



# **Program Year 2021 Ohio Consolidated Plan Annual Action Plan HOME-American Rescue Plan Act (ARPA) Allocation Plan Substantial Amendment**

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**May 2023**

Prepared By:  
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## Summary Of Changes

1. Changed reference of Office of Community Development to Office of Housing Support throughout document to reflect Community Services Division office restructuring.
2. Page 28 - Any unused funds will be returned for use in the Non-Congregate Shelter Program.
3. Page 28 - Applicants can submit Intent to Apply and deadline is August 2024. Development will invite qualifying applicants to complete a full application for grants to begin on Sept. 1, 2024.
4. Page 30 - Removed language regarding the priority of the domestic violence (DV) population.

## Background

On March 11, 2021, President Joe Biden signed the American Rescue Plan Act (ARPA) of 2021 in to law to address the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses. On April 8, 2021, U.S. Department of Housing and Urban Development (HUD) announced the state of Ohio was allocated \$90,557,128 as part of the HOME-American Rescue Plan Act (HOME-ARPA) for homelessness assistance and assistance to other vulnerable populations to:

- Provide capital investment for permanent rental housing.
- Upgrade available stock of shelter to include non-congregate shelter.
- Provide tenant-based rental assistance and supportive services.

## Consultation

HUD Notice CPD-21-10 issued on Sept. 13, 2021, provided the list of HOME ARPA Allocation Plan requirements, including the citizen participation and consultation processes for public engagement. On Nov. 22, 2021, the Office of Housing Support hosted the HOME-ARPA Allocation Stakeholder Group Meeting via Webex to discuss the various eligible activities and funds available to begin the process of planning the allocation plan. The HOME-ARPA Stakeholder Group was comprised of persons representing statewide homeless organizations, local government, veterans, mental health and addiction services providers, housing developers, fair housing groups along with various non-profit organizations and state agencies dealing specifically with support services and housing as noted in the table below. The Ohio Domestic Violence Network was consulted separately.

Based on the stakeholder group meeting, consensus was reached with regards to identifying priorities for the use of HOME-ARPA funds throughout the state, with permanent supportive housing type projects discussed as one of the top priorities.

The stakeholder group meeting identified possible partners for collaboration with the Ohio Housing Finance Agency (OHFA), a key partner as part of the development of affordable housing through the Housing Development Assistance Program (HDAP). Following the stakeholder group meeting participants were asked to provide the OHS with comments to help develop the HOME-ARPA Allocation Plan. Additional feedback was received through direct consultation from several organizations summarized in the following table.

**Table 1: HOME ARPA Consultation Table**

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Ohio Municipal League	Local Government Representative	Virtual stakeholder meeting	The Ohio Housing Authority Conference participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Coalition on Homelessness and Housing in Ohio (COHHIO)	Homeless Service Providers. Balance of State Continuum of Care	Virtual stakeholder meeting, direct phone calls, email	Bill Faith and Douglas Argue from the Coalition on Homelessness and Housing in Ohio representing homeless groups throughout the state indicated at the virtual stakeholder meeting on Nov. 21, 2021, that there is a need to focus on the development of affordable housing as opposed to tenant-based rental assistance (TBRA). COHHIO was also consulted on April 7, 2022, to discuss the proposed activities and budget included in the plan. They agreed less funds be directed towards non-congregate shelter activity from the initial amount of \$30 million. If a significant amount of funds were to be directed towards non-congregate, language in the plan should be added that allows for unspent funds to be directed towards the development of rental housing. In addition, they said that support services are an important component as part of the development of affordable rental housing that should be included as a standalone activity in the plan.
Ohio Housing Finance Agency (OHFA)	Public agencies that address the needs of the qualifying populations including mainstream benefit systems	Virtual stakeholder meeting, direct phone calls, email	Karen Banyai from OHFA indicated at the virtual stakeholder meeting on Nov. 21, 2021, there is strong need for permanent supportive housing projects. They added funding for support services as part of the permanent supportive housing projects is needed. OHFA was integral in the development of the affordable rental housing development activity, through consultation efforts between the initial stakeholder meeting and final draft of the document.
Ohio Department of Health	Public agencies that address the needs of the qualifying populations including mainstream benefit systems	Virtual stakeholder meeting	The OHAC participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Community Housing Network (CHN)	Affordable housing developer	Virtual stakeholder meeting, email	Ryan Cessell from CHN agreed at the Nov. 21, 2021, stakeholder meeting that there is a strong need for permanent supportive housing projects. They added funding for support services as part of the permanent supportive housing projects is needed.
Ohio Housing Authorities Conference	Public Housing Agencies (PHAs)	Virtual stakeholder meeting	The OHAC participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Community Action Agency (CAA) of	Homeless Service Providers, Veterans' Groups, Balance of State Continuum of Care representative (Region 6 Lead)	Virtual stakeholder meeting	The CAA of Columbiana County participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the

Columbiana County			meeting. The draft plan was distributed to them for review.
Buckeye Hills Regional Council (RC)	Housing services provider, Balance of State Continuum of Care representative (Region 2 Lead)	Virtual stakeholder meeting	The Buckeye Hills RC participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Great Lakes Community Action Partnership (GLCAP)	Housing services provider	Virtual stakeholder meeting	The GLCAP participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
U.S. Department of Veteran Services (USDVS)	Veterans' Groups	Virtual stakeholder meeting	The USDVS participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Corporation for Supportive Housing (CSH)	Non-profit technical assistance provider and supportive housing intermediary	Virtual stakeholder meeting	Based on one-on-one consultation on March 31, 2022, as well as feedback provided as part of the comment period, CSH has voiced support for the development of affordable rental housing for all qualifying populations throughout the state. They have indicated that, as part of these projects, there is also a need for support services such as housing clinical staff and peer supporters. They also indicated funding for non-profit capacity building would be very valuable for long-term sustainability.
Ohio Department of Veterans Affairs	Veterans' Groups	Virtual stakeholder meeting	The ODVA participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Habitat for Humanity	Rural affordable housing developer	Virtual stakeholder meeting	The HfH participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
County Commissioners Association	Local Government Representative	Virtual stakeholder meeting	The CCA participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Ohio Department of Mental Health and Addiction Services (OMHAS)	Public agencies that address the needs of the qualifying populations including mainstream benefit systems	Virtual stakeholder meeting, direct phone calls, email	Based on one-on-one consultation on March 31, 2022, phone calls/emails, as well as feedback provided as part of the Nov. 21, 2021, stakeholder group meeting, OMHAS has voiced support for the development of affordable rental housing for all qualifying populations throughout the state. They have indicated that, as part of these projects, there is also a need for support services such as housing clinical staff and peer supporters but understand the timing of the grant could make this difficult as part of program implementation.
Ohio Civil Rights Commission	Organizations that address civil rights, fair housing, and needs of people with disabilities	Virtual stakeholder meeting	The Ohio Civil Rights Commission participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.

Ohio Department of Job and Family Services (ODJFS), Office of Workforce and Development	Public agencies that address the needs of the qualifying populations including mainstream benefit systems	Virtual stakeholder meeting	The ODJFS participated in the virtual stakeholder meeting on Nov. 21, 2021. No feedback was received during or following the meeting. The draft plan was distributed to them for review.
Ohio Domestic Violence Network (ODVN)	Victim Services Providers	Direct phone calls and email	ODVN, a statewide organization that provides services for domestic violence services, was consulted March 23, 2022, outside of the stakeholder group meeting. The ODVN discussed the projects that are eligible, specifically why Development's initial HOME-ARPA proposal included significant funds for non-congregate shelters, not enough funding for housing development for survivors and why funding was not dedicated for TBRA and supportive services. It was brought to ODVN's attention that no preferences will be placed on any of the eligible projects as outlined in the HOME-ARPA Allocation Plan, so there are funding options for independent housing developments for survivors of domestic violence. Development suggested that ODVN discuss these proposals with OHFA to understand the process.
Sunday Creek Horizons	Rural affordable housing developer	Direct phone calls and email	The Sunday Creek Development, a rural development group located in Appalachian Ohio was consulted March 11, 2022, outside of the stakeholder group meeting. They expressed support for the development of affordable rental housing but indicated a local match commitment of the HOME-APRA funds should be required for the development of affordable housing projects. They also added that as there are few non-profit developers in rural Ohio, particularly Appalachian Ohio, both non-profit and private developers should be eligible to develop affordable housing projects. In addition, they expressed a preference for HOME-ARPA to be utilized for 4% gap new construction development as opposed to 9% credits.
Findlay Hope House	Homeless Service Provider, Victim Service Provider, Balance of State Continuum of Care representative (Region 11 Lead)	Focus Group	Hope House participated in a focus group on April 7, 2022, to learn more about the specific needs of homeless persons, victims of domestic violence and qualifying populations. The participants expressed support for utilizing HOME-ARPA resources for the development of additional affordable rental housing units as well as providing support services that can include transportation and financial management training.

Following the approval of the initial submittal the plan has been amended. As part of the amendment process the initial stakeholder group listed above was presented with the draft HOME ARPA Allocation Plan Substantial

Amendment on March 14, 2023, prior to the posting for public comment. There was no additional feedback regarding the proposed change to the plan.

### **Public Participation**

Following the HOME-ARPA Stakeholder Group Meeting, the Draft HOME-ARPA Allocation Plan was prepared for public comment beginning on March 1, 2022. The Draft HOME-ARPA Allocation Plan was posted online along with the memo announcing the HOME-ARPA Allocation Plan public comment process here for the 15-day public comment period. An email was sent to more than 600 communities and organizations throughout the state, along with notification made available on the [Development website](#). As indicated in the HOME-ARPA memo, the public hearing for the Draft HOME-ARPA Allocation Plan took place on March 2, 2022, at the Vern Riffe Center 19<sup>th</sup> Floor, Room 1932, 77 South High Street Columbus, Ohio 43215. As indicated on Development’s website, “the State of Ohio is an Equal Opportunity Employer and Provider of ADA services” along with the following information regarding website accessibility “the Department of Administrative Services has taken steps to ensure that sites on the InnovateOhio Platform are at least minimally accessible to people with disabilities who use assistive technology to access the Internet.” A total of 33 individuals attended the public hearing virtually with two individuals attending the public hearing in-person. A total of three comments were received at the public hearing with 10 written comments received during the public comment period, which are included in the appendix of the plan. A summary of the comments with responses are included below.

Following approval of the HOME-ARPA Allocation Plan on Sept. 13, 2022, it had been determined that the plan would need to be amended. The proposed changes address an additional qualifying population preference along with minor changes to the method of distribution under the Development of Affordable Rental Housing section. As outlined in the state’s Consolidated Plan citizen participation process, a substantial amendment requires the plan to undergo a 15-day public comment period and public hearing. The general public was notified of the [public participation process](#) through a direct emailing along with a media advisory prepared by Department of Development. The amended plan was made available for public comment from April 14, 2023 – April 29, 2023, with a public hearing that took place on April 18, 2023, at the following location:

April 18, 2023, at 2 p.m.  
Vern Riffe Center  
19th Floor, Room 1932  
77 South High Street  
Columbus, Ohio 43215

#### ***Describe any efforts to broaden public participation:***

In addition to the stakeholder group, the table above lists the organizations and stakeholders consulted through direct phone calls, emails, meetings and focus group to get feedback prior to development of the draft plan.

