. Spanish Language Landlord-Tenant booklet and fair housing brochure.

<sup>9</sup> Attachment H. Open purchase order for language translation and interpretation services

Documentation: The city maintains files on all calls, and provides a summary for annual performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2016-2017.<sup>10</sup>

**Action #5: The City will partner with the Fair Housing Advocates and the Latino Coalition to provide an outreach event to the Latino community. The goal will be to educate about fair housing rights, landlord-tenant rights and responsibilities and homeownership.**

Action Time Frame: Date to be determined during 2016-2017 project year.

Resources: CDBG funds, Springfield/Clark County Fair Housing Advocates, and Neighborhood Housing Partnership. Other resources to be identified as part of the project.

Documentation: Springfield/Clark County Fair Housing Advocates minutes.<sup>11</sup>

**Impediment/Concern #3: Discrimination against persons with disabilities**

**Action #1: Educational outreach to real estate community on fair housing law on disability status provisions in the fair housing law through a fair housing seminar.**

Action Time Frame: The City will offer at least one real estate education class on fair housing law during the 2016-2017 project year. The City will provide Constant Contact emails to the real estate community.<sup>12</sup> The City will also prepare two newsletters with fair housing law information to the real estate community.

Resources: The City uses Community Development Block Grant (CDBG) resources and partners with the Springfield/Clark County Fair Housing Advocates.

Documentation: Minutes of the Springfield/Clark County Fair Housing Advocates, Fair Housing Outreach binder with documentation of actions taken.

**Action #2: The city will conduct fair housing educational outreach to the community on fair housing on a regular basis through community fairs, media, printed materials, internet and speaking engagements**

Action Time Frame: The educational outreach will span the 2016-2017 CDBG year.

Resources: The City uses Community Development Block Grant (CDBG) resources for these events and also partners with the Springfield/Clark County Fair Housing Advocates to host educational booths, and media outreach in Real Estate Plus.

Documentation: Springfield/Clark County Fair Housing Advocates minutes with plans for 2016.<sup>13</sup> Copies of outreach seminar lists of persons who attended, sign in sheets are

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<sup>10</sup> Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.

<sup>11</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals

<sup>12</sup> Attachment A. Constant Contact Email Contract

<sup>13</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals

maintained.

**Action #3: The city will continue the contractual relationship with Miami Valley Fair Housing for enforcement services. The agency will conduct random tests during the project year.**

Action Time Frame: The City will continue a contract with Miami Valley Fair Housing to conduct fair housing random tests during 2016.

Resources: The City uses Community Development Block Grant (CDBG) resources for these contractual purposes.

Documentation: A copy of the contract for 2016-2017 with Miami Valley Fair Housing.

**Action #4 : The City will maintain information and referral for fair housing and landlord-tenant concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

Documentation: The city maintains files on all calls, and provides a summary for annual performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2016-2017.<sup>14</sup>

**Action #5: Continue to network with agencies that serve people with disabilities to educate on fair housing law and exchange information and develop specific outreach plans for persons with disabilities. Send letters or emails. Follow up with printed materials and offers to provide speakers for meetings. Continue to follow up once a year to provide additional printed materials and speakers as needed.**

Action Time frame: Ongoing

Resources: City CDBG funds.

Documentation: Records will be maintained of outreach activities and all speaking engagements.

**Action #6: Encourage use of the Ohio Housing Locator Service to list available accessible rental housing on line by rental housing providers.**

Action time frame: Ongoing

Resources: City of Springfield website, CDBG funds

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<sup>14</sup> Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.

Documentation: City's fair housing webpage  
(<http://www.ci.springfield.oh.us/depts/hr/fairhousing2.html#managers>).

**Action #7: Utilize HOME and CDBG money to meet needs of persons with specialized needs. Through the deferred loans, the City provides emergency repair loans and rehabilitation funds for low income persons with disabilities who own and occupy their own house. In addition, loans and grants are provided to agencies serving disabled populations for new construction and rehabilitation of properties for special need populations. In conjunction with the Clark County Board of Development Disabilities, the City utilizes rehab loans to make units handicap accessible. HOME tenant-based rental assistance is also provided for low income special needs clients.**

Action Time frame: 2016-2017 project year.

Resources: HOME, NSP and CDBG funds

Documentation: City of Springfield Action Plan for 2016-2017,<sup>15</sup>  
[http://www.ci.springfield.oh.us/depts/hr/pdf/ActionPlanAmendmentDraft\\_for\\_PublicComment.pdf](http://www.ci.springfield.oh.us/depts/hr/pdf/ActionPlanAmendmentDraft_for_PublicComment.pdf)

**Action #8: Distribute a flyer to housing consumers and housing providers on reasonable accommodations and reasonable modifications.**

Action Time Frame: Reasonable accommodations/modification flyer will be distributed at community events and other times as appropriate during 2016-2017 project year and post on City website.

Resources: CDBG funds

Documentation: Copy of flyer developed.<sup>16</sup> Distribution history will be maintained.

**Impediment/Concern #4: Discrimination against African-Americans**

**Action #1 to be taken: Educational outreach to real estate community on fair housing law.**

Action Time Frame: The City will offer at least one real estate education class on fair housing law during the 2016-2017 project year. The City will provide Constant Contact emails to the real estate community.<sup>17</sup> The City will also prepare two newsletters with fair housing law information to the real estate community.

Resources: The City uses Community Development Block Grant (CDBG) resources and partners with the Springfield/Clark County Fair Housing Advocates.

Documentation: Minutes of the Springfield/Clark County Fair Housing Advocates, Fair Housing Outreach binder with documentation of actions taken.

<sup>15</sup> Attachment I. City of Springfield 2016-2017 Action Plan excerpt

<sup>16</sup> Attachment J. Fair Housing and Disabilities Flyer

<sup>17</sup> Attachment A. Constant Contact Email Contract

**Action #2: The city will continue the contractual relationship with Miami Valley Fair Housing for enforcement services. The agency will conduct random tests during the project year.**

Action Time Frame: The City will continue a contract with Miami Valley Fair Housing to conduct fair housing random tests during 2016.

Resources: The City uses Community Development Block Grant (CDBG) resources for these contractual purposes.

Documentation: A copy of the contract for 2016-2017 with Miami Valley Fair Housing.

**Action #3: The city will conduct fair housing educational outreach to the community on fair housing on a regular basis through community fairs, media, printed materials, internet and speaking engagements**

Action Time Frame: The educational outreach will span the 2016-2017 CDBG year.

Resources: The City uses Community Development Block Grant (CDBG) resources for these events and also partners with the to host educational booths, and media outreach in Real Estate Plus.

Documentation: Springfield/Clark County Fair Housing Advocates minutes with plans for 2016.<sup>18</sup> Copies of outreach seminar lists of persons who attended, sign in sheets are maintained.

**Action #4 The City will educate about and build understanding among the many cultures of local residents through the Global Education Calendar and monthly speaker series. The City will also coordinate efforts to develop a new series and publish a full color calendar to advertise the series. Ads in the calendar will include promoting fair housing with the City and Springfield/Clark County Fair Housing Advocates. The City fair housing office will promote events through press releases, emails and posters in the community, including fair housing newsletters to housing consumers and providers, maintaining records of outreach.**

Action Time Frame: During the project year the City will continue to coordinate a group to provide a monthly speaker series on "Global EarthCare" in local and global ethnic cultures. Programs planned include: April 5, 2016, A Muslim Perspective on Climate Change, May 3, Community Efforts to Cultivate the Earth in South Springfield. The City will also coordinate efforts to develop a new series and publish a full color calendar to advertise the series beginning in September, 2016, with 4000 copies printed.

Resources: CDBG, Lead-Safe Springfield and other community calendar sponsors.

Documentation: 2015-2016<sup>19</sup> calendar. The donor list for 2015-2016.<sup>20</sup> Copies of press

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<sup>18</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals

<sup>19</sup> Attachment E. Global Education Calendar 2015-2016

<sup>20</sup> Attachment F. Global Education Calendar sponsor list 2015-2016

releases and newspaper articles are maintained. Binders are maintained with copies of checks from donors.

**Action #5: The City will maintain information and referral for fair housing and landlord-tenant concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

Documentation: The city maintains files on all calls, and provides a summary for annual performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2016-2017.<sup>21</sup>

### **Impediment/Concern #5: Discrimination against Families with Children**

**Action #1 to be taken: Educational outreach to real estate community on fair housing law.**

Action Time Frame: The City will offer at least one real estate education class on fair housing law during the 2016-2017 project year. The City will provide Constant Contact emails to the real estate community.<sup>22</sup> The City will also prepare two newsletters with fair housing law information to the real estate community.

Resources: The City uses Community Development Block Grant (CDBG) resources and partners with the Springfield/Clark County Fair Housing Advocates.