Based on feedback received during the Draft HOME-ARPA Allocation Plan public comment period that took place from March 1– March 16, 2022, the plan was amended and posted for an additional 15-day public comment period and public hearing to broaden public participation efforts. The second public comment period took place from April 18 - May 3, 2022, with the public hearing taking place at 10:30 a.m. on April 20, 2022, at the Vern Riffe Center 19<sup>th</sup> Floor, Room 1932, 77 South High Street Columbus, Ohio 43215.

In addition to the public participation efforts, the availability of HOME-ARPA funds along with an overview of the eligible activities and program requirements were discussed as part of the virtual Community Housing Impact and Preservation Program (CHIP) Advisory Group and Housing Development Assistance Program Advisory Group

meetings on Nov. 2, 2021, and Dec. 2, 2021. The minutes of the CHIP meeting minutes can be found at <https://development.ohio.gov/community/community-resources/ohio-consolidated-plan>.

***Summarize the comments and recommendations received through the public participation process:***

**Summary of Comments Received on the First Opportunity to Comment on the Draft HOME-ARPA Allocation Plan**

The Office of Housing Support presented the 15-day public comment period beginning on March 1, 2022, along with a public hearing on March 2, 2022. A summary of the comments received along with responses prepared have been included below:

Comment #1

Several organizations expressed concern with the overall budget, particularly the amount dedicated for affordable housing developments. All comments that addressed the funding for affordable housing development indicated most of the funding should be directed to developing housing as that activity has the greatest need across the state. On average, the comments indicated they would like to see the development of housing included at the full \$60 million, with a few comments indicating the entire HOME-ARPA allocation could be spent on housing development.

Response

A mechanism has been built into the plan to allow for any unexpended funds to be reallocated to affordable housing development.

Comment #2

A number of organizations expressed concern with the amount of funding dedicated for non-congregate shelter projects. All comments indicated there isn't a demonstrated need for funding budgeted for non-congregate shelter projects. On average, the comments indicated they would like to see non-congregate shelters funded at \$3-5 million.

Response

OHS has received funding requests for non-congregate shelters indicating there is a need in the state. A mechanism has been built into the plan to allow for any unexpended funds to be reallocated to affordable housing development.

Comment #3

Several comments requested funding specifically for supportive services in the areas of case management, counseling, services, and resource linkage as many supportive housing programs operate with insufficient funding. The comments recommended a portion of the HOME-ARPA funds between \$15-18 million be dedicated specifically for supportive services.

Response

The HOME-ARPA Grant with HUD ends on Sept. 30, 2030. For projects awarded funding, the units would not be placed in service until at least 2025. Given the rarity of the capital resources for permanent supportive housing (PSH) and emergency shelter (ES), a priority was placed on projects like those. Additionally, those projects are more likely to be sustained after funding is ended. If funds for supportive services are needed for HOME-ARPA projects, Development intends to commit a portion of the Ohio Housing Trust Fund (OHTF) budget to provide such services. Plans for self-sustaining those services must be submitted for long-term stability after the OHTF dollars expire.

Comment #4

Public testimony indicated preference on affordable housing developments should be on projects located in the rural parts of the state, particularly the Appalachian region of the state.

Response

A scoring element will be implemented to prioritize projects located in Ohio's Appalachian counties (excluding HUD Entitlement Communities and Non-entitlement Participating Jurisdictions), HUD Non-entitlement Communities and Non-Participating Jurisdictions (PJ). In addition, OHFA has had a non-PJ set aside in the Bond Gap Financing program and will continue to give preference to projects located in non-PJs.

Comment #5

HOME-ARPA funds dedicated for affordable housing development should be used to fill the gaps in 4% new construction developments to increase affordable housing stock throughout the state. HOME-ARPA funding for 9% Low-Income Tax Credits should be ineligible.

Response

Development would like to allocate less than \$2.5 million of HOME-ARPA to 9% PSH projects. This would simply replace the allocation of OHTF or HOME. Even though these projects will receive 9% tax credits, gap financing is still necessary since PSH projects do not have the capacity to generate cash flow like typical 9% Low-Income Housing Tax Credit (LIHTC) properties. Since 100% of the units will serve qualified populations, it benefits Development to use this more restricted source of funds and then use the amount of OHTF/HOME that would have been allocated in a less restricted way i.e., the Bond Gap Financing (BGF) round.

Comment #6

Development should work with OHFA to create three funding rounds: 9% (fund quality applications for supportive housing that come through OHFA's 9% round; 4% bonds (fill capital gaps for projects that apply in 4% rounds); and single source for small scale whether through HDAP or a stand-alone competition.

Response

OHFA plans to use HOME-ARPA in 2022 9% round, 2022 BGF round, and 2022 HDGF (non-tax credit) round. HOME-ARPA will fall under the HDAP umbrella.

Comment #7

The HOME-ARPA Allocation Plan does not target populations at or below 30% area median income as stated in HUD CPD Notice 21-10.

Response

Units funded through OHFA's HDAP program (i.e., assisted units) must serve qualified populations.

Comment #8

A local match commitment of the HOME-APRA funds should be required for the development of affordable housing projects.

Response

If local matches are required, it would exclude potential projects that do not have access to local match. Local leverage is part of the scoring criteria, so there will be a preference to projects that can demonstrate leveraged funds, but it will not be a requirement.

Comment #9

Incentivize communities to invest in home rehabilitation programs to improve the quality of housing stock available in communities.

Response

Private home rehabilitation is not an eligible activity under HOME-ARPA. Rental rehabilitation would be eligible however the qualifying populations criteria would have to be met.

Comment #10

As there are few non-profit developers in rural Ohio, particularly Appalachian Ohio, both non-profit and private developers should be eligible to develop affordable housing projects.

Response

Nothing in the plan excludes profit developers. They are not eligible for grants, but they are eligible for cash flow loans.

Comment #11

The limits placed on affordable housing projects at \$600,000 for CHDO sponsor projects and \$300,000 when combined with the 9% LIHTC program are too low based on several factors. Permanent supportive housing development projects should be able to request up to \$1,000,000 in HDAP to offset reduction in other funds and increase in construction costs. Increasing the amount available for permanent supportive housing projects will allow for projects of more than 40 units.

Response

This is the limit for 9% of projects only. OHFA will increase the per project limits for the HOME-ARP HDAP programs to ensure projects are financially feasible with the inclusion of unit's set-aside for HOME-ARP qualified populations.

Comment #12

The amount budgeted for affordable housing would only allow for the funding of \$58,000 per unit based on the outcomes projected.

Response

This amount will be revised as the initial amount considered for the entire project and not just assisted units.

Comment #13

Several comments requested the amount of administration be reduced from the full 15% (\$13.5) to approximately \$8-10 million so funds can be dedicated to other projects.

Response

Administration covers the implementation of the projects as well as the long-term compliance requirements for the affordability period of 20+ years. Long-term compliance requires annual income renewal for clients as site inspections every three years by OHFA. In addition, OHFA anticipates a considerable amount of training of compliance staff to implement HOME-ARP as well as monitoring for compliance.

Comment #14

There are no funds dedicated to Tenant Based Rental Assistance (TBRA), which is an important activity for persons exiting a shelter.

Response

TBRA funds can only be used for a maximum of 24 months. Other resources providing a long-term solution for person(s), is a better option. Currently, Development has several programs with rental assistance funding. These include the Office of Community Assistance's (OCA) Emergency Rental Assistance program and the Office of Housing Support's Homeless Crisis Response Program. These funding sources have significant amounts of funding to both prevent individuals from entering homelessness and end homelessness quickly. Ohio Housing Finance Agency has also distributed additional homelessness service funding. Resources for capital funding for

permanent supportive housing are limited and there is a demonstrated need for that resource. Capital funding for emergency shelter cannot be obtained elsewhere.

#### Comment #15

There were a few comments regarding the consultation process. The organizations that provided comments indicated they would have liked to have additional opportunities to provide feedback following the stakeholder group meeting.

#### Response

The Office of Housing Support understands having multiple opportunities to provide feedback was helpful in the development of the plan. At the stakeholder group meeting, the Office of Housing Support asked participants to provide feedback at any time following the meeting to begin preparing the draft HOME-ARPA Allocation Plan.

### **Summary of Comments Received on the Second Opportunity to Comment on the Draft HOME-ARPA Allocation Plan**

The Office of Housing Support hosted a second 15-day public comment period beginning on April 18, 2022, along with a public hearing on April 20, 2022. A summary of the comments received, along with responses prepared, have been included below:

#### Comment #1

Several organizations expressed concern with the amount of funding dedicated for non-congregate shelter projects. All comments indicated there isn't a demonstrated need for funding budgeted for non-congregate shelter projects. On average, the comments indicated they would like to see non-congregate shelters funded at approximately \$5 million. Additional information regarding the specifics of the activity should be incorporated into the plan.

#### Response

The Office of Housing Support has received funding requests for non-congregate shelters indicating there is a need in the state. A mechanism has been built into the plan to allow for any unexpended funds to be reallocated to affordable housing development.

#### Comment #2

Several comments requested funding specifically for supportive services in the areas of case management, counseling, services, and resource linkage as many supportive housing programs operate with insufficient funding. The comments recommended a portion of the HOME-ARPA funds be dedicated specifically for supportive services

#### Response

The HOME-ARPA grant ends on Sept. 30, 2030. For projects awarded funding, the units would not be placed in service until at least 2025. Given the rarity of the capital resources for the development of housing a priority was placed specifically on projects like those. Additionally, those projects are more likely to be sustained after funding is ended. If funds for supportive services are needed for HOME-ARP projects, Development intends to commit a portion of the OHTF budget to provide such services. Plans for self-sustaining those services must be submitted for long-term stability after the OHTF dollars expire.

#### Comment #3

It has been recommended that OHFA raise the cap from \$2.5 million to \$3.5 million for New Construction projects only.

#### Response

The Draft OHFA BGF Guidelines have incorporated this recommendation.

#### Comment #4

It has been recommended that the amount of Housing Credit Gap Financing (HCGF) to be awarded to 2022 9% LIHTC developments be based on an updated underwriting of the development to be completed at final application.

#### Response

OHFA underwrites all tax credit projects at proposal application, final application, and 8609. If additional resources are needed at final application (i.e., due to unanticipated increases in construction costs), OHFA will consider additional subsidy.

#### Comment #5

It has been recommended that any unused and uncommitted funds following the 2022 HCGF and proposed BGF funding rounds be reserved for 2023 BGF, 2023 HDGF, and 2023 HCGF.

#### Response

Funds will be prioritized for BGF and HDGF. The 9% LIHTC program provides deeper subsidy, so any unused funds in 2022 will go to rounds needing additional subsidy.

#### Comment #6

Several comments requested the amount of administration be reduced to 10% of the total allocation so funds can be dedicated to other projects. In addition, it has been requested that to determine that the administrative amount is reasonable the plan should incorporate the number of staff it will hire with these funds; the responsibility of each staff member; and, whether the staff will be from OHFA or Development.

#### Response

Administration covers the implementation of the projects, as well as the long-term compliance requirements for the affordability period of 20+ years. Long-term compliance requires annual income renewal for clients as site inspections every three years by OHFA. In addition, OHFA anticipates a considerable amount of training of compliance staff to implement HOME-ARPA as well as monitoring for compliance.

#### Comment #7

A comment was received requesting the HDAP scoring methodology be weighted to place priority on projects in impoverished counties, particularly in the Appalachian region.