Documentation: Minutes of the Springfield/Clark County Fair Housing Advocates, Fair Housing Outreach binder with documentation of actions taken.

**Action #2: The city will continue the contractual relationship with Miami Valley Fair Housing for enforcement services. The agency will conduct random tests during the project year.**

Action Time Frame: The City will continue a contract with Miami Valley Fair Housing to conduct fair housing random tests during 2016.

Resources: The City uses Community Development Block Grant (CDBG) resources for these contractual purposes.

Documentation: A copy of the contract for 2016-2017 with Miami Valley Fair Housing.

**Action #3: The city will conduct fair housing educational outreach to the community on fair housing on a regular basis through community fairs, media, printed materials,**

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<sup>21</sup> Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.

<sup>22</sup> Attachment A. Constant Contact Email Contract

## internet and speaking engagements

Action Time Frame: The educational outreach will span the 2016-2017 CDBG year.

Resources: The City uses Community Development Block Grant (CDBG) resources for these events and also partners with the Springfield/Clark County Fair Housing Advocates to host educational booths, and media outreach in Real Estate Plus.

Documentation: Springfield/Clark County Fair Housing Advocates minutes with plans for 2016.<sup>23</sup> Copies of outreach seminar lists of persons who attended, sign in sheets are maintained.

**Action #4: The City will maintain information and referral for fair housing and landlord-tenant concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

Documentation: The city maintains files on all calls, and provides a summary for annual performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2016-2017.<sup>24</sup>

## Impediment/Concern #6: Substandard Renter-Occupied Housing

**Action #1: Provide outreach to fair housing consumers on fair housing law by participating in housing fairs, and host booths at community events to provide information to housing consumers, distributing newsletters, maintaining landlord-tenant information on the City's website, and distributing information in the community through lectures and printed material.**

Action Time Frame: The educational outreach will span the 2016-2017 CDBG year.

Resources: The City uses Community Development Block Grant (CDBG) resources for these events, partners with the Springfield/Clark County Fair Housing Advocates and the Springfield News-Sun for Real Estate Plus.

Documentation: Springfield/Clark County Fair Housing Advocates minutes with plans for 2016.<sup>25</sup> Will maintain copies of outreach seminars lists of persons who attended, sign in sheets and outreach booths staffed.

**Action #2: The City of Springfield continues to require that all City landlords provide landlord-tenant booklets to tenants upon move in to inform tenants of their fair housing and landlord-tenant rights and responsibilities, and retain records with the tenant's**

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<sup>23</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals

<sup>24</sup> Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.

<sup>25</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals

**signature, indicating they have received the document.**

Action time frame: Ongoing

Resources: CDBG block grant funds print the landlord-tenant booklets and signature forms.

Documentation: City of Springfield Ordinance 1324.16.<sup>26</sup> City of Springfield Tenants Rights and Responsibilities handbook and signature form.<sup>27</sup>

**Action #3: The City of Springfield Code Enforcement office provides a process for intake and processing for tenant requested inspections (TRI) for deficiencies in rental properties.**

Action time frame: Ongoing

Resources: City of Springfield CDBG funds, City general funds

Documentation: City of Springfield Codified Ordinance 1322.<sup>28</sup>

**Action #4 The City will maintain information and referral for fair housing and landlord-tenant concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

Documentation: The city maintains files on all calls, and provides a summary for annual performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2015-2016.<sup>29</sup>

**Action: #5 The Fair Housing Coordinator will continue to follow through on plans made from a group process between property managers, representatives of local housing agencies and tenants that looked for action steps to improve relationships and decent, safe and affordable housing for tenants. The plans for ongoing tenant training on a quarterly basis as well as annual landlord training.**

Action Time frame: This will continue during the 2016-2017 project year.

Resources: CDBG

Documentation: The training sessions will be documented in the 2016-2017 Fair Housing Outreach binder.

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<sup>26</sup> Attachment K. City of Springfield Codified Ordinance Section 1324.16.

<sup>27</sup> Attachment L. City of Springfield Tenant Rights and Responsibilities booklet and signature form.

<sup>28</sup> Attachment M. City of Springfield Codified Ordinance Section 1322

<sup>29</sup> Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.

**Impediment/Concern #7: Those in the protected classes under the fair housing law are often part of lower income groups and have more difficulty qualifying for loans. Even some minorities in higher income groups are denied loans at higher rates than non-minorities. A smaller number of loans go to the minority populations in relation to their percentage in total population.**

**Action #1: The city will conduct fair housing educational outreach to the community on fair housing on a regular basis through community fairs, media, printed materials, internet and speaking engagements**

Action Time Frame: The educational outreach will span the 2016-2017 CDBG year.

Resources: The City uses Community Development Block Grant (CDBG) resources for these events and also partners with the Springfield/Clark County Fair Housing Advocates to host educational booths, and media outreach in Real Estate Plus.

Documentation: Springfield/Clark County Fair Housing Advocates minutes with plans for 2016.<sup>30</sup> Copies of outreach seminar lists of persons who attended, sign in sheets are maintained.

**Action #2: The City partners with the Neighborhood Housing Partnership as their CHDO who will do outreach to low income families and minorities with Homebuyer Counseling, Financial Education and provide loan review services to help reduce barriers to home ownership for minorities.**

Action time frame: 2016-2017 project year.

Resources: CDBG and HOME funds, NHP also has other private and public funding sources

Documentation: City of Springfield Action Plan 2016-2017

**Action #3: The City will maintain information and referral for fair housing and housing loan concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

Documentation: The city maintains files on all calls, and provides a summary for annual performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2016-2017.<sup>31</sup>

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<sup>30</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals

<sup>31</sup> Attachment C, Miami Valley Fair Housing Testing Contract with the City of Springfield.

**Action #4: The City will plan at least one special event in partnership with nonprofit housing agencies, Realtors and Lenders to provide helpful information on loans, home buying foreclosure prevention and credit.**

Action time frame: The event will be scheduled in accord with partners' calendar.

Resources: CDBG, Booth vendors, Fair Housing Advocates , nonprofit housing agencies

Documentation: Records of the event, sign in sheets and schedule, packet will be maintained. Fair Housing Advocates minutes with planning and event report.

**Impediment/Concern #8: There is a high rate of foreclosures in the City of Springfield, especially in minority areas. (Note: this impediment has substantially improved in the past few years. Foreclosures went from 922 in 2013 to 343 in 2015).**

**Action #1: The City of Springfield will continue to partner with the Neighborhood Housing Partnership who provides foreclosure prevention counseling, along with other housing counseling in homebuyer and financial education, debt repair and loan advice that may prevent decisions that could lead to foreclosure.**

Timeline: 2016-2017 project year

Resources: NHP funded in part by City housing HUD grant, NeighborWorks and other local support.

Documentation: Records will be maintained of events and educational outreach conducted.

**Action #2: The city will conduct fair housing educational outreach to the community on fair housing on a regular basis through community fairs, media, printed materials, internet and speaking engagements**

Action Time Frame: The educational outreach will span the 2016-2017 CDBG year.

Resources: The City uses Community Development Block Grant (CDBG) resources for these events and also partners with the Springfield/Clark County Fair Housing Advocates to host educational booths.

Documentation: Springfield/Clark County Fair Housing Advocates minutes with plans for 2016.<sup>32</sup> Copies of outreach seminar lists of persons who attended, sign in sheets are maintained.

**Action #4: The City will plan a special event in partnership with nonprofit housing agencies, Realtors and Lenders to provide helpful information on loans, home buying foreclosure prevention and credit.**

Action time frame: The event will be scheduled in accord with partners' calendar.

Resources: CDBG, Booth vendors, Fair Housing Board, nonprofit housing agencies

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<sup>32</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2015 Goals

Documentation: Records of the event, sign in sheets and schedule, packet will be maintained. Fair Housing Board minutes with planning and event report.

**Impediment/Concern #9: There is a need for more fair housing education for both consumers and housing providers.**

**Action #1 to be taken: Educational outreach to real estate community on fair housing law.**

Action Time Frame: The City will offer at least one real estate education class on fair housing law during the 2016-2017 project year. The City will provide Constant Contact emails to the real estate community.<sup>33</sup> The City will also prepare two newsletters with fair housing law information to the real estate community.

Resources: The City uses Community Development Block Grant (CDBG) resources and partners with the Springfield/Clark County Fair Housing Advocates.

Documentation: Minutes of the Springfield/Clark County Fair Housing Advocates, Fair Housing Outreach binder with documentation of actions taken.

Action Time Frame: The City will offer a real estate education class on fair housing law in April, 2016.

**Action #2: The city will conduct fair housing educational outreach to the community on fair housing on a regular basis through community fairs, media, printed materials, internet and speaking engagements**

Action Time Frame: The educational outreach will span the 2016-2017 CDBG year.