#### Response

OHFA has had a non-participating jurisdiction set aside in the Bond Gap Financing (BGF) program and will continue to give preference to projects located in non-participating jurisdictions.

#### Comment #8

A comment was received requesting the subsidy cap be raised for housing developments funded by HOME-ARPA to \$5 million in subsidy per development in rural and Appalachian Ohio.

#### Response

Projects located in non-participating jurisdictions will be eligible for \$5 million in HOME-ARPA subsidy and must reserve at least 20% of affordable units for qualified households.

#### Comment #9

A comment was received requesting the HDAP section dealing with the calculation of the potential additional 2022 HCGF HDAP does not consider that for the initial application be amended. This request is to allow OHFA staff to provide additional funds in cases where non-committed funds ultimately do not come to fruition by the final application.

#### Response

Language in the draft plan and draft OHFA guidelines allows OHFA to provide additional funds if needed.

#### Comment #10

A comment was received requesting the HDAP BGF \$4.25 million cap be aligned with the 2021 9% projects \$5 million cap.

#### Response

This recommendation has been incorporated into the final plan.

#### Comment #11

A comment was received requesting the 2022 HDAP MF BGF and 2022 HDGF application process be pushed back to allow for the strongest projects and to benefit qualifying households.

#### Response

We have committed to a later deadline than in past years. Applications will be due late summer 2022.

#### Comment #12

A comment was received requesting the 2023 HCGF as an eligible use for unused funds in addition to 2023 BGF and HDGF.

#### Response

The 9% LIHTC provides deeper subsidy than the 4% LIHTC. If there are additional funds remaining, we will be utilizing them for our 4% round. OHTF and HOME will still be available for eligible developments in our 9% round.

#### Comment #13

A comment was received requesting clarification under the HDAP Funding Requirement Loans section for the available interest rate parameters. Providing a range of potential interest rates from 0% to a benchmark would help define the parameters that OHFA staff can use, and developers can anticipate.

#### Response

This is determined much closer to closing, up to 2% is consistent with what OHFA has done in the past.

#### **Summary of Comments Received on the Draft HOME-ARPA Allocation Plan Substantial Amendment**

The Office of Housing Support hosted a 15-day public comment period from April 14, 2023 – April 29, 2023, with a public hearing that took place on April 18, 2023. There were no comments received on the substantial amendment.

#### **Summarize any comments or recommendations not accepted and state the reasons why:**

There were a few comments received as part of the consultation process and public participation process (see above) that did not meet the requirements as stated in CPD-21-10 or were not considered a priority when developing the plan.

#### **Needs Assessment and Gap Analysis**

The state of Ohio reviewed the existing [PY2020 – 2024 Consolidated Plan](#), Ohio Housing Finance Agency's (OHFA) [Housing Needs Assessment](#), the OHFA Confronting Homelessness Report- Homelessness in Ohio 2012- 2018, [2014-2018 Comprehensive Housing Affordable Strategy \(CHAS\)](#) Ohio's [2020 Point-in-Time Report](#), the Corporation for Supportive Housing (CSH) State Investment Response Estimator Tool Data, and the National

Low-Income Housing Coalition (NHILC) [Shortage of Affordable Rental Homes](#) to help determine the needs that exist for the following qualifying populations:

- Homeless, as defined in 24 CFR 91.5
- At risk of Homelessness, as defined in 24 CFR 91.5
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking
- Other Populations:
  - Other families requiring services or housing assistance to prevent homelessness
  - At greatest risk of housing instability
  - Veterans and families that include a veteran family member

Upon examination of the data and plans discussed previously, Development was able to determine the gaps that exist for persons falling under one of the qualifying population criteria. The following provides an overview of how the information contained within the plans and data aligns with the mission of HOME-ARPA. The following tables providing a summary of the homeless needs inventory will be discussed as part of the section covering the size and demographic composition of qualifying populations within the PJ’s boundaries along with the section that addresses the gaps within the current shelter and housing inventory.

**Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	3,031	918	4,249	4,249	112								
Transitional Housing	848	308	947	947	394								
Permanent Supportive Housing	7,142	2,292	10,982	10,982	2,937								
Other Permanent Housing	48	25	161	161	24								
Sheltered Homeless						2,985	5,826	698	1,706				
Unsheltered Homeless						34	1,810	32	#				
<b>Current Gap</b>										1,276	425	1,885	1,885

**Suggested Data Sources:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

**Housing Needs Inventory and Gap Analysis Table**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households

Total Rental Units	1,582,850		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	297,090		
Rental Units Affordable to HH at 50% AMI (Other Populations)	210,160		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		302,870	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		215,470	
<b>Current Gaps</b>			518,340

**Suggested Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

**Describe the size and demographic populations within the Participating Jurisdiction's (PJ) boundaries:**

Homeless (McKinney Act definition at 24 CFR 91.5)

The data covering the size and demographics of the homeless population utilized aggregated data from local Homeless Management Information Systems (HMIS), which captured information on individuals accessing services as reported in the OHFA Homelessness Report. Data in this report reflects information from the aggregated HMIS records maintained by Ohio's nine Continuums of Care (CoC), reflecting all 88 of Ohio's counties, from Jan. 1, 2012, through Dec. 31, 2018. If an individual obtained homelessness services prior to 2012, any such records are not included. In 2018, 76,478 unique individuals were served by Ohio's Continuums of Care. This means about one in every 15 Ohioans (or 6.7% of the population) accessed homelessness services in 2018. This is likely an undercount of the total Ohioans experiencing a housing crisis, as this data source cannot capture families doubling up, staying with family or friends, or staying in temporary locations such as a car or motel. There are also several non-HMIS participating homeless service providers that do not contribute to the HMIS.

The number of people experiencing homelessness each year has grown consistently over time. Between 2012 and 2018, the population experiencing homelessness grew 30.8%; during the same time, Ohio's entire population grew by only 1.3%. In 2018, the average person accessing homelessness services was 31 years old. Excluding children under age 18, the average head of household was 39 years old. Age at first entry was unknown for 402 clients. Over time, the proportion of clients in each age group has shifted slightly. The largest increases in population served from 2012- 2018 have been in the age groups of 55 to 64 and 65 or older, which grew 85 and 208 %, respectively. The next largest increase in age group served is children aged 5 to 9 and 10 to 14, which increased 43 and 49% from 2012-2018.

About a third of the population that experienced homelessness in 2018 were children under the age of 18 (28.5%). This includes 2,258 infants who had not yet reached the age of one. Compared to the state overall, children aged 0 to four were substantially overrepresented in the CoC population; 11.4% of CoC clients fell in this age range, compared with only 5.9% of Ohioans overall. Children aged 10 to 14 are also overrepresented in the CoC population. The total number of children under age 18 experiencing homelessness has increased steadily year over year. Since 2012, the number of children experiencing homelessness has increased 35%, reaching 21,827 in 2018.

Adult sub-groups between 25 and 54 make up about half of the total CoC client population in 2018. The largest sub-age group accessing CoC services is adults aged 35 to 44; this age group comprised 17.8% of the CoC client population and only 8.8% of the Ohio population in 2018. The increasing number of older adults accessing homelessness services may be related to two trends: the number of older Ohioans is increasing, and this

population is uniquely susceptible to housing challenges. Demographers predict the percentage of Ohioans aged 55 and over will peak by 2030 at 32%. This increase in the number and proportion of older adults is not unique to Ohio and is happening at the national level as well.

Males made up just over half of the adults accessing homeless services: of clients aged 18 or older, 56.3% clients were male, 43.3% were female, and 0.3% identified as transgender, non-binary, or another gender identity. Gender at first entry was unknown for 93 clients. This ratio of male-to-female clients has stayed consistent over time. Of the population younger than 18, the gender gap is much smaller. Females account for 49.5% of the CoC youth population, males account for 50.5%, and those identifying as transgender or non-binary is .1%

The number of families accessing homelessness services has been steadily increasing since 2012. Between 2012 and 2018, the number of families (analyzed as adults entering with children) increased by 20.4%. More than 28,800 people entered as part of a family, 64.8% of whom were children under 18.

The racial composition of those accessing homelessness services differs drastically from the state's overall composition. White individuals were underrepresented in the homelessness population. White people made up 81% of the total state population in 2018 but comprised 45.4% of those served. By contrast, Black individuals were over-represented. Black individuals represented 12.4% of Ohio's population in 2018 but made up 48.8% of clients accessing services. Multiracial individuals were also over-represented, comprising 3.1% of Ohio's population, but 5% of persons receiving services. Race at first entry was unknown for 415 clients.

Regarding ethnicity, about 4% of clients reported they were of Hispanic or Latino ancestry. Ohio's population is 3.9% Hispanic or Latino. Ethnicity at first entry was unknown for 249 clients.

#### At-risk of homelessness (McKinney Act definition at 24 CFR 91.5)

Per 24 CFR §91.5, an individual or family is considered at-risk of homelessness if their income is below 30% area median family income, do not have sufficient resources or support networks, and have experienced housing instability. Below is an analysis of 0-30% area median income (AMI) renters.

As reported in the 2014-2018 CHAS dataset, there were a total of 586,490 households in the state of Ohio that had an annual income below 30% of median family income for the area as determined by HUD, which represents 12.6% of all households. Over a quarter of all renters and 5.8% of all owners in the state of Ohio had incomes at or below 30% of median family income. Development considers those living in rental housing with one or more problems who are Extremely Low Income (ELI) as meeting the definition of At Risk, according to the Census CHAS dataset. There are 302,870 renters with at least one housing problem whose income is in the ELI range as of 2018. There are thousands more people who are at risk of homelessness, including those exiting corrections, hospitals, and treatment programs, without suitable housing for whom we cannot deduplicate datasets. Therefore, the CHAS data is used as a proxy measure.

The state of Ohio also considers all those living in poverty as "at risk," given the Ohio Data Warehouse's finding that half of Ohio's poverty stricken were engaged with programs available through the state's Continuum of Care. Given disproportionate representation of Black people in Ohio's homelessness population, and the growing rate of older homelessness, we expect older, Black household heads, especially those with disabling conditions, to be at heightened risk of entering homelessness.

#### Fleeing/Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

In 2021, Ohio's domestic violence agencies provided shelter to 9,118 individuals and 3,965 children fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking (hereafter abbreviated as survivors of domestic violence).

As reported in Ohio Domestic Violence Network's (ODVN) [16th Annual Domestic Violence Counts Report Ohio Summary](#), which provides a count on the domestic violence victims served on one day; a total of 2,456 victims were served in one day. Of that, 1,548 adult and child victims of domestic violence found refuge in emergency shelters, transitional housing, hotels, motels, or other housing provided by local domestic violence programs. A total of 908 non-residential adult and child victims received supportive services including counseling, legal advocacy, and support groups. A total of 770 hotline contacts were received. Domestic violence hotlines are lifelines for victims in danger, providing support, information, safety planning, and resources via phone, chat, text, and email. As reported by ODVN, hotline staff received 770 contacts, averaging more than 32 contacts per hour. 183 victims requested shelter and/or housing assistance but were denied due to a lack of resources that day.

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

As reported in the OHFA Homelessness Report, the number of families accessing homelessness services has been steadily increasing since 2012. Between 2012 and 2018, the number of families (analyzed as adults entering with children) increased by 20.4%. More than 28,800 people entered as part of a family, 64.8% of whom were children under 18. In particular, the number of females entering with children has increased. Despite making up only 43.4% of the adult CoC population, females represented 93.5% of the "single adult with children" population. Males, in contrast, made up 65.4% of the "single adult without children" population.