Resources: The City uses Community Development Block Grant (CDBG) resources for these events and also partners with the Springfield/Clark County Fair Housing Advocates to host educational booths, and media outreach in Real Estate Plus.

Documentation: Springfield/Clark County Fair Housing Advocates minutes with plans for 2016.<sup>34</sup> Copies of outreach seminar lists of persons who attended, sign in sheets are maintained.

**Action #3: The City will maintain information and referral for fair housing and landlord-tenant concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

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<sup>33</sup> Attachment A. Constant Contact Email Contract

<sup>34</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals

Documentation: The city maintains files on all calls, and provides a summary for annual performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2016-2017.<sup>35</sup>

**Action #4: The City will plan a special event in partnership with nonprofit housing agencies, Realtors and Lenders to provide helpful information on loans, home buying foreclosure prevention and credit.**

Action time frame: The event will be scheduled in accord with partners' calendar.

Resources: CDBG, Booth vendors, Fair Housing Advocates , nonprofit housing agencies

Documentation: Records of the event, sign in sheets and schedule, packet will be maintained. Fair Housing Board minutes with planning and event report.

**Impediment #12 Children under the age of 6, and minority children are at risk for lead-based paint exposure in the City of Springfield, although improvements have been made in this area**

Action: The Lead-Safe Springfield (LSS) program has been the recipient of six (6) consecutive HUD Office of Healthy Homes and Lead Hazard Control, Lead Hazard Control grants. The goal of the program is to make lead-safe housing for young children and to provide lead training and outreach activities. The LSS program seeks to work with property owners to bring the properties back into lead-safe condition, after which the owner is to maintain it in lead-safe condition. Unfortunately the poorest citizens, often minorities or low-income families often occupy the housing in the poorest condition. This results in a disproportionate number of minority and poor children becoming lead poisoned. The LSS program works exclusively to make lead-safe housing for the low-income to very, very low-income population.

Since 1997, Lead Safe Springfield has been awarded a total of 17.5 million dollars in six federal grants through the U.S. Department of Housing and Urban Development. They have reduced lead based paint hazards in 1200 houses and apartments. Currently in their sixth grant period, their current goal is to provide assistance for a total of 160 units by June, 2016. They have requested an extension that would continue the grant through March, 2016

The program has completed lead abatement contractor, lead abatement worker and lead renovator skills training 256 persons. The program continues to perform outreach and education to the community on lead paint hazards and how to protect young children in partnership with the fair housing program.

Time Frame: The 6th grant began in June, 2012 and will conclude during the project year.

Resources: H.U.D. Healthy Homes grant and CDBG funds.

Documentation: Lead-Safe Springfield submits quarterly reports to H.U.D. on their progress

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<sup>35</sup> Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.

on this grant, including documentation of all above activities. Copies of their quarterly reports are maintained in the Community Development Department of the City of Springfield of all activities. A database stores the income and race of all assisted families for reporting purposes. The Fair Housing office also maintains outreach records on Lead-Safe promotion and education.

### **Impediment #11: Retaliation for fair housing complaints**

#### **Action #1: Educational outreach to real estate community on fair housing law.**

Action Time Frame: The City will offer at least one real estate education class on fair housing law during the 2016-2017 project year. The City will provide Constant Contact emails to the real estate community.<sup>36</sup> The City will also prepare two newsletters with fair housing law information to the real estate community.

Resources: The City uses Community Development Block Grant (CDBG) resources and partners with the Springfield/Clark County Fair Housing Advocates.

Documentation: Minutes of the Springfield/Clark County Fair Housing Advocates, Fair Housing Outreach binder with documentation of actions taken.

#### **Action #2: Distribute an informational sheet about retaliation for consumers and housing providers and include it in general fair housing education and outreach events.**

Action Time Frame: Distribution during project year.

Resources: CDBG funds

Documentation: Will maintain a copy of flier and distribution record.

#### **Action #3: The City will maintain information and referral for fair housing and housing loan concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

Documentation: The city maintains files on all calls, and provides a summary for annual performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2016-2017.<sup>37</sup>

### **Impediment #12 Military/Veterans Concerns**

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<sup>36</sup> Attachment A. Constant Contact Email Contract

<sup>37</sup> Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.

Military Status was recently added to the Ohio fair housing law. In the Veteran's Focus Group, it appears that veterans are often not aware of benefits available to them and their fair rights. Many face discrimination because of their other protected class status, especially disability status and race.

**Action #1:** Provide information to the Clark County Veteran's office on fair housing rights that they will distribute at their outreach events.

**Action #2: Educational outreach to real estate community on fair housing law on veteran status provisions in the fair housing law through a fair housing seminar.**

Action Time Frame: The City will offer at least one real estate education class on fair housing law during the 2016-2017 project year. The City will provide Constant Contact emails to the real estate community.<sup>38</sup> The City will also prepare two newsletters with fair housing law information to the real estate community.

Resources: The City uses Community Development Block Grant (CDBG) resources and partners with the Springfield/Clark County Fair Housing Advocates.

Documentation: Minutes of the Springfield/Clark County Fair Housing Advocates, Fair Housing Outreach binder with documentation of actions taken.

**Action #3: The city will conduct fair housing educational outreach to the community on fair housing on a regular basis through community fairs, media, printed materials, internet and speaking engagements**

Action Time Frame: The educational outreach will span the 2016-2017 CDBG year.

Resources: The City uses Community Development Block Grant (CDBG) resources for these events and also partners with the Springfield/Clark County Fair Housing Advocates to host educational booths, and media outreach in Real Estate Plus.

Documentation: Springfield/Clark County Fair Housing Advocates minutes with plans for 2016.<sup>39</sup> Copies of outreach seminar lists of persons who attended, sign in sheets are maintained.

**Action #4: The City will maintain information and referral for fair housing and housing loan concerns. Fair housing complaints that are unresolved will be referred to the Ohio Civil Rights Commission. The City also maintains a contract with Miami Valley Fair Housing for case-specific testing of fair housing complaints for discrimination.**

Action Time frame: Ongoing

Resources: CDBG

Documentation: The city maintains files on all calls, and provides a summary for annual

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<sup>38</sup> Attachment A. Constant Contact Email Contract

<sup>39</sup> Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals

performance reports, which will also be included in documentation for this plan. City of Springfield Contract with Miami Valley Fair Housing, 2016-2017.<sup>40</sup>

### **Impediment #13 LGBT Discrimination**

According to Focus Group reports, there are problems with housing discrimination for the Lesbian, Gay, Bi-Sexual and Transgender population in Springfield. Although this is not a protected class in the local, state or federal fair housing laws, it is protected in all U.S. Department of Housing and Urban Development funded programs, which includes the city housing programs and all subsidized housing in the city.

#### **Action #1: Continue to network with Equality Springfield to educate their members about the HUD LGBT regulation.**

Timeframe: During the 2016-2017 project year

Resources: CDBG funds.

Documentation: Fair Housing Outreach binder.

#### **Action#2: Do outreach to housing providers who are involved in HUD funded programs to educate them about HUD regulations**

Timeframe: During the 2016-2017 project year

Resources: CDBG funds

Documentation: Will maintain records of outreach.

#### **Action #3: Continue to distribute landlord-tenant brochure with this information in it.**

Timeframe: Ongoing, throughout project year.

Documentation: Fair Housing outreach binder.

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### **Fair Housing Planning Review Process**

The Human Relations Board of the City of Springfield is charged with oversight of the Fair Housing Program for the City of Springfield and the local fair housing ordinance falls under the purview of this Board.<sup>41</sup> They will continue to review the fair housing planning process annually and make recommendations for revisions as necessary to effectively address

<sup>40</sup> Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.

<sup>41</sup> Attachment N. City of Springfield Codified Ordinance, Title 7 Chapter 171 (Human Relations Board Regulations) and 174 (Fair Housing Board Regulations).

impediments to fair housing in the City of Springfield.

This document represents the fair housing plan for the City of Springfield for the 2016-2017 CDBG project year.

This document is part of the City's 2016-2017 Action Plan as approved by the Springfield City Commission and signed by:

James A. Bodenmiller

Title: City Manager

Address: City of Springfield, 76 E. High St., Springfield, Oh 45502

Telephone Number: (937) 324-7380

## **Attachments to the 2016-2017 Fair Housing Action Plan**

- Attachment A. Constant Contact Email Contract
- Attachment B. Springfield/Clark County Fair Housing Advocates 2016 Goals
- Attachment C. Miami Valley Fair Housing Testing Contract with the City of Springfield.
- Attachment D. City of Springfield 2016-2017 Action Plan.
- Attachment E. Global Education Calendar 2015-2016
- Attachment F. Global Education Calendar sponsor list 2015-2016
- Attachment G. Spanish Language Landlord-Tenant booklet and fair housing brochure.
- Attachment H. Open purchase order for language translation and interpretation services
- Attachment I. City of Springfield 2016-2017 Action Plan excerpt
- Attachment J. Fair Housing and Disabilities Flyer
- Attachment K. City of Springfield Codified Ordinance Section 1324.16.
- Attachment L. City of Springfield Tenant Rights and Responsibilities booklet & signature form.
- Attachment M. City of Springfield Codified Ordinance Section 1322
- Attachment N. City of Springfield Codified Ordinance, Title 7 Chapter 171 (Human Relations Board Regulations) and 174 (Fair Housing Board Regulations).