Of the roughly 14,400 children that entered with a single adult, the average child's age was six years old, and the average age of the adult was 32. More than 1,250 infants entered with a single adult. The increasing number of women and children accessing homelessness services highlights the challenges many women face throughout the state. The lack of affordable and available housing in Ohio is largest for homes with multiple bedrooms. While Ohio is nearly meeting the need for one-bedroom units for very low-income renters, there is a sizable shortage of supply for affordable units with more bedrooms that can accommodate larger families – suggesting adults with children may be even more vulnerable to housing instability.

Of clients entering programs in 2018, 7.4% were military veterans, with veteran status not reported for 1,046 people. During the study period, the average age for veterans entering the CoC system during the study period was 52 and more than 330 veteran households included children at entry.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, Tenant-Based Rental Assistance, and affordable and permanent supportive rental housing***

In Ohio, there are several programs funded with both federal and state resources that can assist qualifying populations with supportive services, along with affordable and permanent supportive rental housing. An overview of the housing programs offered by Development and OHFA are located on Development's website. These programs utilize Ohio Housing Trust Fund (OHTF), Community Development Block Grant (CDBG), CARES-Act, HOME Investment Partnership, Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA) and National Housing Trust Fund dollars to help conserve and expand the affordable housing stock; address the issue of homelessness in Ohio; and provide short-term, emergency assistance and other public services for low-income Ohioans and qualifying populations. In addition to the state and federal funds offered by Development and OHFA, Congress has recently approved a total of nearly \$1.5 billion of Emergency Rental Assistance (ERA) allocated to the State of Ohio, to pay up to 12 months of arrears and up to three months prospective rent for people experiencing housing instability. The statute allows housing providers to initiate ERA applications with cooperation from their tenants.

## ***Describe the unmet housing and service needs of qualifying populations***

### Homeless (McKinney Act definition at 24 CFR 91.5)

The primary unmet need cited multiple times by CoC leaders, people experiencing homelessness, and other homeless system stakeholders consulted during the development of this plan is affordable and supportive housing. There are some specific counties that do not have adequate shelter, and some shelter programs that have capital needs, but the overwhelming response from participants was around the need for affordable and supportive housing.

Using HUD's State-Investment Resource Estimating Tool, some 1,885 units of supportive housing are needed and some 16,000+ affordable housing units are needed for the current population experiencing homelessness. Supportive housing requires capital (no debt), operating subsidy, and supportive services that are adequately financed to promote tenants' wellbeing. Ohio has insufficient resources in all categories. Development notes that OHFA's Permanent Supportive Housing (PSH) pool in the 9% LIHTC program has helped add capacity for many years, generating over 200 new PSH units each year. However, we continue to fall well short of the need. In addition, an examination of recent point-in-time counts over the past few years indicates that the number of people counted as homeless exceeds the available beds across the state (see below). While point-in-time (PIT) is the most reliable tool we have, it is an undercount of the actual number of people experiencing homelessness on any given night.

#### Housing Inventory Count (HIC) by State – Ohio

2021 Total Year-Round ES/TH Beds – 8834

2020 Total Year-Round ES/TH Beds – 9161

2019 Total Year-Round ES/TH Beds – 9127

#### PIT Counts by State – Ohio

2021 – 6,469 (no unsheltered count was reported due to COVID)

2020 – 10,655

2019 – 10,345

### At-risk of Homelessness (McKinney Act definition at 24 CFR 91.5)

People experiencing homelessness, those who had been previously homeless, as well as those who work in the homeless system and work to help people avoid literal homelessness all cited the need for affordable housing and supportive housing as the most pressing challenge. OHFA estimates in the 2022 Needs Assessment it will take 50 years to address the affordable housing need in the state at the current pace of development, and if no new households require affordable housing in the future.

The findings reported in the OHFA Needs Assessment help to understand what the housing conditions are like throughout the state, both in rural and urban areas for persons that meet one of the conditions discussed under 24 CFR 91.5:

- Ohio's foreclosure rate (0.6%), 90-day delinquency rate (2%) and negative equity share (4%) in December 2019 were all at record low levels, having fallen precipitously from the height of the Great Recession.
- In 2018, there were 105,265 eviction filings statewide, representing 6.6% of all renter households. Although consistently higher than the national rate, Ohio's eviction filing rate has fallen to the lowest level in decades, having peaked in 2005 at 8.6%.
- Ohio's public and community schools reported that 35,214 students (2% of enrollment) lacked a fixed, regular, and adequate nighttime residence during the 2018–19 school year.

- In 2019, there were 32,362 beds in Ohio for homeless persons, including 9,231 in temporary housing and 23,131 in permanent housing.
- 76,000 Ohioans accessed homelessness services in 2018 from one of the state’s Continuums of Care. This represents a 30% increase from 2012.

The report states, in Ohio, “More than 40% of mortgage holders aged 65 or over are housing cost burdened. Out of this age group, one-in-six mortgage holders (17%) are severely cost burdened. Black homeowners are twice as likely to be severely cost burdened as white homeowners (14% compared to 7%), meaning they spend at least half their income on housing.”

	2019	2010
Total housing units	5,202,304	5,107,273
Occupied housing units	4,676,358	4,552,270
Vacant housing units	525,946	555,003
Homeowner vacancy rate	1.4%	2.6%
Rental vacancy rate	5.3%	9.5%

Source:: 2015-2019 and 2006-2010 ACS 5-Year Estimates DP-04 Data

The housing affordability crisis is not limited to homeowners. As reported in OHFA’s Needs Assessment, renters in Ohio also face a tight market. “For every 100 extremely low-income renters in Ohio, there were only 44 rental units affordable and available to them in 2018. Ohio’s affordable housing gap has been gradually shrinking, but at the current net annual rate of

around 5,000 units built or made available for the lowest-income renters, it will take almost 50 years to close that gap. One-in-three Black renters in Ohio (33%) were severely rent burdened in 2018, compared to one-in-five white renters (22%).” The issue of housing being overcrowded, and housing cost burden significantly impacts rental housing with “One in four renters in Ohio (25%) experienced severe housing problems, as defined by HUD, including incomplete kitchen and plumbing facilities, severe overcrowding and severe housing cost burden.” In terms of housing availability, the following table shows how the vacancy rate has changed from 2010 – 2019 according to the ACS five-year estimates. The rental vacancy rate has decreased during that period from 9.5% to 5.3%, which provides another sign the housing market in Ohio, particularly rental housing, has been significantly impacted since the 2008-2009 housing recession. Additional information regarding the total number of renter and owner households throughout the state experiencing housing problems, as well as housing cost burden can be found in the appendix. The Comprehensive Housing Affordability Strategy (CHAS) data included in the appendix provides a summary of the ACS data for the 2014-2018 period released on Sept. 29, 2021, by Housing and Urban Development (HUD). It should be noted nearly 43% of all renter households reported at least one of four housing problems, and 18.4% of owner households reported one of four housing problems.”

Fleeing/Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

On one day in 2021 (Sept. 9, 2021), DV agencies in Ohio had to deny services to 286 survivors due to a lack of resources, including housing, emergency shelter, transportation, childcare and legal representation. Housing is a huge obstacle for survivors and local victim service providers. For survivors and their children, it is imperative that they find affordable and safe housing to live independently and free from violence from their abusive partners. The pandemic has had detrimental impacts on a survivor’s ability to find such housing. Ohio has seen an overall lack of independent housing options, rental costs at three times that of what it was pre-pandemic, as well as a lack of landlords willing to rent to survivors of DV. In addition, many survivors struggle with additional obstacles related to the DV they have experienced including prior evictions, back balances of rent and utilities and related transportation, and employment issues.

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

OHFA’s 2021 Needs Assessment reports that “Challenges to secure and maintain affordable housing are particularly difficult for Ohio’s children and aging adults. Both children and older adults are more likely to live in

cost burdened households and thus face potential housing insecurity. As Ohio's population continues to age, a growing number of older adults are also vulnerable to high housing costs. One of every nine households have a single adult aged 65 and over, making regular home maintenance challenging. Older Ohioans also have higher rates of disabilities: nearly two-thirds of homes in Ohio are inaccessible to someone in a wheelchair.”

It is important to note the report includes data indicating where people went after exiting the homeless system, which highlights the lack of housing and services necessary to help extremely low-income Ohioans achieve housing stability. Below are key findings from the report:

- Only 21% of people exiting the homeless system entered a subsidized rental unit, while 45% moved into an unsubsidized unit.
- 27% moved in with family or friends, which often leads to future bouts of homelessness.
- 9% went to another emergency shelter.
- 7% exited shelter to a place not fit for human habitation.

The following data reported in the OHFA Confronting Homelessness Report discusses veterans, which are classified as high-risk populations with regards to homelessness.

Of the veteran clients entering programs in 2018, 7.4% were military veterans, with veteran status not reported for 1,046 people. During the study period:

The average age for veterans entering the CoC system during the study period was 52.

- More than 330 veteran households included children at entry.
- The largest prior residence for veterans included temporary shelter (33%) and a place not fit for habitation (24%).
- The most common exit destinations were an unsubsidized home (35%), a subsidized home (21%), or moving with friends or family (18%).

***Identify the gaps within the current shelter and housing inventory as well as the service delivery system. Explain how the level of need and gaps in the shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:***

The Low-Income Housing Coalition’s most recent [Gap Report](#) indicates there were only 184,584 rental units in 2019 that were affordable and available to Ohio’s 436,611 extremely low-income households. With national median rent prices increasing nearly 18% last year ([Apartment List](#)), we can assume that gap has grown much larger over the past two years. Another statewide dataset to understanding what housing gaps exist within the current shelter and housing inventory is the Corporation for Supportive Housing’s (CSH) State Investment Response Estimator Tool (S-IRET) (see appendix). The CSH S-IRET tool annualizes Ohio’s PIT and HIC to determine the level of need for three evidence-based interventions that end or prevent homelessness. The following is a summary of the housing gap for individuals and families:

- 1,885 gaps in permanent supportive housing units for individuals
- 23,390 gaps in rapid rehousing units for individuals and 2,068 for families
- 3,376 gaps in units for homeless prevention for individuals and 1,331 for families.

The data included in the Homeless Needs Inventory and Gap Analysis Table was based on the CSH S-IRET tool, which provides the total number of beds and units that are needed for homeless families and adults to fill the gap. In terms of the shelter inventory gaps existing throughout the state, there are a total of 1,276 beds and 425 units need to fill the gap for families, with a total of 1,885 beds needed to fill the gap for adults only. The Housing Needs Inventory and Gap Analysis Table was also based on the CSH S-IRET tool and indicated that there are 302,870 renter households with one of more severe housing problems at 0% - 30% AMI and 215,470 renter

households with one of more severe housing problems at 30% - 50% AMI in need of housing. This represents a housing gap of 518,340 households in need of housing.

While CSH's study shows gaps for rapid rehousing and homelessness prevention are larger than the PSH gap, Ohio already has a lot of other funding available for these services, including Emergency Shelter Grant, ESG-CV, CoC competition funding from HUD, Youth Homelessness Demonstration Project funding, Emergency Rental Assistance, and state TANF dollars through the Housing Now for Homeless Families program. The large gap for rapid rehousing primarily is related to the difficulties providers have identifying landlords who are willing to participate in rapid re-housing (RRH) programs.

COHHIO has indicated all nine CoCs consistently report the lack of affordable rental units as the most pressing need they face because it is preventing clients from accessing long-term stable housing and increasing the length of stays in shelter.