# Appendix III

საქართველოს მთავრობის განცხადება



## **Emergency Solutions Grant Policies and Procedures**

Prepared by the City of Springfield, Ohio  
Community Development Department  
76 E High Street  
Springfield, Ohio 45502  
April 2015

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## CITY OF SPRINGFIELD – HOMELESS PROGRAM ADMINISTRATION

### **Background and Context**

The City of Springfield administers homeless programs as both an Entitlement City and as a member of the Ohio Balance of State Continuum of Care. The City's ESG program is administered as an Entitlement City grant program. Application is made annually in the Action Plan and accomplishments are reported in the annual CAPER. The City also administers three Shelter + Care grants as a member of the Ohio Balance of State CoC. Since the City and many of the City's partners in the Springfield/Clark County Housing Collaborative work with and under guidance of the OBOS CoC all program requirements, performance measures and Homeless Program Standards (See Attachments 1 and 2) are used to develop the City's Policies and Procedures for all of the City's Homeless Programs. Additionally, the City and its partners participate in the OBOS CoC HMIS program.

### **Emergency Solutions Grant Program Information**

The Emergency Shelter Grant program changed as result of the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (Hearth Act). The HEARTH ACT, enacted into law on May 20, 2009, consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, and revises the Emergency Shelter Grants program and renames it Emergency Solutions Grants (ESG) program. The HEARTH Act also codifies into law the Continuum of Care planning process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs. The change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

As a result of the American Recovery and Reinvestment Act of 2009, the City of Springfield amended its Consolidated Plan 2008 Action Plan to receive \$815,869 of Homeless Prevention and Rapid Re-housing (HPRP) from HUD. This temporary program, HPRP provided financial assistance and services to prevent individuals and families from becoming homeless and to help those who are experiencing homelessness to be quickly re-housed and stabilized. The funds under this program were intended to target individuals and families who were or would be homeless but for this assistance. The funds provided a variety of assistance including: short-term or medium-term rental assistance and housing relocation and stabilization services, including such activities as security or utility deposits, utility assistance, rental assistance and case management. The new regulation for the ESG program, which is a permanent program, is patterned after the HPRP, providing continuity between the HPRP and ESG programs. The Community Development Department prepared it's substantial amendment in accordance with the requirements of 24 CFR part 91, and the City of Springfield's Citizen Participation plan and now governs the Department's Emergency Solutions Grant Program.

### **ESG Goal**

To prevent individual and families from entering homelessness, provide for emergency shelter operations and rapidly move persons from homelessness to permanent housing.

The Emergency Solutions Grant Program is divided into two components: 1) emergency shelter operations; and 2) homelessness prevention and rapid re-housing activities. This program has been designed to be consistent with the federal Emergency Solutions Grants (ESG) program.

## GRANT PARAMETERS

### Eligible Applicants

Funding is available to eligible nonprofit organizations for emergency shelter activities, homelessness prevention and rapid re-housing activities. To apply for ESG funds an agency must participate in the Region 15 Homeless Service Coordination Plan that includes agreed upon participant screening criteria, common assessment tools, and referral processes, and each participant in the region implementing the program must use the same forms.

*Note: All agencies applying for ESG funding must participate in the planning process carried out within the Region 15/Springfield, Clark County Housing Collaborative to be eligible.*

**Total Funds Available:** The City will receive \$142,271 in 2015 Federal Emergency Solutions Grant funds.

### Maximum Award Amounts:

#### Category:

Emergency Shelter Operations	\$74,411
Homelessness Prevention/Rapid Re-Housing	\$48,860
Administration	\$ 9,000
HMIS	\$10,000

### Eligible Activities:

**Emergency Shelter** – Shelter Operations, including maintenance, rent, repair, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

**Homelessness Prevention** - Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in paragraph (1) of the homeless definition.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

Eligible costs include:

- Rental Assistance: rental assistance and rental arrears
- Financial assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

**Rapid Re-Housing** - Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

Eligible costs include:

- Rental Assistance: rental assistance and rental arrears

- Financial Assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

### **Data Collection (HMIS)**

ESG funds may be used to pay for the costs of participating in and contributing to the HMIS designated by the Ohio Balance of State Continuum of Care; including data collection, evaluation, report preparation and training.

### **Administration**

Up to 7.5 percent of the City's allocation can be used for Administrative activities. These include general management, oversight, and coordination; reporting on the program; the costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings; the costs of preparing and amending the ESG and homelessness-related sections of the Consolidated Plan, Annual Action Plan, and CAPER; and the costs of carrying out environmental review responsibilities. The City does not fund staff salary with ESG funds. The City will allow the admin funds to be used by members of the CoC. City Staff resources committed to the ESG program will be used for Match.

### **Start and Completion Date**

Emergency Solutions Grant FY 2015 funding must be fully expended within 24 months from the date HUD signs the amendment. At this time the City of Springfield anticipates entering into 1-year contracts with agencies providing ESG services. It is estimated that 75% of the funds will be expended by the end of the 2015 grant year (March 30, 2015) and 100% will be expended by *July 1, 2015 (PW)*.

**Matching Requirements:** Emergency Solutions Grant program applicants must provide at least \$1 in local public or private resources for every \$1 in ESG funds (a ratio of 1:1). Matching sources may include cash contributions expended for allowable costs, and non-cash contributions including, but not limited to, the value of any real property, equipment, goods, or services provided that the costs would have been allowable.

## **FUNDING**

### **Funding Priorities**

The City of Springfield is electing to prioritize ESG funds for Shelter Operations, Rapid Re-housing, HMIS and Administration. As the local Continuum of Care and policy experts from the National Alliance to End Homelessness looked back on the HPRP process and lessons learned from that programs, rapid re-housing had the most clearly beneficial effect on the households assisted. The City of Springfield is prioritizing the efficient and effective strategy of reducing the amount of time families spend homeless which can prevent chronic homelessness, and avoid more costly interventions in the future.

While the city does not intend to use ESG funds for homelessness prevention, it is creating policies and procedures for a homelessness prevention component. Future ESG grants may utilize this component.

In consulting *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness* the city will emphasize increasing collaboration within the local systems. This collaboration can increase outcomes related to client's accessing permanent housing, increase economic security, increase access to

mainstream services, improve health and stability, and change funding priorities from emergency shelter to rapid re-housing and homelessness preventions to improve its overall effect on our community's homelessness issue.

**FY2015 Allocations by Activity**

Activity	Funding Amount	Percentage
Administration	\$9,000	6.3%
Street Outreach	0	0%
Emergency Shelter	\$74,411	52.3%
Homeless Prevention	0	0%
Rapid Re-housing	\$48,860	34.3%
HMIS	\$10,000	7%
Total Funds	\$142,271	100%

The lack of short and medium term financial assistance for housing costs has been well documented by the demand for assistance under the HPRP program that far exceeded the resources available. Area unemployment rates and the number of homes remaining in the foreclosure process continue to remain steady in Springfield and continue to indicate that Springfield families are still struggling. Using ESG funds for rapid re-housing is essential to limiting the potential growth of the homeless population.

**Funding Method:**

Emergency Shelter Activities: ESG grants will be awarded by the Community Development Department to local Continuum of Care agencies whose purpose it is to shelter, serve, and re-house the homeless. The city uses an Application/RFP process inviting local CoC agencies with the ability to carry out ESG activities to apply for funds. Applications for ESG funding will be evaluated by the Community Development Department in conjunction with a panel of CoC agencies not requesting ESG funds. Shelter programs currently funded by the City of Springfield are eligible to apply for funding based on previous funding level. Shelter Programs having difficulties expending the full amount of previous year's allocations, submitting timely invoices, or reporting performance measures should consider reducing the amount of their request.

Homeless Prevention and Rapid Re-housing Activities: Funding will be allocated to City appointed agencies that also carry out these activities through the State's HCRP program.

**Threshold Requirements:**

- Proposals for emergency shelter activity must be supported by the Springfield/Clark County Housing Collaborative.
- Applicant must be participating in the appropriate HMIS and meet minimum data quality standards. If not currently funded under a grant program requiring HMIS, the applicant must agree to participate prior to funding.
- Proposals must include documentation verifying the commitment of sufficient matching funds to meet the match requirements.
- All programs must be targeted to individuals who are literally homeless or at risk of homelessness by federal definition, as appropriate. Homelessness prevention and rapid re-housing programs must be targeted at individuals and families below 30% of area median income. Income verification for homelessness prevention is required at intake.

**Rating Criteria** – The City will rate applications based on the following criteria:

1. **Proposal Content.** The proposal narrative must clearly identify the problem to be addressed, population groups to be served and the activities to be undertaken, described in detail. Applicants must include an outline of intended goals and outcomes, including the projected impact on local homeless needs. If the project is designed to serve targeted subpopulations, applicants should address how the needs of other populations are being met within the community.
2. **Outcomes.** Based on data entered into HMIS, applicants must demonstrate acceptable performance. Specific performance measures for emergency shelters include, but are not limited to, the following:
  - Number of persons and households served
  - Occupancy rates (viewed in relation to shelter's role in community's strategy to end homelessness)
  - Average length of stay
  - Percentage of leavers exiting into permanent housing
  - Percentage of leavers employed at exit
  - Percentage of leavers receiving at least one source of non-cash benefit at exit
  - Number of households provided rapid re-housing assistanceSpecific performance measures for homelessness prevention and rapid re-housing include, but are not limited to the follow:
  - Number of persons and households served
  - Length of time to house
  - Number/percentage of households that return to homelessness
3. **Collaboration.** Applicants should demonstrate strategic partnerships that would strengthen the program's success. Examples of partnerships could include referring agencies, supportive service providers, mainstream service providers and other funding sources.
4. **Targeting the Need.** For all programs, applicants must demonstrate the method used for determining current demand for services in the community.
  - Emergency Shelter applicants must describe their plan for diverting individuals and families from shelter stays where possible and appropriate.
  - Homelessness prevention and rapid re-housing applicants must describe their targeting method for determining which families and individuals are most appropriately served with this program, including self-sufficiency criteria to determine which families and individuals are likely to experience homelessness without intervention services.
5. **Capacity.** Projects will be evaluated based on the extent to which the applicant demonstrates the organization's ability to implement proposed activities. Items taken into consideration include the organization's history and descriptions of key staff involved in the project.
6. **HMIS Data Quality.** All applicants are required to meet HUD minimum HMIS data requirements and quality standards to be considered for funding. To earn points on this criterion, applicant's data quality must exceed minimum standards consisting of, but not limited to, null and missing values, number/percent of persons entered into HMIS as "anonymous".

Recommendations for funding will be related to the Community Grant Advisory Board and is subject to City Commission approval.

## **ACTION PLAN REQUIREMENTS**

### **Summary of Consultation Process**

The Community Development Department initiates consultation with the Springfield Clark County Housing Collaborative each year. Members of the Continuum are advised of all HUD correspondence and new ESG guidance each year. Members of the Continuum deliberate and decide on the funding priorities for the ESG program; including, Shelter Operations, Rapid Re-housing, Admin and HMIS activities. The Continuum also assists the city in determining performance measures for the program.

### **Summary of Citizen Participation Process**

The Department provides a 30-day public comment period of the Draft Annual Action Plan each year. The public input process includes notification through a notice published in the Springfield News-Sun, by presentation at a Community Grant Advisory Board meeting, by posting the document on the City's website, and by meeting with entities involved with the Springfield Clark County Housing Collaborative, and by an advertised public meeting. The City of Springfield Commission will also approve the Action Plan with a public vote at a regularly scheduled Commission Meeting.

**Annual Action Plan Priority Need:** The second allocation of ESG funds will address two priority goals listed in the City of Springfield's Annual Action Plan:

- Goal 2 – Housing for Special Needs and Homeless
- Goal Tenant Based Rental Assistance and Rapid Re-Housing

### **Written Standards for Provision of ESG Assistance**

Potential ESG participants will be assessed and evaluated for services by funded agencies. Included in this assessment will be documentation of homelessness status, income certifications as required, and an assessment of other resources available to the participants. This assessment will determine the type and levels of assistance. The Intake and Assessment tool used by the ESG program is one that was developed and is now used by all of Region 15 and the Springfield/Clark County Housing Collaborative. See Attachment 3 for the Intake and Assessment tool.

### **Basic Eligibility for Services:**

To be eligible to ESG Emergency Shelter or Rapid Re-Housing Assistance, households must meet the definition of homelessness posted by HUD within the HEARTH Act.

### **Specific Eligibility for Rapid Re-Housing**

Rapid Re-Housing is available to those who are literally homeless. Non-profit sub-recipients providing this assistance must document that the household is homeless and maintain this documentation along with client HMIS data. No financial assistance may be provided to a household for a purpose and time period supported by another public source.

Rapid Re-housing and prevention activities must document file with a current lease agreement between the tenant and landlord and a rental assistance agreement with the ESG agency, the tenant and the landlord. The terms of the rental assistance agreement must match the lease agreement.

Rapid Re-Housing can be used to help a homeless individual or family move into permanent housing and achieve housing stability. Eligible Rapid Re-Housing activities will include Rental Assistance and Housing Relocation and Stabilization Services. Clients will be assessed for level of need. The assessment will determine the following services:

Intake and Assessment	\$150 per ESG funded household
Case Management, 3 to 5 CM sessions	\$200 reimbursed per session
Financial Assistance, graduated assistance*	\$2,500 maximum per household

\*Financial Assistance includes Rent and Utility arrears, and/or up to 12 months of rental assistance based on the following graduated schedule: Month 1 – 100%, Months 2 through 4 – 75%, Months 5 through 7 – 50% and months 8 through 12 – 25%.

Maximum per household is \$3,650 in any three-year period.

### Specific Eligibility for Homelessness Prevention

The ESG program will prioritize re-housing over prevention. Future allocations may include prevention activities and as such, the city has included the following information. Only persons who are below 30% of Area Median Income, and who are at imminent risk of homelessness according to part (2) of the November 15, 2011 definition, and who otherwise lack adequate resources to prevent homelessness will be eligible for ESG homelessness prevention assistance

Homelessness Prevention Services may be used to prevent an individual or family from becoming homeless or to help an individual or family regain stability in current housing or other permanent housing. Eligible Homelessness Prevention activities will include Rental Assistance and Housing Relocation and Stabilization Services. Clients will be assessed for level of need. The assessment will determine the following services:

Intake and Assessment	\$150 per ESG funded household
Case Management, 1 to 2 CM sessions	\$200 reimbursed per session
Financial Assistance, graduated assistance*	\$1,500 maximum per household

\*Financial Assistance includes Rent and Utility arrears, and/or up to 3 months of rental assistance based on the following graduated schedule: Month 1 – 100%, Month 2 – 75%, and Month 3 – 50%.

Maximum per household is \$2,050 in any three-year period.

### Local Coordination of Shelter and Services

At the local level, emergency shelter providers, essential service providers, homeless prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers are coordinated through the Springfield Clark County Continuum of Care which covers the whole county. The Continuum has developed working groups to ensure coordination of services for homeless and at-risk households.

### Coordinated Assessment System

The Springfield Clark County Housing Collaborative (and Region 15 of the OBOS) developed a coordinated intake and assessment system for use region-wide. The tool assesses households based on need for assistance and determines the level of financial assistance and case management that would be available to the household. The tool also includes a homelessness verification, income verification, staff certification, documentation of compliance with housing standards and lead based paint regulations,

HMIS intake information, rent reasonableness certification, and a copy of the households current lease. All agencies receiving funds from ESG will be required to use this tool.

### **Performance Standards**

The city is looking to more than the traditional output measures – number of persons in emergency shelter, number of bed-nights provided, or number of households receiving services – adopting the following outcome measures, indicators and targets, consistent with the goal of ending homelessness and the performance measures required by the Ohio Balance of State CoC. Not all ESG sub-recipients will report on all measures. Outcome performance measures are tailored to the category of ESG activity for which funding is awarded, as outlined below:

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#### **Emergency Shelter Operations**

- Exits to permanent housing – Goal 30%
- Earned income at exit – Goal 15%
- Non-cash benefits at exit – Goal 50%
- Average length of stay – Goal 40 days

#### **Homelessness Prevention and Rapid Re-Housing**

- Earned income at exit – Goal 50%
- Maintain or increase income – Goal 70%
- Non-cash benefits at exit – Goal 85%
- Average length of stay – Goal 150 days

#### **Transitional Housing (not a part of ESG)**

- Exits to permanent housing – Goal 80%
- Earned income at exit – Goal 40%
- Maintain or increase income – Goal 70%
- Non-cash benefits at exit – Goal 85%
- Average length of stay – Goal 240 days

**Monitoring.** The Community Development Housing Division staff monitors the ESG program and sub-recipients. Monitoring occurs on a regular basis including on-site monitoring visits which audits not only client files, but also housing conditions and standards. Additionally, documentation of expenditures and beneficiary information is submitted with each draw request from ESG sub-recipients. Current monitoring procedures are sufficient to allow monitoring of compliance with the new requirements as well.