Other ARPA funding, namely State Fiscal Recovery Funds, are available to increase the supply of non-PSH affordable housing. HOME-ARP funds provide the rare opportunity to significantly reduce Ohio's PSH gap. Given the challenges in finding units for RRH and other scattered site housing assistance services, we believe the most appropriate and effective use of Ohio's HOME-ARP resources would be to help expand the supply of PSH through OHFA's multifamily housing development program.

The following excerpt from the Confronting Homelessness report prepared by OHFA sheds some light with regards to the unmet housing and service needs of qualifying populations:

"The recent COVID-19 crisis has highlighted the importance of a safe, stable, and affordable home in maintaining a healthy community. The health crisis and related economic crisis have exacerbated the deep racial and economic inequalities that were already present in Ohio. In the wake of this economic and health crisis, Ohio is facing increasing challenges to keeping people in their homes. As hundreds of thousands of Ohioans have filed for unemployment and experienced disruptions in their income, we expect many of these households will be unable to pay rent or their mortgage and may face housing instability in the coming year. Prior to COVID-19, a lack of affordable housing already existed in Ohio; in 2018, the shortage was more than 256,000 housing units for extremely low-income renters. For every 100 extremely low-income renters there were only 44 available and affordable units. This affordability crisis will likely be exacerbated in the coming year."

One of the primary gaps in service delivery for local DV shelters is a lack of funding for supportive services in general and specifically related to housing. DV programs have received cuts to funding at the federal level from many of their primary funding sources, including major cuts to the Victims of Crime Act (VOCA) and the Violence Against Women Act (VAWA). VOCA is often the largest funding source for victim service providers and within the past two years, Ohio programs have seen a cut of up to 40% from this funding stream. While COVID relief money has been a huge help to these programs, much of that funding was not provided for supportive services.

Additionally, the lack of available housing and turnover in housing has had a negative impact on survivors' ability to leave shelter for independent housing. Landlords have been less likely to rent units to survivors and the cost of rent has been higher than what many housing providers are able to cover.

In addition to the data and information pulled from various reports above, the state of Ohio conducted a series of community forums on housing over the course of a few months in 2022. Some of the key findings discussed at these meetings regarding the gaps associated with service delivery are as follows:

- Staffing is a major concern across the state.
  - Not having enough staff
  - Staff burnout
  - Staff have too many responsibilities

- Specific and unreasonable time frames for most voucher subsidies.
  - Having only 60-120 days to find a unit.
- Transportation needs for services.
  - Clients might qualify for services but cannot get to them.
- Not enough quality mental health services that are dedicated specifically to mental health.
- Some providers/clients don't qualify for services because of the HUD definition of homelessness.
  - Does not account for couch surfing, doubling up, and other unique unhoused situations.
- Not having staff dedicated to landlord outreach and retention.
  - Leads to reduction in participating landlords because bridges are being burned but not built.
- Operational costs for units are increasing and funding is not keeping pace with those increases.
- Childcare services also lacking in several regions, presenting an interesting challenge for service provision.
- Internet access in certain regions across the state also greatly influences ability to provide services.
- No central place to find units for rent/landlords – takes a lot of staff time to find units.
- HUD requirements for each program are different and complex – with high staff turnover it takes a long time for orgs to learn requirements and meet deadlines.
  - In the meantime, people are falling through the cracks.
- Some programs and forms still require physical copies and “wet ink” signatures making things difficult in the pandemic and beyond as many things transition to online signatures.
- If shelters are at capacity, the referral pipeline breaks down and people will typically begin couch surfing and are no longer considered homeless by HUD's definition and then are ineligible.
- Families who have been helped are now reentering services because landlords sold the unit, and the new owner will not accept vouchers.
  - Or clients got pandemic funding that paid for rent/utilities/other costs and those funds are drying up, but self-sufficiency hasn't been achieved.
- Service providers put in a uniquely difficult position when tenants leave units due to informal or illegal evictions – there's not much that can be done once the tenant leaves.
- HUD FMR doesn't come close to meeting the need in communities since the pandemic has shifted the housing market.
  - A common request was that HUD would look at that numbers more frequently or adjust based on communities, not counties – vast difference in markets within counties.
- Housing first model prevents service providers from requiring folks to partake in services to maintain housing.
  - This causes some issues in the mental health space because some tenants don't want help but need it to maintain housing.
    - Ex. People destroying units or not paying because of mental health issues
- Service providers face extra barriers getting clients housed that have the following issues:
  - Criminal background
  - Rough credit score/history
  - Prior evictions
- Lack of staffing results in certain supports being dropped that are crucial to client success.
  - Ex. Life skills, financial literacy, general maintenance, etc.
- Programs are often created overnight and expected to be implemented immediately without proper time to build the program infrastructure and address staffing/training needs.
  - Some people mentioned that HUD should stop creating new programs and instead give more money and guidance to existing programs in the areas like staffing, services, and operations costs.
- Issues also raised about coordinated entry/referrals:
  - VISPDAT is a very inaccurate and somewhat harmful tool.
  - Siloed systems don't allow for data sharing to best serve clients.
  - Lack of knowledge of what all programs exist to serve clients.

- Call for services to center around the individual instead of the agency.
  - Ex. John Doe goes to the shelter and the clinic and the food pantry and the clothing drive to get services. They don't talk to each other, so things get missed or duplicated and he has three or more case workers. Instead, John Doe could have a single caseworker that understands his needs and coordinates his services at all those organizations.
  - Very similar to the community health worker model
  - Often called community navigators

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:***

The Ohio Department of Development will not include any additional conditions in its definition of other qualifying populations as established in the HOME-ARPA notice.

***Identify priority needs for qualifying populations:***

Based on the data discussed previously, along with the conversations that took place as part of the consultation process, the need for permanent supportive housing is the greatest priority for all qualifying populations, but many of the comments received indicated the greatest need is to serve homeless individuals and households, as well as persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking. The stakeholder group indicated there was a lack of other resources available for permanent supportive housing projects and that the HOME-ARPA funding is a critical resource in filling the gap.

In addition to the need for permanent supportive housing, there also exists a need to fill the gap that wasn't fully covered by the ESG-CV and CDBG-CV CARES Act funds by establishing or enhancing non-congregate housing opportunities in the state for all qualifying populations. But as mentioned previously the greatest need is to serve individuals and households that are homeless as well as persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking. Development has been approached by organizations identifying the need for capital improvements or acquisition and development of non-congregate shelters. Based on the information presented in the plan, particularly the information gathered from OHFA's Confronting Homelessness Report, the development of safe and affordable rental housing along with the development of non-congregate shelters are priority needs that apply equally to all qualifying populations.

**HOME-ARPA Activities**

***Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:***

The activities associated with HOME-ARPA are included in this section. The following provides an overview of the method distribution along with associated program requirements. There will be a general preference for people experiencing homelessness in both the Development of Affordable Rental Housing activity and non-congregate shelter activity. There will be an additional preference for chronically homelessness in the Development of Affordable Rental Housing activity and an additional preference for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking in the non-congregate shelter activity. This is supported by the needs assessment and data. While there will be a preference for serving those experiencing homelessness, chronic homelessness, and persons fleeing/attempting to flee domestic violence,

dating violence, sexual assault, stalking, or human trafficking, all qualifying populations will be eligible to be served through this activity.

**Use of HOME-ARPA Funding Table**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services			
Acquisition and Development of Non-Congregate Shelters	10,000,000.00		
TBRA			
Development of Affordable Rental Housing	67,500,000.00		
Non-Profit Operating			5%
Non-Profit Capacity Building			5%
Administration and Planning	13,057,128.00	14.4%	15%
<b>Total HOME ARP Allocation</b>	<b>90,557,128.00</b>		

**Development of Affordable Rental Housing – Housing Development Assistance Program (Housing Credit Gap Financing (HCGF), Bond Gap Financing (BGF), and Housing Development Gap Funding (HDGF)) Activity for Rental Housing Development**

**HUD Notice: CPD2021-10 requires the following targeting requirements for Rental Housing:**

- a. Not less than 70 % of the total number of rental units assisted with HOME- ARP funds by the PJ must be restricted for occupancy by households qualifying at the time of initial occupancy; and,**
- b. Not more than 30 % of the total number of rental units assisted with HOME- ARP funds by the PJ may be restricted to low-income households. These rental units do not have to be restricted for occupancy by qualifying households, however rental units restricted to low-income households are only permitted in projects that include HOME-ARP units for qualifying households.**

**Housing Development Assistance Program (Housing Credit Gap Financing and Bond Gap Financing Activity) Funding Amount:** Approximately \$67.5 million in HOME-ARPA. The HOME-ARPA dollars will be awarded through the Ohio Housing Finance Agencies (OHFA) HDAP to provide gap financing to developments serving qualified populations as defined in HUD Notice: CPD 2021-10. In accordance with the needs assessment, there will be a preference for people experiencing chronic homelessness and general homelessness, but all qualified populations will be eligible to be served. Funds may be used to preserve or develop housing serving target populations. Federal regulations may be waived as outlined in HUD Notice: CPD-21-10.

The HCGF program utilizes HOME-ARPA funding to provide gap financing assistance to developments using competitive (9%) LIHTCs to renovate or construct permanent supportive and general occupancy affordable housing serving low- and moderate- income households, and HOME-ARPA Qualified Populations.

Up to \$3 million will be provided for enhanced HCGF to developers of proposed permanent supportive housing projects that submitted applications for 2022 competitive (9%) Low- Income Housing Tax Credits (LIHTC) on Feb. 10, 2022, and meet all criteria to compete in the Service Enriched Housing Pool as defined in the 2022-23 Qualified Allocation Plan. In exchange for an enhanced HCGF-HOME-ARP award, developers must agree to set aside 100 % of the total units for HOME-ARPA Qualified Populations. The amount of funding per project will equal the original HCGF requested plus an amount of funds equal to 25% of the deferred developer’s fee listed in the application to strengthen the financial sustainability of the project. The maximum award per project is \$750,000.

The BGF program utilizes HOME-ARPA funding to provide gap financing assistance to developments using multifamily bonds with non-competitive (4%) LIHTCs to renovate or construct affordable housing serving low- and moderate-income households, and HOME-ARP Qualified Populations the HOME-ARP funds will be allocated for BGF as follows:

- Up to \$17 million will be reserved for sponsors of proposed permanent supportive housing projects that applied for competitive (9%) LIHTC in 2021 but did not receive an allocation of credits and agreed to restructure the project financing using multifamily bonds and 4% LIHTC by submitting a revised application in January 2022. Developers must agree to set aside at a minimum 100% of the HOME-ARPA assisted units for HOME-ARPA Qualified Populations (QP) and the amount of funding per project based on need defined as compensation for the reduction of credits from 9% to 4% plus funds to cover additional bond costs and the original HDAP requested plus funds needed for a capitalized operating reserve for the QP units.
- A minimum of \$39 million will be reserved for sponsors of proposed permanent supportive housing multifamily bond projects that apply in the 2022 competitive BGF program funding round in summer 2022. Developers seeking funding for new affordability integrated supportive housing developments must set aside 20% of affordable units for qualified populations. Preservation developments seeking funding for integrated supportive housing developments must set aside 10% of affordable units for Qualified Populations. New affordability integrated supportive housing projects in participating jurisdictions will be capped at \$3.5 million per project in HOME-ARPA gap financing, and preservation integrated supportive housing projects will be capped at \$2.5 million in HOME-ARPA gap financing. Developments that will set aside 100% of the affordable units for Qualified Populations (i.e. 100% permanent supportive housing) will be eligible for \$5 million in HOME-ARPA gap financing, regardless of geography. Projects located in rural non-Participating Jurisdictions or rural Appalachian communities, based on OHFA's Property Locator Search Tool definition of rural at [OHFA Maps](#), will be eligible up to \$5 million in HOME-ARPA Subsidy, and must reserve at least 20% of affordable units for qualified populations. If funds are available, projects may be awarded additional gap financing using OHTF to ensure the financial feasibility of the project. Additional funding may be allocated if the project has a demonstrated need and is granted an exception request.