### **Homeless Participation Requirement**

The City reserves a seat on the Community Grant Advisory Board for a homeless or formerly homeless person. Admittedly, filling this position continually proves to be a challenge for staff. For this reason, staff recommends that ESG agencies involve this population in it decision-making boards as well. Often the agencies have an easier time of securing board members because of the relationship that forms between the agency and an individual served.

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# Appendix IV

MONITORING AND RESEARCH

## **2016 Action Plan Addendum: Monitoring and Long Term Compliance**

### **Consolidated Plan Compliance Monitoring**

The City will maintain records on who is served on the basis of income, race, ethnicity, family composition, geographic locations, and other variables for all programs. The staff will present reports based on program beneficiaries' socio-economic data to the Community Grant Advisory Board (CGAB) and other related boards. These reports will track progress of different programs in obtaining the goals and objectives of the City's Consolidated Plan. These reports will also evaluate progress in achieving stated goals and provide updates on various program activities.

The City's Consolidated Annual Performance and Evaluation Report (CAPER) will be available for review by the general public, the City Commission, the Community Grant Advisory Board, the Clark County Housing Collaborative, area lenders, special needs population providers, churches, neighborhood groups, and other public and private organizations with an interest in housing and related supportive services.

### **Programmatic Monitoring of Community Development Block Grant Projects**

The primary responsibility for ensuring the CDBG Program is in compliance with requirements is vested in the CDD with additional oversight by the City Finance Department. There is a structured management system in place. In all phases of project development and implementation, a checklist is reviewed to monitor the projects. All contracts, sub-recipients, and contractors are periodically reviewed to insure that one of the national objectives of the CDBG Program is being met. Once funds are allocated for a project, a contract review meeting is held with the recipient to discuss the funding agreement and compliance requirements.

The three programs for which the City has historically entered into contracts with HUD are the CDBG, HOME, and ESG Programs. Monitoring will occur in accordance with executed agreements between the City and each sub-recipient. The City exercises a high degree of control over the activities of designated sub-recipients of these programs. Therefore, minimum monitoring procedures consist of regular contact by telephone, e-mail or in person; maintaining copies of all project documents in City files; obtaining written documentation of expenditures for reimbursement of costs by the City; and, submission of written progress reports. For both programs, the City schedules on-site monitoring visits. The City's monitoring standards and procedures ensure that statutory and regulatory requirements are being met and the information submitted to HUD is correct and complete. New grants funded through HUD, including NSP1 and 2, CDBG-R and HPRP will undergo the same monitoring process.

### **Programmatic Monitoring of In-House Housing Programs**

The City Commission through the City Manager's Office delegates the responsibility for design, administration, and monitoring of all housing rehabilitation programs to the CDD. The CDD is responsible for the Consolidated Plan, the program design of housing

programs, and the in-house programmatic monitoring and oversight functions. The Housing Rehab Coordinator is responsible for Housing Rehab Vendor List certifications and contractor procurement procedures. The Housing Rehab Coordinator performs the day-to-day administration of housing rehabilitation programs. Monitoring for financial verifications is performed by the CDD and the City Finance Department.

The housing rehabilitation process is broken into five phases. Each phase consists of several components of work items. A Rehab Matrix was developed that illustrates how and when different City departments, the Loan Review Committee, and other program participants interface in the housing rehab process to ensure a coordinated effort for effective management.

A special feature of the City's housing programs is the monitoring process that is incorporated into the program design. Each program has its own set of income eligibility guidelines, its own ranking form and "Socio-Economic Data Log" which is completed at periodic intervals to insure the program benefits are received by the target populations. A case-by-case status summary is maintained for each program. This in-house monitoring process ensures continuous review and oversight controls within the systems.

The Loan Review Committee reviews the feasibility and determines final selections of all rehabilitation projects. The Committee consists of five staff members who are appointed by the City Manager. The five members include one person from the Finance Department and four persons from Community Development Department. The Committee meets as needed and makes decisions by a simple majority of members. The Committee also serves as the review body for complaints and grievances, reviewing cases for conflict of interest matters and any other matters that relate to the efficient and expeditious processing of housing rehab cases.

All programs and agencies funded by the CDD with federal grant monies are subject to regular monitoring reporting requirements and also undergo in-site visits as well. The City annually sends out new fair market rents, low and high HOME rent limitations, utility allowances as well as new income limits to all agencies and management firms holding agreements with the City.

# Appendix V

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# The City of Springfield Ohio

## Community Development Department

### MEMO

TO: Development Programs Division/Code Enforcement Division/Housing Rehab Division/Zoning Division  
CC: CDBG Files  
FROM: Jackie Sudhoff, Development Programs Administrator  
DATE: March 28, 2016  
RE: Code Enforcement Target Area for the 2016 Program Year

In accordance with Section 570.202(c) of the CDBG regulations, for the City to expend CDBG funds for Code Enforcement Administration, the funded activities must be targeted to a deteriorated or deteriorating area delineated by the City. The area chosen must meet the following criteria:

- 1) Area must be primarily residential
- 2) At least 51% of the residents of the area are LMI persons; and
- 3) The code enforcement together with public improvements, rehabilitation, and services to be provided, may be expected to arrest the decline of the area.

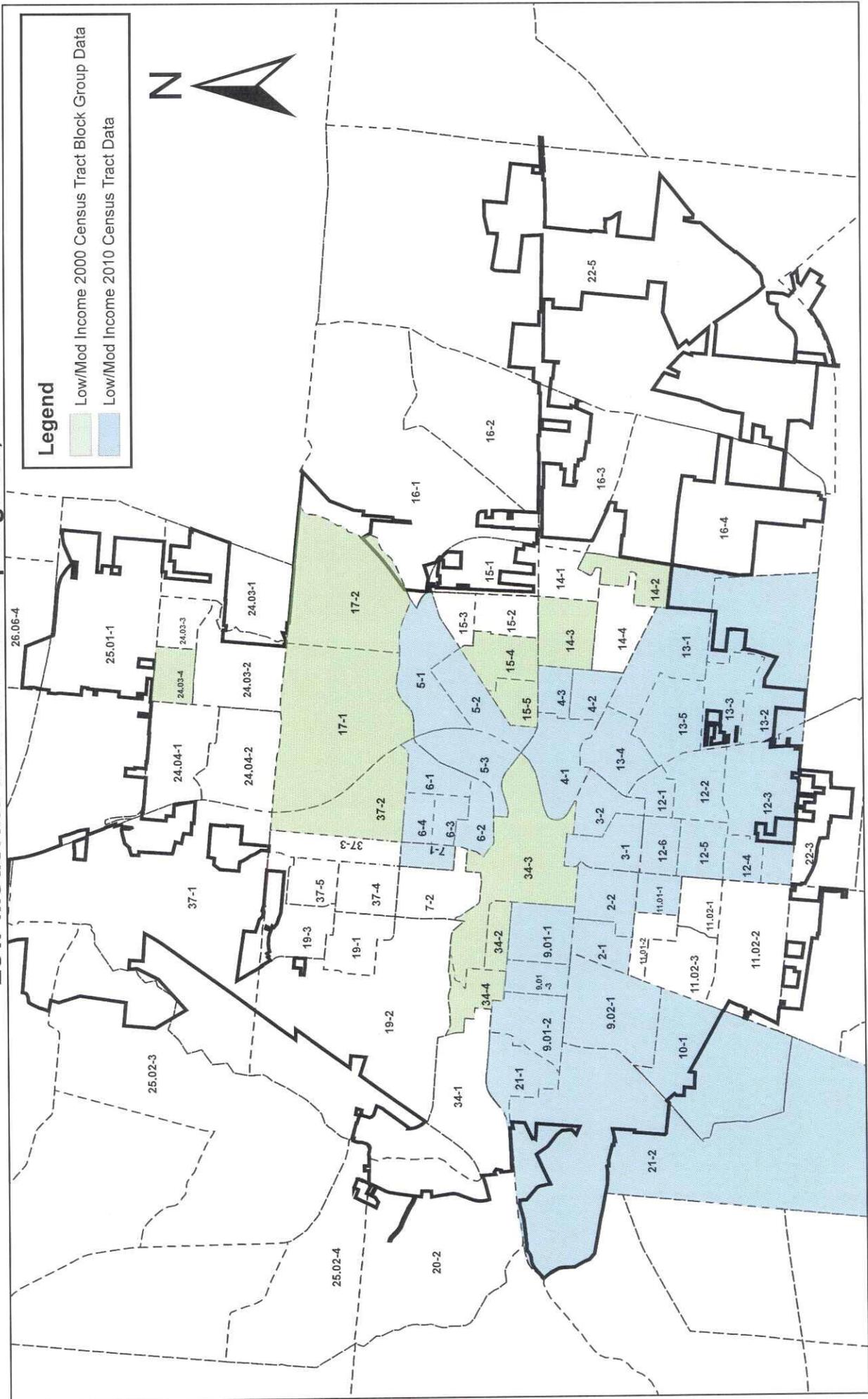
The "targeted areas" were designated as deteriorated or deteriorating based on census data relative to housing indicators, including percentage of vacant units, percentage of units valued below \$99,000, percentage of units valued below \$50,000 and the percentage of occupied structures being utilized as rentals. In each indicator, census data was collected and an average throughout the city was calculated. An area would be considered to be deteriorated or deteriorating if one of the collected indicators fell above the city average AND the area was designated as LMI. Attached to this memo is a list of the eligible census tracts/block groups based on percentage of LMI persons and the indicators being analyzed. The LMI information reflects census data from both 2010 and 2000. (Low-mod income information is only available at the CT level for 2010. Data from 2000 is used in areas in which certain block groups are traditionally LMI, but the entire CT may not be at that level).

Other indicators showing the need of the area is the IRS Section 42 designation of ten of the tracts as Metropolitan Qualified Census Tracts (2, 3, 4, 6, 7, 9.01, 9.02, 12, 21 and 34), eligible for income tax credits for affordable housing projects, and the rate of poverty for the census tracts and block groups.

These areas should be given priority or preference for the following activities to arrest the decline and deterioration of these areas and the neighborhoods:

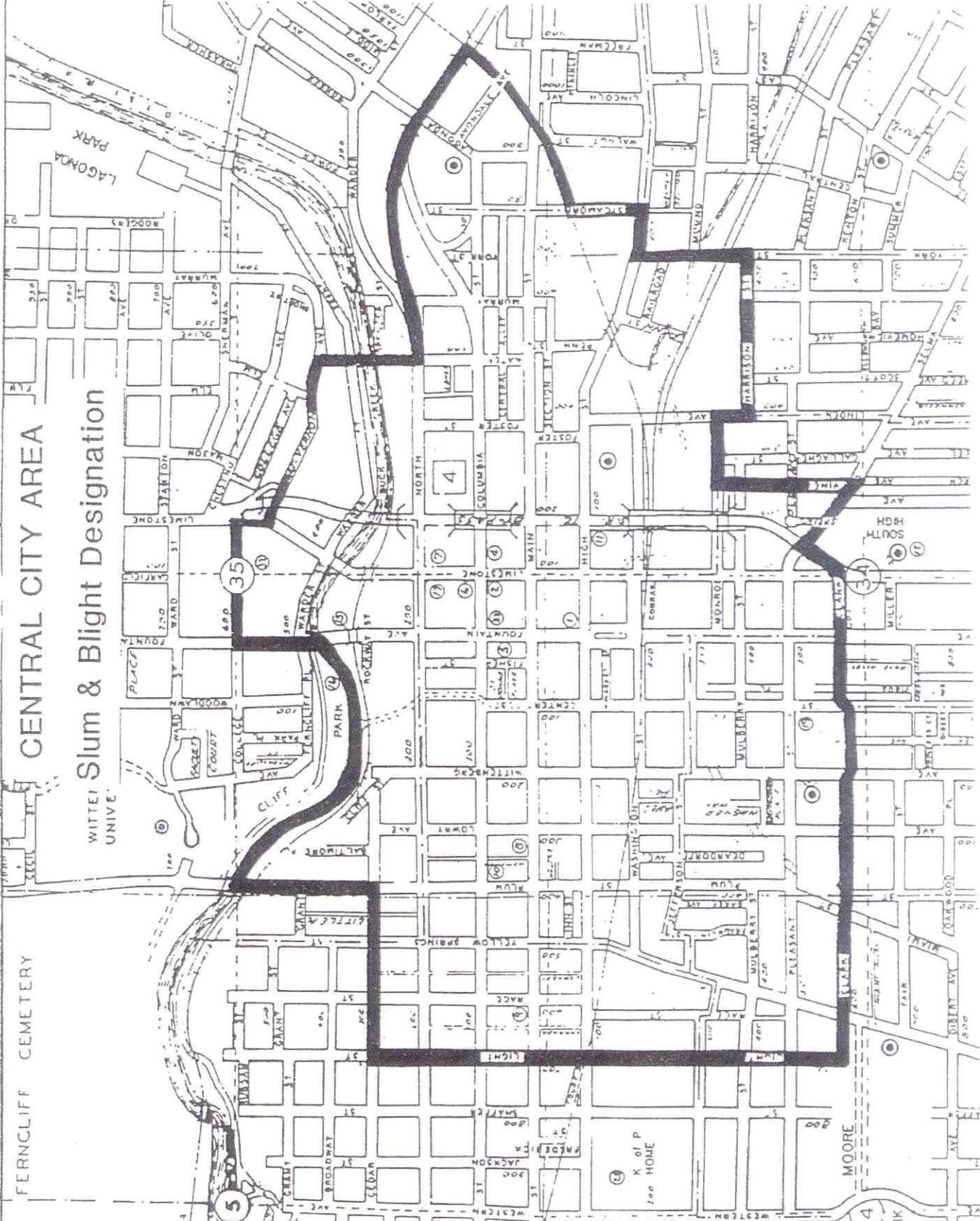
1. Housing Inspections
2. Housing Rehabilitation Programs
3. Housing Demolitions
4. Housing Board and Secures
5. Junk and Trash Removal
6. Junk Car Removal
7. Public Improvements
8. Zoning Enforcement

# Low-Moderate Income Area - Springfield, Ohio



# Appendix VI

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FERNCLIFF CEMETERY

# CENTRAL CITY AREA Slum & Blight Designation

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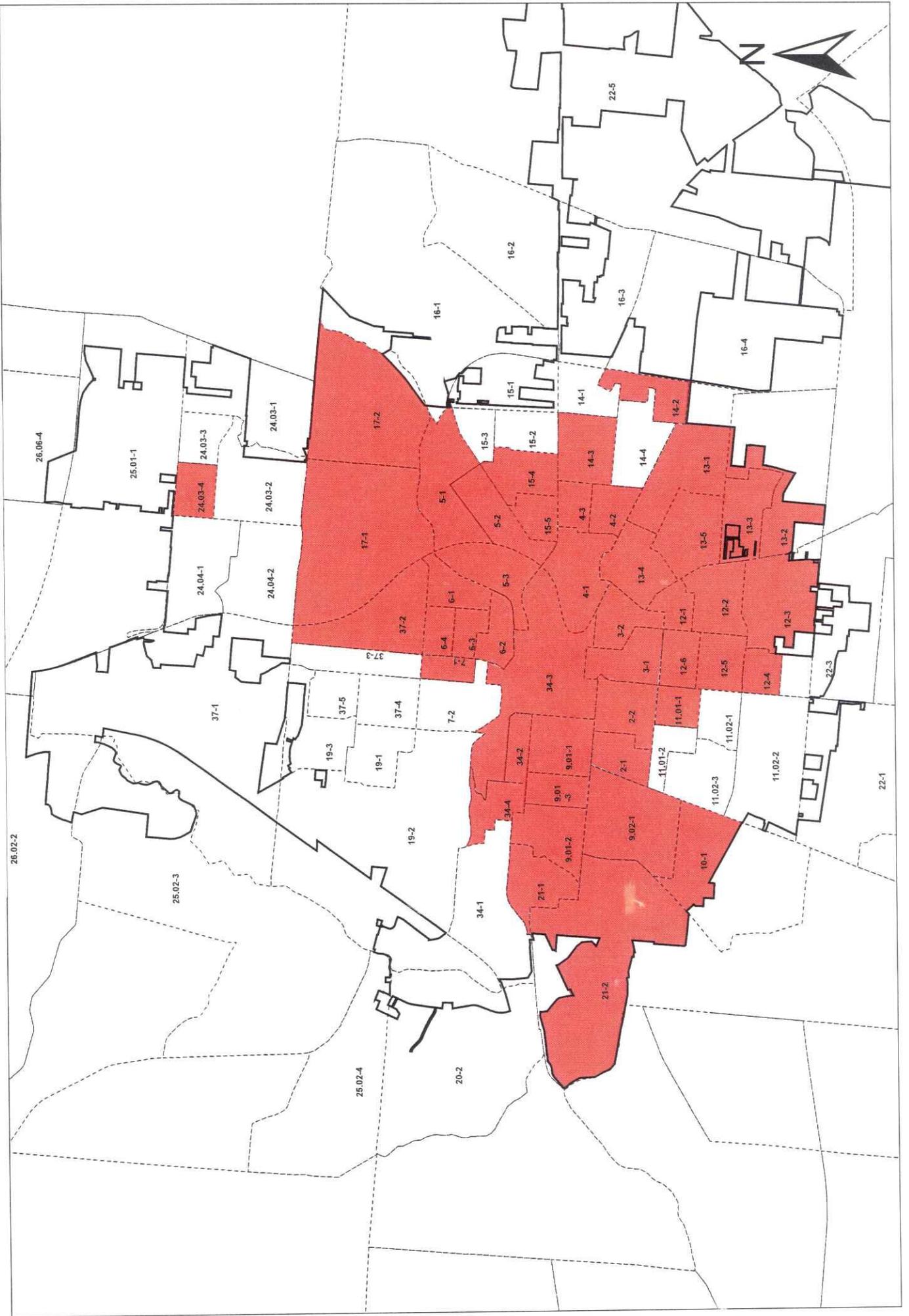
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# Appendix VII