Any unused and uncommitted funds will be returned to the Department of Development for use in the Non-Congregate Shelter Program. Up to \$8 million will be reserved for the Housing Development Gap Financing Program. The HDGF program utilizes HOME-ARPA funding to provide gap financing assistance to small permanent supportive housing projects consisting of 25 units or less using other private and public resources to renovate or construct service enriched affordable housing serving low- and moderate- income households, and HOME-ARP Qualified Populations. All projects will be required to set aside 100% of the total units for HOME-ARP Qualified Persons. The amount of HOME-ARPA HDGF will equal the total project cost less all committed sources. All projects will be capped at \$1 million per project in HOME-ARP. If funds are available, projects may receive an additional award from OHTF to cover any remaining financing gaps. The OHTF plus HOME-ARPA may not exceed 50% of the total project cost.

OHFA reserves the right to exceed or reduce the above award amounts based on the location and needs of the project. Award amounts for the BGF program will be based on funding availability and the needs of the project.

As noted in the Waivers and Alternative Requirements for Implementation of the HOME American Rescue Plan Act (HOME-ARPA) Program, the requirements of 24 CFR 92.218 through 24 CFR 92.222 and any other requirements for matching contributions in 24 CFR part 92 shall not apply to HOME-ARPA funds, as subsection (c)(1) of ARPA states that the underlying statutory requirement at section 220 of NAHA (42 U.S.C. 12750) does not apply to HOME-ARPA funds.

If utilizing bonds, the development cannot have closed on the bonds prior to application for HDAP funds.

Closing "in Escrow" will be considered by OHFA to be closed.

*Eligible Activities:* HDAP funds may be applied in the development budget toward non-related party acquisition, hard costs associated with new construction or rehabilitation, and developer fees associated with the project.

### **Funding Requirements**

- 1) **Reporting and Record Keeping:** The applicant will be responsible for compliance with applicable implementation, reporting and record keeping requirements associated with HOME-ARPA, OHFA, and state regulations.
- 2) **Environmental Review Requirements:** OHFA will conduct a supplemental environmental review for all projects receiving HDAP funds. The environmental review will be completed in accordance with the relevant state or federal requirements as specified below.

Environmental reviews are conducted in accordance with 24 CFR. Part 58. Development serves as the Responsible Entity.

- 3) **Determination and Requirements for Assisted Units:** Assisted units must meet all requirements as stated in HUD Notice: CPD-21-10.
- 4) **Rehabilitation Standards:** Developments that involve rehabilitating structures must adhere to OHS Residential Rehabilitation Standards (RRS). Refer to OHS's RRS Handbook, or other standards agreed on by OHFA and OHS.
- 5) **Lead-Based Paint Standards:** All housing developments designed to rehabilitate pre-1978 structures must adhere to the Development's Lead-Based Paint Guidelines.
- 6) **Relocation Standards:** All developments, regardless of funding source, that involve rehabilitating existing occupied units must submit a Relocation Plan or rehabilitation strategy that outlines the plan to work with the tenants in place. If the development receives federal funds, the plan must meet the requirements set forth in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. If the development involves acquisition, the applicant must supply the *Real Property Acquisition and Relocation Certifications and Voluntary Acquisition Forms* for the project.
- 7) **Timeline:** The HDAP recipient will confirm that all financing is committed and submit a request to close on HDAP funding to OHFA which must be received at the OHFA offices at 57 East Main Street, Columbus, OH 43215, by the date(s) set forth in the recipients Funding Agreement.
- 8) **Changes to Approved Applications:** The HDAP recipient must notify OHFA, in writing, of all changes, financial or otherwise, relating to an application for financial assistance of an approved development. Failure to notify OHFA may jeopardize the applicant's ability to receive assistance in the future. If there are any substantive changes to the development prior to executing the Funding Agreement, OHFA may require the applicant to resubmit the application.
- 9) **Eligible/Ineligible Applicants:** Applicants can be private for-profit, not-for-profit developers/owners, or public housing authorities. For developments owned by partnerships (limited liability corporations, etc.), to qualify for financing terms available to not-for-profit organizations, the majority/controlling general partner interest must be held by a not-for-profit (for-profit affiliates of not-for-profit parent corporations qualify as a not-for-profit in a partnership situation). To request financing terms available

to not-for-profit organizations, the applicant must provide evidence of IRS 501(c)(3) or 501(c)(4) status. To be eligible for funding, religious organizations must meet the provisions in 24 CFR § 92.257.

OHFA reserves the right to evaluate developments, including those that have previously received an award from HDAP, and that have received other forms of federal subsidy to determine what amount, if any, the development needs to be financially feasible. OHFA reserves the right to evaluate such developments to determine the facts and circumstances that necessitate the need for additional funds and to ensure projects are not over subsidized.

OHFA would prefer that HDAP resources be used to provide new opportunities for affordable housing or to preserve existing, currently subsidized, or rent-restricted affordable housing for the residents of Ohio. Therefore, OHFA reserves the right to determine if rehabilitating existing affordable renter-occupied housing without project-based subsidy is eligible.

- 10) **Projects per Developer:** Developers may submit more than one proposed development per year based on the organization's capacity to implement multiple and/or simultaneous projects. OHFA reserves the right to require further information and to decide on an organization's capacity to carry out multiple developments, which will include status and progress on projects using any resources provided by OHFA. OHFA may also limit the amount of HDAP awarded to any single developer.

OHFA reserves the right to combine the costs for developments that are located near each other and share similar attributes such as project type, construction style, and development team.

- 11) **Cost Certification:** After construction is completed, each development may be required to obtain and submit a cost certification prepared by an independent certified public accountant or other comparable documentation approved by OHFA.

- 12) **Fee Limits:** Developer's fee for applications submitted for HDAP funding must be consistent with the limits established in the Qualified Allocation Plan (QAP), BGF Guidelines, or other funding guidelines.

- 13) **Public Notification:** Applicants intending to develop rental housing (including lease-purchase) must comply with the Ohio Revised Code §175.07 pertaining to public notification.

- 14) **Loans:**

- 2% interest will be charged unless otherwise agreed to by OHFA.
- Loans will mature at the end of the affordability period. The affordability period is defined as the minimum term required in 24 CFR 92 and any extended affordability period imposed by OHFA.
- Collateral will be a subordinate mortgage. OHFA must be in second or shared-second lien position unless otherwise agreed to by OHFA based on good cause and sufficient supporting documentation.
- Payments will be based on a percentage of the available cash flow as defined by OHFA. If loan payments flow from a third party to the recipient, they will be excluded from cash flow analysis provided they are transferred to OHFA in full. Any remaining balance on the loan is due as a balloon payment at the end of the term or sale, whichever is first. On a case-by-case basis, OHFA may agree to subordinate to other government investors and accept payments consistent with their terms.
- Loan interest will accrue, and repayment obligations will start following the closeout of the project, regardless of the Placed-in-Service date. Closeout means the HDAP recipient leased the "Assisted" units, provided the appropriate documentation to OHFA, and OHFA approved the documentation as evidenced by a closeout letter from Analyst; and
- Funds cannot be lent to the project at a rate higher than OHFA's rate without the approval of OHFA. OHFA reserves the right to designate which general partner/managing member/owner, if

more than one (1), will be the recipient.

15) **Grants:**

Grants must be requested and are available only when all the following conditions are met:

- The eligible applicant is the controlling general partner and is a 501(c)(3) or 501(c)(4) not-for-profit (for-profit affiliates of not-for-profit parent corporations qualify as a not-for-profit in a partnership situation).
- At least 20% of the units in the development will be occupied by and affordable to households at or below 35% of the area median income.
- The recipient treats the funds as a grant for tax purposes. If the recipient is the project, it will receive an IRS Form 1099.
- The recipient does not loan the funds to the development but treats it as a grant or capital contribution.

Developments meeting both the requirements established by OHFA for Permanent Supportive Housing and the above-noted conditions are also eligible to request a grant.

For low-income housing tax credit (LIHTC) developments that request a direct grant, the HDAP funds may be included in eligible tax credit basis if the funds are a general partner's capital contribution **and** provided that the development can provide a tax opinion certifying the funds as part of eligible basis. The development must still meet all the above-noted requirements to be eligible for a grant. However, when considering grant eligibility, OHFA will apply the regulations governing the funds awarded when considering how the recipient passes the award on to the development.

16) **Fees:**

*Application Fee:* OHFA may elect to impose application, document correction and/or funding fees as it determines necessary. Fees may be based on threshold deficiencies and designed to encourage complete and accurate application submissions with a likelihood of success.

*Amendment/Extension or Reinstatement to Funding Agreements:* OHFA may elect to impose a \$100 fee for each amendment or extension made to the funding agreement. OHFA may also elect to impose a \$1,000 fee to reinstate an expired funding agreement. These fees are implemented to encourage applicants to complete developments in a timely manner and as proposed in the application.

17) **Waivers:**

OHFA reserves the right to waive state-imposed requirements if the applicant demonstrates a compelling reason. OHFA will review such requests on a case-by-case basis.

18) **Application Review Criteria and Review Process:**

All programs under the HDAP will include a review of the application and all required supporting documentation to ensure that the development is financially feasible and meets all HOME-ARPA and/or OHFA program requirements. OHFA reserves the right to determine cost reasonableness and fees associated with the development.

The application will be assigned to a housing grant analyst (HGA) who will be responsible for the application review, funding agreement processing and resolving post-award implementation issues.

Threshold Review - The threshold criteria assure that all selected developments comply with program requirements. Applications that do not meet the threshold requirements will not be considered for funding. The only exception to this will be the HCGF developments, which will follow the Threshold Review process established in the OHFA QAP.

Competitive Review - Applications submitted for the HCGF program will follow the allocation system established in the OHFA QAP.

Applications submitted for the HDGF program will be evaluated based on the following criteria: 1) experience and capacity of the applicant and development team; 2) financial feasibility of the development; 3) site selection; 4) development design; 5) demonstrated market for the development; and 6) policies as stated in the program guidelines.

Applications submitted for the BGF program will be evaluated based on the following criteria: 1) experience and capacity of the applicant and development team; 2) financial feasibility of the development; 3) site selection; 4) development design; 5) demonstrated market for the development; and 6) policies as stated in the program guidelines. OHFA reserves the right to prioritize projects located in Ohio's Appalachian counties (excluding HUD Entitlement Communities and Non-entitlement Participating Jurisdictions); HUD Non-entitlement Communities and Non-Participating Jurisdictions, projects preserving existing affordable housing, or projects undergoing a rental assistance demonstration (RAD) conversion.

Pro Forma or Affordability Analysis - A financial review will include an evaluation to determine the amount of funds necessary to complete the actual development of the development, considering all other committed sources.

The financial review for rental housing developments includes the analysis of a 15- and/or a 30-year pro forma, assuming a 2% annual revenue increase, a 3% annual operating expense increase, and a 7% stabilized vacancy rate. If the pro forma forecasts different assumptions, justification must be provided. The affordability analysis for rental developments requires the resident's rent and utility payments not to exceed 30% of an income-qualified household's income at the projected affordability level. Utility allowance information must be obtained from the local public housing authority, local utility provider, or other approved source (e.g., actual usage history on rehabilitation developments).

Capitalized Operating Reserves – OHFA will modify program guidelines to include capitalized operating reserves for projects that do not provide project-based rental subsidy for the QP units. that meet the requirements of HUD CPD Notice 21-10 and related HUD guidance as an eligible use of HOME-ARP funds. OHFA will administer the reserves and comply with the requirements for management and oversight outlined in HUD CPD Notice 21-10.

Pre-Award Site Visit - OHFA may conduct a site visit prior to submitting a funding recommendation. The purpose of the visit is 1) to evaluate the proposed development site for suitability and impact on the surrounding community; 2) to confirm the status of previously funded developments; and 3) to develop the relationship between the applicant and OHFA. Both parties can discuss any issues or concerns regarding the proposed development and the organization has an opportunity to familiarize OHFA staff with their overall programs and operations.

Formal Recommendation for Funding - OHFA will present the development and submit a funding recommendation, either for approval or rejection, to the OHFA Board's Multifamily Committee. This committee will submit a formal recommendation to the OHFA's Board for consideration and approval.

Units Restricted for Occupancy by Qualifying Households: The HOME-ARPA rent must comply with HUD Notice: CPD 2021-10 and may not exceed 30% of the adjusted income of a household whose annual income is equal to or less than 50% of the median income for the area, as determined by HUD (i.e., Low HOME Rents). If a household receives federal or state tenant-based rental assistance, the rent is the rent

permissible under the applicable rental assistance program (i.e., the tenant rental contribution plus the rental subsidy allowable under that rental assistance program).

19) **Application Submission:**

Applications must be submitted on a compact disc, or electronically via OHFA's ftp site, with all required documents clearly labeled as detailed in the respective program's guidelines. Applications must be submitted to the Office of Multifamily Housing, Ohio Housing Finance Agency, 57 East Main Street, Columbus, Ohio 43215-5135.

Incomplete Applications: OHFA will perform a preliminary review of all submissions to determine whether a complete application has been submitted. If it is determined that OHFA cannot evaluate the proposal based on the information provided, the application will be returned to the applicant along with a written listing of the application's deficiencies.

*Acquisition and Development of Non-Congregate Shelters (NCS)*

Development will reserve the remaining \$10 million of its allocation for acquiring and developing NCS for qualifying individuals and families. This activity may include, but is not limited to, the acquisition of land and construction of NCS or acquisition and/or rehabilitation of existing structures such as motels, hotels, or other facilities to be used for NCS. Organizations interested in the HOME-ARPA NCS activity will be requested to show that there are sufficient funds to support any NCS activity. If funds for supportive services are needed for the projects, Development intends to commit a portion of the OHTF budget to provide such services. Plans for self-sustaining those services must be submitted for long-term stability after the OHTF dollars expire.

Development reserves the right to prioritize projects located in Ohio's Appalachian counties (excluding HUD Entitlement Communities and Non-entitlement Participating Jurisdictions) and in HUD Non-entitlement Communities and Non-Participating Jurisdictions, as well as projects located in regions that have no emergency shelters.

**Administration of Activities**

Department of Development staff within the Community Services Division will administer the Acquisition and Development of Non-congregate Shelters activity. The Office of Division Support along with OHS's Supportive Housing and Residential Revitalization sections will lead and administer the application process, grant award, drawing funds, and reporting.

**Method for soliciting applications for funding and/or selecting developers, service providers, and/or subrecipients.**

Department of Development staff will administer the Acquisition and Development of Non-congregate Shelters activity. Funding will be awarded through the creation of a new HOME ARPA NCS Program.

**Eligible Applicants:** Funding is available to eligible nonprofit organizations and units of local government.

**Application Eligibility and Procedures:** Eligible applicants may submit an Intent to Apply form found on Development's technical assistance (TA) website. The Intent to Apply includes information such as the project type, anticipated award request, and information on how the project meets HOME ARPA eligible population and NCS requirements. Development will invite applicants submitting qualifying proposals to complete a full application. **Applicants will be required to submit evidence of region and/or Continuum support and describe how it will align with housing first practices and participate in coordinated entry.**

**Application Timing:** Project applications will be due before August 2024 for grants starts on Sept. 1, 2024. Any uncommitted funds through the first round of funding will be saved for a second round of funding which will open in 2026 and run through 2028,

**Program Period:** The program period will be determined through negotiations with OHS. Grant audit(s) must be conducted in accordance with 2CFR200, as described in [Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures](#).

**Grant Ceiling:** Awards are negotiated based upon need, impact, and funding availability.

**Administrative Cost:** Applicants may request funds for administration, up to 10% of allocation or \$50,000, whichever is less. Up to an additional 5% of allocation to pay eligible costs related to developing capacity of non-profit organizations undertaking eligible activities will also be available.

OHS will evaluate the community's request during application review and reserves the right to award less than the requested amount.

Subrecipients may use up to 20% of the project award for soft costs. Soft costs include the direct carrying out of activities identified in the application.

### *Administration*

A total of just over \$13 million has been budgeted to cover the implementation of the projects as well as the long-term compliance requirements for the affordability period. In addition, administration funds will be used for the training of compliance staff to implement HOME-ARPA, as well as monitoring for compliance.

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

The increase in homelessness reflects, in part, the lack of affordable and available housing in Ohio. Based on the feedback received as part of the consultation process along with comments received during the public comment periods, the development of safe and affordable rental housing along with non-congregate shelters are the top priorities to address the extreme shortage and system housing gaps, particularly for qualifying populations with the use of HOME-ARPA funds. The data included under the gap analysis section helped to reinforce the need to increase the affordable rental housing supply for homeless and all qualifying populations.

To restate what was included in the gap analysis section, the current shelter and housing inventory states that the recent point-in-time data over the past few years indicates that the number of people counted as homeless exceeds the available beds across the state. In addition, the need for the acquisition and development of non-congregate shelters has been determined based on requests received for other stimulus funds that may not have been able to fund at that time. Administration funds align with the needs addressed as part of the service delivery system gaps identified in that they will be used for the training of compliance staff to implement HOME-ARPA, monitoring for compliance, and assisting in the program implementation to effectively serve qualifying populations. As discussed previously, the lack of available housing and turnover in housing has had a negative impact on domestic violence survivors' ability to leave shelter for independent housing. Landlords have been less likely to rent units to survivors and the cost of rent has been higher than what many housing providers are able to cover.

## **HOME-ARPA Production Goals**

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

There will be approximately 50 rental units rehabilitated along with approximately 250 new rental units constructed as part of the HDAP Housing Credit Gap Financing (HCGF) and Bond Gap Financing (BGF) development of affordable housing project along, with approximately 100 units as part of the non-congregate shelter activity intended for all qualifying populations, with preference for homeless along with persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking .

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the priority needs:***

The activities included in the HOME-ARPA align with the priority needs identified in the PY 2020-2024 Ohio Consolidated Plan section SP-25 that places high priority to homelessness and rapid rehousing as well as affordable housing production. In addition, the activities align with the goals stated in section SP-45 of the PY 2020-2024 Ohio Consolidated Plan that deals specifically with housing preservation and accessibility, affordable housing as well as supportive housing. In addition to the needs stated in the Consolidated Plan, the rental housing production goal aligns with the priority needs section, which states that the development of permanent supportive is an important need as there is currently a shortage of these types of housing units throughout the state of Ohio.

## **Preferences**

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

Based upon the needs assessment analysis, there will be a preference for populations experiencing chronic homelessness and general homelessness in the permanent housing activity.

The eligibility criteria for permanent supportive housing for the homeless includes, but is not limited to, vulnerable persons and families experiencing homelessness, as well as homeless or at-risk of homelessness veterans (including Wounded Warriors as defined by the Caring for Wounded Warriors Act of 2008). In addition to permanent supportive housing for the homeless and homeless or at-risk of homelessness veterans, funds will also be used to develop permanent housing that will be more broadly targeted and available to additional Qualifying Populations beyond those experiencing homelessness. Projects will take referrals from the Coordinated Entry organization but will also maintain a waitlist of other qualifying populations.

In Ohio, there are nine Continua of Care (CoC). Each CoC's prioritization process is based on local needs and data, but all share the commonality that they prioritize based on chronic homelessness, barriers to housing, number of times homeless, and length of time homeless. Property Managers working with HOME-ARPA funded units will work with Coordinated Entry (CE) organizations to refer a tenant meeting the Qualified Population requirement. Units will be available for all qualified populations, but those experiencing chronic homelessness and homelessness as well as homeless or at-risk homelessness veterans will have preference.

Projects requesting funds through HDAP will be required to submit a MOU at the time of application as proof of a referral partnership with the CoC serving the area of their project. Projects should work with the CoC to take referrals, if the CE does not have an eligible tenant meeting the definition of Qualified Population, the property manager may maintain a waiting list of potential tenants meeting the definition. The MOU will include the applicability of fair housing, civil rights, and nondiscrimination requirements, including those listed in 24 CFR 5.104(a), as well as the preferences as set forth in this plan.

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

The preference for people who are experiencing homelessness aligns with the information and data presented in the Needs and Gap Analysis section. Recent data as part of the shelter and housing inventory indicates that the number of people counted as homeless exceeds the available beds in the state thus the state of Ohio has prioritized homeless populations for both the affordable rental housing projects as well as the non-congregate shelter activity. Persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking has been selected as an additional preference for non-congregate shelter based on the information presented as part of the unmet housing and service section of the plan indicates that many persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking are denied services due to a lack of resources, including housing, emergency shelter, transportation, childcare and legal representation. Housing is a huge obstacle for survivors and local victim service providers.

***If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:***

While the plan identifies preferences, it does not exclude other qualifying populations from being served to address the unmet needs and gaps as outlined in the Needs Assessment and Gap Analysis section of the plan.

### **HOME-ARPA Refinancing Guidelines**

HOME-ARPA will not be used to refinance existing debt secured by multifamily rental housing.

## Appendix

State of Ohio 2006 – 2017 CHAS Dataset issued on Sept. 29, 2021. HUD released updated CHAS data for the 2014-2018 period.