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**M**  
**a**  
**p**

2016 Code Enforcement Target Area Springfield, Ohio



# Signed Certifications

Application for Federal Assistance SF-424								
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application			<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision			<b>* If Revision, select appropriate letter(s):</b> _____ <b>* Other (Specify):</b> _____		
<b>* 3. Date Received:</b> _____			<b>4. Applicant Identifier:</b> _____					
<b>5a. Federal Entity Identifier:</b> _____			<b>5b. Federal Award Identifier:</b> _____					
<b>State Use Only:</b>								
<b>6. Date Received by State:</b> _____		<b>7. State Application Identifier:</b> _____						
<b>8. APPLICANT INFORMATION:</b>								
<b>* a. Legal Name:</b> City of Springfield, Ohio								
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 31-6000056			<b>* c. Organizational DUNS:</b> 0794263340000					
<b>d. Address:</b>								
<b>* Street1:</b> 76 E High Street								
<b>Street2:</b> _____								
<b>* City:</b> Springfield								
<b>County/Parish:</b> _____								
<b>* State:</b> OH: Ohio								
<b>Province:</b> _____								
<b>* Country:</b> USA: UNITED STATES								
<b>* Zip / Postal Code:</b> 45502/1214								
<b>e. Organizational Unit:</b>								
<b>Department Name:</b> Community Development Dept			<b>Division Name:</b> Development Programs					
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>								
<b>Prefix:</b> _____		<b>* First Name:</b> Jackie						
<b>Middle Name:</b> A		_____						
<b>* Last Name:</b> Sudhoff		_____						
<b>Suffix:</b> _____		_____						
<b>Title:</b> Development Programs Administrator								
<b>Organizational Affiliation:</b> _____								
<b>* Telephone Number:</b> 937-328-3480			<b>Fax Number:</b> 937-328-3489					
<b>* Email:</b> jsudhoff@springfieldohio.gov								

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.218

CFDA Title:

Community Development Block Grant for Entitlement Communities

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

2016 Community Development Block Grant Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,632,411.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value="375,000.00"/>
* f. Program Income	<input type="text" value="90,000.00"/>
* g. TOTAL	<input type="text" value="2,097,411.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:

Fax Number:

\* Email:

\* Signature of Authorized Representative:



\* Date Signed:

**Application for Federal Assistance SF-424**

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> _____ <b>* Other (Specify):</b> _____
---	---	--

<b>* 3. Date Received:</b> _____	<b>4. Applicant Identifier:</b> _____
-------------------------------------	--

<b>5a. Federal Entity Identifier:</b> _____	<b>5b. Federal Award Identifier:</b> _____
--	---

**State Use Only:**

<b>6. Date Received by State:</b> _____	<b>7. State Application Identifier:</b> _____
---	---

**8. APPLICANT INFORMATION:**

<b>* a. Legal Name:</b> City of Springfield, Ohio	
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 31-6000056	<b>* c. Organizational DUNS:</b> 0794263340000

**d. Address:**

<b>* Street1:</b> 76 E High Street
<b>Street2:</b> _____
<b>* City:</b> Springfield
<b>County/Parish:</b> _____
<b>* State:</b> OH: Ohio
<b>Province:</b> _____
<b>* Country:</b> USA: UNITED STATES
<b>* Zip / Postal Code:</b> 45502/1214

**e. Organizational Unit:**

<b>Department Name:</b> Community Development Dept	<b>Division Name:</b> Development Programs
--	--

**f. Name and contact information of person to be contacted on matters involving this application:**

<b>Prefix:</b> _____	<b>* First Name:</b> Jackie
<b>Middle Name:</b> A	_____
<b>* Last Name:</b> Sudhoff	_____
<b>Suffix:</b> _____	_____
<b>Title:</b> Development Programs Administrator	
<b>Organizational Affiliation:</b> _____	
<b>* Telephone Number:</b> 937-328-3480	<b>Fax Number:</b> 937-328-3489
<b>* Email:</b> jsudhoff@springfielddohio.gov	

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.231

CFDA Title:

Emergency Solutions Grant Program for Entitlement Communities

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

2016 Emergency Solutions Grant Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="144,902.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="144,902.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

**Application for Federal Assistance SF-424**

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>
---	---	--

<b>* 3. Date Received:</b> <input type="text"/>	<b>4. Applicant Identifier:</b> <input type="text"/>
--	---

<b>5a. Federal Entity Identifier:</b> <input type="text"/>	<b>5b. Federal Award Identifier:</b> <input type="text"/>
---	--

**State Use Only:**

<b>6. Date Received by State:</b> <input type="text"/>	<b>7. State Application Identifier:</b> <input type="text"/>
--	--

**8. APPLICANT INFORMATION:**

<b>* a. Legal Name:</b> <input type="text" value="City of Springfield, Ohio"/>	
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text" value="31-6000056"/>	<b>* c. Organizational DUNS:</b> <input type="text" value="0794263340000"/>

**d. Address:**

<b>* Street1:</b>	<input type="text" value="76 E High Street"/>
<b>Street2:</b>	<input type="text"/>
<b>* City:</b>	<input type="text" value="Springfield"/>
<b>County/Parish:</b>	<input type="text"/>
<b>* State:</b>	<input type="text" value="OH: Ohio"/>
<b>Province:</b>	<input type="text"/>
<b>* Country:</b>	<input type="text" value="USA: UNITED STATES"/>
<b>* Zip / Postal Code:</b>	<input type="text" value="45502/1214"/>

**e. Organizational Unit:**

<b>Department Name:</b> <input type="text" value="Community Development Dept"/>	<b>Division Name:</b> <input type="text" value="Development Programs"/>
--	--

**f. Name and contact information of person to be contacted on matters involving this application:**

<b>Prefix:</b> <input type="text"/>	<b>* First Name:</b> <input type="text" value="Jackie"/>
<b>Middle Name:</b> <input type="text" value="A"/>	
<b>* Last Name:</b> <input type="text" value="Sudhoff"/>	
<b>Suffix:</b> <input type="text"/>	
<b>Title:</b> <input type="text" value="Development Programs Administrator"/>	
<b>Organizational Affiliation:</b> <input type="text"/>	
<b>* Telephone Number:</b> <input type="text" value="937-328-3480"/>	<b>Fax Number:</b> <input type="text" value="937-328-3489"/>
<b>* Email:</b> <input type="text" value="jsudhoff@springfielddohio.gov"/>	

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

CFDA Title:

HOME Partnership Program for Entitlement Communities

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

2016 HOME Partnership Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="389,640.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="389,640.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

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- Yes
- No

If "Yes", provide explanation and attach

Add Attachment

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View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

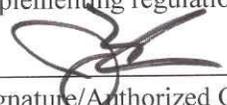
**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
Signature/Authorized Official

4.4.16  
Date

## Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) \_\_\_\_\_ , \_\_\_\_\_ (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

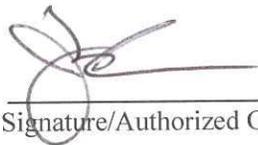
jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

**Compliance with Laws** -- It will comply with applicable laws.



Signature/Authorized Official

4/4/16

Date

City Manager

Title

### Specific HOME Certifications

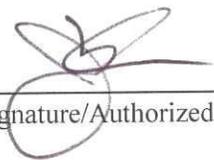
The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**Eligible Activities and Costs** -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

**Appropriate Financial Assistance** -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
\_\_\_\_\_  
Signature/Authorized Official

4/4/16  
\_\_\_\_\_  
Date

City Manager  
\_\_\_\_\_  
Title

## ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

**Major rehabilitation/conversion** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services ( including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

**Matching Funds** – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

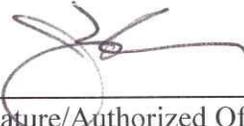
**Confidentiality** – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

**Discharge Policy** – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.



\_\_\_\_\_  
Signature/Authorized Official

4-4-16

\_\_\_\_\_  
Date

City Manager

\_\_\_\_\_  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING:

#### A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.