<b>Income Distribution Overview</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Household Income <= 30% HAMFI	179,020	407,470	586,490
Household Income >30% to <=50% HAMFI	236,735	282,945	519,680
Household Income >50% to <=80% HAMFI	445,620	331,205	776,825
Household Income >80% to <=100% HAMFI	316,740	157,750	474,490
Household Income >100% HAMFI	1,893,115	403,480	2,296,595
<b>Total</b>	<b>3,071,225</b>	<b>1,582,850</b>	<b>4,654,075</b>

<b>Housing Problems Overview 1</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Household has at least 1 of 4 Housing Problems	567,435	680,610	1,248,045
Household has none of 4 Housing Problems OR cost burden not available no other problems	2,503,795	902,240	3,406,035
<b>Total</b>	<b>3,071,225</b>	<b>1,582,850</b>	<b>4,654,075</b>

<b>Severe Housing Problems Overview 2</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Household has at least 1 of 4 Severe Housing Problems	242,895	381,540	624,435
Household has none of 4 Severe Housing Problems OR cost burden not available no other problems	2,828,330	1,201,310	4,029,640
<b>Total</b>	<b>3,071,225</b>	<b>1,582,850</b>	<b>4,654,075</b>

<b>Housing Cost Burden Overview 3</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Cost Burden <=30%	2,513,875	899,010	3,412,885
Cost Burden >30% to <=50%	329,445	312,610	642,055
Cost Burden >50%	207,730	328,380	536,110
Cost Burden not available	20,180	42,850	63,030
<b>Total</b>	<b>3,071,225</b>	<b>1,582,850</b>	<b>4,654,075</b>

<b>Income by Housing Problems (Owners and Renters)</b>	<b>Household has at least 1 of 4 Housing Problems</b>	<b>Household has none of 4 Housing Problems OR cost burden not available no other problems</b>	<b>Total</b>
Household Income <= 30% HAMFI	440,585	145,910	586,490
Household Income >30% to <=50% HAMFI	347,255	172,425	519,680
Household Income >50% to <=80% HAMFI	273,400	503,415	776,825

Household Income >80% to <=100% HAMFI	77,975	396,515	474,490
Household Income >100% HAMFI	108,830	2,187,765	2,296,595
<b>Total</b>	<b>1,248,045</b>	<b>3,406,035</b>	<b>4,654,075</b>

<b>Income by Housing Problems (Renters only)</b>	<b>Household has at least 1 of 4 Housing Problems</b>	<b>Household has none of 4 Housing Problems OR cost burden not available no other problems</b>	<b>Total</b>
Household Income <= 30% HAMFI	302,870	104,605	407,470
Household Income >30% to <=50% HAMFI	215,470	67,475	282,945
Household Income >50% to <=80% HAMFI	123,400	207,800	331,205
Household Income >80% to <=100% HAMFI	19,290	138,460	157,750
Household Income >100% HAMFI	19,580	383,900	403,480
<b>Total</b>	<b>680,610</b>	<b>902,240</b>	<b>1,582,850</b>

<b>Income by Housing Problems (Owners only)</b>	<b>Household has at least 1 of 4 Housing Problems</b>	<b>Household has none of 4 Housing Problems OR cost burden not available no other problems</b>	<b>Total</b>
Household Income <= 30% HAMFI	137,715	41,305	179,020
Household Income >30% to <=50% HAMFI	131,785	104,950	236,735
Household Income >50% to <=80% HAMFI	150,000	295,615	445,620
Household Income >80% to <=100% HAMFI	58,685	258,055	316,740
Household Income >100% HAMFI	89,250	1,803,865	1,893,115
<b>Total</b>	<b>567,435</b>	<b>2,503,795</b>	<b>3,071,225</b>

<b>Income by Cost Burden (Owners and Renters)</b>	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	432,885	351,600	586,490
Household Income >30% to <=50% HAMFI	339,080	123,960	519,680
Household Income >50% to <=80% HAMFI	255,195	44,165	776,825
Household Income >80% to <=100% HAMFI	68,670	7,930	474,490
Household Income >100% HAMFI	82,335	8,460	2,296,595

<b>Total</b>	<b>1,178,165</b>	<b>536,110</b>	<b>4,654,075</b>
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<b>Income by Cost Burden (Renters only)</b>	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	297,090	247,245	407,470
Household Income >30% to <=50% HAMFI	210,160	67,360	282,945
Household Income >50% to <=80% HAMFI	111,510	11,095	331,205
Household Income >80% to <=100% HAMFI	14,100	1,360	157,750
Household Income >100% HAMFI	8,130	1,320	403,480
<b>Total</b>	<b>640,990</b>	<b>328,380</b>	<b>1,582,850</b>

<b>Income by Cost Burden (Owners only)</b>	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	135,795	104,350	179,020
Household Income >30% to <=50% HAMFI	128,915	56,600	236,735
Household Income >50% to <=80% HAMFI	143,690	33,070	445,620
Household Income >80% to <=100% HAMFI	54,570	6,570	316,740
Household Income >100% HAMFI	74,205	7,140	1,893,115
<b>Total</b>	<b>537,175</b>	<b>207,730</b>	<b>3,071,225</b>

Year Selected: 2014-2018 ACS

1. The four housing problems are: incomplete kitchen facilities; incomplete plumbing facilities more than 1 person per room; and cost burden greater than 30%.

2. The four severe housing problems are: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 50%.

3. Cost burden is the ratio of housing costs to household income. For renters- housing cost is gross rent (contract rent plus utilities)

For owners- housing cost is "select monthly owner costs" which includes mortgage payment; utilities; association fees; insurance; and real estate taxes.

### The Corporation for Supportive Housing (CSH) State Investment Response Estimator Tool Data:

Population Summary		Point in Time Total	State-wide Annualization Rate	Annualized Total	Shift to NCS	Resource Need				
						PSH	RRH	Prevention	User Defined	Self-Resolve
<b>Individuals</b>										
	Sheltered	5,826								
	Unsheltered	1,810								
	Newly Homeless Households			0		0	0	0	0	0
	Non-Congregate Shelter (NCS)			0		0	0	0	0	0
	<b>Total</b>	<b>7,636</b>		<b>33,756</b>		<b>2,998</b>	<b>24,007</b>	<b>3,376</b>	<b>0</b>	<b>3,376</b>
<b>Families</b>										
	Sheltered	2,985								
	Unsheltered	34								
	Newly Homeless Households			0		0	0	0	0	0
	Non-Congregate Shelter (NCS)			0		0	0	0	0	0
	<b>Total</b>	<b>3,019</b>		<b>6,654</b>		<b>665</b>	<b>3,327</b>	<b>1,331</b>	<b>665</b>	<b>665</b>
	Newly Homeless Households			0		0	0	0	0	0
	Non-Congregate Shelter (NCS)			0		0	0	0	0	0
	<b>Grand Total Households</b>	<b>10,655</b>		<b>40,410</b>		<b>3,663</b>	<b>27,334</b>	<b>4,706</b>	<b>665</b>	<b>4,041</b>

Resource Turnover	Individuals			Families		
	HIC Bed Count	Estimated Turnover	Manual Adjust	HIC Bed Count	Estimated Turnover	Manual Adjust
PSH	11,125	1,113	1,113	7,203	720	720
RRH	1,871	617		4,198	1,259	
Prevention (No default estimate)		0			0	
User Defined (No default estimate)		0			0	

Total PH Placements (SPM Measure 7) **18,701**

Year Need Total Base Population	Month-by-Month Need											
	June	July	August	September	October	November	December	January	February	March	April	May
Individuals	33,756	2,813	2,813	2,813	2,813	2,813	2,813	2,813	2,813	2,813	2,813	2,813
Newly Homeless Ind.	0	0	0	0	0	0	0	0	0	0	0	0
Families	6,064	555	555	555	555	555	555	555	555	555	555	555
Newly Homeless Families	0	0	0	0	0	0	0	0	0	0	0	0
Total Newly Homeless Households	0	0	0	0	0	0	0	0	0	0	0	0
Indicate Predicted Surge %												
Total Base Population	3,968	3,968	3,968	3,968	3,968	3,968	3,968	3,968	3,968	3,968	3,968	3,968
<b>Permanent Supportive Housing</b>												
Total Need Newly Homeless Households (IND)	0	0	0	0	0	0	0	0	0	0	0	0
Total Need (IND)	2,998	290	290	290	290	290	290	290	290	290	290	290
System PH Placements (IND)	1,113	93	93	93	93	93	93	93	93	93	93	93
Gap in Resource Need (IND)	1,885	197	197	197	197	197	197	197	197	197	197	197
Total Need Newly Homeless Households (FAM)	0	0	0	0	0	0	0	0	0	0	0	0
Total Need (FAM)	665	55	55	55	55	55	55	55	55	55	55	55
System PH Placements (FAM)	720	60	60	60	60	60	60	60	60	60	60	60
Gap in Resource Need (FAM)	-56	-5	-5	-5	-5	-5	-5	-5	-5	-5	-5	-5
<b>Rapid Re-Housing</b>												
Total Need Newly Homeless Households (IND)	0	0	0	0	0	0	0	0	0	0	0	0
Total Need (IND)	24,007	2,001	2,001	2,001	2,001	2,001	2,001	2,001	2,001	2,001	2,001	2,001
System PH Placements (IND)	617	51	51	51	51	51	51	51	51	51	51	51
Gap in Resource Need (IND)	23,390	1,950	1,950	1,950	1,950	1,950	1,950	1,950	1,950	1,950	1,950	1,950
Total Need Newly Homeless Households (FAM)	0	0	0	0	0	0	0	0	0	0	0	0
Total Need (FAM)	3,327	277	277	277	277	277	277	277	277	277	277	277
System PH Placements (FAM)	1,206	105	105	105	105	105	105	105	105	105	105	105
Gap in Resource Need (FAM)	2,068	172	172	172	172	172	172	172	172	172	172	172
<b>Prevention</b>												
Total Need Newly Homeless Households (IND)	0	0	0	0	0	0	0	0	0	0	0	0
Total Need (IND)	3,376	281	281	281	281	281	281	281	281	281	281	281
System PH Placements (IND)	0	0	0	0	0	0	0	0	0	0	0	0
Gap in Resource Need (IND)	3,376	281	281	281	281	281	281	281	281	281	281	281
Total Need Newly Homeless Households (FAM)	0	0	0	0	0	0	0	0	0	0	0	0
Total Need (FAM)	1,331	111	111	111	111	111	111	111	111	111	111	111
System PH Placements (FAM)	0	0	0	0	0	0	0	0	0	0	0	0
Gap in Resource Need (FAM)	1,331	111	111	111	111	111	111	111	111	111	111	111
<b>User Defined</b>												
Total Need Newly Homeless Households (IND)	0	0	0	0	0	0	0	0	0	0	0	0
Total Need (IND)	0	0	0	0	0	0	0	0	0	0	0	0
System PH Placements (IND)	0	0	0	0	0	0	0	0	0	0	0	0
Gap in Resource Need (IND)	0	0	0	0	0	0	0	0	0	0	0	0
Total Need Newly Homeless Households (FAM)	0	0	0	0	0	0	0	0	0	0	0	0
Total Need (FAM)	665	55	55	55	55	55	55	55	55	55	55	55
System PH Placements (FAM)	0	0	0	0	0	0	0	0	0	0	0	0
Gap in Resource Need (FAM)	665	55	55	55	55	55	55	55	55	55	55	55
<b>Self-Resolving Prediction by Month</b>												
Total Self-Resolved Newly Homeless Households (IND)	0	0	0	0	0	0	0	0	0	0	0	0
Total Self-Resolved (IND)	3,376	281	281	281	281	281	281	281	281	281	281	281
Total Self-Resolved Newly Homeless Households (FAM)	0	0	0	0	0	0	0	0	0	0	0	0
Total Self-Resolved (FAM)	665	55	55	55	55	55	55	55	55	55	55	55

National Low-Income Housing Coalition Shortage of Affordable Rental Homes <https://reports.nlihc.org/gap>

Ohio Housing Finance Agency 2021 Needs Assessment <https://ohiohome.org/hna-20/executivesummary-hna.aspx>

Ohio Housing Finance Agency CONFRONTING HOMELESSNESS - Homelessness in Ohio 2012 – 2018 <https://ohiohome.org/news/documents/HomelessnessReport.pdf>